

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N715849045

FACILITY: <del>FLC Acres</del> <b>Rainbow Bridge</b>		SRN / ID: N7158
LOCATION: 5646 Commerce St Unit F, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Curt Russel ,		ACTIVITY DATE: 05/01/2019
STAFF: Samantha Braman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection for compliance with PTI No. 123-02A.		
RESOLVED COMPLAINTS:		

**N7158****Unannounced, scheduled inspection to determine compliance with PTI 123-02A.**

**EGLE – AQD Staff Present:** Samantha Braman and Marina Ostaszewski.

**Environmental Contact:** Curt Russel – 517-882-1700

**Facility Description:**

Rainbow Bridge is a pet crematory with a small pathological waste incinerator covered by Permit to Install (PTI) No. 123-02A. Rainbow Bridge was bought in 2013 from the previous owners.

**Location:**

The building is at the end of a dead-end road. The building is divided into four separate business units. The northern most unit is occupied by Rainbow Bridge and contains the incinerators.

**Inspection:**

Marina and I arrived at the facility at 10:09am. The facility's website indicates that the Lansing location office hours are Monday through Friday from 9 am to 5 pm. There were no visible emissions or odors coming from the facility upon our arrival. Heat waves from the newer stack (EUINCINERATOR2) indicate that one of the units was operating.

**EUINCINERATOR1:** This incinerator is the original unit from when Rainbow Bridge bought the facility in 2013. This unit is very old, and Rainbow Bridge has rarely used it. Curt informed me that it needs some major repair work to the refractory on the inside. They have no plans to do this costly repair any time soon. I informed Curt of Special Condition (SC) 341 in PTI 123-02A which states, "*The permittee shall not operate EUINCINERATOR1 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.*"

**EUINCINERATOR2:** This incinerator is a refurbished Matthews unit that was installed in 2018 with the modification of this permit from 123-02 to 123-02A. This is the main unit that performs majority of the charges at this facility. They preheat the unit until it reaches 1600-degree F and set the unit at 1650 degrees to ensure it stays at the minimum temperature of 1600 required by the permit. Curt informed me they start out with bigger charges in the morning and move to the smaller charges throughout the day, this helps limit any smoke being emitted. They also do a cool-down of the unit halfway through the day.

At other facilities in the past, crematories have had trouble keeping their temperature at the minimum temperature requirement for the duration of the charge due to the burner timer being set shorter than the duration of a charge. At Rainbow Bridge they leave the burner on for the entire charge except for during cool down, when they turn it off manually.

I inquired if they have ever had any organizations or local units of government approach them with a request to burn pharmaceuticals. Curt had told me that about 6 or 7 years ago the MI State Police had contacted their Whitmore Lake location about this, and that his dad had a conversation with permits about this. Curt does not recall anyone approaching them about pharmaceutical disposal since then. Curt was aware that they were not permitted to be able to accept this type of waste.

**Permit Review:**

SC 3.2 & 4.1 – These conditions require that the unit be maintained and operated in a satisfactory manner. Based on what I have learned of EUINCINERATOR1, this unit is not in good operating condition. I would advice Rainbow Bridge to have this unit repaired if they plan to continue using it in the future. Operating this unit in the current condition it is in would be a violation of PTI No. 123-02A.

SC 4.3 – A scale had once been on site but it broke and so there was no longer one on site. Curt said when they receive these animals from the vet or from the owner, they can usually tell them the weight of the animal. Marina (permit engineer of 123-02A) informed me that she wrote “where applicable” so if they are getting those weights from owners and vets then it’s not absolutely necessary they have one on site.

SC 6.2 & 6.6 – Temperature recorders are installed and used on the incinerator units; however, dates are not kept on the sheets. I recommended to Curt that he start keeping the date on these and filing them away for the required five-year period.

SC 6.3 – Daily records of time, description and weight of charges were not being kept for either unit.

SC 6.6 – A record of all service, maintenance and equipment inspections was not being kept for either unit.

**Violations:**

Process Description	Rule/Permit Condition Violated	Comments
EUINCINERATOR1	PTI 123-02A SC 6.3	Failure to keep daily records of the time, description and weight of the charges combusted.
EUINCINERATOR2	PTI 123-02A SC 6.3	Failure to keep daily records of the time, description and weight of the charges combusted.
EUINCINERATOR2	PTI 123-02A SC 6.6	Failure to keep a record of service, maintenance and equipment inspections.

**Conclusion:**

Rainbow Bridge Pet Crematory was doing a good job maintaining temperature during charges in their units. However, the lack of recordkeeping materials is a violation of PTI No. 123-02A, and therefore Rainbow Bridge will be receiving a Violation Notice.

**Update:** A Violation Notice was sent out to Rainbow Bridge on May 2<sup>nd</sup>, 2019 for the above cited violations. A violation response letter was received from Mr. Curt Russel on 5/23/19. They have begun keeping the required records and have also added a scale on site. This is violation is considered resolved.

NAME James H. Brown DATE 6/6/19 SUPERVISOR OB.M.