

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

N755447923

FACILITY: PHOENIX CREMATION SERVICES		SRN / ID: N7554
LOCATION: 525 WEST HUME AVE., MUSKEGON HTS		DISTRICT: Grand Rapids
CITY: MUSKEGON HTS		COUNTY: MUSKEGON
CONTACT: Brett Wright, Owner/President		ACTIVITY DATE: 02/22/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY'19 on-site inspection to determine the facility's compliance status with respect to PTI No. 319-05A and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff, Chris Robinson (CR), conducted a scheduled on-site and unannounced inspection of Phoenix Cremation Services located at 525 West Hume Avenue in Muskegon Heights, Michigan on February 22, 2019. CR met with Mr. Brett Wright, Owner/President. AQD identification was provided and CR announced intent to conduct an inspection of the facility in order to determine the facility's current compliance status with respect to Permit to Install (PTI) No. 319-05A and any other applicable air quality rules and regulations.

Weather conditions were sunny approximately 33°F with east to south-east winds at approximately 7mph with no precipitation. CR surveyed the perimeter of the facility, upon arrival, for odors and visible emissions, none were observed.

#### **Compliance Evaluation**

This facility operates two natural gas fired only pathological waste incinerators, one (1) for human remains (EUCREMATORY1) and one (1) for animal remains (EUCREMATORY2).

Based on discussion with Mr. Wright and a records review, which was completed on site, the permittee only burns pathological waste as defined in 40 CFR 60.51c, and as allowed per EUCREMATROY1 and EUCREMATORY2 Special Conditions (SC) II.1 of PTI No. 319-05A.

The facility is limited to 0.20lbs/1,000lbs of gas corrected to 50% excess air, per emission unit. Compliance with this condition is determined by proper operation. A recommended list of operating and maintenance procedures is provided in Appendix A of the PTI and attached to each emission unit. Per Mr. Wright, this is being followed as well as any other manufacturer recommendations. Although Mr. Wright indicated that the emission units are typically inspected annually, documentation of any maintenance or inspections could not be provided. Mr. Wright indicated that this information is not retained. This is a violation of EUCREMATORY2 SC VI.4, which requires all records of service, maintenance and equipment inspections to be maintained and provided upon request. A Violation Notice will be issued. No visible emissions or odors were observed, and both emission units were operating at the time of this inspection. Exhaust gases, from each unit, were exhausted unobstructed vertically upwards. Stack dimensions and heights were not explicitly measured, however, based observations, appeared to meet the requirements specified in EUCREMATORY1 and EUCREMATORY2 SC VIII.1.

Special Condition EUCREMATORY2 II.2 limits the weight of the charge to no more than 500 pounds. Per Mr. Wright this is also the maximum charge recommended by the manufacturer. The facility appears to be in compliance with this requirement.

Several Monitoring and recordkeeping requirements apply to this facility. As required by EUCREMATORY1 SC VI.1 and EUCREMATORY2 SC IV.1, each unit is equipped with a device to monitor and record the afterburner temperature. A digital display allows staff to monitor temperature while temperature data is recorded on a circle chart. Circle charts were reviewed on-site and demonstrated, at least for EUCREMATORY1 that a temperature of 1,600°F is being maintained throughout the entire cycle. During this inspection EUCREMATORY1 was operating at a temperature of 1,680°F. The digital readout for EUCREMATORY2 indicated an operating temperature of 1,740°F, however it's unknown if this is being maintained throughout the entire cycle. The circle chart recorder for this unit stopped working in September 2017 with a last record being generated on August 22, 2017. Per discussions with Mr. Wright, this unit is equipped with an interlock system that shuts down the entire unit if the combustion temperature drops below a manufacturer specified set point of 1,650°F. Because of the interlock system, it's unlikely that the unit operated below the 1,600°F requirement specified in EUCREMATORY2 SC III.1, however, its unknown if the interlock system is operating properly due to the lack of records. EUCREMATORY2 SC VI.1 requires secondary combustion chamber temperatures to be recorded on a

continuous basis and EUCREMATORY2 SC VI.3 requires the permittee to maintain these records. In addition, failure to maintain a device to record the temperature in the secondary combustion chamber is also a violation of EUCREMATORY1 SC IV.2 requiring proper maintenance.

Daily records of the time, description and weight of each charge in both units is maintained by the facility and were reviewed on site during this inspection.

**Conclusion**

Based on observations, discussions and a record review made during the February 22, 2019 inspection, Phoenix Cremation Services does not appear to be in compliance with all of the Design/Equipment Parameters and Monitoring/Recordkeeping requirements of PTI No. 319-05A, as discussed above. A violation Notice will be issued.

NAME

Chris Katersen

DATE

2/25/2019

SUPERVISOR

[Signature]