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

FACILITY: OAKLAND COUNTY SHERIFF'S OFFICE		SRN / ID: P0451
LOCATION: 1200 NORTH TELEGRAPH BLDG 38E, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Brent Miles, Lieutenant (Invest./Forensic/Narcotics Services)		ACTIVITY DATE: 05/03/2016
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Level 2 Target Ins	pection	
RESOLVED COMPLAINTS:		

On May 3, 2016, I conducted a level 2 target inspection at Oakland County Sheriff's Office located at 1200 N Telegraph Road, Pontiac, Michigan 48341. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Permit to Install No. 53-13 issued for a confiscated contraband goods incinerator.

I was at the facility a few weeks ago to follow-up on the status of the installation of the incinerator. During the pre-inspection meeting, I initially showed my credential (ID Badge), stated the purpose of my visit, and gave a copy of the pamphlet, "Environmental Inspections: Rights and Responsibilities", to Lt. Brent Miles of the Investigative and Forensic Services and Narcotics Enforcement Team, Oakland County Sheriff's Office. He is also the facility contact person for the incinerator. Ms. Teresa Hofman-Lawrence, Property Room Tech, was also present to show me the recordkeeping requirements in the permit.

During the facility walk through Lt. Miles took me to the outside back lot of Building 38 East where the incinerator was located. It was not operating during inspection. I verified that the incinerator had a continuous temperature monitoring device installed at the unit that collects and records afterburner temperature continuously as required by PTI No. 53-13, special conditions EUMEDIBURN30((IV)(1) & (VI)(1)). Per PTI No. 53-13, special condition EUMEDIBURN30(II)(3), the combustion fuel for the incinerator is diesel. Since the unit was not operating, I could not verify compliance with the 1800°F afterburner temperature in PTI No. 53-13, special condition EUMEDIBURN30(III)(1). I was informed that the equipment has an interlock system to ensure the main chamber only starts combustion when the afterburner temperature reaches the desired level. Per PTI No. 53-13, special condition EUMEDIBURN30(II)(1), submitted records showed only contraband, prohibited goods, and pharmaceuticals are being incinerated at the emission unit. Per PTI No. 53-13, special condition EUMEDIBURN30(II)(2), records also showed the amount charged per run appeared to be less than the 145 lb./charge permit limit. Some records showed number of marijuana

plants instead of weight charged. Upon inquiry with Ms. Hofman-Lawrence, I was told that a plant of marijuana is about 1 lb. in weight on the average. The highest number of plants incinerated in: 2014 = 113; 2015 = 102; and through April 2016 = 56. The highest weight incinerated was 120 lb. of prescription medicine in June 2015. Per PTI No. 53-13, special conditions EUMEDIBURN30((III)(2), (VI)(3), and (VI)(4)), the permittee appeared to be following Appendix A operating and maintenance instructions. Per PTI No. 53-13, special condition EUMEDIBURN30(VI)(2), permittee is keeping daily records of time, type, and weight of waste combusted.

During inspection, I did not find any deviations. I will conduct a follow-up inspection to verify compliance with the 1800°F afterburner temperature when the equipment is operating.

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DATE 5/16 2016 SUPERVISOR