

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

40445		SRN / ID: P0580
FACILITY: GREAT LAKES CREMATION SERVICE, LLC		DISTRICT: Lansing
LOCATION: 800 TACOMA COURT, CLIO		COUNTY: GENESEE
CITY: CLIO		ACTIVITY DATE: 06/27/2017
CONTACT: Ryan O'Guinn, Member		SOURCE CLASS: MINOR
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Non Compliance	
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Inspection Report

P0580- Great Lakes Cremation Services
800 Tacoma Court
Clio, MI 48420

Inspection Date:

6/27/17

Facility Contacts:

Ryan O'Guinn, 810-247-0283, ryanoguinn@gmail.com

MDEQ AQD Personnel:

Nathan Hude – 517-284-6779, huden@michigan.gov

Facility Description:

Human and animal crematory facility.

Permit History:

195-14, issued 1/31/17: One Power Pak II Plus (IE43-PPII Plus) human crematory and one IEB-16 animal crematory unit.

Applicable Regulations:

PTI 195-14

Previous Inspections:

Attempts logged, but no actual inspection

Previous Violations (within 5 years):

None

Recent Complaints (within 2 years):

None found on record

Number of Violations Found During this Inspection:

None cited due to agreeance for immediate compliance.

Inspection Key Concerns:

Record keeping procedures and practices are lacking specifics in terms of weight (individual and charge) as well as missing acknowledgements of the charge being "Only Pathological Waste" or "Non-Pathological Waste" as required by 40CFR60.50c(b). Details are provided under Special Conditions (SC) II.2, VI.1., VI.3., and VI.4. for both EU-CREMATORY1 and EU-CREMATORY2.

MAERS Reporting

No

Inspection Summary

I arrived onsite at approx. 11:00 am. The weather was mostly sunny with a westerly wind around 5 mph. Upon entering the parking lot and the facility, I did not detect any odors or see any VE's. I did notice heat coming out of one of the stacks which I later found to be the human crematory.

I entered the front door which was unlocked and entered what appeared to be a waiting room with offices. I shouted hello several times and due to the lack of response continued down the hall continuing to announce my presence without response. I then continued to where I entered the crematory area and met Ryan. I informed him of my name and the reasoning for my visit. Because he was about to begin a cremation, I went back to the front of the building so he could finish the task at hand and waited for him. Within 5 minutes Ryan returned to the front and we went into his office where we began to discuss the purpose of the inspection.

While in the office, I reviewed all of the circular temperature charts the company had completed. They wrote the date, associated name on the chart for each charge. We then went back to the crematory area to finish the inspection.

PTI 195-14 EUCREMATORY1

This device was operating during the inspection.

SCI1. PM Limit 0.20 lbs/1000 lbs of gas

RESULT: Confirmation of this limit can only be completed via stack testing. Controls such as minimum afterburner temperatures, weight restrictions, and operation measures are used in lieu to ensure compliance.

SCII.1. The permittee shall not burn any waste in EUCREMATORY1 other than the following:

Pathological wastes—As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. This emission unit shall burn only HUMAN pathological waste and associated materials.

RESULT: Compliance- from the information collected I can reasonably assume pathological waste is the only waste type that has been incinerated.

SCII.2. The permittee shall not charge more than 750 pounds per charge in EUCREMATORY1, where charge is the total weight of the material placed in the incinerator to be combusted. *RESULT: Non-Compliance- specific weights of each charge are not being maintained though a range is. The range is entered into the incinerator computer which then dictates the burn time automatically. The ranges are small, medium, large, and obese. The database can be queried to retrieve the data; the data pull also includes: the date/time, operator ID, case ID, afterburner temperature, combustion chamber temperatures, fuel usage, and electrical usage. Based on the chances of exceeding the weight limit being rare, a violation for this condition will not be written as long as immediate compliance is agreed upon. On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggested adding a weight column to the database so that additional records were not needed or maintaining a separate record for weight.*

SCII.3. The permittee shall not burn any fuel in EUCREMATORY1 other than natural gas.

RESULT: Compliance- natural gas is the only available form of fuel for this device.

SCIII.1. The permittee shall not combust waste in EUCREMATORY1 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained.

RESULT: Compliance- circular charts were reviewed while in the office indicating 1600°F or higher. It appeared all of the incineration events were included, yet the records were combined with the animal crematory unit and were not in chronological order.

While onsite, I suggested to Ryan that the records be separated between animal and human and along with the handwritten data (name of deceased, date) on the charts that weights be added as possibility to complying with SCII.2.

SCIII.2. The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUCREMATORY1. A list of recommended operating and maintenance procedures is specified in Appendix A.

RESULT: Compliance- it appears the unit is being maintained to manufacturer's standards and monitoring software is being maintained with the manufacturer online oversight for malfunction detection.

SCIV.1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis.

RESULT: Compliance- a circular chart recording device is installed and operational.

SCIV.2. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2.

RESULT: Compliance- a gurney type cart with a digital scale is used on the human side of the crematory.

SCV. NA

SCVI.1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

RESULT: Non-Compliance- due to the lack of maintaining charge weight and the lack of distinguishing charge as pathological waste, the facility is not in compliance with this condition. On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggest adding a weight column and a acknowledgment of some sort to indicate the charge only consists of pathological waste to the database so that additional records were not needed or maintaining a separate record for weight and the acknowledgement.

SCVI.2. The permittee shall monitor and record the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis.

RESULT: Compliance- circular charts were reviewed while in the office area. It appeared all of the incineration events were included, yet the records were combined with the animal crematory unit and were not in chronological order.

While onsite, I suggested to Ryan that the records be separated between animal and human and along with the handwritten data (name of deceased, date) on the charts that weights be added as simple way of complying with SCII.2.

SCVI.3. The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY1, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: Non-Compliance- due to the lack of maintaining charge weight, the facility is not in compliance with this condition. Incineration time is available through the used database and labeled as "case_time". On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggest adding a weight column be added to the database so that additional records were not needed or maintaining a separate record for weight

SCVI.4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned in the incinerator as required by 40 CFR 60.50c(b). The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: Non-Compliance: records reviewed on file do not distinguish between waste types, although it can be reasonably assumed non-pathological waste is not incinerated, federal regulation requires this record for confirmation of compliance and to avoid the requirements of stack testing or the installation of other monitoring devices.

On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggested adding a column to the database that the operator could initial indicating a "confirmation of only pathological waste" was charged so that additional records were not needed.

SCVI.5. The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY1, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: Compliance- circular charts were reviewed while in the office area

SCVI.6. The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY1. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: Compliance- these records are available by request through Matthews.

SCVII. NA

SCVIII.1. SVCREMATORY1 Stack dimensions; maximum diameter 20 inches, minimum height above ground 24 feet

RESULT: Compliance- Ryan and I measured the stack diameter from the outside and came up with 26 inches. According to the specifications submitted with the permit application, the exhaust stack is insulated with a "4 ½ inch insulating firebrick or castable" thus the actual inside diameter of the stack is 17 inches and meets the diameter condition. It appears that the height is appropriate as observed from outdoors. During the observation, I did note some sporadic VE's ranging from 10-20% yet were very brief.

SCIX. NA

PTI 195-14 EUCREMATORY2

This device was not operating during the inspection.

SCII. PM Limit 0.20 lbs/1000 lbs of gas

RESULT: Confirmation of this limit can only be completed via stack testing. Controls such as minimum afterburner temperatures, weight restrictions, and operation measures are used in lieu to ensure compliance.

SCII.1. The permittee shall not burn any waste in EUCREMATORY2 other than the following:

Pathological wastes—As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. This emission unit shall burn only ANIMAL pathological waste and associated materials.

RESULT: Compliance- from the information collected I can reasonably assume pathological waste is the only waste type that has been incinerated.

SCII.2. The permittee shall not charge more than 300 pounds per charge in EUCREMATORY2, where charge is the total weight of the material placed in the incinerator to be combusted. **RESULT: Non-Compliance-** specific weights of each charge are not being maintained.

The chances of exceeding the weight limit for this device is a higher possibility than the human crematory because multiple animals can be incinerated at one time. This may be the case for individual whom do not wish to recover the animal's ashes, and rather than incinerating only one animal at a time, multiple animals are incinerated; this is common practice for animals euthanized from animal shelters or for road kill animals. On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance.

SCII.3. The permittee shall not burn any fuel in EUCREMATORY2 other than natural gas.

RESULT: Compliance- natural gas is the only available form of fuel for this device.

SCIII.1. The permittee shall not combust waste in EUCREMATORY2 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained.

RESULT: Compliance- circular charts were reviewed while in the office area indicating 1600°F or higher. It appeared all of the incineration events were included, yet the records were combined with the animal crematory unit and were not in chronological order.

While onsite, I suggested to Ryan that the records be separated between animal and human and along with the handwritten data (name of deceased, date) on the charts that weights be added as possibility to complying with SCII.2.

SCIII.2. The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUCREMATORY2. A list of recommended operating and maintenance procedures is specified in Appendix A.

RESULT: Compliance- it appears the unit is being maintained to manufacturer's standards and monitoring software is being maintained with the manufacturer online oversight for malfunction detection.

SCIV.1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY2 on a continuous basis.

RESULT: Compliance- a circular chart recording device is installed and operational.

SCIV.2. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2.

RESULT: Compliance- I did not confirm a separate scale for the animal crematory was available. A gurney type cart with a digital scale is used on the human side of the crematory.

SCV. NA

SCVI.1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

RESULT: *Non-Compliance- due to the lack of maintaining charge weight and the lack of distinguishing charge as pathological waste, the facility is not in compliance with this condition. On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggest adding a weight column and an acknowledgment of some sort to indicate the charge only consists of pathological waste to future records.*

SCVI.2. The permittee shall monitor and record the temperature in the secondary combustion chamber of EUCREMATORY2 on a continuous basis.

RESULT: *Compliance- circular charts were reviewed while in the office area. It appeared all of the incineration events were included, yet the records were combined with the human crematory unit and were not in chronological order.*

While onsite, I suggested to Ryan that the records be separated between animal and human and along with the handwritten data (name of deceased, date) on the charts that weights be added as simple way of complying with SCII.2.

SCVI.3. The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY2, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: *Non-Compliance- incineration time records for this device were not provided, in addition due to the lack of maintaining charge weight and the lack of distinguishing charge as pathological waste, the facility is not in compliance with this condition.*

On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance.

SCVI.4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned in the incinerator as required by 40 CFR 60.50c(b). The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: *Non-Compliance: records reviewed on file do not distinguish between waste types, although it can be reasonably assumed non-pathological waste is not incinerated, federal regulation requires this record for confirmation of compliance and to avoid the requirements of stack testing or the installation of other monitoring devices.*

On 6/30/17 I wrote Ryan an email detailing the importance of the recordkeeping requirement and asking for immediate compliance. I suggested adding a column to future records that the operator could initial indicating a "confirmation of only pathological waste" was charged so that additional records were not needed.

SCVI.5. The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY2, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: *Compliance- circular charts were reviewed while in the office area*

SCVI.6. The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY2. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request.

RESULT: *Compliance- these records are available by request through Matthews.*


SCVII. NA

SCVIII.1. SVCREMATORY2 Stack dimensions; maximum diameter 15 inches, minimum height above ground 24 feet

RESULT: *Compliance- Ryan and I measured the stack diameter from the outside and came up with 20 inches. According to the specifications submitted with the permit application, the exhaust stack is insulated with a "3inch insulating firebrick or castable" thus the actual inside diameter of the stack is 14 inches and meets the diameter condition. The stack height appears to be greater than 24 feet when observed from outside.*

SCIX. NA

Based on my inspection, it appears that the Great Lakes Cremation Services is not in compliance with PTI 195-14 and state of Michigan air quality rules. Though the owner has acknowledged the deficiencies and has committed to corrections by the dates requested in each condition and thus a violation notice will not be sent. A follow-up inspection will be performed at a later date to review and ensure the deficiencies were corrected.

NAME 

DATE 7/14/17

SUPERVISOR 