

10918 Gratiot Ave.
Casco, MI 48064



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9/3/2020

EGLE, AQD, Warren District
27700 Donald Court
Warren, MI 48092-2793

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SEP 08 2020
Air Quality Division
Warren Office

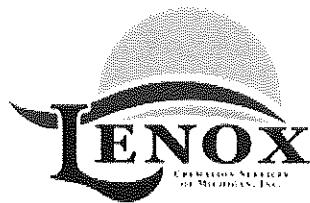
To Whom It May Concern,

Below is a written response to the violation notice sent on August 18, 2020 from EGLE, AQD:

1. **Rule/Permit Condition Violated: PTI No. 155-16 VI.1. Inspection Date: August 4, 2020.** The cremator was manufactured in France and programmed to display Celsius. They were able to change the computer program to measure in Fahrenheit, but not the label displayed. I have hired a software developer to make updates to change the display to label temperature as Fahrenheit. Due to COVID-19, he was not able to provide an exact start date, but I am on his schedule. In no way was I trying to deceive anyone with these temperatures, I did tell my inspector that all temperatures are in Fahrenheit. In addition, my machine is also recording and monitoring the oxygen level to insure it maintains 6% excess oxygen for a good complete combustion in the secondary combustion chamber throughout the cremation process, the secondary combustion zone starts after the last injection of combustion air. The State of Michigan is still not requiring the oxygen level to be recorded or monitored at this time, but with being able to see my oxygen level the state can ensure a complete combustion on the cremation. The cremator also has a minimum retention time of 2.0 seconds in the secondary combustion zone, double the time that the State of Michigan requires. The cremator is also designed to not open the main door until the cremation is fully completed, (most cremators are designed to open the main door halfway through a cremation to reposition the body, as allowed by the State of Michigan). By not opening the main door until the cremation is complete it ensures that there is not an excess amount of oxygen inside of the cremator during a cremation.
2. **Rule/Permit Condition Violated: PTI No. 155-16 III.1. Inspection Date: August 4, 2020. Dates failed to maintain: June 19, June 17, August 3 and August 4, 2020.** The cause of the violation is that the cremation software records and measures temperature during the de-ashing process where the door is open so the temperature drops. One action already taken on August 10, 2020 was to have the Manufacturer change the settings to maintain 1700 degrees Fahrenheit from the previous 1650 degrees Fahrenheit. Additionally, the software developer hired will change the software, so it does not record during the de-ashing process.
3. **Rule/Permit Condition Violated: PTI No. 155-16 VI.5. Inspection Date: August 4, 2020.** My software provides more graphs required per the Permit. I have recently updated my software and there are some bugs that need corrected. I have hired a software developer to make updates to the software to either fix or remove the non-required graphs.

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4. Rule/Permit Condition Violated: R 336.1201(1). Inspection Date: August 4, 2020. The manufacturer of the AP Lazer did not say a permit was required to purchase and/or install the machine. I have reached out the manufacturer on the right corrective actions needed to comply with the emission requirements.

The above completes my response to the Violation Notice dated August 18, 2020. Additionally, I would request that EGLE, AQD not enter these as violations but rather recommendations for correction. When I previously applied for and was granted Permit PTI No. 155-16, I had requested an inspector come out to my facility and provide guidance on changes needed to remain in compliance with the Permit. At the time, I was told that it was not necessary. I appreciate the work EGLE, AQD does to ensure facilities meet emission standards. If there are any questions related to my response, please contact me at the number listed below.

Sincerely,

Craig Harms

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