



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 18, 2020

Mr. Craig Harms, Owner
Lenox Cremation Services of Michigan, Inc.
10918 Gratiot Avenue
Casco, MI 48064-1004

SRN: P0746, Saint Clair County

Dear Mr. Harms:

VIOLATION NOTICE

On August 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lenox Cremation Services of Michigan, Inc. located at 10918 Gratiot Avenue, Casco, Michigan. The purpose of this inspection was to determine Lenox Cremation Services of Michigan'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 155-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY01	PTI No. 155-16, VI.1	The permittee failed to keep records in a format acceptable to the AQD District Supervisor. Temperature records indicate the values are recorded in degrees Celsius, but the recorded values are actually in degrees Fahrenheit.
EUCREMATORY01	PTI No. 155-16, III.1	The permittee failed to maintain a minimum temperature of 1600°F in the secondary combustion chamber on June 10, June 17, August 3, and August 4, 2020. The minimum temperatures recorded were 1476°F, 1458°F, 1126°F, and 1542°F respectively.
EUCREMATORY01	PTI No. 155-16, VI.5	The permittee failed to provide continuous records (e.g., charts) of the secondary combustion chamber temperature.
AP Lazer Model SN3024	R 336.1201(1)	The permittee installed and operated an emission unit without an approved permit to install or demonstrating an exemption from R 336.1201(1) applies.

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During this inspection, Lenox Cremation Services of Michigan provided records of the secondary combustion chamber temperatures in degrees Celsius although the recorded temperatures were actually recorded in degrees Fahrenheit. This appears to be a violation of EUCREMATORY01, special condition VI.1, which states in part, "The permittee shall complete all required records in a format acceptable to the AQD District Supervisor."

During this inspection, the records provided by Lenox Cremation Services of Michigan indicate the permittee failed to maintain a minimum temperature of 1600°F in the secondary combustion chamber on June 10, June 17, August 3, and August 4, 2020. The minimum temperatures recorded were 1476°F, 1458°F, 1126°F, and 1542°F respectively. This appears to be a violation of EUCREMATORY01, Special Condition III.1, which requires the permittee to maintain a minimum temperature of 1600°F in the secondary combustion chamber.

During this inspection, Lenox Cremation Services of Michigan failed to provide continuous records (e.g., charts) of the secondary combustion chamber temperature. This appears to be a violation of EUCREMATORY01 VI.5, which states in part, "The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY01, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request."

During this inspection, it was noted that Lenox Cremation Services of Michigan, Inc. had installed unpermitted equipment (AP Lazer SN3024) at this facility. The AQD staff advised Lenox Cremation of Michigan on August 4, 2020, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the AP Lazer SN3024 laser engraving process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 8, 2020, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Lenox Cremation Services of Michigan, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of August 4, 2020. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE