## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

FACILITY: Surrey Veterinary Clinic		SRN / ID: P0751
LOCATION: 3598 S. Clare Ave., CLARE		DISTRICT: Saginaw Bay
CITY: CLARE		COUNTY: CLARE
CONTACT: Peggy Siegert, General Office Manager		ACTIVITY DATE: 02/27/2018
STAFF: Meg Sheehan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self initiated inspec	tion to determine initial compliance with permit no. 165-1	16
RESOLVED COMPLAINTS:		

At 11:30 am Tuesday, February 27, Meg Sheehan conducted a self-initiated inspection at Surrey Veterinary Clinic (SRN P0751), 3598 S. Clare Ave, Clare. SVC was open for business, but the crematory was not operating during the inspection, so no visible emissions could be observed.

## **COMPLIANCE HISTORY**

Surrey Veterinary Clinic was previously located at 5957 E. Surrey in Clare (SRN N7430) and associated with PTI No. 60-05. This permit was issued for the facility on April 20, 2005 as a result of multi-media site visits/inspections resulting from a complaint on November 22, 2004, and additional information obtained by inspectors regarding improper waste disposal, and wood burner operation activities by the facility. A Letter of Violation was issued for the site on January 5, 2005 for open burning of solid waste including medical waste as well as installation of a boiler without a permit. No additional complaints have been received regarding the facility since the initial complaint. A permit application was submitted for the boiler but withdrawn by Dr. Stephen Siegert (owner/operator). PTI No. 165-16 was issued on December 2, 2016 for relocation of the crematory. On February 17, 2017, it was confirmed that the facility had relocated and PTI No. 60-05 was voided per electronic request by District Staff.

## **COMPLIANCE EVALUATION**

Dr. Siegert provided a tour and demonstration of the crematory. The emission unit is located inside a fenced perimeter behind the main building. The area immediately surrounding the crematory was well maintained and free of waste. Dr. Siegert turned on the crematory so I could observe how and when the secondary combustion chamber fires, at approximately 528° C (982° F).

Maintenance activities performed on the crematory include thermocouple and filter replacement. Dr. Siegert indicated that he did not record when these replacements occurred. I advised him that this is a condition of permit no. 165-16 and cited the special condition (SC VI.6). A review of the files showed that some maintenance activities are recorded; there was one record of the thermocouple being replaced since initial start-up in January 2017, and no recordings of the filter being replaced. Ms. Peggy Siegert provided a file where purchase receipts for the filters and thermocouples were kept. I indicated that this was a good practice to maintain.

I also reviewed SVC's Required Operational Recordkeeping log (Appendix B). Staff maintains records of the date, charge weight, start time, secondary combustion chamber temperature, end time and duration of burn as required. I noted that within the first several months of use, the temperature of the secondary combustion chamber was not reaching 871° C (1600° F) before the charge was placed into the crematory. Looking at more recent entries from January, 2018, the temperature was still only reaching approximately 800° C before the charge was loaded into the crematory.

## **COMPLIANCE DETERMINATION**

At this point in the inspection Dr. Siegert had returned to his veterinary duties so I spoke with Ms. Siegert regarding the recordkeeping issues. She indicated that the permit language was a bit confusing, so I explained the correct operating procedures as such: turn on the crematory, wait for the secondary combustion chamber to reach a temperature of at least 871° C (1600° F), load the charge into the crematory, make note of the temperature and continue to do so every 30 minutes for the duration of the burn. I also explained the issues with the maintenance recordkeeping and that I would need to speak with my supervisor about it, but that these two deviations from the permit may result in a violation notice.

After speaking with Chris Hare, I determined that a violation notice was warranted and drafted one on February 28, 2018. It was mailed on March 1, 2018. Based on the information collected during the February 27, 2018 site visit, Surrey Veterinary Clinic is not operating in compliance with PTI No. 165-16.

**MACES-** Activity Report

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NAME Meg Meetron DATE 3/1/18 SUPERVISOR C. Stare