

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

N145533173

FACILITY: Noah's Pet Cemetery & Pet Crematory		SRN / ID: N1455
LOCATION: 2727 ORANGE AVE SE, CASCADE TWP		DISTRICT: Grand Rapids
CITY: CASCADE TWP		COUNTY: KENT
CONTACT: Ellen McGee, Owner		ACTIVITY DATE: 01/29/2016
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

**Owner: Rob and Ellen McGee**  
**616-949-1390**  
**Safety Glasses and Closed Toe Shoes/Boots**

Denise Plafcan (DP) conducted an unannounced scheduled inspection of Noah's Garden Pet Cemetery to determine compliance with AQD rules and regulations and PTI Nos. 13-88I, 344-06 and 104-10.

Before and after conducting the inspection, DP conducted surveillance of the area for any odors, smoke, particulate matter, fallout or malfunctions. The ovens appeared to be operating properly as no odors, smoke, particulate matter, fallout or malfunctions were detected. DP arrived at the office and explained to Ellen McGee the reason for the inspection and furnished an Environmental Inspections brochure. Rob was not at the facility so Ellen was the escort to the crematorium where the three ovens are located.

#### FACILITY DESCRIPTION

Noah's Garden and Pet Cemetery is a pet cemetery and also an animal crematorium that typically operates five days a week. There are three incinerators and the associated afterburners that range in size from small individual loads to loads up to 3400 pounds and each oven has a separate PTI; all three ovens were operational during the inspection. Details for each oven are listed below with the individual permit conditions. The two smallest ovens are on the south side of the building and the newest and largest oven is on the north side of the building. The entire cremation building was extremely clean and orderly.

#### REGULATORY OVERVIEW

All three ovens are subject to the requirements of an infectious waste incinerator and require afterburners operating in excess of 1600°F. NSPS for Pathological Waste incinerators 40 CFR 60.51c

#### COMPLIANCE EVALUATION

Rod Vanlewen is responsible for operation of the incinerators and had just compiled the monthly records so they were ready to turn into the front office. All three units run on natural gas. All required records (daily or weekly) for the three units were being maintained and were posted near each oven as required. Records for the past month were reviewed on site except for the last maintenance records of the units which were submitted via e-mail and are attached. Stack dimensions of the three ovens were not verified during the inspection but appear to be accurate. All waste materials appear to be being handled correctly. All three PTIs have a PM limit of 0.20 pounds/ 1000 pounds of exhaust gases corrected to 50% excess air which can only be verified by a stack test and since all three units appear to be operating so efficiently a stack test was not requested. It appears that all three incinerators are only burning pathological waste in accordance with 40 CFR 60.51c.

PTI 13-88I is for a B&L Systems pathological type 4 waste incinerator that was installed in 1989. This oven was operational during the inspection. This oven is the oldest and the least efficient in terms of the load size and the gas usage. The following are PTI 13-88I Special Conditions.

Incinerator must be equipped with a manual timer switch, with operating instructions, to insure use of the afterburner whenever the incinerator is operated. If it is determined, by the DS that such manual timer switch is not being utilized correctly, an automatic afterburner switch may be required. An automatic lock-out has been installed and the primary burner cannot start until the secondary burner is at 1600°F.

Applicant shall not operate the equipment unless a minimum temperature of 1600°F and minimum retention time of 1.1 seconds in the equipment is maintained. At the time of the inspection the oven was operating at 1650°F and the afterburner 1665°F.

PTI 344-06 is for EU-CREMATORY2 the Therm-Tec Model G-30-P Animal Crematory Natural Gas Fired Maximum Charge 3,400 Pounds Burn Rate 340 Pound/Hour. This is the most efficient of the three incinerators and usually run it at less than 2800 pounds. The day of the inspection it was running at 3000 pounds.

The permittee shall not combust waste in EU-CREMATORY2 unless a minimum temperature of 1500°F and a minimum retention time of 0.36 seconds in the secondary combustion chamber are maintained. During the inspection, the oven was operating at 1700°F and the afterburner was at 1777°F.

The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMATORY2. A list of recommended operating and maintenance procedures is specified in Appendix A. It appears that the incinerator and afterburner are being operated properly in accordance with Appendix A.

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 EU-CREMATORY2 on a continuous basis. There is a device installed to monitor and record the temperature of both the primary and secondary chamber. However, they are only required to record the secondary chamber temperature. Records reviewed on-site confirm the secondary chamber is being recorded and on some occasions they do use 2 pens and record both chambers.

PTI 104-10 is for EUCREMATORY3 The B&L Cremation Systems Pet Cremator Model BLP 500/150 Fuel Type: Natural Gas Maximum Charge: 500 Pounds Burn Rate: 150 Pounds/Hour Charge Type: Animal "Pet" Remains

The permittee shall not charge more than 500 pounds per charge in EUCREMATORY3. Based on the records reviewed on site it does not appear that loads larger than 500 pounds are being burned in EUCREMATORY3.

The permittee shall not combust waste in EUCREMATORY3 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained.

The equipment also has a lock-out system. A circular chart is used to record the temperature of the secondary combustion chamber. It appears that the incinerator and afterburner are being operated properly in accordance with Appendix A.

Based on the physical inspection and a review of the required recordkeeping, it appears the facility is in compliance with AQD rules and regulations and PTI Nos. 13-881, 344-06 and 104-10.

NAME Devin Page

DATE 2.12.16 SUPERVISOR \_\_\_\_\_