

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N701871065

FACILITY: Cheboygan County Humane Society		SRN / ID: N7018
LOCATION: 1536 Hackleburg Road, CHEBOYGAN		DISTRICT: Gaylord
CITY: CHEBOYGAN		COUNTY: CHEBOYGAN
CONTACT: Richelle Brown , Executive Director		ACTIVITY DATE: 03/08/2024
STAFF: David Bowman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY24 Scheduled inspection. source working on corrections for record keeping and stack height. email sent to Richelle 3.11.24 for plan of corrections.		
RESOLVED COMPLAINTS:		

On 8 Mar 2024 I, David Bowman MI EGLE AQD, conducted a site inspection of N7018 Cheboygan County Human Society, a true minor site, operating under the conditions of permit to install (PTI) 193-01. The site is located at 1536 Hackleburg rd, Cheboygan. Hackleburg road is located west of M33 north of the M33 where it departs north from M68.

The last inspection of the source was 19 Oct 2009 and since then there have been personnel changes that have resulted in changes in the operation that have the source currently in NONCOMPLIANCE. The director and crematory operator have changed in recent past and none of the information was passed on.

I was met by Richelle Brown, Executive Director, of the Cheboygan Humane Society, and Allen, the cremator operator. We reviewed the conditions of PTI 193-01 and noted the areas that require work to maintain compliance. The crematory is outside of the main building in a roof only structure. The stack had failed and was in the process of being replaced. Part of that replacement involved the removal and repair of the roof over the crematory. At the time of the inspection the stack did not meet the 20' foot minimal height requirement. There was no data plate that I could locate on the crematory. The crematory was not operating at the time of the inspection. There was blackening on the roof rafter directly above the stack but there was no ash residue on or near the crematory. The area appeared to be clean and maintained.

On 11 March 2024 I sent an email to Richelle outlining the noncompliance issues and requesting a timeline and resolution no later than 21 March 2024. At this time, I am using enforcement discretion and not issuing a VN because the source was already working on some of the compliance issues and was very committed to correction of the other issues that they were not aware of. The crematory is used infrequently and is most likely not causing issues for local air quality.

SC 1. 0.20 lbs/100 lbs exhaust gases, corrected to 50% excess air...

Discussion – There is no testing and no monitoring requirements for this source. The emission limit is considered to be met if SC 3 is met during operation.

SC 2. Shall not burn any waste other than pathological...

Discussion – Allen stated that only pet remains, the containers, and bedding materials are burned in the crematory. The items he listed are those allowed by the permit.

SC 3. Shall not operate unless a minimum temperature of 1600°F is maintained....

Discussion- there is a gauge on the crematory that displays the temperature during operation.

SC 4. Proper operation and adequate maintenance...

Discussion - Allen uses the operators manual to ensure that proper operation is maintained during operation. He is in process of maintenance of the stack and adding a new recoding device for the temperature monitoring. In the discussion of the operations guidelines, I am going into more detail about some short comings for the maintenance of the crematory.

SC 5. Records of the temperature in the secondary combustion chamber...

Discussion – due to the changeover of personnel and no hand over of any records Richell and Allen are not aware of any records being maintained on the site. Richelle searched her desk and files that pertained to the crematory, and none were located. The paper recorder discussed in the last inspection had failed and was in process of being replaced by a blue tooth recorder. The cremator has been operated without the tracking of the temperature. The source is creating a paper tracking report to use during operation until they can install the new temperature logging device.

SC 6. Quarterly records of periods of time when pathological waste if burned...

Discussion due to the changeover of personnel and no hand over of any records Richell and Allen are not aware of any records being maintained on the site. Richelle searched her desk and files that pertained to the crematory, and none were located. The paper recorder discussed in the last inspection had failed and was in process of being replaced by a blue tooth recorder. The cremator has been operated without the tracking of the temperature. The source is creating a paper tracking report to use during operation until they can install the new temperature logging device.

SC 7. Stack is required to be no more than 8” diameter and minimum of 20’ above ground level...

Discussion – Allen stated that the old stack failed in December of 2023 and he had to replace it. The stack at the time of inspection was approximately 10-12’ above ground. It was low enough that it did not extend above the rafter line from the roof over the crematory. As noted earlier, there was some blackening of the rafters but there was no odors and no ash around the crematory area.

INCINERATOR OPERATION GUIDELINES

1. Designate a trained operator...

Discussion – Allen is the designated operator. His description of how to operate the crematory leads me to believe that he is sufficiently trained in proper operation.

2. Grates should be cleaned...

Discussion – Allen stated that before and after each burn he ensures that the device is cleaned.

3. Preheat the unit...

Discussion – Allen sated a 1 hour preheat time to get to temperature for proper operation. During that time he is tuning the air ratio per the operators manual.

4. Do not over load...

Discussion -Allen stated that the unit is not over loaded.

5. Schedule charges to minimize opening of the doors..

Discussion – Allen plans his loads and minimizes the opening of the crematory during operation.

6. Burn only types of waste authorized...

Discussion – as stated is SC 2, only authorized waste is burned.

7. Keep combustion air adjusted...

Discussion – Allen uses the operators manual to ensure that the proper air flow is maintained.

8. Observe the stack frequently and adjust operation as needed...

Discussion – the stack is observed during operation to ensure that the emissions are minimized.

9. Copy of manufacturers manual and guideline posted near the crematory...

Discussion – Near the crematory is a copy of the manual and these guidelines.

10. Make quarterly inspections to check an service all of the equipment...

Discussion -Allen has been maintaining the equipment as best he can. There is currently no quarterly maintenance checklist. Source is reviewing the manuals and going to create a quarterly maintenance checklist and then keep the records on hand. There has been some maintenance, i.e. the stack replacement and the data recorder. Allen cleans and inspects for damage before operation as well, but it is not what would be considered a maintenance program in the intent for this requirement.

NAME 

DATE 5-9-24

SUPERVISOR 