

**VIOLATION NOTICE** On May 10, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Southern Michigan Cremation Services R.O. Inc. (SMCS) located at 4839 Fernlee Avenue, Royal Oak, Michigan. The purpose of this inspection was to determine SMCS'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 113-18A. We have received your response to the Violation Notice (VN) issued on May 21, 2024, and have determined your response is inadequate.

Original Response that was rejected

Response to the violation for May 10, 2024, the spike in temperature and smoking that was caused by an oversized person in a disaster pouch, when the operator realized that the machine was smoking and over temperature, he immediately shut the flames off to let the rising temperature and smoke settle and stop the smoking. While the operator had the cremation burner and afterburner flames off to stop the smoking, he was assisting a funeral home that was dropping off a decedent and by the time he got back to the machine the temperature had dipped down below 1600. The operator has reviewed the requirements that have been set in place by the department.

We have added cameras to the roof of the building to better monitor the smoke coming from the stacks and try to catch it as soon as possible. We have also had maintenance on the machines to make sure all of the natural gas is at the appropriate psi going into the machines as well as the blowers to make sure everything is up to specifications. The maintenance company was at the Royal Oak location when the department staff was out doing their investigation on May 10<sup>th</sup> 2024 as well as June 18<sup>th</sup> 2024. As sent to you in a prior response letter I included the receipt for the scale we purchased, from that day also we ordered a lift that will have scale attached and we will be marking all the weights on the cremation containers and the log we keep for all machines.

Thank you

Matt Dziadzio - GM

The written response did not include an explanation of the causes and duration of the violations; whether the violations are ongoing; specific dates to complete the actions proposed, and what steps are being taken to prevent a reoccurrence.

Additional Response

We are taking every step to make sure this doesn't happen again. We have added addition training for our operators and gone over the procedures to prevent the machine from smoking. We have thoroughly trained our staff and explained the importance of making sure the machine stays at the 1600 min temp or above. Most importantly are operators will not walk away from any cremations while adjusting air and burner controls to prevent smoke. We have further inspected our machines to make sure that they are running under manufactured specs. Southern Michigan Services is in the process of ordering a new machine so that the Livonia location can preform cremations for the size people in the area. Currently

we are one of the few crematories that can handle a large capacity cremation. We do all the work for the unclaimed bodies at Wayne County and many of these people are large in stature. We cremate for the majority of the funeral homes in Detroit and have safely cremated 1000 pound bodies. Its very important to service this segment of the population. Many crematories reject people of this size and we believe that all people should be treated and serviced with dignity and respect.

The VN response explained how the facility will catch the malfunctions, but it did not include what actions will be taken to prevent malfunctions from occurring.

Southern Michigan will make it a priority to keep all equipment running at intended temp and under the intended manufacture specks. This includes training, inspections, and regular maintenance.

In addition, we have reviewed additional temperature charts provided by SMCS from May 29 through May 31, 2024. Our evaluation has identified an additional violation. The tables below incorporate the previous VN issued on May 21, 2024, and identify an additional violation. Process Description Rule/Permit Condition Violated Comments FG1200 PTI No. 113-18A FG1200 SC III.1 The facility failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste on April 10 and May 30, 2024. FG750 FG1200 PTI No. 113-18A FG750 SC IV.3 FG1200 SC IV.3 The facility did not maintain a scale on-site for purposes of weighing each charge. James Santeiu Southern Michigan Cremation Services R.O. Inc. Page 2 June 24, 2024 AQD staff reviewed the circular temperature charts for EU-CREMATORY5 and EUCREMATORY6 for April 10, 2024. According to these records and speaking with on-site staff, the operator shut down EU-CREMATORY5 and EU-CREMATORY6 in the middle of their cremations because the units became too hot, and they needed to cool down. While the cremation units were shut off, the secondary combustion chamber (SCC) temperature in EU-CREMATORY5 dropped to 1050°F and in EU-CREMATORY6, it dropped to 1150°F, which is less than the permitted minimum of 1600°F. If the incinerator is shut off in the middle of a cremation, the residual heat inside the cremation unit continues to combust the charge while the temperature in the SCC is below 1600° F. This constitutes a violation of PTI No. 113-18A, FG1200 SC III.1, which states that the permittee cannot combust waste in FG1200 unless a minimum temperature of 1600°F in the SCC is maintained. SMCS staff said that the actual charge weights for these cremations were far heavier than what the operator had originally estimated. This constitutes a violation of PTI No. 113-18A, FG750 SC IV.3 and FG1200 SC IV.3, which requires the permittee to maintain a scale at the facility to verify charge weight. SMCS sent additional circular temperature chart records for 5/29/2024 – 5/31/2024. On May 30, 2024, EU-CREMATORY5's operating temperature dropped to 1450°F, which is 150 °F less than the permitted minimum of 1600°F. This constitutes a violation of PTI No. 113-18A, FG1200 SC III.1, which states that the permittee cannot combust waste in FG1200 unless a minimum temperature of 1600°F in the SCC is maintained.

#### Response

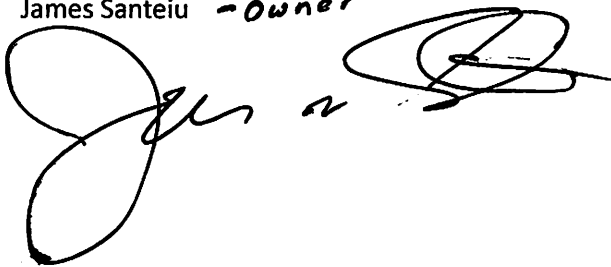
We have retrained our operators and in the event they need to turn off any burners to prevent smoking while cremating an oversize body they will stay and monitor the screen and temp to make sure everything is running at the correct temperature. They will not walk away from the machine while an oversize body is being cremated. We have explained the seriousness of the violation. My manger is reviewing charts to make sure the employs are cremating at the proper temps. Southern Michigan

Services is looking into oxygen based control panels that can be retrofitted onto the machines that would automate the controls and provide less human management of temperature smoke controls. Southern Michigan Services prides ourself on being up to code and operating some of the nicest crematories in the country. We are making every effort to make sure no other violations happen at our facilities.

I spoke with Katie at EGLE and I verbally explained what had caused the violations. I was hoping to get some direction on exactly what you need for my response. I am still waiting to hear back. I will be out of town from July 31- Aug 12. Please feel free to contact me on my cell during this time 734-634-0990. Hopefully this is an adequate response and we can move forward.

Thanks

James Santeiu -owner

A handwritten signature in black ink, appearing to read 'James Santeiu', followed by a large, stylized circular flourish.