



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

June 24, 2024

James Santeiu
Southern Michigan Cremation Services R.O. Inc. (SMCS)
4839 Fernlee Avenue
Royal Oak, MI 48073

SRN: P0932, Oakland County

Dear James Santeiu:

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. 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. 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. 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.

AQD staff reviewed the circular temperature charts for EU-CREMATORY5 and EU-CREMATORY6 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 15, 2024, (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 Marie Reid at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or reidm5@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If SMCS 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.

James Santeiu
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of SMCS. 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,

A handwritten signature in black ink, appearing to read "Marie Reid". The signature is fluid and cursive, with the first name "Marie" and last name "Reid" clearly distinguishable.

Marie Reid
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Tom Perini, SMCS
Matt Dziadzio, SMCS
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Kerry Kelly, EGLE