

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



SRN: P0932, Oakland County

May 21, 2024

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

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.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	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.
FG750	PTI No. 113-18A	The facility did not maintain
FG1200	FG750 SC IV.3	a scale on-site for purposes
	FG1200 SC IV.3	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.

James Santeiu Southern Michigan Cremation Services R.O. Inc. Page 2 May 21, 2024

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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 11, 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.

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,

Marie Reid

Environmental Quality Analyst

Air Quality Division

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586-249-6505

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