

Lane Regional Air Pollution Authority
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Musgrove Crematorium

Permit No. 204732

PERMITTING

Permitting Action

1. The action is a renewal for an existing Air Contaminant Discharge Permit (ACDP), which was issued on June 1, 1996, with an expiration date of May 31, 2001. Since the last renewal, it was modified on March 27, 1997 to change the permit type from Regular to Minimal.

Location Area Attainment Status

2. The facility is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀. The Eugene/ Springfield Air Quality Management Area is an attainment area for the criteria pollutants PM, CO, VOC, NO_x, and SO_x.

SOURCE DESCRIPTION

Overview

3. The facility operates a crematory unit for purposes of human and animal remains incineration. Installation was completed on or about May of 1984. LRAPA approved construction on May 10, 1984. The crematory unit is defined as an existing unit since it was constructed or modified prior to March 13, 1990, (OAR 340-0255-0855(13)), and must meet a 1600° F final combustion chamber (after-burner) temperature during the course of cremation rather than the 1800° F final combustion chamber temperature required of new units. The facility in the year 2000 conducted 360 human and 414 pet cremations and normally operates during what may be considered a typical 8 hours-per-day, 5 days-per-week, work week.
4. There have been no changes to the source since initially permitted.

Process and Control Devices

5. The facility operates an "All" Crematory unit model No. L-1701. The crematory, fueled by natural gas, was put in service in 1984. Emissions are controlled, as required by regulation, by an after-burner and exhaust gases from the after-burner are vented to the atmosphere.

EMISSIONS

6. Emissions for this source are expected to be minimal and consist mainly of particulate matter (PM) and products of combustion from the auxiliary fuel. A source performance PM stack test, as required by regulation, was performed by Horizon Engineering on February 23, 1993. The result of the PM stack test was 0.021 gr/dscf corrected to 7% O₂. The PM limit, as stated in LRAPA 30-045(1), is 0.08 gr/dscf. The average pound-per-hour PM emission rate was 0.078. Typical cremation duration is at worst case two (2)

hours. At 360 human and 414 pet cremations, PM emissions would be approximately 150 pounds for the year 2000.

MINIMAL PERMIT DETERMINATION

7. The Authority has determined that the source qualifies as a minimal source for the following reasons:
 - a. Emissions from this source are less than 5 tons per year of PM and less than 10 tons per year for the criteria gaseous pollutants.
 - b. The facility was inspected on June 22, 2001 and found to be in compliance with permit conditions.

SPECIAL CONDITIONS (Optional)

8. Not applicable.

NESHAPS APPLICABILITY

9. There are no sources at this facility for which NESHAPS standards have been promulgated.

NSPS APPLICABILITY

10. There are no sources at this facility for which NSPS standards have been promulgated.

REPORTS

11. As directed by the Authority.

ENFORCEMENT HISTORY

12. Notice of Non-Compliance (NON) 1088 was issued to Musgrove on June 15, 1995 for an opacity violation that occurred on June 14, 1995. Visible emissions reached 30% opacity. Permit limit is 10% opacity. NON 1088 required that Musgrove submit a corrective action plan. The plan was submitted in a timely manner and during the course of a follow-up inspection on July 19, 1995 the facility was found to be in compliance and NON file 1088 was closed.

NON 1466 was issued to Musgrove on January 29, 1999 for failure to notify LRAPA of breakdown of equipment or air pollution control equipment which may result in exceeding emission limitations. The equipment breakdown occurred on January 27, 1999 and LRAPA received a citizen complaint regarding smoke from the crematory stack. Musgrove acknowledged the

equipment breakdown and LRAPA proceeded with Notice of Violation and Civil Penalty (NCP) 99-1466 for the violation. NCP 99-1466 included a civil penalty in the amount of \$600. Musgrove admitted the violation and requested reduction in civil penalty. The penalty was reduced to \$250. On June 2, 1999 NCP file 99-1466 was closed upon LRAPA receiving payment of the \$250 civil penalty.

NON 2187 was issued to Musgrove on January 29, 2001 for failure to maintain during the course of a cremation a final combustion chamber temperature of 1400° F. NON 2187 required that Musgrove submit a written account. Musgrove submitted the account in a timely manner and acknowledged that operator error was responsible. LRAPA proceeded with NCP 01-2187 for the violation. NCP 01-2187 included a civil penalty in the amount of \$1300. On April 18, 2001 NCP file 01-2187 was closed upon LRAPA receiving payment of the \$1300 civil penalty.

Non 2275 was issued to Musgrove on June 22, 2001 for a visible emissions and opacity violation that occurred on May 10, 2001. For a period of 8.75 minutes visible emissions were observed from crematory stack. Permit limit is less than 3 minutes in any one hour. Highest level of visible emissions observed was 30% opacity. Permit limit is 10% opacity. LRAPA proceeded with Notice of Violation and Civil Penalty (NCP) 01-2275 for the violation. NCP 01-2275 included a civil penalty in the amount of \$3,600. Musgrove admitted the violation and requested reduction in civil penalty. The penalty was reduced to \$1800 of which \$600 was suspended. On August 14, 2001 NCP file 2275 was closed upon LRAPA receiving payment of the \$1200 civil penalty.

PUBLIC NOTICE

Renewal

13. The draft permit was placed on public notice from November 21, 2001 to December 21, 2001. No written comments were received during the 30-day comment period.

JM/cmw
11/14/01