

Lane Regional Air Pollution Authority
Air Contaminant Discharge Permit

REVIEW REPORT

Rest-Haven Memorial Park and Funeral Home

Permit No. 207052

1. General Background Information

Rest-Haven Memorial Park and Funeral Home (Rest-Haven) operates a crematory incinerator at 3900 Willamette Street in Eugene, Oregon.

The source is located in an area that has been designated as non-attainment for PM₁₀ and designated as attainment for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. The Land Use Compatibility Statement (LUCS) for the source was issued by the City of Eugene on November 13, 1998.

Regulated pollutants emitted from the crematory incinerator consist of total suspended particulate matter (TSP), particulate matter less than 10 microns in diameter (PM₁₀), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen oxides (NO_x), lead (Pb), mercury (Hg), and hazardous air pollutants (HAPs).

The operating schedule for the source is 3640 hours per year (10 hours per day, 7 days per week, and 52 weeks per year).

2. History of Source

Rest-Haven has held an Air Contaminant Discharge Permit (ACDP) since at least 1978. The current ACDP expired on October, 31, 1998. In 1994, LRAPA approved the construction of a new cremation chamber at Rest-Haven.

3. Reasons for Permit Issuance

The source is applying for a renewal of its most recent ACDP. The source operates a process listed in Part II of Table A of LRAPA Title 34 (Category 44(d) - crematoriums). A minimal permit is appropriate for this source.

4. Enforcement Actions

There have been no enforcement actions taken against the source.

5. Performance Test Results

The source completed a performance test in May 1994. The results from this test showed that the PM emissions were 0.025 gr/dscf (grains per dry standard cubic foot) and 0.14 lb/hr (pounds per hour). The grain-loading value was below the limit contained in LRAPA 30-045(1) and, therefore, the source has satisfied the compliance requirements of LRAPA 30-060(1).

6. Projected Emissions

Based on the 1994 source test results, the projected PM emissions from the crematory incinerator, assuming continuous operation, are about 0.25 tons per year.

7. Plant Site Emission Limits

In accordance with LRAPA 34-060(4), plant site emission limits shall not be established for this source since it is being issued a minimal permit.

8. Process-Specific Emission Limitations

In accordance with LRAPA 30-045(1), the permit limits PM emissions to 0.08 gr/dscf of exhaust or less. The measured emission rate of 0.14 lb/hr is less than the minimum value allowed by process weight emission limitation specified in LRAPA 32-045. Therefore, the permit does not contain a process weight limitation for the crematory incinerator.

9. Typically Achievable Control Technology

In accordance with LRAPA 32-008, the source is not required to install typically-achievable control technology, since the emissions of gaseous criteria air pollutants and PM are not greater than ten (10) tons per year and five (5) tons per year, respectively.

10. Design and Operation Requirements

The source is required to follow the design and operation provisions for new crematory incinerators contained in LRAPA 30-050. LRAPA has approved the training program for the crematory incinerator operators, as required by LRAPA 30-050(2).

11. Performance Testing

Until required by LRAPA, the source is not required to perform any additional performance testing.

12. Monitoring and Reporting Requirements

In accordance with LRAPA 30-055, the source is required to perform the following inspection and monitoring:

Parameter	Minimum Recording Frequency
Maintenance of Crematory Incinerator	As Recommended by Manufacturer
Inspection of Crematory Incinerator Afterburner	Monthly

Parameter	Minimum Recording Frequency
Temperature in Final Combustion Chamber of Crematory Incinerator	Continuously During Operation
Number of Cremations	Monthly

Except for the temperature monitoring of the final combustion chamber, the source is required to report the results of all monitoring and inspection with the application for permit renewal. Only periods when the temperature in the final combustion chamber falls below the minimum temperature values allowed in the permit need to be reported with the permit renewal application.

13. Production Limits

The permit contains no production limits.

14. New Source Performance Standards

The U.S. Environmental Protection Agency has promulgated New Source Performance Standards (NSPS) for hospital, medical, and infectious waste incinerators (HMIWI). Since the permit does not allow the incineration of infectious waste, the source is not subject to the HMIWI NSPS.

15. Public Notice

The draft permit was placed on public notice from July 19, 1999, to August 18, 1999. No comments were received during the 30-day comment period.

DW/bp
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