

ASSIGNMENT
to
GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

PERMITTEE:

Rest Assured Pet Cremation, LLC
PO Box 425
Junction City, Oregon 97448

INFORMATION RELIED UPON:

Application No.: 56714
Date Received: 10/26/2011

PLANT SITE LOCATION:

90504 Highway 99N
Eugene, Oregon 97405

LAND USE COMPATABILITY STATEMENT:

Approving Authority: City of Eugene
10/25/2011

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060(2) and based on the land use compatibility findings included in the permit record (note: land use compatibility statements are not applicable to portable sources).



Merlyn L. Hough, Director

NOV 29 2011

Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-012	10/14/2018	Crematories (OAR 340-216-0020, Table 1, Part B, 23)	7261

SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Laura or David Hagey	
Phone number:	541-914-4757	
Facsimile number:		
e-mail address:	foxglove@epud.net	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	No	N/A
Reports Required:		
Annual	Yes	February 15
NSPS	No	N/A
NESHAP	No	N/A
Other	No	N/A
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and incorporated into Title 37 Section 37-0060 by LRAPA for the following source category:

Incinerators, human and/or animal crematories. SIC 4953

TABLE OF CONTENTS

1.0	PERMIT ASSIGNMENT	2
2.0	EMISSION STANDARDS AND LIMITS.....	2
3.0	OPERATION AND MAINTENANCE REQUIREMENTS	3
4.0	PLANT SITE EMISSION LIMITS	4
5.0	COMPLIANCE DEMONSTRATION	4
6.0	RECORDKEEPING REQUIREMENTS	6
7.0	REPORTING REQUIREMENTS	7
8.0	ADMINISTRATIVE REQUIREMENTS	9
9.0	FEES	10
10.0	GENERAL CONDITIONS AND DISCLAIMERS	11
11.0	ABBREVIATIONS, ACRONYMS, DEFINITIONS.....	12

1.0 PERMIT ASSIGNMENT

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing the cremation activities listed on the cover page of this permit, including supporting activities.
 - b. A Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's regulations and that the LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of LRAPA Title 37, Section 37-0060 and the conditions of this permit.
- 1.3 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Standard Permit or additional General ACDPs, if applicable.

2.0 EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** No visible emissions shall be present except for a period aggregating no more than three (3) minutes in any sixty (60)-minute period, as measured by EPA Method 9, At no time shall visible emissions exceed an opacity of 10%.
- 2.2 Particulate Matter Emissions** Particulate matter must not exceed 0.080 grains per dry standard cubic foot of exhaust gases corrected to 7% O₂ at standard conditions.

- 2.3 Fugitive Emissions** The permittee must take reasonable precautions for preventing fugitive dust emissions from becoming a nuisance, such as but not limited to:
- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
 - b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
 - c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- 2.4 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.5 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 3.1 Work practices** The permittee may not burn any material other than human and/or animal bodies and materials normally used in cremations in the incinerator(s). No other waste, including infectious waste as defined in LRAPA Title 30, Section 30-010, may be incinerated.
- 3.2 Temperature and Residence Time Requirements** The permittee must comply with the following standards, as applicable:
- a. For incinerators installed prior to March 13, 1993, the temperature at the final chamber must be equal to or greater than 1600°F with a residence time of at least 0.5 seconds. The temperature in the final chamber must be equal to or greater than 1200°F prior to igniting the primary burner.
 - b. For incinerators installed on or after March 13, 1993, the temperature at the final chamber must be equal to or greater than 1800°F with a residence time of at least 0.5

seconds. The temperature in the final chamber must be equal to or greater than 1400°F prior to igniting the primary burner.

3.3 Operator Training The incinerator(s) shall be operated at all times under the direction of individuals who have received training necessary for proper operation. The following shall be available on-site at all times from LRAPA inspection:

- a. A description of a LRAPA-approved training program. New facilities must submit a description of the operator training program to LRAPA for approval within 60 days after the permit is assigned.
- b. A written statement signed by each operator stating that the operator has undergone and understood the training program.

4.0 PLANT SITE EMISSION LIMITS

4.1 Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	tons per year
SO ₂	39	tons per year
NO _x	39	tons per year
CO	99	tons per year
VOC	39	tons per year

4.2 Annual Period The annual plant site emissions limits apply to any 12-consecutive calendar month period.

5.0 COMPLIANCE DEMONSTRATION

5.1 Visible Emissions and Particulate Matter Emissions The permittee must demonstrate compliance with the visible emissions and particulate matter emission standards contained in Conditions 2.1 and 2.2:

- a. If the source is a new crematory incinerator;

- b. If the source violates the requirements of Conditions 2.1 or 2.2; or
- c. At the LRAPA's request.

**5.2 Compliance
Demonstration
Procedures**

As proof of compliance, the permittee may submit to the LRAPA:

- a. A source test conducted for particulate matter emissions in accordance with LRAPA Title 35, Section 35-0120 through 35-0140; or,
- b. The results of testing performed on a crematory incinerator that LRAPA agrees is comparable to the incinerator in question.

**5.3 Temperature
Monitoring
Requirement**

All crematory incinerators must operate and maintain continuous monitoring for final combustion chamber exit temperature. The monitoring device must be installed and operated in accordance with the manufacturer's instructions, and must be located in an area of the secondary combustion chamber that will allow evaluation of compliance with temperature requirements in Condition 3.2.

5.4 PSEL Compliance Monitoring Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \Sigma(EF \times P)/2000$$

where,

E = pollutant emissions (ton/yr);
EF = pollutant emission factor (see Condition 5.5);
P = process production (number of hours operated or number of batches incinerated for PM/PM₁₀; million cubic feet of natural gas combusted for SO₂, CO, NO_x and VOC)

5.5 Emission Factors The permittee must use the default emission factors provided in the attachment to the review report for calculating pollutant emissions, unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA.

6.0 RECORDKEEPING REQUIREMENTS

6.1 Operation and Maintenance The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:

- a. All records associated with continuous monitoring data including, but not limited to, original data sheets, charts, calculations, calibration data, production records and final reports.
- b. The amount of natural gas combusted in the incinerator(s) on a 12-consecutive calendar month basis.
- c. The number of hours the incinerator(s) are operated **or** the tons of material incinerated **or** the number of batches incinerated on a 12-consecutive calendar month basis, consistent with the emission factor.

6.2 Excess Emissions The permittee must maintain records of excess emissions as

defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.

6.3 Complaints

The permittee must maintain a log of all air quality related complaints received. The log must contain the date and time the complaint was received, a description of the complaint, and a description of the corrective action taken.

6.4 Retention of Records

Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to LRAPA upon request.

7.0 REPORTING REQUIREMENTS

7.1 Excess Emissions

The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 8.3.
- b. If the excess emissions occur during non-business hours, the permittee must notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by LRAPA.

- 7.2 Annual Report** The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year:
- a. Operating parameters (report the parameter(s) used in the emission factor):
 - i. hours of operation; or
 - ii. tons of material incinerated; or
 - iii. number of batches; and
 - iv. cubic feet of natural gas burned.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. List major maintenance performed on pollution control equipment.
- 7.3 Initial Startup Notice** The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.
- 7.4 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 7.5 Construction or Modification Notices** The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA Title 34 Section 34-010 through 34-038 before:
- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
 - b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;

- c. Making any physical change which increases emissions; or
- d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.

7.6 Where to Send Reports and Notices The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the LRAPA as identified in Condition 8.2.

8.0 ADMINISTRATIVE REQUIREMENTS

8.1 Reassignment to the General ACDP A complete application for reassignment to this permit is due within 60 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued. The application must be sent to the appropriate regional office.

- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
- b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application.
- c. If a complete application for reassignment to the General ACDP or Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

8.2 Permit Coordinator Address All reports, notices, and applications should be directed to the Permit Coordinator as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

8.3 Department Contacts Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org. All inquiries about this permit should be directed to the regional office for the area where the source is located. The

LRAPA's office as indicated in Condition 8.2 above.

9.0 FEES

- 9.1 Annual Compliance Fee** The Annual Compliance Determination Fee specified in LRAPA Title 37, Section 37-0090, Part 2(c) for a Class One General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.
- 9.2 Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in LRAPA Title 37, Section 37-0090, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company of a source assigned to this permit.
- 9.3 Where to Submit Fees** Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 10.4 LRAPA Access** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 10.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 10.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 10.9 Termination, Revocation, or Modification** LRAPA may modify or revoke this permit pursuant to 37-0060(3) and (4).

11.0 ABBREVIATIONS, ACRONYMS, DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
bbl	barrel (42 gal)	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31st	O&M	operation and maintenance
CFR	Code of Federal Regulations	Pb	lead
CO	carbon monoxide	PCD	pollution control device
date	mm/dd/yy	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	ppm	part per million
EPA	US Environmental Protection Agency	ppmv	part per million by volume
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
gal	gallon(s)	PSEL	Plant Site Emission Limit
gr/dscf	grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RACT	Reasonably Available Control Technology
ID	identification number	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SERP	Source Emission Reduction Plan
LRAPA	Lane Regional Air Protection Agency	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in LRAPA Title 29
NO _x	nitrogen oxides	VE	visible emissions
NSPS	New Source Performance Standard	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

cac/cd/msf:7/25/01
 AQGP-012, crematories
 Max 3/28/07

Lane Regional Air Protection Agency

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

CREMATORY INCINERATORS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from crematory incinerators.
2. The facilities assigned to this General Permit have no other air pollution sources which require regulation beyond that specified in this permit, or have other pollution sources that also qualify for General Permits. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.

ASSESSMENT OF EMISSIONS

3. Facilities assigned to this General Permit are sources of PM and PM₁₀, SO₂, CO, NO_x, and VOC emissions. Pollutant emissions from these facilities are typically less than 1 ton per year.
4. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of LRAPA Title 12.

SPECIFIC AIR PROGRAM APPLICABILITY

5. Facilities assigned to this General Permit are subject to visible emissions standards, particulate matter standards, and operating requirements in LRAPA Title 32 and 33. The permit contains requirements and limitations to ensure compliance with these standards.

COMPLIANCE ASSURANCE

6. New crematories are required to demonstrate compliance with the emissions limits by conducting a stack source test shortly after beginning operations or providing results of tests performed on a similar type unit.
7. Permittees are required to maintain records associated with continuous secondary combustion chamber temperature monitoring data, operating parameters, excess emissions, and complaints received at the facility. These records must be maintained for a period of two years.
8. LRAPA staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

REVOCAATION OF ASSIGNMENT

9. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

10. General Air Contaminant Discharge Permits are incorporated LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. LRAPA will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the Environmental Quality Commission.

AQGP-012r, crematories

7/25/01

Max 4/6/07

Crematory Emission Factors

Emissions device or activity	Pollutant	Emission Factor (EF)	Emission factor units
Crematory	PM/ PM ₁₀	source test result	lbs/hr, lbs/ton of material, or lbs/batch
	SO ₂	1.7	lb/million cubic feet of natural gas combusted
	NO _x	100	lb/million cubic feet of natural gas combusted
	CO	84	lb/million cubic feet of natural gas combusted
	VOC	5.5	lb/million cubic feet of natural gas combusted