

**BASIC
AIR CONTAMINANT DISCHARGE PERMIT**

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

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Sunset Hills Inc.
4810 Willamette Street
Eugene, Oregon 97405

INFORMATION RELIED UPON:

Application No.: 65399
Date Received: 09/24/19

PLANT SITE LOCATION:

4810 Willamette Street
Eugene, Oregon 97405

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: 09/04/08

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

OCT 28 2019

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 4	Crematory incinerators with less than 20 tons per year material input.	7261

1.0 STATEMENT OF PURPOSE

- 1.1 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air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

2.0 EMISSION STANDARDS AND LIMITS

- 2.1 Production limits** The permittee is prohibited from cremating 20 or more tons of material per year without first applying for and being assigned to General Air Contaminant Discharge Permit AQGP-012.
- 2.2 Visible emission limits** No visible emissions may be present except for a period aggregating no more than three (3) minutes in any 60-minute period, as measured by EPA Method 9. At no time shall visible emissions exceed an opacity of 10%.
- 2.3 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.
- 2.4 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 30-010 may be incinerated unless approved in advance by LRAPA.
- 2.5 Temperature Requirements** The permittee must comply with the following standards:
- a. For incinerators installed or modified on or after March 13, 1993, the exit temperature at the final chamber (afterburner) must be at or above 1800°F during the entire cremation, with a residence time of at least 0.5 seconds.
 - b. The temperature within the final chamber (afterburner) must be at or above 1400°F prior to igniting the primary burner.
- 2.6 Operator Training** The crematory unit(s) must be operated at all times under the direction of individuals who have received training necessary for proper operation. The following must be available on-site at all times for 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 review within 60 days after the permit is initially issued.

- b. A written statement signed by each operator stating that the operator has undergone and understood the training program.

- 2.7 Fugitive Emissions** The permittee must take reasonable precautions for preventing fugitive dust emissions.
- 2.8 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.
- 2.9 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.
- 2.10 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the LRAPA.

3.0 COMPLIANCE DEMONSTRATION AND MONITORING

- 3.1 Visible Emissions and Particulate Matter Emissions** The permittee must demonstrate compliance with the visible emissions and particulate matter emission standards contained in Conditions 2.2 and 2.3:
 - a. If the source is a new crematory incinerator;
 - b. If the source exceeds the visible emission or particulate matter emission limits in Conditions 2.2 or 2.3; or
 - c. At LRAPA's request.
- 3.2 Compliance Demonstration Procedures** As proof of compliance, the permittee must either submit to LRAPA:
 - a. A source test conducted in accordance with the Oregon Department of Air Quality (DEQ) Source Sampling Manual; or,
 - b. The results of testing performed on a crematory incinerator that LRAPA agrees is comparable to the permittee's crematory incinerator(s).
- 3.3 Temperature Monitoring Requirement** The permittee must record and maintain continuous monitoring data for all crematory incinerators at the facility. The monitoring device must be installed and operated in accordance with the manufacturer's instructions and must be located in an area of the final chamber (afterburner) that

will allow evaluation of compliance with temperature requirements in Condition 2.5. The continuous monitoring data shall reference the case number and actual date and time of cremation, or actual date and time of cremation outset shall be recorded separately with case number referenced on the temperature record.

4.0 RECORDKEEPING AND REPORTING REQUIREMENTS

- 4.1 Records** The permittee must maintain records on site for a period of five (5) years and made available to LRAPA upon request:
- a. All records associated with continuous temperature monitoring data, including, but not limited to, original data sheets, charts, calculations, calibration data, production records and final reports.
 - b. Temperature records of afterburner exit temperature.
 - c. The tons of material incinerated each calendar month.
- 4.2 Reports** The permittee is required to report to LRAPA by **February 15th** of each year the amount of material cremated during the previous calendar year.
- 4.3 Permit Renewal** An application to renew the permit is due 30 days prior to expiration date.
- 4.4 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased.
- 4.5 Notice of Change of Ownership or Company Name** The permittee must promptly notify LRAPA of any change of mailing address, company name, or plant ownership. The permit will expire 60 days after a change in the legal entity owning/operating the facility unless application, with appropriate fees, is made to transfer the permit to the new entity.
- 4.6 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.

5.0 FEES

5.1 Fees The Annual Fee specified in LRAPA Section 37-8020, Table 2, Part 2 for a Basic 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 to the permittee prior to the above date.

5.2 Where to Submit Fees Fees must be submitted to:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

6.0 GENERAL CONDITIONS

6.1 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.

6.2 Outdoor Burning The permittee may not conduct any outdoor burning except as allowed by LRAPA Title 47.

6.3 Asbestos The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to demolition, renovation, repair, construction, and maintenance.

6.4 Permit Availability The permittee must have a copy of the permit available at all times.

6.5 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.

6.6 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.

- 6.7 Permit Revocation** LRAPA may modify or revoke this permit pursuant to LRAPA 37-0056 and 37-0082.
- 6.8 LRAPA Contact** Call the LRAPA office at (541) 736-1056.

Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Sunset Hills Incorporated
 4810 Willamette Street
 Eugene, Oregon 97405
 (541) 342-6853

Reports			NSPS	Public Notice
Annual	Semi-annual	Excess Emissions		
Feb 15 th	NA	NA	NA	1

1. The proposed permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on November 20, 2008 and was originally scheduled to expire on November 19, 2019.
2. The facility operates a crematory incinerator. The facility was built in 1999 and purchased by Sunset Hills Inc. in 2008. A description of the processes, equipment, and activities is available in the LRAPA files.
3. This facility qualifies for a Basic ACDP because the material cremated will be less than 20 tons per year.
4. The facility is located in an attainment area for PM, PM_{2.5}, SO₂, NO_x, VOC and Lead, a maintenance area for PM₁₀ and CO.
5. LRAPA has determined that facilities that qualify for a Basic ACDP will not have significant emissions. In most cases the emissions will not exceed 5 tons of PM, PM₁₀, and PM_{2.5} or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. Pursuant to LRAPA Section 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Section 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.