



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 8, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Faithful Friends Pet Cremation Services, Inc / 039-18872-00601

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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June 8, 2004

Mr. Beryl A. Billings
Faithful Friends Pet Cremation Services, Inc.
225 Kenyon Avenue
Elkhart, Indiana 46516

Re: Exempt Construction and Operation Status,
039-18872-00601

Dear Mr. Billings:

The application from the Faithful Friends Pet Cremation Services, Inc., received on April 22, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission unit, to be located at 1606 Navajo Street, Elkhart, Indiana, is classified as exempt from air pollution permit requirements:

One (1) crematory incinerator for animals, identified as N001, constructed in 2004, using natural gas as fuel, with a maximum capacity of 75 pounds of dead animals per hour and a maximum heat input rate of 2.25 MMBtu/hr, and exhausting through stack ISI-27.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 4-2 (Incinerator Requirements), the incinerator at this source shall comply with the following:
 - (a) Consist of primary and secondary chambers or the equivalent;
 - (b) Be equipped with a primary burner unless burning wood products;
 - (c) Comply with 326 IAC 5-1 and 326 IAC 2;
 - (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and

- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/YC

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance – Paul Karkiewicz
Northern Regional Office
Permit Tracking – Sara Cloe
Compliance Data Section

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Faithful Friends Pet Cremation Services, Inc.
Source Location: 1606 Navajo Street, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 7261
Exemption No.: 039-18872-00601
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from the Faithful Friends Pet Cremation Services, Inc. relating to the construction and operation of a pet crematory.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units and pollution control devices at this source.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Exempted Emission Units and Pollution Control Equipment

The application includes information relating to the operation of the following equipment:

One (1) crematory incinerator for animals, identified as N001, constructed in 2004, using natural gas as fuel, with a maximum capacity of 75 pounds of dead animals per hour and a maximum heat input rate of 2.25 MMBtu/hr, and exhausting through stack ISI-27.

Existing Approvals

This exemption is the first air approval issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
ISI-27	Incinerator	27	1.4	2,565	1,600

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on April 22, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 and 2).

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0.51
PM-10	0.51
SO ₂	0.42
VOC	0.54
CO	0.99
NO _x	1.48

HAPs	Potential to Emit (tons/yr)
Total	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) all criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (d) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants is less than the levels listed in 326 IAC 2-5.5-1(b). Therefore, the source is not subject to the provisions of 326 IAC 2-5.5-1.
- (e) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants is less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (f) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and 326 IAC 2-3, since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate

matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Effective June 15, 2004, Elkhart County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset. (40 CFR 51, Appendix S).
- (b) Elhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD and Emission Offset Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.51
PM-10	0.51
SO ₂	0.42
VOC	0.54
CO	0.99
NO _x	1.48
Single HAP	Negligible
Combination HAPs	Negligible

- (a) This new source is not an Emission Offset major source because no regulated nonattainment pollutant is emitted at a rate of 100 tons/yr or greater.
- (b) This new source is not a PSD major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The charging rate of the incinerator at this source is less than fifty (50) tons per day. Therefore, the requirements of the New Source Performance Standards for Incinerators (40 CFR Part 60.50 - 60.54, Subpart E) do not apply to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 20, and 40 CFR Parts 61 and 63) applicable to this source.
- (d) The incinerator at this source does not combust any hazardous waste as defined in 40 CFR 261. Therefore, the National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Combustors (326 IAC 20-28, 40 CFR 63.1200 - 63.1213, Subpart EEE) do not apply to this source.
- (e) This source is located in Elkhart County, which has been redesignated as a nonattainment area for Ozone in June, 2004. The potential VOC and NOx emissions from this source are less than 100 tons/yr. Therefore, this source is an Emission Offset minor source and the requirements of 40 CFR 51, Appendix S (Emission Offset) are not applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This new source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1). The potential to emit of each criteria pollutant and PM before control is less than 250 tons per year. Therefore, this source is not major under 326 IAC 2-2 (PSD).

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from this new source is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is not required to operate under a Part 70 permit. Therefore, the requirements of 326 IAC 2-6 are not applicable to this source.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability – Incinerator N001

326 IAC 4-2 (Incinerator Requirements)

Pursuant to 326 IAC 4-2, the incinerator at this source shall comply with the following:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(2), incinerators are exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The construction and operation of this pet crematory shall be subject to the conditions of the Exemption No.: 039-18872-00601.

Appendix A: Emission Calculations
Emissions
From the Waste Combustion in the Incinerator

Company Name: Faithful Friends Pet Cremation Services, Inc.
Address: 1606 Navajo St., Elkhart, IN 46516
Exemption: 039-18872-00601
Reviewer: ERG/YC
Date: May 8, 2004

Max. Input Capacity
 lbs/hr

75.0

	Pollutant					
Emission Factor	*PM 0.1 (lbs/hr)	*PM10 0.1 (lbs/hr)	**SO ₂ 2.5 (lbs/ton)	**NO _x 3.0 (lbs/ton)	**VOC 3.0 (lbs/ton)	**CO 1.0 (lbs/ton)
Potential to Emit in tons/yr	0.44	0.44	0.41	0.49	0.49	0.16

*PM/PM10 emission factors are from the test results for the same model provided by the manufacturer.

** Emission factors for SO₂, NO_x, VOC, and CO are from AP-42, Table 2.1-12, Uncontrolled EF for Industrial/commercial refuse combustors, multiple chambers (AP-42, 10/96).

Methodology

PTE of PM/PM10 (tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of SO₂, NO_x, VOC, and CO (tons/yr) = Max. Input Capacity (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From 2.25 MMBtu/hr Incinerator**

**Company Name: Faithful Friends Pet Cremation Services, Inc.
Address: 1606 Navajo St., Elkhart, IN 46516
Exemption: 039-18872-00601
Reviewer: ERG/YC
Date: May 8, 2004**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.25

19.7

	Pollutant					
Emission Factor in lbs/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.07	0.07	5.9E-03	0.99	0.05	0.83

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100 lbs/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs