

TO: Interested Parties / Applicant

RE: Indiana Memorial & Cremation Services, Inc. / 097-22649-00528

FROM: Felicia A. Robinson
Manager of Environmental Planning

Notice of Decision: Approval - Registration

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 IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

May 4, 2006



Wanda L. Lamon
Indiana Memorial & Cremation Services, Inc.
6785 Woodcliff Circle
Zionsville, IN 46077

Certified Mail Number: 7000 0600 0023 5186 5737

Re: Registered Construction and Operation Status,
097-22649-00528

Dear Ms. Lamon:

The application from Indiana Memorial & Cremation Services, Inc., received on February 6, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following human and pet crematory, located at 3562 West 10th Street, Indianapolis, Indiana, is classified as registered:

- (a) One (1) Human Crematory with afterburner, with a maximum capacity of 150 pounds per hour, identified as BL 01, using no controls.
- (b) One (1) Pet Crematory with afterburner, with a maximum capacity of 300 pounds per hour, identified as BL 02, using no controls.

The following conditions shall be applicable:

- (a) 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:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.
- (b) Pursuant to 326 IAC 4-2-2, the human crematory (emission unit BL 01) and pet crematory (emission unit BL 02) each shall:
 - (1) Consist of primary and secondary chambers or the equivalent.
 - (2) Be equipped with a primary burner.
 - (3) Comply with 326 IAC 5-1 and 326 IAC 2.
 - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Administrator.



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186

indygov.org/dpw

- (5) Emission unit BL 01 shall 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 because the maximum solid waste capacity is less than two hundred (200) pounds per hour.

Emission unit BL 02 shall not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air because the maximum solid waste capacity is greater than or equal to two (200) pounds per hour.
 - (6) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerators until adjustments are made that address the underlying cause of the deviation.
 - (7) The incinerators are exempt from requirement (5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (c) Pursuant to Chapter 511 "Air Pollution Control Ordinance", Section 511-503, the source shall comply with the following conditions:
- (1) An operator must be in attendance at all times while the crematory is in operation.
 - (2) The operator must keep a log (in a form approved by the Administrator) of the number and species of bodies cremated in each unit, chamber temperature at the beginning of each cremation for each unit, and the dates and times of the cremation for each unit.
 - (3) Required records must be kept on-site for three (3) years and available for inspection by the City of Indianapolis Office of Environmental Services (OES).
 - (4) An afterburner must be used at all times when the unit is in operation. The afterburner must be operating at a minimum temperature of 1600° F while the crematory is in operation.
 - (5) Opacity shall not exceed ten percent (10%) for any six-minute period as measured according to 40 CFR 60, Appendix A, Method 9.
 - (6) Aside from the human or animal remains, no additional material other than cardboard or pine may be added to the crematory for incineration.
 - (7) No cremation may occur between sunset and sunrise unless the unit has a Certified Opacity Monitor (COM) operating at all times during night burning.

This condition (c) is a "local only" condition. It is not enforceable under state or federal law by IDEM or U.S.EPA. Pursuant to Chapter 511 "Air Pollution Control Ordinance", Sections 511-503 and 511-504 of the Revised Code of the Consolidated City of Indianapolis and Marion County, Indiana, this condition is enforceable by the City of Indianapolis through its Department of Public Works, Office of Environmental Services.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental

Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

Office of Environmental Service
Compliance Data Group
City of Indianapolis
2700 S. Belmont Avenue
Indianapolis, IN 46221

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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

Sincerely,

ORIGINAL SIGNED BY:

Felicia A. Robinson
Manager of Environmental Planning
Office of Environmental Services

FAR/an

cc: File
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
Marion County Health Department
US EPA Region V

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

Company Name:	Indiana Memorial & Cremation Services
Address:	3562 West 10 th Street
City:	Indianapolis
Authorized individual:	Wanda L. Lamon
Phone #:	(317) 733-8667
Registration #:	097-22649-00528

I hereby certify that Indiana Memorial & Cremation Services, Inc. is still in operation and is in compliance with the requirements of Registration 097-22649-00528.

Name (typed):
Title:
Signature:
Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Indiana Memorial & Cremation Services, Inc.
Source Location:	3562 West 10th Street, Indianapolis, IN 46222
County:	Marion
SIC Code:	7261
Operation Permit No.:	097-22649-00528
Permit Reviewer:	Anh-tuan Nguyen

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Indiana Memorial & Cremation Services, Inc. relating to the construction and operation of a funeral service and crematory.

New Emission Units and Pollution Control Equipment

The source consists of the following new emission unit, which will be constructed in April 2006.

- (a) One (1) Pet Crematory with afterburner, with a maximum capacity of 300 pounds per hour, identified as BL 02, using no controls.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Human Crematory with afterburner, with a maximum capacity of 150 pounds per hour, identified as BL 01, using no controls.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Exemption 097-19055-00528, issued on May 17, 2004.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

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 February 6, 2006.

Emission Calculations

See Appendix A (page 1) of this document for detailed emission calculations.

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	6.9
PM-10	6.9
SO ₂	2.5
VOC	3.0
CO	9.9
NO _x	3.0

HAPs	Potential to Emit (tons/yr)
Total	Negligible

- (a) The potential to emit of particulate matter (PM) and PM-10 is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) The potential to emit of any single HAP is less than ten (10) tons per year and/or the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. A registration will be issued.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 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

Existing Source PSD, Emission Offset, Part 70, or FESOP 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	6.9
PM-10	6.9
SO ₂	2.5
VOC	3.0
CO	9.9
NO _x	3.0
Single HAP	Negligible
Combination HAPs	Negligible

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the application submitted by the company and the exemption issued on May 14, 2004.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 097-22649-00528, is still 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 status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this registration. The crematory has a charge rate of less than fifty (50) tons per day. Therefore, it is not subject to the requirements of 40 CFR Part 60 Subpart E.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this registration. The crematory does not combust hazardous waste as defined in 40 CFR 261. Therefore, it is not subject to the requirements of 40 CFR 63 Subpart EEE.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

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

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, and construction occurred before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as a Registration source, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

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 thirty percent (30%) 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 – Individual Facilities

326 IAC 4-2-2 (Incinerators: requirements)

Pursuant to 326 IAC 4-2-2, the human crematory (emission unit BL 01) and pet crematory (emission unit BL 02) shall:

- (1) Consist of primary and secondary chambers or the equivalent.
- (2) Be equipped with a primary burner.
- (3) Comply with 326 IAC 5-1 and 326 IAC 2.
- (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Administrator.
- (5) Emission unit BL 01 shall 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 because the maximum solid waste capacity is less than two hundred (200) pounds per hour.

Emission unit BL 02 shall not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air because the maximum solid waste capacity is greater than or equal to two (200) pounds per hour.
- (6) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerators until adjustments are made that address the underlying cause of the deviation.
- (7) The incinerators are exempt from requirement (5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

326 IAC 6 (Particulate Rules)

The Permittee does not have the potential to emit more than one hundred (100) tons per year of particulate matter. Therefore, 326 IAC 6-1 does not apply. The cremation units are not considered sources of indirect heating. Therefore, 326 IAC 6-2 does not apply. Pursuant to 326 IAC 6-3-1(b)(2), incineration is exempt. Therefore, 326 IAC 6-3 does not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The Permittee has no individual facility with the potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 11-8

The cremation units are not considered Commercial and Industrial Incineration Units. Therefore, 326 IAC 11-8 does not apply.

Local Rule Applicability – Individual Facilities

Pursuant to Chapter 511 "Air Pollution Control Ordinance", Section 511-503, the source shall comply with the following conditions:

- (1) An operator must be in attendance at all times while the crematory is in operation.
- (2) The operator must keep a log (in a form approved by the Administrator) of the number and species of bodies cremated in each unit, chamber temperature at the beginning of each cremation for each unit, and the dates and times of the cremation for each unit.
- (3) Required records must be kept on-site for three (3) years and available for inspection by the City of Indianapolis Office of Environmental Services (OES).
- (4) An afterburner must be used at all times when the unit is in operation. The afterburner must be operating at a minimum temperature of 1600° F while the crematory is in operation.
- (5) Opacity shall not exceed ten percent (10%) for any six-minute period as measured according to 40 CFR 60, Appendix A, Method 9.
- (6) Aside from the human or animal remains, no additional material other than cardboard or pine may be added to the crematory for incineration.
- (7) No cremation may occur between sunset and sunrise unless the unit has a Certified Opacity Monitor (COM) operating at all times during night burning.

This condition is a "local only" condition. It is not enforceable under state or federal law by IDEM or U.S.EPA. Pursuant to Chapter 511 "Air Pollution Control Ordinance", Sections 511-503 and 511-504 of the Revised Code of the Consolidated City of Indianapolis and Marion County, Indiana, this condition is enforceable by the City of Indianapolis through its Department of Public Works, Office of Environmental Services.

Conclusion

The construction and operation of this funeral service and crematories shall be subject to the conditions of the Registration 097-22649-00528.

Appendix A: Emission Calculations
Incinerator

Company Name: Indiana Memorial & Cremation Services, Inc.
Address City IN Zip: 3562 West 10th Street, Indianapolis, Indiana 46222
Registration: 097-22649-00528
Reviewer: Anh-tuan Nguyen
Date: 3/7/06

Emission Unit	Throughput lbs/hr	Throughput ton/yr
BL 01	150	1971
BL 02	300	
Total	450	

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
7.0	2.5	10.0	3.0	3.0	
Potential Emissions in ton/yr	6.9	2.5	9.9	3.0	3.0

Methodology

There is no emission factor for PM-10 listed in AP-42, therefore it is assumed that PM = PM-10.

Emission factors are from AP 42 Table 2.1-12 Uncontrolled emission factors for industrial/commercial refuse combustors, other than municipal waste, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Emission Factor (lb/ton) * throughput(ton/yr)* 1 ton / 2000 lbs = Potential Emissions (tons/ yr)