City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

TO: Interested Parties / Applicant

RE: G. H. Herrmann Funeral Homes / E097-25105-00623

FROM: Felicia A. Robinson
Administrator
City of Indianapolis
Office of Environmental Services

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

Enclosures

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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

City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

August 21, 2007

Jeff Herrmann
G. H. Herrmann Funeral Homes
1505 South East Street
Indianapolis, Indiana 46225

Certified Mail: 7000 0600 0023 5187 1813

Re: Exempt Construction and Operation Status, E097-25105-00623

Dear Mr. Herrmann:

The application from G. H. Herrmann Funeral Homes, received on August 6, 2007, 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 stationary crematory incinerator for human remains, located at 1505 South East Street, Indianapolis, Indiana 46225, is classified as exempt from air pollution permit requirements:

(a) One (1) B & L Systems Model N-20AA human crematory, with afterburner, identified as EU 001, which was constructed in 2007, with a maximum operating capacity of 150 pounds per hour (lbs/hr), using natural gas as a supplemental fuel at maximum heat input capacity of 1.5 million Btu per hour (MMBtu/hr).

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, unless otherwise stated:

(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 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.

(b) Pursuant to 326 IAC 4-2-2, the human crematory identified as EU 001 shall:

(1) Consist of primary and secondary chambers or the equivalent;

(2) Be equipped with a primary burner unless burning only wood products;

(3) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules);

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's

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specifications or an operation and maintenance plan approved by the Administrator;

(5) Emission unit EU 001 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;

(6) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation; and

(7) The incinerator is 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 326 IAC 6-4 (Fugitive Dust Emissions), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

(d) 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 of bodies cremated in the crematory, chamber temperature at the beginning of each cremation for the emission unit, and the dates and times of the cremation for the emission 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 1600º 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 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 (d) 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 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 Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and City of Indianapolis, Office of Environmental Services (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
Administrator
Office of Environmental Services

FAR/mmd

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

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	G. H. Herrmann Funeral Homes
Source Location:	1505 South East Street, Indianapolis, Indiana 46225
Mailing Address:	1505 South East Street, Indianapolis, Indiana 46225
County:	Marion
SIC Code:	7261
Operation Permit No.:	E097-25105-00623
Permit Reviewer:	Monica Doyle

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from G. H. Herrmann Funeral Homes relating to the construction and operation of a human crematory.

Exempt Emission Units and Pollution Control Equipment

The source consists of the following exempt emission unit:

(a) One (1) B & L Systems Model N-20AA human crematory, with afterburner, identified as EU 001, which was constructed in 2007, with a maximum operating capacity of 150 pounds per hour (lbs/hr), using natural gas as a supplemental fuel at maximum heat input capacity of 1.5 million Btu per hour (MMBtu/hr).

Existing Approvals

The source has not been operating under any previous or existing approvals.

Enforcement Issue

IDEM, OAQ, and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. However, the air emissions from the source have been evaluated and no air permit is needed. Therefore, no enforcement action is necessary.

Recommendation

The staff recommends to the Administrator that the application be approved as an Exemption. 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 August 6, 2007.

Emission Calculations

See Appendix A (pages 1 and 2) 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, inclulding 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	2.3
PM-10	2.3
SO_2	0.8
VOC	1.0
CO	3.9
NO_x	1.7

HAPs	Potential to Emit (tons/yr)
Single HAP	Negligible
Combination HAPs	Negligible

(a) The PTE (as defined in 326 IAC 2-7-1(29)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE 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. An exemption 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	nonattainment
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
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 non-attainment 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 non-attainment for PM-2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM-2.5 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 PM-10, SO_2, NO_2, 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.

(e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision revoking the one-hour ozone standard in Indiana

Source Status

New Source PSD 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	2.3
PM-10	2.3
SO_2	0.8
VOC	1.0
CO	3.9
NO_x	1.7
Single HAP	Negligible
Combination HAPs	Negligible

(a) This new source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no non-attainment 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. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

(b) These emissions were based on the application submitted by the company on August 6, 2007.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This previously unpermitted existing source, including the emissions from this exemption E097-25105-00623, 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 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) included in this exemption.

(b) This crematory is not subject to the requirements of NSPS 40 CFR Part 60 Subpart E because the crematory has a charge rate of less than fifty (50) tons per day.

(c) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60, Subpart Ec (60.50c through 60.58c)), Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced after January 20, 1996, does not apply because the crematory incinerator is considered a pathological waste combustor and is not considered a municipal waste combustor or hospital/medical/infectious waste incinerator.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this exemption.

(e) This crematory is not subject to the requirements of 40 CFR 63 Subpart EEE because the crematory does not combust hazardous waste as defined in 40 CFR 261.

State Rule Applicability – Entire Source

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

This source is not major under non-attainment NSR because it has the potential to emit less than 100 tons of PM-10 (as a surrogate for PM-2.5). 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 2-3 (Emission Offset)

This source is not major because no nonattainment regulated pollutant emissions are equal to or greater than 100 tons per year. Therefore, the Emission Offset requirements do not apply.

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 after 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 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:

(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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source does not have the potential to emit twenty-five (25) tons per year of fugitive particulate matter, and is exempt from air pollution permit requirements. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 4-2-2 (Incinerators: requirements)
Pursuant to 326 IAC 4-2-2, the human crematory identified as EU 001 shall:

(1) Consist of primary and secondary chambers or the equivalent;

(2) Be equipped with a primary burner unless burning only wood products;

(3) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules);

(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 EU 001 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;

(6) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation; and

(7) The incinerator is 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, or actual emissions greater than ten (10) tons per year. Therefore, 326 IAC 6.5 does not apply. The cremation unit is not considered a source 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 9-1 (Carbon Monoxide Emission Limits)
This stationary source, constructed after the applicability date of March 21, 1972, is not subject to the requirements of 326 IAC 9-1-2(a)(3), since the crematory incinerator (EU 001) burns pathological waste and does not burn refuse consisting of more than 50 percent municipal type waste (household, commercial/retail, and/or institutional waste).

326 IAC 11-6 (Hospital/Medical/Infectious Waste Incinerators)
The cremation unit is not subject to the requirements of 326 IAC 11-6, since it is considered a pathological waste combustor and not a hospital/medical/infectious waste combustor.

326 IAC 11-8 (Commercial and Industrial Solid Waste Incineration Units)
The cremation unit is not considered a Commercial and Industrial Incineration Unit. 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 of bodies cremated in the crematory, chamber temperature at the beginning of each cremation for the emission unit, and the dates and times of the cremation for the emission 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 1600º 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 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.

These conditions (1-7) are "local only" conditions. They are 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, these conditions are enforceable by the City of Indianapolis through its Department of Public Works, Office of Environmental Services.

Conclusion

The construction and operation of this human crematory shall be subject to the conditions of the attached exemption, E097-25105-00623.

Appendix A: Emission Calculations
Incinerator

Company Name: G. H. Herrmann Funeral Homes
Address City IN Zip: 1505 South East Street, Indianapolis, Indiana, 46225
Exemption: E097-25105-00623
Reviewer: Monica Doyle
Date: August 9, 2007

Throughput lbs/hr	Throughput ton/yr
150	657

	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	2.3	0.8	3.3	1.0	1.0

Methodology

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: G. H. Herrmann Funeral Homes
Address City IN Zip: 1505 South East Street, Indianapolis, Indiana, 46225
Exemption: E097-25105-00623
Reviewer: Monica Doyle
Date: August 9, 2007

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Human Cremator	1.5	13.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.7	0.0	0.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton