INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: March 11, 2009

RE: WMS Development, LLC / 019-27487-00112

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

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, Suite N 501E, 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 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
FN-REGIS.dot 1/2/08

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REGISTRATION
OFFICE OF AIR QUALITY

WMS Development, LLC
2515 Veterans Parkway
Jeffersonville, IN 47130

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 019-27487-00112	
Issued by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 11, 2009

SECTION A SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary human and animal crematory incinerators source.

Source Address:	2515 Veterans Parkway, Jeffersonville, IN 47130
Mailing Address:	2515 Veterans Parkway, Jeffersonville, IN 47130
General Source Phone Number:	(812) 283-8161
SIC Code:	7261
County Location:	Clark County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) crematory incinerator for human remains, identified as BLN-20-01, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-01.

(b) One (1) crematory incinerator for animal remains, identified as BLP-02, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-02.

(c) One (1) crematory incinerator for animal remains, identified as BLI-03, approved for construction in 2009, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.8 MMBtu per hour, and exhausting through one (1) stack identified as ST-03.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this registration.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.

(d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to Registration No. 019-27487-00112 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), 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.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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, unless otherwise stated in this registration:

(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.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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 (Fugitive Dust Emissions).

SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

(a) One (1) crematory incinerator for human remains, identified as BLN-20-01, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-01.

(b) One (1) crematory incinerator for animal remains, identified as BLP-02, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-02.

(c) One (1) crematory incinerator for animal remains, identified as BLI-03, approved for construction in 2009, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.8 MMBtu per hour, and exhausting through one (1) stack identified as ST-03.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Burning Regulations Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the three (3) crematory incinerators, identified as BLN-20-01, BLP-02, and BLI-03, shall comply with the following:

(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;

(5) Not emit particulate matter in excess of 0.5 pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to 50% excess air for incinerators with solid waste capacity less than 200 pounds per hour;

(6) If any of the requirements of (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.

(7) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

REGISTRATION
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	WMS Development, LLC
Address:	2515 Veterans Parkway
City:	Jeffersonville, Indiana 47130
Phone Number:	(812) 283-8161
Registration No.:	019-27487-00112

I hereby certify that WMS Development, LLC is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that WMS Development, LLC is :
- ☐ in compliance with the requirements of Registration No. 019-27487-00112.
- ☐ not in compliance with the requirements of Registration No. 019-27487-00112.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption Transitioning to a Registration

Source Description and Location

Source Name:	**WMS Development, LLC**
Source Location:	**2515 Veterans Parkway, Jeffersonville, IN 47130**
County:	**Clark County**
SIC Code:	**7261**
Registration No.:	**019-27487-00112**
Permit Reviewer:	**Jeff Scull**

On February 13, 2009, the Office of Air Quality (OAQ) received an application from WMS Development, LLC related to the construction and operation of new emission units at an existing crematory and transition from an Exemption to a Registration.

Existing Approvals

The source has been operating under Exemption No. 019-17328-00112, issued on June 25, 2003.

Due to this application, the source is transitioning from an Exemption to a Registration.

County Attainment Status

The source is located in Clark County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

(a) Ozone Standards

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 ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Clark County has been classified as attainment or unclassifiable in Indiana for all regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by WMS Development, LLC on February 13, 2009, relating to the construction and operation of a new crematory incinerator for animal remains at an existing stationary human and animal crematory. Because of the additional emission unit the source will transition from an Exemption to a Registration. The source will now be a Registration because the PM10 emissions are in the greater than five tons per year (> 5 tpy) and less than twenty-five tons per year (< 25 tpy) range.

The source consists of the following existing emission unit(s):

(a) One (1) crematory incinerator for human remains, identified as BLN-20-01, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-01.

(b) One (1) crematory incinerator for animal remains, identified as BLP-02, constructed in 2003, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.5 MMBtu per hour, and exhausting through one (1) stack identified as ST-02.

The following is a list of the new emission unit:

(c) One (1) crematory incinerator for animal remains, identified as BLI-03, approved for construction in 2009, with a maximum capacity of 150 pounds per hour, using natural gas as fuel, at a rate of 1.8 MMBtu per hour, and exhausting through one (1) stack identified as ST-03.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination –Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally

enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
crematory BLN-20-01	2.30	2.30	2.30	0.82	0.99	0.99	3.29	N/A	N/A
crematory BLP-02	2.30	2.30	2.30	0.82	0.99	0.99	3.29	N/A	N/A
crematory BLI-03	2.30	2.30	2.30	0.82	0.99	0.99	3.29	N/A	N/A
natural gas combustion for BLN-20-01	0.012	0.050	0.050	0.004	0.657	0.036	0.552	0.012	Hexane 0.012
natural gas combustion for BLP-02	0.012	0.050	0.050	0.004	0.657	0.036	0.552	0.012	Hexane 0.012
natural gas combustion for BLI-03	0.015	0.060	0.060	0.005	0.788	0.043	0.662	0.015	Hexane 0.014
Total PTE of Entire Source	**6.94**	**7.06**	**7.06**	**2.48**	**5.06**	**3.07**	**11.62**	**0.040**	**0.038**
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

(b) The potential to emit (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, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in the permit, since the crematory has a charge rate less than 50 tons per day and does not burn refuse consisting of more than 50 percent municipal type waste (household, commercial/retail, and/or institutional).

(b) The requirements of the New Source Performance Standard for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996, 40 CFR 60, Subpart Ec (326 IAC 12), are not included in the permit, since the crematory is not a

hospital/medical/infectious waste incinerator as defined by the rule.

(c) There are no New Source Performance Standards (NSPS) 326 IAAC 12 and (40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(d) 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 this permit:

(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.

(e) 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.

(f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

(g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Crematory

(h) 326 IAC 4-2 (Incinerators)
Pursuant to 326 IAC 4-2-2, the three (3) crematory incinerators, identified as BLN-20-01, BLP-02, and BLI-03, shall comply with the following:

(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;

(5) Not emit particulate matter in excess of 0.5 pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to 50% excess air for incinerators with solid waste capacity less than 200 pounds per hour;

(6) If any of the requirements of (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.

(7) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

(i) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The crematory is not considered a source of indirect heating. Therefore, the crematory is not subject to the provisions of 326 IAC 6-2.

(j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The crematory is an incinerator. Pursuant to 326 IAC 6-3-1(b)(2), incinerators are exempt from the provisions of 326 IAC 6-3. Therefore, the crematory is not subject to the provisions of 326 IAC 6-3.

(k) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The potential to emit sulfur dioxide from the crematory is less then 25 tons per year. Therefore, the crematory is not subject to the provisions of 326 IAC 7-1.1.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 13, 2009.

The construction of the new emission unit and operation of this source shall be subject to the conditions of

the attached proposed Registration No. 019-27487-00112. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jeff Scull at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
Uncontrolled Potential to Emit Summary

Company Name: WMS Development, LLC
Address City IN Zip: 2515 Veterans Parkway, Jeffersonville, IN 47130
Permit Number: 019-27487-00134
Plt ID: 019-00134
Reviewer: Jeff Scull
Date: 2/26/2009

	Uncontrolled Potential to Emit (tons/year)			
	Emissions Generating Activity			
Category	Pollutant	Incineration	Natural Gas Combustion	**TOTAL**
Criteria Pollutants	PM	6.90	0.04	6.94
	PM10/PM2.5	6.90	0.16	7.06
	SO2	2.46	0.01	2.48
	NOx	2.96	2.10	5.06
	VOC	2.96	0.12	3.07
	CO	9.86	1.77	11.62
Hazardous Air Pollutants	Chromium		2.9E-05	2.9E-05
	Manganese		8.0E-06	8.0E-06
	Nickel		4.4E-05	4.4E-05
	n-Hexane		0.038	0.038
	Toluene		7.1E-05	7.1E-05
	Benzene		4.4E-05	4.4E-05
	Dichlorobenzene		2.5E-05	2.5E-05
	Formaldehyde		1.6E-03	1.6E-03
	Lead		1.1E-05	1.1E-05
	Cadmium		2.3E-05	2.3E-05
	Totals	**0**	**0.04**	**0.040**
			Worse Case HAP	**0.038**

Uncontrolled total potential to emit are based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Multiple Chamber Industrial Incinerators (Process Emissions)

Company Name: WMS Development, LLC
Address City IN Zip: 2515 Veterans Parkway, Jeffersonville, IN 47130
Permit Number: 019-27487-00134
Plt ID: 019-00134
Reviewer: Jeff Scull
Date: 2/26/2009

		Pollutant	PM*	PM10*/2.5	SO2	NOx**	VOC	CO
		Emission Factor (lb/ton)	7.0	7.0	2.5	3.0	3.0	10.0
Emission Unit	Potential Throughput (lbs/hr)	Potential Throughput (tons/yr)	Uncontrolled Potential to Emit (tons/yr)					
			PM*	PM10*/2.5	SO2	NOx**	VOC	CO
crematory incinerator for human remains, identified as BLN-20-01	150	657.0	2.30	2.30	0.82	0.99	0.99	3.29
crematory incinerator for animal remains, identified as BLP-02	150	657.0	2.30	2.30	0.82	0.99	0.99	3.29
crematory incinerator for animal remains, identified as BLI-03	150	657.0	2.30	2.30	0.82	0.99	0.99	3.29
Totals			**6.90**	**6.90**	**2.46**	**2.96**	**2.96**	**9.86**

Methodology

Potential Throughput (tons/yr) = [Potential Throughput (lbs/hr)] x [8,760 hrs/yr] x [1ton/2000 lbs]

Uncontrolled Potential to Emit (tons/yr) = [Potential Throughput (tons/yr)] x [Emission Factor (lb/ton)] x [1 ton/2,000 lbs]

where:

Emission factors are from AP-42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

*No emission factor for PM10 available (assume PM = PM10)

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide

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

Company Name: WMS Development, LLC
Address City IN Zip: 2515 Veterans Parkway, Jeffersonville, IN 47130
Permit Number: 019-27487-00134
Plt ID: 019-00134
Reviewer: Jeff Scull
Date: 2/26/2009

				Pollutant	PM*	PM10*/2.5	SO2	NOx**	VOC	CO
				Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Emission Unit	Number of Units	Unit Heat Input Capacity (MMBtu/hr)	Combined Total Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Uncontrolled Potential to Emit (tons/yr)					
					PM*	PM10*/2.5	SO2	NOx**	VOC	CO
crematory incinerator for human remains, identified as BLN-20-01	1	1.5	1.5	13.14	0.012	0.050	0.004	0.657	0.036	0.552
crematory incinerator for animal remains, identified as BLP-02	1	1.5	1.5	13.14	0.012	0.050	0.004	0.657	0.036	0.552
crematory incinerator for animal remains, identified as BLI-03	1	1.8	1.8	15.77	0.015	0.060	0.005	0.788	0.043	0.662
Totals	**3**		**4.8**		**0.040**	**0.160**	**0.013**	**2.102**	**0.116**	**1.766**

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
crematory incinerator for human remains, identified as BLN-20-01	1.4E-05	7.9E-06	4.9E-04	0.012	2.2E-05	3.3E-06	7.2E-06	9.2E-06	2.5E-06	1.4E-05
crematory incinerator for animal remains, identified as BLP-02	1.4E-05	7.9E-06	4.9E-04	0.012	2.2E-05	3.3E-06	7.2E-06	9.2E-06	2.5E-06	1.4E-05
crematory incinerator for animal remains, identified as BLI-03	1.7E-05	9.5E-06	5.9E-04	0.014	2.7E-05	3.9E-06	8.7E-06	1.1E-05	3.0E-06	1.7E-05
Totals	**4.4E-05**	**2.5E-05**	**1.6E-03**	**0.038**	**7.1E-05**	**1.1E-05**	**2.3E-05**	**2.9E-05**	**8.0E-06**	**4.4E-05**

Uncontrolled Total HAPs (tons/yr)	**0.040**

Methodology

Potential Throughput (MMCF/yr) = [Combined Total Heat Input Capacity (MMBtu/hr)] x [8,760 hrs/yr] x [1 MMCF/1,000 MMBtu]
Uncontrolled Potential to Emit (tons/yr) = [Potential Throughput (MMCF/yr)] x [Emission Factor (lb/MMCF)] x [1 ton/2,000 lbs]
where:
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)
All emission factors are based on normal firing.
*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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
MMCF = 1,000 MMBtu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter	NOx = Nitrous Oxides	DCB = Dichlorobenzene	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC - Volatile Organic Compounds	Pb = Lead	Mn = Manganese
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium	Ni = Nickel