

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 022016 - 004 Project Number: 2015-10-024

Parent Company: Carson Speaks Cremation

Parent Company Address: 1501 W Lexington Ave, Independence, MO 64052

Installation Name: Carson Speaks Crematory

Installation Number: 095-0212

Installation Address: 1438 W Lexington Ave., Independence, MO 64052

Location Information: Jackson County, S10, T49N, R32W

Application for Authority to Construct was made for:
a CMS Millennium III human cremator. This review was conducted in accordance with
Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Feb 5, 2016
EFFECTIVE DATE

Kendall B. Hale
DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

Page No.	3
Permit No.	
Project No.	2015-10-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Carson Speaks Crematory
Jackson County, S10, T49N, R32W

1. Mercury Emission Limitation
 - A. Carson Speaks Crematory shall emit less than 0.01 tons of mercury from the human crematory (EP-01) in any consecutive 12-month period.
 - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A.
2. Process Requirements for the Human Crematory (EU-01)
 - A. Carson Speaks Crematory will burn exclusively non-infectious human bodies or body parts (as defined in the Installation Description) and containers not containing chlorine.
 - B. Charging of waste during burn cycles is prohibited.
 - C. The crematory shall be equipped with a continuous digital temperature recorder that monitors, displays and records the temperature in the final combustion chamber with an accuracy of two percent ($\pm 2\%$).
 - D. Carson Speaks Crematory shall maintain the temperature in the final combustion chamber at or above 1600 degrees Fahrenheit.
 - E. Carson Speaks Crematory shall maintain an accurate record of the number of cremations and the total mass of remains cremated at this installation per month.
3. Opacity
The crematory (EP-01) shall have opacity of less than ten percent (10%) at all times.

Page No.	4
Permit No.	
Project No.	2015-10-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

4. Requirements for Operators of the Human Crematory (EU-01)
 - A. All crematory operators shall attend a training program equivalent to that developed by the American Society of Mechanical Engineers (ASME), by the crematory manufacturer or by an individual with more than one (1) year experience in the operation of the crematory. The training shall include basic combustion theory, operating procedures, monitoring of combustion control parameters and all emergency procedures to be followed if the crematory should malfunction or exceed operating parameters.
 - B. The crematory operator shall have the essential steps necessary for satisfactory operation of the crematory readily available to him or her in an easy to read and follow manual.
5. Restriction of Emission of Odors

If a continued situation of verified nuisance odors exists in violation of 10 CSR 10-6.165, the Director may require through written notice that Carson Speaks Crematory submit within ten days a corrective action plan adequate to timely and significantly mitigate the odors. Carson Speaks Crematory shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be in violation of this permit.
6. Record Keeping and Reporting Requirements
 - A. Carson Speaks Crematory shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. Carson Speaks Crematory shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2015-10-024

Installation ID Number: 095-0212

Permit Number:

Carson Speaks Crematory
1501 W Lexington Ave
Independence, MO 64052

Complete: November 5, 2015

Parent Company:
Carson Speaks Crematory
1501 W Lexington Ave
Independence, MO 64052

Jackson County, S10, T49N, R32W

REVIEW SUMMARY

- Carson Speaks Crematory has applied for authority to install a CMS Millennium III human cremator.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are from the combustion of remains and the combustion of natural gas used to fuel the incinerator/cremator.
- None of the New Source Performance Standards (NSPS) apply to the installation.
 - NSPS Subpart CCCC & Subpart EEEE do not apply to this installation because the permitted incinerator is not classified as commercial, industrial, or medical; furthermore, exclusively non-hazardous waste, in the form of human remains, will be burned.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- A secondary combustion chamber is being used to control the emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of Mercury (Hg) are conditioned below its SMAL. All other remaining pollutants are below their de minimis levels.
- This installation is located in Jackson County, an attainment area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below de minimis levels. Potential mercury emissions have been limited below the SMAL for the entire facility
- Emissions testing is not required for the equipment. Stack testing was conducted on a similar unit and approved by the Air Pollution Control Program.
- A Basic Operating Permit amendment is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Carson Speaks Crematory is established in Independence, Missouri 64052. This installation provides human cremation services for those who seek this service in lieu of earth burial. The installation has received one construction permit (#0992-0010) for an existing human cremator (EP-1) and currently has a basic operating permit. This project will be a new human cremator (EP-1) that will replace the existing human cremator. This permit, pertaining to project #2015-10-024, will be issued as a Section (5) de minimis permit. Carson Speaks Crematory will need to submit an application for an amendment to their basic operating permit within 30 days of this permit being issued.

PROJECT DESCRIPTION

Carson Speaks Crematory is installing a CMS Millennium III human cremator which will replace the existing human cremator (EP-1). The new incinerator is a single-entry, dual-chambered cremation unit rated at 150 lb/hr maximum capacity. The primary burner has a maximum hourly design rate (MHDR) of 0.40 MMBtu/hr, and the secondary burner has an MHDR of 1.0 MMBtu/hr.

For ash removal after the incineration process is complete, the ashes are hand-raked into a cremation pan. A secondary combustion chamber is being used to control the emissions from the equipment in this permit.

A stack test on a similar unit (CMS Millennium III) was conducted by Cetcon in Tulsa, Oklahoma on January 6, 2010. This test was approved by the Missouri Air Pollution Control Program Testing & Emissions Unit. The crematory was required to submit stack test results to demonstrate compliance with the programs requirements for crematories. These requirements include that the crematory achieve a combustion efficiency of 99.9%, that the maximum particulate concentration in the crematory's stack gas is less than 0.09 grains per dry standard cubic feet and that the crematory's opacity does not

exceed 10%. These requirements were developed to ensure proper combustion, which ensures destruction of HAPs.

The crematory is permitted to cremate non-infectious human bodies and body parts. The Air Pollution Control Program's definition of this term is human bodies and body parts that do not fit the definition of medical/infectious waste as defined in the Code of Federal Regulations, 40 CFR 60.51, *Standards of Performance for New Stationary Sources*, Subpart Ec—"Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996." The rule defines medical/infectious waste as:

Medical/infectious waste means any waste generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals that are listed in paragraphs (1) through (7) of this definition. The definition of medical/infectious waste does not include hazardous waste identified or listed under the regulations in part 261 of this chapter; household waste, as defined in §261.4(b)(1) of this chapter; ash from incineration of medical/infectious waste, once the incineration process has been completed; human corpses, remains, and anatomical parts that are intended for interment; and domestic sewage materials identified in §261.4(a)(1) of this chapter.

- (1) Cultures and stocks of infectious agents and associated biologicals, including: cultures from medical and pathological laboratories; cultures and stocks of infectious agents from research and industrial laboratories; wastes from the production of biologicals; discarded live and attenuated vaccines; and culture dishes and devices used to transfer, inoculate, and mix cultures.
- (2) Human pathological waste, including tissues, organs, and body parts and body fluids that are removed during surgery or autopsy, or other medical procedures, and specimens of body fluids and their containers.
- (3) Human blood and blood products including:
 - (i) Liquid waste human blood;
 - (ii) Products of blood;
 - (iii) Items saturated and/or dripping with human blood; or
 - (iv) Items that were saturated and/or dripping with human blood that are now caked with dried human blood; including serum, plasma, and other blood components, and their containers, which were used or intended for use in either patient care, testing and laboratory analysis or the development of pharmaceuticals. Intravenous bags are also include in this category.
- (4) Sharps that have been used in animal or human patient care or treatment or in medical, research, or industrial laboratories, including hypodermic needles, syringes (with or without the attached needle), pasteur pipettes, scalpel blades, blood vials, needles with attached tubing, and culture dishes (regardless of presence of infectious agents). Also included are other types of broken or unbroken glassware that were in contact with infectious agents, such as used slides and cover slips.

- (5) Animal waste including contaminated animal carcasses, body parts, and bedding of animals that were known to have been exposed to infectious agents during research (including research in veterinary hospitals), production of biologicals or testing of pharmaceuticals.
- (6) Isolation wastes including biological waste and discarded materials contaminated with blood, excretions, exudates, or secretions from humans who are isolated to protect others from certain highly communicable diseases, or isolated animals known to be infected with highly communicable diseases.
- (7) Unused sharps including the following unused, discarded sharps: hypodermic needles, suture needles, syringes, and scalpel blades.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition. The emission rates for particulate matter less than ten (10) microns in aerodynamic diameter (PM₁₀), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen oxides (NO_x), mercury (Hg), and hydrochloric acid (HCl) were calculated using emission factors from the performance tests conducted by Cetcon for this model of incinerator.

Because the emissions provided in the performance tests submitted by Cetcon did not account for *all* potentially emitted HAPs, the emission factors used in the analysis of combined HAPs were also obtained from FIRE for SCC 3-15-021-01. The composite emission factor of HAPs listed in FIRE excluding HCl was 0.0042 pounds of HAP per body cremated. The HAP emissions from HCl taken from the Cetcon stack test were added to the HAPs listed in FIRE to give 0.0342 pounds of HAP per body cremated. Emissions due to the combustion of natural gas in the two burners (0.75 MMBtu/hr and 1.50 MMBtu/hr) are based on continuous operations, and are accounted for in the submitted performance test results. Table 1 lists the emission rates that were derived from the performance test conducted by Cetcon and used in the calculations of potential emissions of this project.

Table1: Provided Emission Rates

Pollutant ¹	Emission Rate (lb/hr)
PM ₁₀	0.09
SO _x	0.06
NO _x	0.32
CO	0.00
Hydrochloric Acid (HCl)	0.03

¹Emission factors for pollutants that are not listed in Table 1 were taken from FIRE for SCC 3-15-021-01.

Table 2 lists the emissions summary of this construction permit application for this new installation. The existing actual emissions were taken from the 2014 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) New installation conditioned potential emissions account for the 0.01 tons per year mercury emission limit taken by the facility to avoid modeling requirements. The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> / SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application	Conditioned Potential Emissions of the Application
PM ₁₀	15.0	N/D	0.0001	0.39	0.27
SO _x	40.0	N/D	0.0001	0.26	0.18
NO _x	40.0	N/D	0.0001	1.40	0.97
VOC	40.0	N/D	0.0014	0.98	0.68
CO	100.0	N/D	0.0007	0.00	N/A
Combined HAPs	25.0	N/D	N/A	0.15	0.10
<i>*Mercury (Hg)</i>	0.01	N/D	N/A	0.014	< 0.01
<i>*HCl</i>	10.0	N/D	N/A	0.13	0.09

N/A = Not Applicable

*Individual HAPs listed in italics, and the respective SMALs are in column 2.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of Mercury (Hg) are conditioned below its SMAL. All other remaining pollutants are below their de minimis levels.

APPLICABLE REQUIREMENTS

Carson Speaks Crematory shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-6.165*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Chad Stephenson
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 9, 2015, received October 14, 2015, designating Carson Speaks Cremation as the owner and operator of the installation.

Mr. Rick Christian
Manager
Carson Speaks Crematory
1438 W Lexington Ave
Independence, MO 64052

RE: New Source Review Permit - Project Number: 2015-10-024

Dear Mr. Christian:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, Administrative Hearing Commission, 573-751-2422, website: www.oa.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Chad Stephenson, at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:css

Enclosures

c: Kansas City Regional Office
PAMS File: 2015-10-024

Permit Number: