

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: 11 2 0 0 9 - 0 0 5      Project Number: 2009-08-044

Parent Company:                      Rolling Acres Memorial Gardens for Pets, Inc.

Parent Company Address: P.O. Box 12073, Kansas City, MO 64152

Installation Name:                      Rolling Acres Memorial Gardens for Pets, Inc.

Installation Number:                      165-0011

Installation Address:                      12200 North Crooked Road, Kansas City, MO 64152

Location Information:                      Platte County, S16, T51N, R34W


Application for Authority to Construct was made to install and operate the Power-Pak Jr. Model IE43-PPJ crematory incinerator. 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.

NOV 13 2009

EFFECTIVE DATE

  
\_\_\_\_\_  
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.

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**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."*

Rolling Acres Memorial Gardens for Pets, Inc.  
Platte County, S16, T51N, R34W

1. Process Requirements for the Incinerator (EU-01)
  - A. Rolling Acres Memorial Gardens for Pets, Inc. will burn exclusively non-infectious animal remains not in containers and non-infectious animal remains in containers not containing chlorine.
  - B. Charging of waste between burn cycles is prohibited. The incinerator door shall remain closed at all times during operation.
  - C. The incinerator shall be equipped with a continuous chart recorder that monitors, displays and records the temperature in the final combustion chamber with an accuracy of two percent ( $\pm 2\%$ ).
  - D. Rolling Acres Memorial Gardens for Pets, Inc. shall maintain the temperature in the final combustion chamber at or above 1400 degrees Fahrenheit.
  - E. Rolling Acres Memorial Gardens for Pets, Inc. shall maintain an accurate record of the number of cremation and the total mass of remains cremated at this installation per month.
2. Record Keeping Requirements  
Rolling Acres Memorial Gardens for Pets, Inc. shall maintain an accurate record of the monthly amount and type of waste combusted at this installation. The installation shall use Attachment A or other equivalent form(s) approved by the Air Pollution Control Program for this purpose. Rolling Acres Memorial Gardens for Pets, Inc. shall maintain records on-site for the most recent 60 months of all records required by this permit and shall immediately make such records available to any Missouri Department of Natural Resources' personnel upon request.

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**SPECIAL CONDITIONS:**

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

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

If a continued situation of verified nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require through written notice that Rolling Acres Memorial Gardens for Pets, Inc. submits within ten days a corrective action plan adequate to timely and significantly mitigate the odors. Rolling Acres Memorial Gardens for Pets, Inc. 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.

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

Project Number: 2009-08-044  
Installation ID Number: 165-0011  
Permit Number:

Rolling Acres Memorial Gardens for Pets, Inc.  
12200 North Crooked Road  
Kansas City, MO 64152

Complete: October 23, 2009

Parent Company:  
Rolling Acres Memorial Gardens for Pets, Inc.  
P.O. Box 12073  
Kansas City, MO 64152

Platte County, S16, T51N, R34W

REVIEW SUMMARY

- Rolling Acres Memorial Gardens for Pets, Inc. has applied for authority to install an animal cremator.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment, but are less than the screen model action levels (SMAL).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 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.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below *de minimis* levels. Section (1)(B) requires all incinerators to obtain construction permits.
- This installation is located in Platte County, a maintenance area for the 8-hour ozone standard and an attainment area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.
- Ambient air quality modeling was not performed since potential emissions of the application are below *de minimis* levels and HAPs are expected to be less than the SMALs.

- 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 application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Rolling Acres Memorial Gardens for Pets, Inc. is a *de minimis* source and is located in Parkville, Missouri where it will operate a small animal incinerator, which is permitted in this project. Rolling Acres Memorial Gardens for Pets, Inc. has received the following permits from the Air Pollution Control Program:

**Table 1: Permit History**

Permit Number	Description
1193-020	Install and operate two animal cremators, a Power-Pak Junior IE43-PPJ and a Power-Pak II IE43-PPII
0485-003	Install and operate Shenandoah P25-2GN Model animal cremator
1081-007	Install and operate Shenandoah G-64/ITC Model animal cremator

## PROJECT DESCRIPTION

Rolling Acres Memorial Gardens for Pets, Inc. is installing the Power-Pak Jr. Model IE43-PPJ crematory incinerator, which is rated to incinerate 75 pounds of remains per hour. The applicant submitted stack test results from a similar unit operated by Southern Environmental, Inc. This test was conducted on November 12, 2004 in Largo, Florida.

The incinerator’s stack test demonstrates compliance with the programs requirements for incinerators. These requirements include that the incinerator achieve a combustion efficiency of 99.9%, that the maximum particulate concentration in the incinerator’s stack gas is less than 0.09 grains per dry standard cubic feet and that the incinerator’s opacity does not exceed 10%. These requirements were developed to ensure proper combustion, which ensures destruction of HAPs.

The incinerator is permitted to burn exclusively non-infectious animal remains in containers not containing chlorine. Infectious and non-infectious human bodies and body parts are not permitted to be cremated in this incinerator. The Air Pollution Control Program’s definition of non-infectious animal remains is animal 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” (specifically

paragraph (5)). 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 and the Factor Information Retrieval (FIRE) Data System Version 6.24. The emission rates for particulate matter less than ten (10) microns in aerodynamic diameter (PM<sub>10</sub>) and carbon monoxide (CO) used in this review were obtained from a stack test performed on a similar incinerator. Emissions of sulfur dioxide (SO<sub>2</sub>) were calculated using the emission factor from AP-42 Table 1.4-2. Nitrogen oxide (NO<sub>x</sub>) and volatile organic compound (VOC) emissions were calculated using an emission factor from FIRE SCC 5-02-001-01. The emission factors used in the analysis of HAP emissions were obtained from FIRE for SCC 3-15-021-01. The composite emission factor of HAPs listed in FIRE was 0.0381 pounds of HAP per body cremated. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

**Table 2: Emissions Summary (tons per year)**

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	N/A	N/A	0.3779	N/A
SO <sub>x</sub>	40.0	N/A	N/A	0.0039	N/A
NO <sub>x</sub>	40.0	N/A	N/A	0.4928	N/A
VOC	40.0	N/A	N/A	0.4928	N/A
CO	100.0	N/A	N/A	0.0784	N/A
HAPs	10.0/25.0	N/A	N/A	0.1597	N/A

N/A = Not Applicable

### 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 all pollutants are below *de minimis* levels. Section (1)(B) requires all incinerators to obtain construction permits. This installation currently has an operating permit (Project # 2007-05-089), completed on September 21, 2007.



## APPLICABLE REQUIREMENTS

Rolling Acres Memorial Gardens for Pets, Inc. 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 10-3.090*

## 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.

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Daronn Williams  
Environmental Engineer

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 20, 2009, received August 24, 2009, designating Rolling Acres Memorial Gardens for Pets, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Factor Information Retrieval (FIRE) Data System Version 6.24
- Kansas City Regional Office Site Survey, dated September 14, 2009.



Ms. Nancy Piper  
President  
Rolling Acres Memorial Gardens for Pets, Inc.  
P.O. Box 12073  
Kansas City, MO 64152

RE: New Source Review Permit - Project Number: 2009-08-044

Dear Ms. Piper:

Enclosed with this letter is your permit to construct. Please study it carefully. 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 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 have any questions regarding this permit, please do not hesitate to contact Daronn Williams, at the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:dwl

Enclosures

c: Kansas City Regional Office  
PAMS File: 2009-08-044

Permit Number: