MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

November 30, 2023

PERMIT TO INSTALL 19-22A

ISSUED TOFaithful Companion Memorials, Inc.

LOCATED AT 1909 Thunderbird Street Troy, Michigan 48084

IN THE COUNTY OF Oakland

STATE REGISTRATION NUMBER P1245

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

November 28, 2023	QUIRED BY RULE 203:
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:
November 30, 2023	
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan Air Emissions Reporting System

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review
PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction

SRN State Registration Number

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

^{*}For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit
°C Degrees Celsius
CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Personal Per

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

kW Kilowatt

lb Pound

m Meter

mg Milligram

mm Millimeter

MM Million

MW Megawatts

NMOC Non-Methane Organic Compounds

NO_x Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter

pph Pounds per hour ppm Parts per million

ppmv Parts per million by volume
ppmw Parts per million by weight
psia Pounds per square inch absolute

psia Pounds per square inch absolut psig Pounds per square inch gauge

scf Standard cubic feet

sec Seconds SO₂ Sulfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year Microgram

μm Micrometer or Micron

VOC Volatile Organic Compounds

yr Year

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GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID Emission Unit ID Device(s)) EUCREMATORY1 Matthews Cremation Division Power Pak Jr. (IE43-PPJR) Fuel Type: Natural Gas Maximum Charge: 300 Pounds Burn Rate: 75 Pounds/Hour) ID
Emission Unit ID Device(s)) Flexible Group EUCREMATORY1 Matthews Cremation Division NA Power Pak Jr. (IE43-PPJR) Fuel Type: Natural Gas Maximum Charge: 300 Pounds	o ID
Power Pak Jr. (IE43-PPJR) Fuel Type: Natural Gas Maximum Charge: 300 Pounds	
Fuel Type: Natural Gas Maximum Charge: 300 Pounds	
Maximum Charge: 300 Pounds	
Rurn Rate: 75 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	
EUCREMATORY5 Matthews Cremation Division FGIEB16	
Fuel Type: Natural Gas	
Maximum Charge: 300 Pounds	
Burn Rate: 100 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	
EUCREMATORY6 Matthews Cremation Division FGIEB16	
Multi-Chambered Incinerator with	
Afterburner	
Fuel Type: Natural Gas	
Maximum Charge: 300 Pounds	
Burn Rate: 100 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	
EUCREMATORY7 Matthews Cremation Division FGIEB16	
IE43-IEB16	
Multi-Chambered Incinerator with	
Afterburner	
Fuel Type: Natural Gas	
Maximum Charge: 300 Pounds	
Burn Rate: 100 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	
EUCREMATORY8 Matthews Cremation Division FGIEB16	
IE43-IEB16	
Multi-Chambered Incinerator with	
Afterburner	
Fuel Type: Natural Gas	
Maximum Charge: 300 Pounds Burn Rate: 100 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	
EUCREMATORY9 Matthews Cremation Division NA	
IEB-56- 4SPet Crematory	
Fuel Type: Natural Gas	
Maximum Charge: 1700 pounds	
Burn Rate: 340 Pounds/Hour	
Charge Type: ANIMAL "PET" REMAINS	

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUCREMATORY11	Matthews Cremation Division IEB-56 Pet Crematory Fuel Type: Natural Gas Maximum Charge: 3000 pounds Burn Rate: 400 Pounds/Hour Charge Type: ANIMAL "PET" REMAINS	NA
EUCREMATORY12	Matthews Cremation Division IE43-IEB16 Multi-Chambered Incinerator with Afterburner Fuel Type: Natural Gas Maximum Charge: 300 Pounds Burn Rate: 100 Pounds/Hour Charge Type: ANIMAL "PET" REMAINS	FGIEB16

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

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EUCREMATORY1 EMISSION UNIT CONDITIONS

DESCRIPTION

Matthews Cremation Division Power Pak Jr. (IE43-PPJR) Fuel Type: Natural Gas Maximum Charge: 300 Pounds Burn Rate: 75 Pounds/Hour

Charge Type: ANIMAL "PET" REMAINS

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Secondary combustion chamber with afterburner.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requireme nts
1. PM	0.20 lb / 1000	Hourly	EUCREMATORY1	SC V.1	R 336.1331
	lbs of gasa	,			
a. Calculated to 50	0% excess air.				

II. MATERIAL LIMIT(S)

1. The permittee shall not burn any waste in EUCREMATORY1 other than the following:

Pathological wastes - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. **This emission unit shall burn only animal pathological waste and associated materials. (40 CFR 60.51)**

- 2. The permittee shall not charge more than 300 pounds per charge in EUCREMATORY1, where charge is the total weight of the material placed in the incinerator to be combusted. (R 336.1301, R 336.1331)
- 3. The permittee shall not burn any fuel in EUCREMATORY1 other than pipeline natural gas. (R 336.1224, R 336.1225, R 336.1702)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not combust waste in EUCREMATORY1 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained. (R 336.1301, R 336.1331, R 336.1910)
- 2. The incinerator shall be installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor to control emissions from EUCREMATORY1. A list of recommended operating and maintenance procedures is specified in Appendix A. (R 336.1301, R 336.1331, R 336.1910)
- 3. The permittee shall not begin operation of EUCREMATORY1 until a site plan has been submitted to the AQD District Supervisor and the AQD Permit Section. (R 336.1301, R 336.1331, R 336.1910)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate any crematory in EUCREMATORY1 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor. (R 336.1301, R 336.1331, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a manner satisfactory to the AQD District Supervisor a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2. (R 336.1301, R 336.1331)
- 4. The permittee shall equip and maintain EUCREMATORY1 with its own natural gas regulator. (R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUCREMATORY1 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1301, R 336.1331, 40 CFR 60.50c(b))
- 2. The permittee shall monitor and record the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description and weight of waste combusted in EUCREMATORY1, as required by SC II.1 and SC II.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1331)
- 4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned, as required by 40 CFR 60.50c(b). The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.50c(b))
- 5. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY1, as required by SC IV.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)

6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY1. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-CREMATORY1	15	25	40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain a label for EUCREMATORY1 with the emission unit ID and name used at the facility according to a method acceptable to the AQD District Supervisor. (R 336.1201)

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EUCREMATORY9 EMISSION UNIT CONDITIONS

DESCRIPTION

Matthews Cremation Division IEB-56-4S Pet Crematory Fuel Type: Natural Gas

Maximum Charge: 1700 pounds Burn Rate: 340 Pounds/Hour

Charge Type: ANIMAL "PET" REMAINS

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Secondary combustion chamber with afterburner.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.20 lb / 1000	Hourly	EUCREMATORY9	SC V.1	R 336.1331
	lbs of gas ^a				
 a. Calculated to 50 	Calculated to 50% excess air.				

II. MATERIAL LIMIT(S)

1. The permittee shall not burn any waste in EUCREMATORY9 other than the following:

Pathological wastes - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. **This emission unit shall burn only animal pathological waste and associated materials. (40 CFR 60.51)**

- 2. The permittee shall not charge more than 1,700 pounds per charge in EUCREMATORY9, where charge is the total weight of the material placed in the incinerator to be combusted. (R 336.1301, R 336.1331)
- 3. The permittee shall not burn any fuel in EUCREMATORY9 other than natural gas. (R 336.1224, R 336.1225, R 336.1702)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not combust waste in EUCREMATORY9 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained. (R 336.1301, R 336.1331, R 336.1910)
- 2. The incinerator shall be installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor to control emissions from EUCREMATORY9. A list of recommended operating and maintenance procedures is specified in Appendix A. (R 336.1301, R 336.1331, R 336.1910)
- 3. The permittee shall not begin operation of EUCREMATORY9 until a site plan has been submitted to the AQD District Supervisor and the AQD Permit Section. (R 336.1301, R 336.1331, R 336.1910)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate EUCREMATORY9 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor. (R 336.1301, R 336.1311, R 336.1910)
- 2. The permittee shall install, calibrate, maintain, and operate in a manner satisfactory to the AQD District Supervisor, a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY9 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2. (R 336.1301, R 336.1331)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUCREMATORY9 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1301, R 336.1331, 40 CFR 60.50c(b))
- 2. The permittee shall monitor and record, in a manner satisfactory to the AQD District Supervisor, the temperature in the secondary combustion chamber of EUCREMATORY9 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY9, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)
- 4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned in the incinerator, as required by 40 CFR 60.50c(b). The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.50c(b))
- 5. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY9, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)

6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY9. The record shall include the description, reason, date and time of the service, maintenance, or inspection. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCREMATORY9	29.25	18	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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EUCREMATORY11 EMISSION UNIT CONDITIONS

DESCRIPTION

Matthews Cremation Division IEB-56 Pet Crematory

Fuel Type: Natural Gas Maximum Charge: 3000 pounds

Burn Rate: 400 Pounds/Hour

Charge Type: ANIMAL "PET" REMAINS

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Secondary combustion chamber with afterburner.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.20 lb / 1000	Hourly	EUCREMATORY11	SC V.1	R 336.1331
	lbs of gas ^a				
a. Calculated to 50	% excess air.				

II. MATERIAL LIMIT(S)

1. The permittee shall not burn any waste in EUCREMATORY1 other than the following:

Pathological wastes - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. **This emission unit shall burn only animal pathological waste and associated materials. (40 CFR 60.51)**

- 2. The permittee shall not charge more than 3,000 pounds per charge in EUCREMATORY11, where charge is the total weight of the material placed in the incinerator to be combusted. (R 336.1301, R 336.1331)
- The permittee shall not burn any fuel in EUCREMATORY1 other than natural gas. (R 336.1224, R 336.1225, R 336.1702)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not combust waste in EUCREMATORY11 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained. (R 336.1301, R 336.1331, R 336.1910)
- 2. The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUCREMATORY11. A list of recommended operating and maintenance procedures is specified in Appendix A. (R 336.1301, R 336.1331, R 336.1910)

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3. The permittee shall not operate EUCREMATORY11 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 60 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate EUCREMATORY11 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY11 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2. (R 336.1301, R 336.1331)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUCREMATORY11 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1301, R 336.1331, 40 CFR 60.50c(b))
- 2. The permittee shall monitor and record, in a satisfactory manner, the temperature in the secondary combustion chamber of EUCREMATORY11 on a continuous basis. (R 336.1301, R 336.1331)
- The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY11, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)

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- 4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned in the incinerator, as required by 40 CFR 60.50c(b). The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.50c(b))
- 5. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY11, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)
- 6. The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY11, including a log of all maintenance activities conducted according to the MAP (pursuant to SC III.3). The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, R 336.1911)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCREMATORY11	29	26	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGIEB16	Five (5) Matthews Cremation Division IE43-IEB16	EUCREMATORY5,
	cremation units. All have these specifications:	EUCREMATORY6,
	· ·	EUCREMATORY7,
	Matthews Cremation Division	EUCREMATORY8,
	IE43-IEB16	EUCREMATORY12
	Multi-Chambered Incinerator with Afterburner	
	Fuel Type: Natural Gas	
	Maximum Charge: 300 Pounds	
	Burn Rate: 100 Pounds/Hour	
	Charge Type: ANIMAL "PET" REMAINS	

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FGIEB16 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Five (5) Matthews Cremation Division IE43-IEB16 cremation units. All have these specifications:

Matthews Cremation Division

IE43-IEB16

Multi-Chambered Incinerator with Afterburner

Fuel Type: Natural Gas

Maximum Charge: 300 Pounds Burn Rate: 100 Pounds/Hour

Charge Type: ANIMAL "PET" REMAINS

Emission Unit: EUCREMATORY5, EUCREMATORY6, EUCREMATORY7, EUCREMATORY8,

EUCREMATORY12

POLLUTION CONTROL EQUIPMENT

Secondary combustion chamber with afterburner.

I. EMISSION LIMIT(S)

					Underlying Applicable
		Time Period /		Monitoring /	Requireme
Pollutant	Limit	Operating Scenario	Equipment	Testing Method	nts
1. PM	0.20 lb / 1000	Hourly	EUCREMATORY5,	SC V.1	R 336.1331
	lbs of gasa		EUCREMATORY6,		
			EUCREMATORY7,		
			EUCREMATORY8,		
			EUCREMATORY12		
a. Calculated to 50% excess air.					

II. MATERIAL LIMIT(S)

- 1. The permittee shall not burn any waste in any unit within FGIEB16 other than the following:
 - **Pathological wastes** As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. **This emission unit shall burn only animal pathological waste and associated materials. (40 CFR 60.51)**
- 2. The permittee shall not combust more than 300 pounds per charge in each unit within FGIEB16, where charge is the total weight of the material placed in the incinerator to be combusted. (R 336.1301, R 336.1331)
- 3. The permittee shall not burn any fuel in FGIEB16 other than natural gas. (R 336.1224, R 336.1225, R 336.1702)

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not combust waste in any unit in FGIEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained. (R 336.1301, R 336.1331, R 336.1910)

2. The incinerators shall be installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor to control emissions from each unit in FGIEB16. A list of recommended operating and maintenance procedures is specified in Appendix A. (R 336.1301, R 336.1331, R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate any crematory in FGIEB16 unless its respective secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor. (R 336.1301, R 336.1331, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a manner satisfactory to the AQD District Supervisor a device to monitor and record the temperature in the secondary combustion chamber of each crematory in FGIEB16 on a continuous basis. (R 336.1301, R 336.1331)
- 3. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.2. (R 336.1301, R 336.1331)
- 4. The permittee shall equip and maintain EUCREMATORY5, EUCREMATORY6, EUCREMATORY7 and EUCREMATORY8 with their own natural gas regulator. (R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from any unit within FGIEB16 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference		
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules		

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1301, R 336.1331, 40 CFR 60.50c(b))
- 2. The permittee shall monitor and record the temperature in the secondary combustion chamber in each unit of FGIEB16 on a continuous basis. (R 336.1301, R 336.1331)

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- 3. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description and weight of charge combusted in each crematory in FGIEB16, as required by SC II.1 and SC II.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)
- 4. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records on a calendar quarter basis of the periods of time when only pathological waste is burned in each incinerator as required by 40 CFR 60.50c(b). The records shall be kept on file for a period of five years and made available to the Air Quality Division upon request. (40 CFR 60.50c(b))
- 5. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for each crematory in FGIEB16, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331)
- 6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for each crematory in FGIEB16. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910)
- 7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in each unit of FGIEB16, pursuant to SC II.3. The permittee shall keep all records on file at a location approved by the AQD District Supervisor for a period of at least five years and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVCREMATORY5	15	25	40 CFR 52.21(c) & (d)
SVCREMATORY6	15	25	40 CFR 52.21(c)&(d)
SVCREMATORY7	15	25	40 CFR 52.21(c)&(d)
SVCREMATORY8	15	25	40 CFR 52.21(c)&(d)
SVCREMATORY12	15	24	40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain a label for each unit in FGIEB16 with the emission unit ID and name used at the facility according to a method acceptable to the AQD District Supervisor. (R 336.1201)

APPENDIX A Incinerator Operation and Maintenance Guidelines

- 1. Designate a trained operator for the unit and make that person responsible for compliance with the air pollution control requirements.
- 2. Clean grates before each day's operation (more often if necessary), and dispose of the ashes properly.
- 3. Do not combust waste until the secondary combustion chamber (afterburner) is at or above the minimum required temperature. This temperature must be maintained for the duration of the burn cycle.
- 4. Do not overload the incinerator. Stay within the given loading rates and follow the manufacturer's instructions.
- 5. Schedule charges to minimize opening the charging door as infrequently as possible. Opening the charging door lets cold air in and quenches the fire causing smoke.
- 6. Burn only the type of wastes that the incinerator has been approved to burn. Follow the manufacturer's instructions to maximize the efficiency of the unit, and to properly burn the waste(s).
- 7. Keep the combustion air adjusted according to the manufacturer's instructions.
- 8. Observe the stack frequently and adjust the operation as necessary to eliminate smoke and flyash.
- 9. Post a copy of the manufacturer's manual and this Guideline near your incinerator.
- 10. Make quarterly inspections to check and service all of the equipment. If a qualified person is not available for proper inspections, a service contract with a reputable manufacturer is advisable.
- 11. Follow manufacturer's operation and maintenance guidelines.