

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

October 27, 2023

**PERMIT TO INSTALL**  
124-23

**ISSUED TO**  
Great Lakes Cremation, Inc.

**LOCATED AT**  
29547 Costello Drive  
New Hudson, Michigan 48165

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
N8339

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).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>October 10, 2023</b>	
DATE PERMIT TO INSTALL APPROVED: <b>October 27, 2023</b>	SIGNATURE:
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
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan 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
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	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
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## 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 conditions 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 Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUCREMATORY1	Mathews Cremation Division Power Pak II (IE43-PPII) Fuel Type: Natural Gas Maximum Charge: 750 Pounds Burn Rate: 150 Pounds/Hour Charge Type: Human Remains	November 3, 2009	N/A
EUCREMATORY2	Mathews Cremation Division Super Power Pak (IE43-SPP) Fuel Type: Natural Gas Maximum Charge: 750 Pounds Burn Rate: 200 Pounds/Hour Charge Type: Human Remains	November 3, 2009	N/A
EUCREMATORY3	Mathews Cremation Division Power-Pak Jr. (IE43-PPJ) Fuel Type: Natural Gas Maximum Charge: 300 Pounds Burn Rate: 75 Pounds/Hour Charge Type: Animal "Pet" Remains	May 11, 2010	N/A
EUCREMATORY4	Mathews Cremation Division Super Power Pak (IE43-SPP) Fuel Type: Natural Gas Maximum Charge: 750 Pounds Burn Rate: 200 Pounds/Hour Charge Type: Human Remains	February 3, 2012	N/A
EUCREMATORY5	Mathews Cremation Division Power Pak II Plus (IE43-PPII Plus) Fuel Type: Natural Gas Maximum Charge: 750 Pounds Burn Rate: 175 Pounds/Hour Charge Type: Human Remains	April 17, 2015	N/A

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.

## EUCREMATORY1 EMISSION UNIT CONDITIONS

**DESCRIPTION**

Mathews Cremation Division  
 Power Pak II (IE43-PPII)  
 Fuel Type: Natural Gas  
 Maximum Charge: 750 Pounds  
 Burn Rate: 150 Pounds/Hour  
 Charge Type: Human 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 lbs of gas <sup>a</sup>	Hourly	EUCREMATORY1	SC V.1	R 336.1331
<sup>a</sup> . 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 human pathological waste and associated materials. (40 CFR 60.51)**
2. The permittee shall not charge more than 750 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, R 336.1901)**
3. The permittee shall not burn any fuel in EUCREMATORY1 other than natural gas. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

**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 operate EUCREMATORY1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), 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 30 days after such an event occurs. The permittee shall also amend the MAP within 30 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), AQD CONSENT ORDER NO. 2023-17, Section 9.B. Paragraph 3 and Section 9.D Paragraph 5)**

4. The permittee shall not operate EUCREMATORY1 unless a Close Circuit Television (CCTV) is installed and maintained. The CCTV monitors shall be installed at locations visible to the cremation unit operator while standing at the control panel of EUCREMATORY1 as well as in each supervisor's office. The permittee shall continuously operate and record the CCTV video, with time stamp, before the start-up of the first cremation unit through the shutdown of the last operating cremation unit each day. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
5. The permittee shall maintain and operate the CCTV and recording system in a manner acceptable to the AQD, including but not limited to routinely checking and correcting video time stamps, routine cleaning, replacing and/or adding equipment to maintain a clear image of EUCREMATORY1's exhaust stack including positioning each camera to encompass the plume out to a minimum of 60 feet above the roof. Satisfactory operation and proper use of the CCTV system shall be detailed in the MAP as required by SC III.3. Additionally, the permittee shall provide the AQD with a live stream of the CCTV system. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
6. When EUCREMATORY1 is awaiting service, the permittee shall place signage on the malfunctioning cremation unit. The signage shall clearly state "Do Not Operate, Malfunctioning cremation unit awaiting service". Upon request of the AQD District Supervisor the permittee shall use a LockOut/TagOut system to prevent operation of a malfunctioning cremation unit that is awaiting service. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 4)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate 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 336.1901, 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, R 336.1901)**
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, R 336.1901)**
4. The permittee shall not operate EUCREMATORY1 unless an opacity monitor is installed, maintained, and properly operated. Proper operation includes calibration every 90 days. The permittee shall follow manufacturer instructions for proper operation and calibration. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 3))**

#### **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:

<b>Pollutant</b>	<b>Test Method Reference</b>
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 EUCREMATORY1 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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 EUCREMATORY1, 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 EUCREMATORY1, 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, R 336.1901)**
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, 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,)**
7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in EUCREMATORY1, 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)**
8. On and after August 9, 2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of opacity alarms for EUCREMATORY1. Each record shall indicate the date, start time, end time, duration (end time minus start time), and charge weight associated with each opacity alarm. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
9. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all opacity alarms calibrations for EUCREMATORY1. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4 and Section 9.D. Paragraph 3)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY1. The record shall identify the emission unit, charge weight, date, time and duration of each event. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
11. On and after August 9 ,2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all CCTV system failures, maintenance, equipment replacement, and equipment upgrades. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 2 and 4)**
12. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, all CCTV video records, with time stamps, pursuant to SC III.4 for EUCREMATORY1. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**

**VII. REPORTING**

1. The permittee shall report each opacity event lasting 60 or more seconds to the AQD District Supervisor within 24 hours of the opacity event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 1).**
2. The permittee shall report by email each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY1 to the AQD District Supervisor within 24 hours of the event. The report shall include the emission unit name, the date of the event, start time, end time, charge weight, and the CCTV video recording of the event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 3)**
3. The permittee shall submit a report of the opacity events lasting 60 or more seconds to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any Reporting special condition. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 3)**

**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. SVCREMATORY1	26	33.5	R 336.1901, 40 CFR 52.21 (c) & (d) AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 1

**IX. OTHER REQUIREMENT(S)**

NA

## EUCREMATORY2 EMISSION UNIT CONDITIONS

**DESCRIPTION**

Mathews Cremation Division  
 Super Power Pak (IE43-SPP)  
 Fuel Type: Natural Gas  
 Maximum Charge: 750 Pounds  
 Burn Rate: 200 Pounds/Hour  
 Charge Type: Human 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 lbs of gas <sup>a</sup>	Test Protocol* Hourly	EUCREMATORY2	SC V.1	R 336.1331
<sup>a</sup> . Calculated to 50% excess air.					

**II. MATERIAL LIMIT(S)**

1. The permittee shall not burn any waste in EUCREMATORY2 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 human pathological waste and associated materials. (40 CFR 60.51)**
2. The permittee shall not charge more than 750 pounds per charge in EUCREMATORY2, where charge is the total weight of the material placed in the incinerator to be combusted. **(R 336.1301, R 336.1331, R 336.1901)**
3. The permittee shall not burn any fuel in EUCREMATORY2 other than natural gas. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not combust waste in EUCREMATORY2 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 EUCREMATORY2. 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 operate EUCREMATORY2 unless a malfunction abatement plan (MAP) as described in Rule 911(2), 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 30 days after such an event occurs. The permittee shall also amend the MAP within 30 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), AQD CONSENT ORDER NO. 2023-17, Section 9.B. Paragraph 3 and Section 9.D Paragraph 5)**

4. The permittee shall not operate EUCREMATORY2 unless a Close Circuit Television (CCTV) is installed and maintained. The CCTV monitors shall be installed at locations visible to the cremation unit operator while standing at the control panel of EUCREMATORY2 as well as in each supervisor's office. The permittee shall continuously operate and record the CCTV video, with time stamp, before the start-up of the first cremation unit through the shutdown of the last operating cremation unit each day. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
5. The permittee shall maintain and operate the CCTV and recording system in a manner acceptable to the AQD, including but not limited to routinely checking and correcting video time stamps, routine cleaning, replacing and/or adding equipment to maintain a clear image of EUCREMATORY2's exhaust stack including positioning each camera to encompass the plume out to a minimum of 60 feet above the roof. Satisfactory operation and proper use of the CCTV system shall be detailed in the MAP as required by S.C. III.3. Additionally, the permittee shall provide the AQD with a live stream of the CCTV system. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
6. When EUCREMATORY2 is awaiting service, the permittee shall place signage on the malfunctioning cremation unit. The signage shall clearly state "Do Not Operate, Malfunctioning cremation unit awaiting service". Upon request of the AQD District Supervisor the permittee shall use a LockOut/TagOut system to prevent operation of a malfunctioning cremation unit that is awaiting service. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 4)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EUCREMATORY2 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 336.1901, 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 EUCREMATORY2 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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, R 336.1901)**
4. The permittee shall not operate EUCREMATORY2 unless an opacity monitor is installed, maintained, and properly operated. Proper operation includes calibration every 90 days. The permittee shall follow manufacturer instructions for proper operation and calibration. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 3))**

#### **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 EUCREMATORY2 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
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 EUCREMATORY2 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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 EUCREMATORY2, 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 EUCREMATORY2, 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, R 336.1901)**
6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY2, 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)**
7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in EUCREMATORY2, 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)**
8. On and after August 9, 2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of opacity alarms for EUCREMATORY2. Each record shall indicate the date, start time, end time, duration (end time minus start time), and charge weight associated with each opacity alarm. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
9. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all opacity alarms calibrations for EUCREMATORY2. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4 and Section 9.D. Paragraph 3)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY2. The record shall identify the emission unit, charge weight, date, time and duration of each event. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
11. On and after August 9 ,2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all CCTV system failures, maintenance, equipment replacement, and equipment upgrades. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 2 and 4)**
12. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, all CCTV video records, with time stamps, pursuant to SC III.4 for EUCREMATORY2. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**

**VII. REPORTING**

1. The permittee shall report each opacity event lasting 60 or more seconds to the AQD District Supervisor within 24 hours of the opacity event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 1).**
2. The permittee shall report by email each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY2 to the AQD District Supervisor within 24 hours of the event. The report shall include the emission unit name, the date of the event, start time, end time, charge weight, and the CCTV video recording of the event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 3)**
3. The permittee shall submit a report of the opacity events lasting 60 or more seconds to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any Reporting special condition. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 3)**

**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. SVCREMATORY2	26	33.5	R 336.1901 40 CFR 52.21 (c) & (d), AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 1

**IX. OTHER REQUIREMENT(S)**

NA

**EUCREMATORY3  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Matthews Cremation Division  
Power-Pak Jr. (IE43-PPJ)  
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)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. PM	0.20 lb / 1000 lbs of gas <sup>a</sup>	Hourly	EUCREMATORY3	SC V.1	R 336.1331
<sup>a</sup> . Calculated to 50% excess air.					

**II. MATERIAL LIMIT(S)**

1. The permittee shall not burn any waste in EUCREMATORY3 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 EUCREMATORY3, where charge is the total weight of the material placed in the incinerator to be combusted. **(R 336.1301, R 336.1331, R 336.1901)**
3. The permittee shall not burn any fuel in EUCREMATORY3 other than natural gas. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not combust waste in EUCREMATORY3 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 EUCREMATORY3. 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 operate EUCREMATORY3 unless a malfunction abatement plan (MAP) as described in Rule 911(2), 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 30 days after such an event occurs. The permittee shall also amend the MAP within 30 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), AQD CONSENT ORDER NO. 2023-17, Section 9.B. Paragraph 3 and Section 9.D Paragraph 5)**

4. The permittee shall not operate EUCREMATORY3 unless a Close Circuit Television (CCTV) is installed and maintained. The CCTV monitors shall be installed at locations visible to the cremation unit operator while standing at the control panel of EUCREMATORY3 as well as in each supervisor's office. The permittee shall continuously operate and record the CCTV video, with time stamp, before the start-up of the first cremation unit through the shutdown of the last operating cremation unit each day. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
5. The permittee shall maintain and operate the CCTV and recording system in a manner acceptable to the AQD, including but not limited to routinely checking and correcting video time stamps, routine cleaning, replacing and/or adding equipment to maintain a clear image of EUCREMATORY3's exhaust stack including positioning each camera to encompass the plume out to a minimum of 60 feet above the roof. Satisfactory operation and proper use of the CCTV system shall be detailed in the MAP as required by S.C. III.3. Additionally, the permittee shall provide the AQD with a live stream of the CCTV system. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
6. When EUCREMATORY3 is awaiting service, the permittee shall place signage on the malfunctioning cremation unit. The signage shall clearly state "Do Not Operate, Malfunctioning cremation unit awaiting service". Upon request of the AQD District Supervisor the permittee shall use a LockOut/TagOut system to prevent operation of a malfunctioning cremation unit that is awaiting service. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 4)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EUCREMATORY3 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 336.1901, 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 EUCREMATORY3 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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, R 336.1901)**
4. The permittee shall not operate EUCREMATORY3 unless an opacity monitor is installed, maintained, and properly operated. Proper operation includes calibration every 90 days. The permittee shall follow manufacturer instructions for proper operation and calibration. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 3))**

#### **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 EUCREMATORY3 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
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 EUCREMATORY3 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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 EUCREMATORY3, 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 EUCREMATORY3, 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, R 336.1901)**
6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY3, 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)**
7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in EUCREMATORY3, 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)**
8. On and after August 9, 2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of opacity alarms for EUCREMATORY3. Each record shall indicate the date, start time, end time, duration (end time minus start time), and charge weight associated with each opacity alarm. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
9. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all opacity alarms calibrations for EUCREMATORY3. 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 336.1301, R 336.1331, R 336.1910m AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4 and Section 9.D. Paragraph 3)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY3. The record shall identify the emission unit, charge weight, date, time and duration of each event. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
11. On and after August 9 ,2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all CCTV system failures, maintenance, equipment replacement, and equipment upgrades. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 2 and 4)**
12. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, all CCTV video records, with time stamps, pursuant to SC III.4 for EUCREMATORY3. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**

**VII. REPORTING**

1. The permittee shall report each opacity event lasting 60 or more seconds to the AQD District Supervisor within 24 hours of the opacity event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 1).**
2. The permittee shall report by email each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY3 to the AQD District Supervisor within 24 hours of the event. The report shall include the emission unit name, the date of the event, start time, end time, charge weight, and the CCTV video recording of the event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 3)**
3. The permittee shall submit a report of the opacity events lasting 60 or more seconds to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any Reporting special condition. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 3)**

**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. SVCREMATORY3	24	33.5	R 336.1901, 40 CFR 52.21 (c) & (d) AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 1

**IX. OTHER REQUIREMENT(S)**

NA

**EUCREMATORY4  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Matthews Cremation Division  
Super Power Pak  
(IE43-SPP)  
Fuel Type: Natural Gas  
Maximum Charge: 750 Pounds  
Burn Rate: 200 Pounds/Hour  
Charge Type: Human Remains

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Secondary combustion chamber with afterburner

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. PM	0.20 lb / 1000 lbs of gas <sup>a</sup>	Hourly	EUCREMATORY4	SC V.1	R 336.1331

<sup>a</sup>. Calculated to 50% excess air.

**II. MATERIAL LIMIT(S)**

1. The permittee shall not burn any waste in EUCREMATORY4 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 human pathological waste and associated materials. (40 CFR 60.51)**
2. The permittee shall not charge more than 750 pounds per charge in EUCREMATORY4, where charge is the total weight of the material placed in the incinerator to be combusted. **(R 336.1301, R 336.1331, R 336.1901)**
3. The permittee shall not burn any fuel in EUCREMATORY4 other than natural gas. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not combust waste in EUCREMATORY4 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 EUCREMATORY4. 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 operate EUCREMATORY4 unless a malfunction abatement plan (MAP) as described in Rule 911(2), 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

30 days after such an event occurs. The permittee shall also amend the MAP within 30 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), AQD CONSENT ORDER NO. 2023-17, Section 9.B. Paragraph 3 and Section 9.D Paragraph 5)**

4. The permittee shall not operate EUCREMATORY4 unless a Close Circuit Television (CCTV) is installed and maintained. The CCTV monitors shall be installed at locations visible to the cremation unit operator while standing at the control panel of EUCREMATORY4 as well as in each supervisor's office. The permittee shall continuously operate and record the CCTV video, with time stamp, before the start-up of the first cremation unit through the shutdown of the last operating cremation unit each day. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
5. The permittee shall maintain and operate the CCTV and recording system in a manner acceptable to the AQD, including but not limited to routinely checking and correcting video time stamps, routine cleaning, replacing and/or adding equipment to maintain a clear image of EUCREMATORY4's exhaust stack including positioning each camera to encompass the plume out to a minimum of 60 feet above the roof. Satisfactory operation and proper use of the CCTV system shall be detailed in the MAP as required by S.C. III.3. Additionally, the permittee shall provide the AQD with a live stream of the CCTV system. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
6. When EUCREMATORY4 is awaiting service, the permittee shall place signage on the malfunctioning cremation unit. The signage shall clearly state "Do Not Operate, Malfunctioning cremation unit awaiting service". Upon request of the AQD District Supervisor the permittee shall use a LockOut/TagOut system to prevent operation of a malfunctioning cremation unit that is awaiting service. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 4)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EUCREMATORY4 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 336.1901, 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 EUCREMATORY4 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
3. The permittee shall maintain a scale at a site approved by the AQD district supervisor for the purpose of verifying the charge weight as required by SC II.2. **(R 336.1301, R 336.1331, R 336.1901)**
4. The permittee shall not operate EUCREMATORY4 unless an opacity monitor is installed, maintained, and properly operated. Proper operation includes calibration every 90 days. The permittee shall follow manufacturer instructions for proper operation and calibration. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 3))**

#### **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:

<b>Pollutant</b>	<b>Test Method Reference</b>
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 EUCREMATORY4 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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 EUCREMATORY4, 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 EUCREMATORY4, 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, R 336.1901)**
6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY4, 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)**
7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in EUCREMATORY4, 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)**
8. On and after August 9, 2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of opacity alarms for EUCREMATORY4. Each record shall indicate the date, start time, end time, duration (end time minus start time), and charge weight associated with each opacity alarm. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
9. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all opacity alarms calibrations for EUCREMATORY4. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4 and Section 9.D. Paragraph 3)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY4. The record shall identify the emission unit, charge weight, date, time and duration of each event. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
11. On and after August 9 ,2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all CCTV system failures, maintenance, equipment replacement, and equipment upgrades. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 2 and 4)**
12. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, all CCTV video records, with time stamps, pursuant to SC III.4 for EUCREMATORY4. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**

**VII. REPORTING**

1. The permittee shall report each opacity event lasting 60 or more seconds to the AQD District Supervisor within 24 hours of the opacity event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 1).**
2. The permittee shall report by email each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY4 to the AQD District Supervisor within 24 hours of the event. The report shall include the emission unit name, the date of the event, start time, end time, charge weight, and the CCTV video recording of the event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 3)**
3. The permittee shall submit a report of the opacity events lasting 60 or more seconds to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any Reporting special condition. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 3)**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVCREMATORY4	26	33.5	R 336.1901, 40 CFR 52.21 (c) & (d) AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 1

**IX. OTHER REQUIREMENT(S)**

NA

**EUCREMATORY5  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Matthews Cremation Division  
Power Pak II Plus  
(IE43-PPII Plus)  
Fuel Type: Natural Gas  
Maximum Charge: 750 Pounds  
Burn Rate: 175 Pounds/Hour  
Charge Type: Human Remains

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Secondary combustion chamber with afterburner

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. PM	0.20 lb / 1000 lbs of gas <sup>a</sup>	Hourly	EUCREMATORY5	SC V.1	R 336.1331

<sup>a</sup>. Calculated to 50% excess air.

**II. MATERIAL LIMIT(S)**

1. The permittee shall not burn any waste in EUCREMATORY5 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 human pathological waste and associated materials. (40 CFR 60.51)**
2. The permittee shall not charge more than 750 pounds per charge in EUCREMATORY5, where charge is the total weight of the material placed in the incinerator to be combusted. **(R 336.1301, R 336.1331, R 336.1901)**
3. The permittee shall not burn any fuel in EUCREMATORY5 other than natural gas. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not combust waste in EUCREMATORY5 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 EUCREMATORY5. 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 operate EUCREMATORY5 unless a malfunction abatement plan (MAP) as described in Rule 911(2), 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

30 days after such an event occurs. The permittee shall also amend the MAP within 30 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), AQD CONSENT ORDER NO. 2023-17, Section 9.B. Paragraph 3 and Section 9.D Paragraph 5)**

4. The permittee shall not operate EUCREMATORY5 unless a Close Circuit Television (CCTV) is installed and maintained. The CCTV monitors shall be installed at locations visible to the cremation unit operator while standing at the control panel of EUCREMATORY5 as well as in each supervisor's office. The permittee shall continuously operate and record the CCTV video, with time stamp, before the start-up of the first cremation unit through the shutdown of the last operating cremation unit each day. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
5. The permittee shall maintain and operate the CCTV and recording system in a manner acceptable to the AQD, including but not limited to routinely checking and correcting video time stamps, routine cleaning, replacing and/or adding equipment to maintain a clear image of EUCREMATORY5's exhaust stack including positioning each camera to encompass the plume out to a minimum of 60 feet above the roof. Satisfactory operation and proper use of the CCTV system shall be detailed in the MAP as required by S.C. III.3. Additionally, the permittee shall provide the AQD with a live stream of the CCTV system. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**
6. When EUCREMATORY5 is awaiting service, the permittee shall place signage on the malfunctioning cremation unit. The signage shall clearly state "Do Not Operate, Malfunctioning cremation unit awaiting service". Upon request of the AQD District Supervisor the permittee shall use a LockOut/TagOut system to prevent operation of a malfunctioning cremation unit that is awaiting service. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 4)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EUCREMATORY5 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 336.1901, 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 EUCREMATORY5 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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, R 336.1901)**
4. The permittee shall not operate EUCREMATORY5 unless an opacity monitor is installed, maintained, and properly operated. Proper operation includes calibration every 90 days. The permittee shall follow manufacturer instructions for proper operation and calibration. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 3))**

#### **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 EUCREMATORY5 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
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 15<sup>th</sup> 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 EUCREMATORY5 on a continuous basis. **(R 336.1301, R 336.1331, R 336.1901)**
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 EUCREMATORY5, 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 EUCREMATORY5, 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, R 336.1901)**
6. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all service, maintenance and equipment inspections for EUCREMATORY5, 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)**
7. The permittee shall keep, in a satisfactory manner to the AQD Supervisor, records of the type of fuel burned in EUCREMATORY5, 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)**
8. On and after August 9, 2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of opacity alarms for EUCREMATORY5. Each record shall indicate the date, start time, end time, duration (end time minus start time), and charge weight associated with each opacity alarm. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
9. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all opacity alarms calibrations for EUCREMATORY5. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4 and Section 9.D. Paragraph 3)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY5. The record shall identify the emission unit, charge weight, date, time and duration of each event. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 4)**
11. On and after August 9 ,2023, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, a record of all CCTV system failures, maintenance, equipment replacement, and equipment upgrades. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 2 and 4)**
12. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, all CCTV video records, with time stamps, pursuant to SC III.4 for EUCREMATORY5. 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 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 2)**

**VII. REPORTING**

1. The permittee shall report each opacity event lasting 60 or more seconds to the AQD District Supervisor within 24 hours of the opacity event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 1).**
2. The permittee shall report by email each event in which flames, regardless of size, intensity, or duration are emitted from the stack of EUCREMATORY5 to the AQD District Supervisor within 24 hours of the event. The report shall include the emission unit name, the date of the event, start time, end time, charge weight, and the CCTV video recording of the event. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraphs 1 and 3)**
3. The permittee shall submit a report of the opacity events lasting 60 or more seconds to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any Reporting special condition. **(R 336.1301, R 336.1331, R 336.1910, AQD CONSENT ORDER NO. 2023-17, Section 9.C. Paragraph 3)**

**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. SVCREMATORY5	29	33.5	R 336.1901, 40 CFR 52.21 (c) & (d) AQD CONSENT ORDER NO. 2023-17, Section 9.D. Paragraph 1

**IX. OTHER REQUIREMENT(S)**

NA

**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.