



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: December 18, 2024

Effective Date: May 28, 2026

Revision Date: May 21, 2026

Expiration Date: November 28, 2026

Revision Type: Extension

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 63-01072A

Federal Tax Id - Plant Code: 88-3951234-1

Owner Information

Name: COMM CREMATIONS LLC

Mailing Address: 24 N CHERRY AVE
HOUSTON, PA 15342

Plant Information

Plant: COMM CREMATIONS LLC/COMM CREMATIONS HOUSTON

Location: 63 Washington County

63937 Houston Borough

SIC Code:

Responsible Official

Name: ROBERT K MCILVAINE

Title: MGR & PRES

Phone: (724) 719 - 9988

Email: rmcilvaine@comcast.net

Plan Approval Contact Person

Name: ROBERT K MCILVAINE

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Phone: (724) 719 - 9988

Email: rmcilvaine@comcast.net

[Signature] _____

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION



Plan Approval Description

This plan approval allows Community Cremations Houston facility to cremate human bodies weighing up to 1,000 pounds including container in the previously authorized natural gas-fired A-350 HT crematory incinerator rated at 150 lbs/hr located in Houston Borough, Washington County.



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Plan Approval Inventory List

Section B. General Plan Approval Requirements

- #001 Definitions
- #002 Future Adoption of Requirements
- #003 Plan Approval Temporary Operation
- #004 Content of Applications
- #005 Public Records and Confidential Information
- #006 Plan Approval Terms and Conditions
- #007 Transfer of Plan Approvals
- #008 Inspection and Entry
- #009 Plan Approval Changes for Cause
- #010 Circumvention
- #011 Submissions
- #012 Risk Management
- #013 Prohibition of Air Pollution
- #014 Compliance Requirement

Section C. Site Level Plan Approval Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Plan Approval Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Section E. Source Group Restrictions

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements



SECTION A. Table of Contents

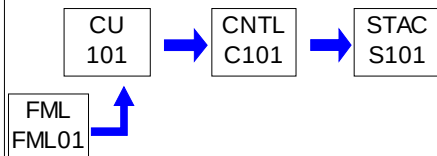
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	AMERICAN CREMATORY @ 150 LBS/HR		
C101	SECONDARY CHAMBER @ 1.25 MMBT/HR		
FML01	FUEL MATERIAL LOCATION		
S101	FUGITIVE OF HUMAN CREMATOR		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

(c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the act.

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (8) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in § § 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

(d) The requirements contained in subsection (a) and 123.2 do not apply to fugitive emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

003 [25 Pa. Code §123.2]**Fugitive particulate matter**

The Owner/Operator may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code §123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions) if the emissions are visible at

**SECTION C. Site Level Plan Approval Requirements**

the point the emissions pass outside the Owner/Operator's property.

004 [25 Pa. Code §123.31]**Limitations**

The Owner/Operator may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside of the property of the Facility.

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

There shall be no fugitive emissions from the facility contrary to 25 Pa. Code § 123.1 & § 123.2.

II. TESTING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this plan approval may be in excess of the limitations specified in or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

007 [25 Pa. Code §139.11]**General requirements.**

If performance testing is required, such testing shall be conducted as follows:

- (a) The permittee shall submit a pre-test protocol electronically to the Department for review at least 90 days prior to the performance of any EPA reference method stack test or portable analyzer test. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.
- (b) The permittee shall notify the Regional Air Quality Manager at least 15 days prior to any performance test so that an observer may be present at the time of the test. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (d) Pursuant to 25 Pa. Code §139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
 - (1) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - (2) Permit number(s) and condition(s) which are the basis for the evaluation.
 - (3) Summary of results with respect to each applicable permit condition.
 - (4) Statement of compliance or non-compliance with each applicable permit condition.
- (e) Pursuant to 25 Pa. Code §139.3, all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (f) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.



SECTION C. Site Level Plan Approval Requirements

- (g) All submittals shall be sent electronically to ra-epstacktesting@pa.gov, with CC: to ra-epswstacktesting@pa.gov.
- (h) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method, or rule shall be used by default.

III. MONITORING REQUIREMENTS.

008 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following [25 Pa. Code §123.43]:

- (i) A device approved by the Department and maintained to provide accurate opacity measurements.
- (ii) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) All required records shall be maintained on file at the facility for a minimum of five (5) years and shall be made available to the Department upon request. These records may be maintained in electronic format.
- (b) The owner or operator of the facility shall keep records of all written notifications required under the plan approval conditions.

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Malfunction reporting shall be conducted as follows:

- (a) For purpose of this condition a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions may include, but are not limited to large dust plumes, heavy smoke, a spill or release those results in a malodor that is detectable outside the property of the person on whose land the source is being operated.

- (b) When the malfunction poses an imminent and substantial danger to the public health and safety, potential harm to the environment, the permittee shall report the incident to the Department within one hour of discovery. The permittee shall also notify the Department within one hour, when corrective measures have been accomplished.

All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

- (c) Initial reporting of the malfunction shall identify the following items to the extent known:

- (1) Name and location of the facility;
- (2) Nature and cause of the malfunction;
- (3) Time when the malfunction or breakdown was first observed;
- (4) Expected duration of increased emissions; and
- (5) Estimated rate of emissions.

**SECTION C. Site Level Plan Approval Requirements**

(d) Malfunctions shall be reported to the Department by e-mail (addresses will be provided by the Department) or at the following address:

PA DEP
Office of Air Quality
400 Waterfront Drive
Pittsburgh, PA 15222-4745
412-442-4000

(e) If requested by the Department, the permittee shall submit a full written report to the Department including final determinations of the items identified in c. and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

(b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report with 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.

(c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall conduct a facility-wide inspection for the presence of any visible stack emissions, fugitive emissions, and any potentially objectionable odors at the property line at a minimum of once each week, during daylight hours, and while the sources are operating. If visible stack emissions, fugitive emissions, and/or potentially objectionable odors are apparent, the permittee shall take corrective action. Records of each inspection shall be maintained in a log and at the minimum include the date, time, name, and title of the observer, along with any corrective action taken as a result.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules.

VII. ADDITIONAL REQUIREMENTS.**# 014 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This plan approval allows Community Cremations Houston facility to cremate human bodies weighing up to 1,000 pounds including container in the previously authorized natural gas-fired A-350 HT crematory incinerator rated at 150 lbs/hr located in Houston Borough, Washington County.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Upon determination by the permittee that the air contamination sources, and air cleaning devices covered by this plan approval are in compliance with all conditions of the plan approval, the permittee shall contact the Department's technical reviewer and schedule the Initial Operating Permit Inspection.

**SECTION C. Site Level Plan Approval Requirements****# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Upon completion of the Initial Operating Permit Inspection and determination by the Department that the permittee is in compliance with all conditions of the plan approval, the permittee shall submit a State Only Operating Permit (SOOP) application for this Facility within 120 days.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit requests to extend the temporary operation periods at least 30 days prior to the expiration date of any authorized period of temporary operation.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: AMERICAN CREMATORY @ 150 LBS/HR

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The operation of crematory shall not exceed the following emission limits at any time:

- a. Filterable particulate matter emissions in excess of 0.08 gr/dscf, corrected to 7% oxygen.
- b. Sulfur compound emissions in excess of 500 parts per million, by volume, dry basis, as specified in 25 Pa. Code § 123.21.
- c. Visible emissions in excess of either of the following limitations:
 - i. Equal to or greater than 10% for a period or periods aggregating more than three minutes in any hour;
 - ii. Equal to or greater than 30% at any time.
- d. Odor emission in such a manner that the malodors are detectable outside the property of the permittee as specified in 25 Pa. Code § 123.31.

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

If any visible or odor emissions are apparent, the owner or operator shall take immediate action to eliminate them. If any visible or odor emissions are apparent after the corrective action, the crematory incinerator shall not start another cremation cycle until the owner or operator can verify compliance with the visible emission limitations specified in Section C, conditions through methods prescribed in 25 Pa. Code § 123.43, such as Method 9 readings taken by a certified visible emissions reader.

Operation Hours Restriction(s).**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

A-350 HT Crematory unit shall not exceed 4,368 hours of operation in any consecutive 12-month period.

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Testing shall be conducted, if required, on the A-350 HT human crematory unit as follows:

The Owner/Operator shall conduct EPA reference method stack testing for Filterable Particulate Matter (FPM) upon the A-350 HT unit. Initial performance testing is required within 180 days of installation of the A-350 HT unit, or at a timeframe extended by the Department in writing. The initial performance test shall be conducted using EPA Method stack testing or alternative methods as approved by the Department in writing. Alternatively, the Owner/Operator may provide a copy of a stack test performed on an identical unit within the last five years within 180 days of installation of the A-350 HT unit to show

**SECTION D. Source Level Plan Approval Requirements**

compliance with particulate matter emission limitations.

III. MONITORING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall observe the exhaust stack of the crematory at least once during each cremation cycle for the presence of visible and odor emissions. As an alternative to the stack observations, if the crematory is equipped with an opacity monitoring device, the operator may observe the output from the opacity monitoring device for the presence of visible emissions, provided that the device is maintained in accordance with the manufacturer's recommendations and the operator is instructed in the proper operation and maintenance of the opacity monitoring device as part of the operator training program. The device must be capable of detecting and measuring stack opacity at any level from 0% to 100%. The operator must observe and record the output readings during each cremation cycle. Readings in excess of the applicable limitations shall be addressed in the same manner as the visual stack observations.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The owner or operator shall install, maintain, and operate temperature monitors to measure and continuously record the temperature at the exit from the primary combustion chamber and at the exit from the secondary (or last) chamber of the crematory incinerator. Sensors shall be located where flames from the burners do not impinge on the sensors.

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All required records shall be maintained on file at the facility for a minimum of five (5) years and shall be made available to the Department upon request. The owner or operator shall maintain records of:

- (i) The name of the operator performing the cremation;
- (ii) Visible and odor emission observations including the name of the operator conducting the observation, the date and time of the observation, and any corrective actions;
- (iii) The temperature of the primary and secondary (or last) combustion chambers during each cremation cycle on a continuous basis;
- (iv) The time and corresponding exit temperatures of the primary and secondary (or last) combustion chamber when charging the unit;
- (v) The amount and type of fuel used on a monthly basis;
- (vi) The hours of operation;
- (vii) The number of cremations performed;
- (viii) The time, date, and duration of when the charge door is opened during the cremation cycle;
- (ix) Operator training certifications and training program content;
- (x) Burner adjustments and maintenance;
- (xi) Thermocouple calibrations, adjustments, and replacements;
- (xii) The fuel oil sulfur content as certified by the supplier of the fuel oil burned in the crematory incinerator; and
- (xiii) The removal from the body and proper disposal of an implanted electronic device or potentially hazardous remedial device.
- (xiv) For large cases (200 to 300 pounds) and obese cases (over 350 pounds), the operator shall record body weight and confirm that the manufacturer's special instructions were followed for these cases during cremation process.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) Before charging the unit, the temperature at the exit of the secondary (or last) chamber shall achieve and be maintained at or above 1,600°F throughout the cremation cycle.
- (b) Cold charging of the primary chamber is permitted,
- (c) Operators may open the charge door during the cremation cycle for short periods of time to inspect or reposition the remains. In the event that the owner or operator opens the charge door, the owner or operator shall follow the manufacturer's recommended written specifications for operating the unit during inspection or repositioning of the remains and keep records of the time, date, and duration of when the charge door is opened during the cremation cycle.
- (d) The manufacturer's representative or another qualified technician shall adjust the burners after the unit is constructed or modified and before the new or modified unit is first operated and at other appropriate times such as when the use of an approved fuel is initiated and when visible emissions are observed.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The crematory at the facility shall be configured as follows:

- Provide sufficient secondary chamber volume to maintain the exhaust gases at 1,600° F for at least one second.
- Fueled by natural gas, where compliance with this requirement shall be deemed to establish compliance with the sulfur compound emission limitations of this Plan Approval.
- In accordance with the manufacturer's specification, equipped with an opacity control system of which the alarm is calibrated to a set-point of 10% opacity.
- Equipped with temperature monitors to measure and continuously record the temperature at the exit from the primary combustion chamber and in the secondary chamber of the crematory. Sensors shall be located such that flames from the burners do not impinge on the sensors.

VII. ADDITIONAL REQUIREMENTS.**# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This plan approval does not authorize the cremation of:

- Anything aside from human remains and the container used to transport the remains.
- Human bodies whose weight exceeds 1,000 pounds, including the weight of the container.
- Human remains in polyvinylchloride (PVC) containers.
- Medical devices (e.g. pacemakers, defibrillators, etc.) and potentially hazardous remedial devices (e.g. radioactive implants, etc.). The owner or operator shall ensure that these items have been removed from the bodies and properly disposed of prior to cremation. Documentation certifying compliance with this requirement must be maintained for each cremation.
- Any other type of waste (e.g. hospital, medical, hazardous, chemotherapeutic, radioactive, etc.).

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

If nighttime cremations will be conducted, adequate artificial lighting of the plume at the stack outlet must be provided to enable observations of stack emissions to occur at night.

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The manufacturer's representative or another qualified training source shall provide adequate instruction to all crematory

**SECTION D. Source Level Plan Approval Requirements**

operators at this facility including hands-on control of the unit for at least two operating cycles. The training shall include all of the following elements:

- a. Principles of combustion.
- b. Operating monitors and controls.
- c. Operating sequence under normal conditions.
- d. Safety and operating procedures under foreseeable upset conditions (e.g. power or fuel interruption, burner malfunction, visible emissions, high and low temperature incidents, etc.)
- e. Regulatory requirements.
- f. Calibration, adjustment, and replacement of thermocouples.
- g. Preventative maintenance practices and procedures and recommended frequency, and
- h. Recordkeeping requirements and conditions.
- i. Manufacturer's Manual Recommended procedure for cremating the large cases weighing between 200 pounds to 300 pounds and obese cases weighing over 350 pounds.



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



***** End of Report *****
