

Air Standard Permit Application Priceless Pets Crematory, LLC 11616 State Highway 94 South Trinity, TX 75862 Trinity County

Prepared By:

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Application Information and Notes

Project Description:

The intent of this application is to obtain a Standard Permit for Installation of a Crawford Industrial Group model C700P Crematory to be installed at Priceless Pets Crematory, LLC located at 11616 State Highway 94 South, Trinity, TX 75862, Trinity County. This is a new crematory at a new facility and meets the 50ft setback requirements for a standard permit.

Compliance History:

Stack Sampling Ports & Facilities: Stack testing of the crematory is not expected to be required based on identical source stack testing results. C700P Criteria pollutant emission estimates are based on AP-42 Table 2.1-12, Uncontrolled Emission Factors for Refuse Combustors Other Than Municipal Waste.

Protection of Public Health and Welfare:

Based on similar source stack test and manufacturer supplied data, the emissions from the proposed facility will comply with the rules and regulations of the Commission, including protection of the health and physical property of the people.

Title 40 CFR Part 60: The source is not applicable to NSPS. Title 40 CFR Part 61: The source is not applicable to NESHAP. Title 40 CFR Part 63: The source is not applicable to MACT.

Performance Demonstration:

Stack testing of the crematory is not expected to be required.

In accordance with TCEQ Rule 111.121(1), the PM emission concentration should be less than 0.08 gr/dscf, corrected to 7% 02 (total PM 0.16 gr/dscf), based on the similar source stack test included in Appendix IV. In accordance with TCEQ Rule 111.121(3), the CO emission concentration will not exceed 100 ppm by volume (dry basis), corrected to 7% 02, based on the similar source stack test included.

Nonattainment review:

Emission levels are not of the magnitude to trigger nonattainment review. Prevention of Significant Deterioration (PSD) review: Due to the emission levels PSD is not applicable. Air Dispersion Modeling:

Based on the emission levels and nature of the surrounding environment, dispersion modeling is not warranted.

Hazardous Air Pollutants (HAPs):

Emission of HAPs from the cremation of animal cremators are insignificant.

It is the intent of Priceless Pets Crematory, LLC Crematory to comply with applicable portions of 30 TAC Chapter 116 "Control of Air Pollution by Permits for New Construction or Modifications". Additional information pertaining to compliance with 30 TAC Chapter 116 is provided below:

30 TAC Chapter 116.112 does not apply to this facility. 30 TAC Chapter 116.115 "General and Special Conditions" It is the intent of Priceless Pets Crematory, LLC to comply with the applicable permit General Conditions and those Special Conditions, which have been reviewed by our air, permit engineer and have been deemed absolutely necessary by the TCEQ. 30 TAC Chapter 116.116 "Changes to Facilities" It is the intent of Priceless Pets Crematory, LLC to comply with the applicable portions of 30 TAC Chapter 116.116 should changes to the facility are proposed. 30 TAC Chapter 116.117 "Documentation and Notification of Changes to Qualified Facilities" It is the intent of Priceless Pets Crematory, LLC to comply with the applicable portions of 30 TAC Chapter 116.117 should proposed changes fall within the definition of Qualified Facilities in 30 TAC Chapter 116.116(e). <u>30 TAC Chapter 116.118 "Pre-change Qualification"</u> Should facility conditions exist and facility changes are proposed which require the facility to obtain pre-change qualifications, it is the intent of Priceless Pets Crematory, LLC to comply with the applicable portions of 30 TAC Chapter 116.118.

It is the intent of Priceless Pets Crematory, LLC to comply with the applicable portions of 30 TAC Chapters 111, 112, 113, 115, 117, 118, and 122.

<u>Chapter 111 Control of Air Pollution from Visible Emissions and</u> <u>Particulate Matter</u>

Particulate emissions shall not exceed 0.18 gram per dry standard cubic meter (g/dscm) or 0.08 grains per dry standard cubic foot (gr/dscf), front-half of sampling train only, when corrected for 7.0% oxygen (02) in the stack gas according to the formula. Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume dry basis, when corrected to 7.0% 0 2 in the stack gas. Oxygen content shall be maintained at greater than 4.0% by volume of the emissions of the incinerator, measured at the exit of the incinerator. Visible emissions shall not exceed opacity of 5.0% averaged over any six-minute period.

Based on the Source Emission Test Report the model C700P can maintain a Secondary Combustion Chamber temperature in excess of 1800 degrees Fahrenheit and 1.0 second residence time during actual conditions. Actual operating temperature shall be from 1400°F to 1600°F.

The source does not burn Hazardous Waste Fuels.

RULE §111.127 Monitoring and Record keeping Requirements

A Partlow MRC 5000 chart recorder or equivalent is going to record the secondary chamber temperature.

<u>Chapter 112 Control of Air Pollution from Sulfur Compounds</u> Chapter 112 Control of Air Pollution from Sulfur Compounds is not applicable to this source.

<u>Chapter 113 Standards of Performance for HAPs and for Designated</u> <u>Facilities</u>

Chapter 113 Standards of Performance for HAPs and for Designated Facilities and pollutants is not applicable to this source. Animal crematories are not one of the designated sources under Subchapter D Designated Facilities and Pollutants.

<u>Chapter 115 Control of Air Pollution from Volatile Organic</u> <u>Compounds</u>

Chapter 115 Control of Air Pollution from Volatile Organic Compounds is not applicable to this source.

<u>Chapter 117 Control of Air Pollution from Nitrogen Compounds</u> Chapter 117 Control of Air Pollution from Nitrogen Compounds is not applicable to this source. An animal crematory is not considered a water heater, small boiler, or process heater as they are defined in Subchapter D Small Combustion Sources. Chapter 122 Federal Operating Permits

This source is not a Major Source of air pollution or a Synthetic Minor Source of air pollution. It is a minor source of air pollution, which may be applicable to TCEQ rules and regulations. Chapter 122 Federal Operating Permits is not applicable to this source as the source does not need to limit it's potential to emit.

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