April 7, 1994

MEMORANDUM

TO: Martin Bauer, Chief
    Construction Permits Bureau
    Permits and Enforcement

FROM: Dan Salgado, Air Quality Engineer
      Construction Permits Bureau

SUBJECT: Shoshone Funeral Service (Kellogg) -- P-940039
         (Cremator Incinerator PTC Modification)
         PTC Technical Analysis

PROJECT DESCRIPTION

Shoshone Funeral Service requests that their Permit to Construct #079-00019 be modified to change the temperature to which the secondary combustion chamber will be preheated. The applicant wants the preheat temperature to be 1600 degrees F as opposed to 1800 degrees F as the current permit requires.

SUMMARY OF EVENTS

On February 11, 1994, DEQ issued Shoshone Funeral Home a Permit to Construct for a cremator incinerator. On March 1, 1994, DEQ received a request to modify the permit. On March 22, 1994, the permit was determined complete.

A. Discussion

1. Area Classification
   
The cremator incinerator will be installed at the Shoshone Funeral Home in Kellogg, Idaho. The area is classified as attainment or unclassified for all criteria pollutants.

2. Emission Estimates
   
Emissions from the facility are not being modified and therefore no emission estimates were calculated. Preheating the secondary chamber to 1600 degrees will not affect the current permitted emissions. When the human remains ignite, the temperature in the secondary chamber will increase by approximately 250 degrees. Therefore, the operating temperature of the secondary chamber will remain at a minimum of 1800 degrees, as specified in the current permit.
3. Facility Classification

The facility is a non-designated facility as defined by IDAPA 16.01.01003.29. The facility is a non-major facility as defined by IDAPA 16.01.01003.56. This is a minor modification to a minor facility. The facility is a funeral service (SIC 7261).

4. Regulatory Review

The facility is subject to the following permitting requirements:

- IDAPA 16.01.01012.02 Permit to Construct;
- IDAPA 16.01.01012.04 Application Procedures;
- IDAPA 16.01.01012.05 Permit Requirements for New and Modified Stationary Sources;
- IDAPA 16.01.01012.13 Procedure for Issuing Permits;
- IDAPA 16.01.01012.14 Conditions for Permits to Construct;
- IDAPA 16.01.01012.15 Obligation to Comply;
- IDAPA 16.01.01501 Rules for Control of Incinerators;
- IDAPA 16.01.01502 Emission Limits;
- IDAPA 16.01.01503 Design Standards.

5. Modeling

Because the emission limits are not being changed no modeling is required.

6. Fees

This facility's absolute potential to emit as defined in IDAPA 16.01.01003.01 is less than 100 tons per year and is not an affected facility under any New Source Performance Standard and, therefore, is not subject to registration fees in accordance with IDAPA 16.01.01016.05.
RECOMMENDATION

Based on a review of application materials and state and federal regulations, staff recommend that Shoshone Funeral Home be issued a modified Permit to Construct for their crematory incinerator. No public comment period is recommended, no entity has requested a comment period and the project does not involve PSD Permit to Construct requirements.

DS/ve:SHOSHON/SHOSH02.TM

cc:  R. Wilkosz/TSB
     P. Rayne/AFS
     NIRO
     File Manual
     COF