<table>
<thead>
<tr>
<th>Permit Number</th>
<th>079539</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility (Permittee)</td>
<td>The Independent Funeral Group, Inc. dba East Tennessee Cremation Co.</td>
</tr>
<tr>
<td>Facility ID</td>
<td>05-0051</td>
</tr>
<tr>
<td>Facility Address</td>
<td>503 National Drive, Maryville Blount County</td>
</tr>
<tr>
<td>Facility Classification</td>
<td>True Minor</td>
</tr>
<tr>
<td>Federal Requirements</td>
<td>Non-Attainment BACT</td>
</tr>
<tr>
<td>Facility Description</td>
<td>Crematory Services</td>
</tr>
</tbody>
</table>

Operating Permit 079539, consisting of 22 pages is hereby issued July 21, 2022, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit expires on January 1, 2032. The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

Michelle W. Owenby  
Technical Secretary  
Tennessee Air Pollution Control Board

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.
Section I – Sources Included in this Operating Permit

<table>
<thead>
<tr>
<th>Source Number</th>
<th>Source Description</th>
<th>Status</th>
<th>Control Device/Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>02</td>
<td>One Natural Gas-Fired Human Crematory</td>
<td>Existing</td>
<td>Afterburner</td>
</tr>
<tr>
<td>03</td>
<td>One Natural Gas-Fired Human Crematory</td>
<td>Existing</td>
<td>Afterburner</td>
</tr>
<tr>
<td>05</td>
<td>One Natural Gas-Fired Human Crematory</td>
<td>Existing</td>
<td>Afterburner</td>
</tr>
<tr>
<td>06</td>
<td>One Natural Gas-Fired Human Crematory</td>
<td>Existing</td>
<td>Afterburner</td>
</tr>
</tbody>
</table>

Section II – Permit Record

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Description of Permit Action</th>
<th>Issue Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial</td>
<td>Initial operating permit for Source 06 and renewal of Sources 02, 03, and 05</td>
<td>July 21, 2022</td>
</tr>
</tbody>
</table>

Section III - General Permit Conditions

G1. Responsible Person

The applications that were utilized in the preparation of this operating permit are dated September 23, 2021, (signed by Jarrett W. Vance, Director of Operations) and October 22, 2021, signed by Brad Kuchnicki, Executive Director, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after being assigned as the Responsible Person. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in Condition G1, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)
G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the email addresses indicated in the table below:

<table>
<thead>
<tr>
<th>Permitting Program</th>
<th>Compliance Validation Program</th>
<th>Field Services Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Notifications</td>
<td>• Test protocols</td>
<td>• Semiannual reports</td>
</tr>
<tr>
<td>• Startup certifications</td>
<td>• Emission test reports</td>
<td>• Annual compliance certifications/status reports</td>
</tr>
<tr>
<td>• Applications</td>
<td>• Visible emission evaluation reports</td>
<td></td>
</tr>
<tr>
<td>• NSPS reports</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• MACT/GACT/NESHAP reports</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Emission Statements</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Division of Air Pollution Control
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
Air.Pollution.Control@tn.gov

Knoxville Environmental Field Office
Division of Air Pollution Control
3711 Middlebrook Pike
Knoxville, TN 37921
APC.KnoxEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

TAPCR 1200-03-09-.03(8)

G4. Notification of Changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)
B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in Condition G1.

TAPCR 1200-03-09-.03(6)(a) and (b)

G6. Operating Permit Renewal Application Submittal

A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit’s expiration date.

TAPCR 1200-03-09-.02(3)(a)

B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G7. Fees

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in Appendix 4 of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from Appendix 4). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

G8. General Recordkeeping Requirements

A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

<table>
<thead>
<tr>
<th>For Daily Recordkeeping</th>
<th>For Weekly Recordkeeping</th>
<th>For Monthly Recordkeeping</th>
</tr>
</thead>
<tbody>
<tr>
<td>No later than seven days from the end of the day for which the data is required.</td>
<td>No later than seven days from the end of the week for which the data is required.</td>
<td>No later than 30 days from the end of the month for which the data is required.</td>
</tr>
</tbody>
</table>

B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility’s address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility’s address.

TAPCR 1200-03-10-.02(2)(a)
G9. **Routine Maintenance Requirements**

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G10. **Visible and Fugitive Emissions**

A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

**Compliance Method:** When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:

(a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
(b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
(c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

**Compliance Method:** When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

G11. Facility-wide Limitations – Not Applicable

G12. NSPS/NESHAP/MACT/GACT Standards – Not Applicable

G13. VOC and NOX Emission Statement – Not Applicable

G14. Permit Supersedes Statement

This permit supersedes all previously issued permits for this/these source(s).

TAPCR 1200-03-09-.03(8)

G15. Source Testing Requirements – Not Applicable

Section IV - Source Specific Permit Conditions

<table>
<thead>
<tr>
<th>Source Number</th>
<th>Source Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>02</td>
<td>One Natural Gas-Fired Crematory with Afterburner Control</td>
</tr>
</tbody>
</table>

S1-1. Input Limitation(s) or Statement(s) of Design

A. This permit is valid only for the incineration of deceased human remains and their associated containers. This permit is not valid for incineration of any “infectious waste” as this term is defined at TAPCR 1200-03-25-.04. This emission unit is not permitted to operate as a hospital/medical/infectious waste incinerator as this term is defined at 40 CFR Part 60, Subpart Ec-Standards of Performance for Hospital/Medical/Infectious Waste Incinerators (see §60.51c Definitions). This emission unit is not permitted to combust any amount of “hospital waste” and/or “medical/infectious waste” as these terms are defined in the above referenced regulations.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated July 9, 1997

B. The stated design heat input capacity for each of the burners is as follows: **0.72 million British thermal units per hour** (MMBtu/hr) from the primary chamber burner (cremation burner) and **1.4 MMBtu/hr** from the secondary chamber (afterburner). If the permittee wishes to increase or modify the design heat input capacity of this incinerator, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated July 9, 1997
Compliance Method: The permittee shall maintain documentation to demonstrate the heat input capacity for the crematory unit. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

C. This permit is only valid for a Model IE43-PPII incinerator manufactured by Matthews Cremation Division. The charging rate for this source shall not exceed 100 pounds per hour (lbs/hr) averaged over the duration of each batch. The permittee shall maintain a log of the weight of the charge components and burn cycle times to demonstrate that the weight of the charge divided by the burn time does not exceed 100 lbs/hr.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated July 9, 1997

Compliance Method: The permittee shall maintain a log of the weight of the charge components and burn cycle times for each charging period and calculate the average charge rate in pounds per hour. A daily log of the type and weight of material incinerated for each charging period shall be maintained at the source location (see example Log A in Appendix 7 or use an alternate format that provides the same information). This log shall be retained in accordance with Condition G8.

D. Only natural gas shall be used as fuel for the crematory unit.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated July 9, 1997

Compliance Method: The permittee shall maintain documentation to demonstrate the type of fuel used by this source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

S1-2. Production Limitation(s) – Not Applicable

S1-3. Operating Hour Limitation(s) – Not Applicable

S1-4. Emission Limitation(s)

Particulate matter (PM) emitted from this source shall not exceed 0.2% of the charging rate (0.20 lb/hr at maximum of 100 lbs/hr charge rate).

TAPCR 1200-03-06-.02(3)(a)

Compliance Method: This incinerator shall be operated with a minimum secondary chamber temperature of 1,600°F. The secondary chamber temperature shall be continuously monitored and recorded. This data must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. This record of temperature data must be retained for a period of not less than five years. Sensors shall be installed, maintained, and operated such that the flames from the burner do not impinge upon the sensors. The secondary chamber temperature shall be measured at or beyond the chamber exit. The temperature-sensing device shall have an accuracy that is plus or minus 25°F over its operating range. The recorders must have a minimum chart speed of one inch per hour for strip chart recorders and a maximum of 24 hours per chart for circular recorders. As an alternative, an electronic data recorder may be utilized. A data logger may be substituted for a recorder provided that its data resolution is at least as good as that from the specified recorders.
S1-5. **Source-Specific Visible Emissions Limitation(s)**

Visible emissions from this source shall not exhibit greater than 10% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(3) and the agreement letter dated May 1, 2012 (Appendix 6)

**Compliance Method:** The incinerator shall be operated in accordance with the manufacturer’s recommendations. The manufacturer’s operating recommendations for this incinerator are to be maintained on site and kept available for inspection by the technical Secretary or a Division representative in accordance with **Condition G8**. When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

S1-6. **Malfunctions**

Any malfunction/failure in equipment or operation shall be noted in a log. The log shall note when the event was discovered by date and time, duration (if known), by whom, and what corrective action was taken (if any), when taken, and when resolved (see example Log B in Appendix 7 or use an alternate format that provides the same information). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or an authorized representative. All data must be entered in the log on the day that the events were discovered, the day the problems were noted, and the day action(s) were taken. This log must be retained in accordance with **Condition G8**.

TAPCR 1200-03-10-.02(2)(a)

<table>
<thead>
<tr>
<th>Source Number</th>
<th>Source Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>03</td>
<td>One Natural Gas-Fired Crematory with Afterburner Control This source is subject to Non-attainment BACT</td>
</tr>
</tbody>
</table>

S2-1. **Input Limitation(s) or Statement(s) of Design**

A. This permit is valid only for the incineration of deceased human remains and their associated containers. This permit is not valid for incineration of any “infectious waste” as this term is defined at TAPCR 1200-03-25-.04. This emission unit is not permitted to operate as a hospital/medical/infectious waste incinerator as this term is defined at 40 CFR Part 60 Subpart Ec-Standards of Performance for Hospital/Medical/Infectious Waste Incinerators (see §60.51c Definitions). This emission unit is not permitted to combust any amount of “hospital waste” and/or “medical/infectious waste” as these terms are defined in the above referenced regulations.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated May 20, 2005

B. The stated design heat input capacity for each of the burners is as follows: **0.80 MMBtu/hr** from the primary chamber burner (cremation burner) and **1.2 MMBtu/hr** from the secondary chamber (afterburner). If the permittee wishes to increase or modify the design heat input capacity of this incinerator, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated May 20, 2005
**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input capacity for the crematory unit. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

C. This permit is only valid for a Model IE43-PPII incinerator manufactured by Matthews Cremation Division. The charging rate for this source shall not exceed 150 lbs/hr averaged over the duration of each batch. The permittee shall maintain a log of the weight of the charge components and burn cycle times to demonstrate that the weight of the charge divided by the burn time does not exceed \(150 \text{ lbs/hr}\).

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated May 20, 2005

**Compliance Method:** The permittee shall maintain a log of the weight of the charge components and burn cycle times for each charging period and calculate the average charge rate in pounds per hour. A daily log of the type and weight of material incinerated for each charging period shall be maintained at the source location (see example Log A in Appendix 7 or use an alternate format that provides the same information). This log shall be retained in accordance with **Condition G8**.

D. Only natural gas shall be used as fuel for the crematory unit.

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated May 20, 2005

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type of fuel used by this source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

S2-2. **Production Limitation(s) – Not Applicable**

S2-3. **Operating Hour Limitation(s) – Not Applicable**

S2-4. **Emission Limitation(s)**

A. Pursuant to Rule 1200-03-09-.01(5)(b)2(ii) of the Tennessee Air Pollution Control Regulations, the permittee shall utilize Best Available Control Technology (BACT) for particulate matter (PM\(_{2.5}\)) and volatile organic compounds (VOC) emissions, as specified by the Technical Secretary. **Conditions S2-1B, S2-1C, S2-1D, S2-4B through S2-4D** specify limitations that shall constitute BACT for PM\(_{2.5}\), VOC, and NO\(_X\).

B. PM emitted from this source shall not exceed 0.2\% of the charging rate (0.30 lb/hr at maximum of 150 lbs/hr charge rate).

TAPCR 1200-03-06-.02(3)(a) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** This incinerator shall be operated with a minimum secondary chamber temperature of 1,600°F. The secondary chamber temperature shall be continuously monitored and recorded. This data must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. This record of temperature data must be retained for a period of not less than five years. Sensors shall be installed, maintained, and operated such that the flames from the burner do not impinge upon the
sensors. The secondary chamber temperature shall be measured at or beyond the chamber exit. The temperature-sensing device shall have an accuracy that is plus or minus 25°F over its operating range. The recorders must have a minimum chart speed of one inch per hour for strip chart recorders and a maximum of 24 hours per chart for circular recorders. As an alternative, an electronic data recorder may be utilized. A data logger may be substituted for a recorder provided that its data resolution is at least as good as that from the specified recorders.

C. Volatile organic compounds (VOC) emitted from this source shall not exceed 0.01 lb/hr on a daily average basis.

TAPCR 1200-03-06-.03(2) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** Compliance with the VOC emission limitation shall be assured by compliance with Conditions S2-1B, S2-1D, and the emission factor of 5.5 pounds of VOC per million cubic feet of natural gas (AP-42, Table 1.4-2 VOC).

D. Nitrogen oxides (NOₓ) emitted from this source shall not exceed 0.20 lb/hr on a daily average basis.

TAPCR 1200-03-06-.03(2) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** Compliance with the NOₓ emission limitation shall be assured by compliance with Conditions S2-1B, S2-1D, and the emission factor of 100 pounds of NOₓ per million cubic feet of natural gas (AP-42, Table 1.4-2 NOₓ).

S2-5. **Source-Specific Visible Emissions Limitation(s)**

Visible emissions from this source shall not exhibit greater than 10% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(3) and the agreement letter dated May 1, 2012 (Appendix 6)

**Compliance Method:** The incinerator shall be operated in accordance with the manufacturer’s recommendations. The manufacturer’s operating recommendations for this incinerator are to be maintained on site and kept available for inspection by the technical Secretary or a Division representative in accordance with Condition G8. When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

S2-6. **Malfunctions**

Any malfunction/failure in equipment or operation shall be noted in a log. The log shall note when the event was discovered by date and time, duration (if known), by whom, and what corrective action was taken (if any), when taken, and when resolved (see example Log B in Appendix 7 or use an alternate format that provides the same information). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or an authorized representative. All data must be entered in the log on the day that the events were discovered, the day the problems were noted, and the day actions(s) were taken. This log must be retained in accordance with Condition G8.

TAPCR 1200-03-10-.02(2)(a)
S3-1. Input Limitation(s) or Statement(s) of Design

A. This permit is valid only for the incineration of deceased human remains and their associated containers. This permit is not valid for incineration of any “infectious waste” as this term is defined at TAPCR 1200-03-25-.04. This emission unit is not permitted to operate as a hospital/medical/infectious waste incinerator as this term is defined at 40 CFR Part 60 Subpart Ec-Standards of Performance for Hospital/Medical/Infectious Waste Incinerators (see §60.51c Definitions). This emission unit is not permitted to combust any amount of “hospital waste” and/or “medical/infectious waste” as these terms are defined in the above referenced regulations.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated November 10, 2009

B. The stated design heat input capacity for each of the burners is as follows: 0.60 MMBtu/hr from the primary chamber burner (cremation burner) and 1.2 MMBtu/hr from the secondary chamber (afterburner). If the permittee wishes to increase or modify the design heat input capacity of this incinerator, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated November 10, 2009

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input capacity for the crematory unit. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

C. This permit is only valid for a Super Power-Pak III Cremator, Model IE43-SPP, manufactured by Matthews Cremation Division. The charging rate for this source shall not exceed 200 lbs/hr averaged over the duration of each batch. The permittee shall maintain a log of the weight of the charge components and burn cycle times to demonstrate that the weight of the charge divided by the burn time does not exceed 200 lbs/hr.

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated November 10, 2009

Compliance Method: The permittee shall maintain a log of the weight of the charge components and burn cycle times for each charging period and calculate the average charge rate in pounds per hour. A daily log of the type and weight of material incinerated for each charging period shall be maintained at the source location (see example Log A in Appendix 7 or use an alternate format that provides the same information). This log shall be retained in accordance with Condition G8.

D. Only natural gas shall be used as fuel for the crematory unit.

TAPCR 1200-03-09-.01(1)(d), 1200-03-09-.01(5)(b)2(ii), and the construction permit application dated November 10, 2009

Compliance Method: The permittee shall maintain documentation to demonstrate the type of fuel used by this source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records,
operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

S3-2. Production Limitation(s) – Not Applicable

S3-3. Operating Hour Limitation(s) – Not Applicable

S3-4. Emission Limitation(s)

A. Pursuant to Rule 1200-03-09-.01(5)(b)2(ii) of the Tennessee Air Pollution Control Regulations, the permittee shall utilize BACT for particulate matter (PM$_{2.5}$), nitrogen oxides (NO$_X$), and volatile organic compounds (VOC) emissions, as specified by the Technical Secretary. Conditions S3-1B, S3-1C, S3-1D, S3-4B through S3-4D specify limitations that shall constitute BACT for PM$_{2.5}$, NO$_X$, and VOC

B. PM emitted from this source shall not exceed 0.2% of the charging rate (0.40 lb/hr at maximum of 200 lbs/hr charge rate).

TAPCR 1200-03-06-.02(3)(a) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** This incinerator shall be operated with a minimum secondary chamber temperature of 1,600°F. The secondary chamber temperature shall be continuously monitored and recorded. This data must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. This record of temperature data must be retained for a period of not less than five years. Sensors shall be installed, maintained, and operated such that the flames from the burner do not impinge upon the sensors. The secondary chamber temperature shall be measured at or beyond the chamber exit. The temperature-sensing device shall have an accuracy that is plus or minus 25°F over its operating range. The recorders must have a minimum chart speed of one inch per hour for strip chart recorders and a maximum of 24 hours per chart for circular recorders. As an alternative, an electronic data recorder may be utilized. A data logger may be substituted for a recorder provided that its data resolution is at least as good as that from the specified recorders.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated November 10, 2009

C. VOC emitted from this source shall not exceed 0.30 lb/hr on a daily average basis.

TAPCR 1200-03-06-.03(2) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** Compliance with the VOC emission limitation shall be assured by compliance with Conditions S3-1B, S3-1D, and the emission factor of 5.5 pounds of VOC per million cubic feet of natural gas (AP-42, Table 1.4-2).

D. NO$_X$ emitted from this source shall not exceed 0.30 lb/hr on a daily average basis.

TAPCR 1200-03-06-.03(2) and 1200-03-09-.01(5)(b)2(ii)

**Compliance Method:** Compliance with the NO$_X$ emission limitation shall be assured by compliance with Conditions S3-1B, S3-1D, and the emission factor of 100 pounds of NO$_X$ per million cubic feet of natural gas (AP-42, Table 1.4-1 [uncontrolled burners]).
E. Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.01 lb/hr on a daily average basis.

TAPCR 1200-03-14-.03(5)

**Compliance Method:** Compliance with the SO₂ emission limitation shall be assured by compliance with **Conditions S3-1B, S3-1D**, and the emission factor of 0.6 pounds of SO₂ per million cubic feet of natural gas (AP-42, Table 1.4-2).

S3-5. **Source-Specific Visible Emissions Limitation(s)**

Visible emissions from this source shall not exhibit greater than 10% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(3) and the agreement letter dated May 1, 2012 (Appendix 6)

**Compliance Method:** When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

S3-6. **Malfunctions**

Any malfunction/failure in equipment or operation shall be noted in a log. The log shall note when the event was discovered by date and time, duration (if known), by whom, and what corrective action was taken (if any), when taken, and when resolved (see example Log B in Appendix 7 or use an alternate format that provides the same information). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or an authorized representative. All data must be entered in the log on the day that the events were discovered, the day the problems were noted, and the day actions(s) were taken. This log must be retained in accordance with **Condition G8**.

TAPCR 1200-03-10-.02(2)(a)

<table>
<thead>
<tr>
<th>Source Number</th>
<th>Source Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>06</td>
<td>One Natural Gas-Fired Crematory with Afterburner Control</td>
</tr>
</tbody>
</table>

S4-1. **Input Limitation(s) or Statement(s) of Design**

A. This permit is valid only for the incineration of deceased human remains and their associated containers. This permit is not valid for incineration of any “infectious waste” as this term is defined at TAPCR 1200-03-25-.04. This emission unit is not permitted to operate as a hospital/medical/infectious waste incinerator as this term is defined at 40 CFR Part 60 Subpart Ec-Standards of Performance for Hospital/Medical/Infectious Waste Incinerators (see §60.51c Definitions). This emission unit is not permitted to combust any amount of “hospital waste” and/or “medical/infectious waste” as these terms are defined in the above referenced regulations.

TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated June 24, 2019
B. The stated design heat input capacity for each of the burners is as follows: **0.95 MMBtu/hr** from the primary chamber burner (cremation burner) and **1.1 MMBtu/hr** from the secondary chamber (afterburner). If the permittee wishes to increase or modify the design heat input capacity of this incinerator, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

**TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated June 24, 2019**

**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input capacity for the crematory unit. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

C. This permit is only valid for a Facultative Technologies, Model FT III, incinerator manufactured by Facultative Technologies. The charging rate for this source shall not exceed 200 lbs/hr averaged over the duration of each batch. The permittee shall maintain a log of the weight of the charge components and burn cycle times to demonstrate that the weight of the charge divided by the burn time does not exceed **200 lbs/hr**.

**TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated June 24, 2019**

**Compliance Method:** The permittee shall maintain a log of the weight of the charge components and burn cycle times for each charging period and calculate the average charge rate in pounds per hour. A daily log of the type and weight of material incinerated for each charging period shall be maintained at the source location (see example Log A in Appendix 7 or use an alternate format that provides the same information). This log shall be retained in accordance with **Condition G8**.

D. Only natural gas shall be used as fuel for the crematory unit.

**TAPCR 1200-03-09-.01(1)(d) and the construction permit application dated June 24, 2019**

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type of fuel used by this source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**S4-2. Production Limitation(s) – Not Applicable**

**S4-3. Operating Hour Limitation(s) – Not Applicable**

**S4-4. Emission Limitation(s)**

PM emitted from this source shall not exceed 0.2% of the charging rate (**0.40 lb/hr** at maximum of **200 lbs/hr** charge rate).

**TAPCR 1200-03-06-.02(3)(a)**

**Compliance Method:** This incinerator shall be operated in accordance with the manufacturer’s recommendations with a minimum afterburner temperature of 1600°F. The afterburner temperature shall be continuously monitored and recorded. This data must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. This record of temperature data must be retained for a period of not less than five years. Sensors shall be installed, maintained, and operated such that the flames from the burner do not impinge upon the sensors. The afterburner temperature shall be measured at or beyond the chamber exit. The temperature-
sensing device shall have an accuracy that is plus or minus 25°F over its operating range. A monitoring device and recording instrument shall be utilized in accordance with the information submitted in the approved permit application dated June 24, 2019. The recorders must have a minimum chart speed of one inch per hour for strip chart recorders and a maximum of 24 hours per chart for circular recorders. As an alternative, an electronic data recorder may be utilized. A data logger may be substituted for a recorder provided that its data resolution is at least as good as that from the specified recorders.

S4-5.  **Source-Specific Visible Emissions Limitation(s) – Not Applicable**

S4-6.  **Malfunctions**

Any malfunction/failure in equipment or operation shall be noted in a log. The log shall note when the event was discovered by date and time, duration (if known), by whom, and what corrective action was taken (if any), when taken, and when resolved (see example Log B in Appendix 7 or use an alternate format that provides the same information). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or an authorized representative. All data must be entered in the log on the day that the events were discovered, the day the problems were noted, and the day actions(s) were taken. This log must be retained in accordance with **Condition G8**.

(end of conditions)

The permit application gives the location of this source as 35° 49’ 43.97 N Latitude and 83° 57’ 08.90 W Longitude.
Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): The Independent Funeral Group, Inc. dba East Tennessee Cremation Co.

Facility ID: 05-0051

Former Responsible Person:

Name
Title

New Responsible Person:

Name
Title

Email

Date New Responsible Person was assigned this duty:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature
Date

Signer’s name (print)
Title
Phone (with area code)
Appendix 2: Notification of Changes

Facility (Permittee): The Independent Funeral Group, Inc. dba East Tennessee Cremation Co.

Facility ID: 05-0051

Source Number: 

<table>
<thead>
<tr>
<th>Control Equipment</th>
<th>Stack Height (Feet)</th>
<th>Stack Diameter (Feet)</th>
<th>Exit Velocity (Feet/Second)</th>
<th>Exit Temperature (°F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Proposed</td>
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<tr>
<td>Current</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Proposed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature
Date

Signer’s name (print) Title Phone (with area code)
Appendix 3: Notification of Ownership Change

Facility (Permittee): The Independent Funeral Group, Inc. dba East Tennessee Cremation Co. (Previous Owner)

Facility ID: 05-0051

Facility (Permittee): (New Owner)

Email Address:

Secretary of State Control Number: [as registered with the TN Secretary of State]

Date of Ownership Change:

Comments:

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30\(^1\), and

- I agree to comply with the conditions contained in the permits listed below, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signer’s name (print)</td>
<td>Title</td>
</tr>
</tbody>
</table>

\(^1\) Appropriate application forms must be submitted prior to modification of the stationary source(s).
### Appendix 4: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below unless otherwise specified in TAPCR 1200-03-26-.02(6)(c). The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

**SCHEDULE I**

Month the Annual Emissions Fee is Due (Accounting Period)

<table>
<thead>
<tr>
<th>Counties in the Monthly Grouping</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
</tr>
<tr>
<td>February</td>
</tr>
<tr>
<td>March</td>
</tr>
<tr>
<td>April</td>
</tr>
<tr>
<td>May</td>
</tr>
<tr>
<td>June</td>
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<tr>
<td>July</td>
</tr>
<tr>
<td>August</td>
</tr>
<tr>
<td>September</td>
</tr>
<tr>
<td>October</td>
</tr>
<tr>
<td>November</td>
</tr>
</tbody>
</table>

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Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at [apc.inventory@tn.gov](mailto:apc.inventory@tn.gov) if you have any questions.
Appendix 5: Emission Statement for VOC and NO\textsubscript{x}

*Not Applicable*
Appendix 6: Agreement Letters

May 1, 2012

Hymelia Craig
TN DEC, Air Pollution Control
9th Floor, I&C Annex
401 Church Street
Nashville, TN 37243-1531

RE: 05-0051-05, 0660491 MODEL #SPP III

Ms. Craig:

As to the issue of Emission Source Reference #05-0051-05, we agree to 10% opacity in accordance with Rule 1200-03-05-.03(6) (6 minute averaging) and Rule 1200-03-05-.01(3) of the Tennessee Air Pollution Control Regulations.”

Regarding Condition 14, the minimum secondary chamber temperature should be 1600 degrees F. This unit is preheated to 1675 degrees F before the individual is placed into the chamber.

We will comply with all of your attached conditions.

If you need additional information, please call me at 865/970-2087.

Sincerely,

[Signature]

Helen Taylor
Director of Operations
East TN Cremation Company
The Independent Funeral Group, Inc.

503 National Drive - Maryville, TN 37804
865/970-2087 – 888/451-2669 – fax 865/970-0022
Appendix 7: Example Logs

LOG A

Daily Cremation Log: Source Nos. 05-0051-02, 03, 05, and 06

<table>
<thead>
<tr>
<th>Cremation No. and Date</th>
<th>Source No.</th>
<th>Charge input material and respective weights (indicate contents and weight of each charge material such as remains + wooden casket or vinyl body bag, etc. for each cremation)</th>
<th>Ignition Start Time (Light -off)</th>
<th>Charge of Input Material Start Time</th>
<th>End of Burn time</th>
<th>Input Material Burn Duration (minutes)</th>
<th>Average Charge Rate (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Cremation No. 1 input materials and weights.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Cremation No. 2 input materials and weights.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Example Cremation #17</td>
<td>02</td>
<td>Remains 156 lbs, Wooden Casket 40 lbs. Total 196 lbs</td>
<td>2:15 PM</td>
<td>2:45 PM</td>
<td>5:09 PM</td>
<td>144 min.</td>
<td>81.7 lbs/hr</td>
</tr>
</tbody>
</table>

LOG B

Malfunction Log: Source Nos. 05-0051-02, 03, 05, and 06

<table>
<thead>
<tr>
<th>Owner or Operator</th>
<th>Source No.</th>
<th>Malfunction Description</th>
<th>Date and Time of Discovery</th>
<th>Duration of Malfunction</th>
<th>Corrective Action</th>
<th>Date and Time Corrective Action Initiated</th>
<th>Date and Time Malfunction Resolved</th>
</tr>
</thead>
</table>