Asheville-Buncombe Air Quality Agency Facility Inspection Report

Facility Inspection Information

<table>
<thead>
<tr>
<th>Facility Name:</th>
<th>Cremation Services of WNC, LLC – Tunnel Rd.</th>
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<tbody>
<tr>
<td>Date of Inspection:</td>
<td>June 8, 2023</td>
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<tr>
<td>Mailing Address:</td>
<td>2239 Smoky Park Highway, Candler, NC 28715</td>
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<tr>
<td>Contact Name:</td>
<td>Roy Allen “Al” Williams</td>
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<tr>
<td>Permit #:</td>
<td>11-888-15</td>
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<tr>
<td>Inspector(s):</td>
<td>Alexander (Alex) Latta</td>
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<tr>
<td>Results:</td>
<td>Appears in compliance</td>
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Introduction

On the above date, a comprehensive inspection was conducted at Cremation Services of WNC, LLC. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). Cremation Services of WNC, LLC, otherwise known as the facility, specializes in funeral and cremation services. Operation of this facility is granted under permit number 11-888-15 which was issued on July 13, 2015 and expires on July 31, 2023. The inspection was conducted by Alex Latta. The facility was represented by Al Williams. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Hearing protection is recommended while touring the crematory.

Permitted Equipment

- ES-1: One (1) 1.5 million BTU per hour B&L Cremation Systems natural gas-fired crematory incinerator.

ES-1 was observed but not in operation during the inspection. The unit is currently down and waiting on maintenance. The unit last ran on March 1, 2023. The incinerator went down in March 2023 and the facility replaced the regulator on April 26, 2023 thinking this was the cause of the problem. Upon testing the unit after maintenance, the regulator did not appear to fix the issue. The facility has decided to contact a specialist to diagnose the unit and conduct the necessary repairs. The issue with the incinerator
occurs just after heating up. The unit will randomly shut down after it reaches the set
temperature. The chart recorder appeared to show the unit turning off around 5 – 10
mins after reaching the set temperature. This unit operates as a backup for the facility’s
primary incinerator located on Smokey Park Hwy and does not operate as frequently.

Permit Conditions:

The following permit conditions were reviewed during this inspection:

• A.1 – The facility is required to operate according to AB Air Quality Code including but
  not limited to the following specified conditions and any other applicable Local, State,
  and Federal regulations.
• A.2 – This condition is informational in nature and the facility is aware of the
  requirements relating to permit changes and permit applications.
• A.3 – The facility is required to submit an application for any changes or alterations to
  processes and equipment to AB Air Quality. Failure to do so could result in enforcement
  action.
• A.4 – This condition requires the permittee to notify the Agency in the event of a name
  or ownership change.
• A.5 – The facility is required to obtain a new air permit prior to installing and operating
  sources of air emissions at a site or location not specified in the permit (relocation).
• A.6 – This permit does not absolve the facility of any liabilities related to any
  civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The
  facility shall be subject to enforcement action if the terms of the permit are violated.
• A.7 – This condition requires that the permittee maintain and operate the facility at all
  times so that the overall reduction in air pollutants, in accordance with applicable
  standards, is achieved. The facility has developed a maintenance schedule for
  equipment and is maintaining records of all maintenance. Additionally, the facility is
  maintaining an inventory of spare parts for equipment. The facility has established
  standard operating procedures for equipment and is training equipment operators on
  the procedures. The incinerator went down in March 2023 and the facility replaced the
regulator on April 26, 2023 to address the problem. Upon testing the unit after maintenance, the regulator did not appear to fix the issue. The facility has decided to contact a specialist to diagnose the unit and conduct the necessary repairs. The issue with the incinerator occurs just after heating up. The unit will randomly shut down after it reaches the set temperature. The chart recorder appeared to show the unit turning off around 5 – 10 mins after reaching the set temperature.

- A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.
- A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.
- A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.
- A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up-to-date on fee payments. The facility last submitted their fee payment on April 19, 2023.
- A.12 – The facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility’s request was received by the Agency on May 12, 2023. The permit renewal was due on May 2, 2023. Mike Bagsby of Cremation Services contacted the Agency on May 3rd to inform the agency that the renewal submittal would be late due to health reasons. Given the nature of the circumstances, no enforcement action is being pursued.
- A.13 – This permit may be suspended or revoked by the AB Air Quality Board under certain conditions.
- A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.
- B.1 – The previous issue of this permit shall become void with the issuance of this current version.
• B.2 – This condition states the facility shall be operated to prevent odorous emissions from being emitted beyond the boundary of the facility. The facility was not producing any odorous emissions during the inspection.

• B.3 – This Condition limits visible emissions from all sources to no more than 20 percent opacity when averaged over a six-minute period. Due to the unit not operating during the inspection, a visible emission evaluation was not conducted.

• B.4 – This condition states that sulfur dioxide emissions from ES-1 shall not exceed 2.3 pounds per million Btu input, which equates to 3.45 pounds per hour. Actual emission from ES-1 for Sulfur dioxide are 0.03 pounds per hour and do not exceed the established limit in this condition.

• B.5 – This condition establishes the facility’s particulate matter emission limit from ES-1 at 0.20 pounds per hour. Per emissions calculations, particulate matter emissions from ES-1 are 0.03 pounds per hour and do not exceed the established limit in this condition.

• B.6 – This condition states that the facility has triggered an air toxics review and is limited to 1490 cremations per year in order to comply with the requirements of AB Air Quality Code 17.0700. The facility has conducted 77 cremations for 2022 and operated for 198.4 hours. For 2023, the facility has conducted 6 cremations from January 1 through the date of the inspection.

• B.7 – This permit condition states that the facility is required to maintain a continuous temperature monitoring and recording device for the primary and secondary chambers. The facility is maintaining continuous temperature monitoring for both the primary and secondary burners in the incinerator.

• B.8 – This permit condition states that the facility is required to maintain the records from condition B.7 for a period of at least two (2) years. The facility is retaining temperature charts on site and were available for review.

• B.9 – This condition requires the facility to submit annual reports by February 15th each year. The facility is submitting annual reports as required. The most recent annual report was submitted on time and contained all the required information. For 2022, the
facility has conducted 77 cremations with an average time of 2.57 hrs. The total hours of operation for 2022 is approximately 198.4 hours. For 2023, the facility has conducted 6 cremations from January 1 through the date of the inspection.

**Compliance History:**

The facility does not have any history of recorded violations in the last ten (10) years.

**Conclusion:**

Based on the above information, Cremation Services of WNC, LLC appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature: [Signature] Date: 6/15/2023

Reviewer Signature: [Signature] Date: 7/16/2023

Director Signature: [Signature] Date: 7/21/2023