# AIR AND RADIATION ADMINISTRATION APPLICATION FOR A PERMIT TO CONSTRUCT

# **DOCKET #09-20**

COMPANY: Vaughn Greene Funeral Services, PA

LOCATION: 4905 York Road, Baltimore, MD 21212

APPLICATION: Installation of a Matthews Environmental Solutions Power-Pak II Plus human

crematory.

<u>ITEM</u>	DESCRIPTIO	<u>N</u>
1	Notice of App Informational	lication and Opportunity to Request an Meeting
2	Permit to Cor Form 5	nstruct Application Forms: Application for Processing/Manufacturing Equipment
	Form 5EP Form 5A	• •
	Form 5T	Toxic Air Pollutants (TAP) Emissions Summary and Compliance Demonstration
3	Calculations	of Emissions
4	Zoning Appro	oval Letter

# DEPARTMENT OF THE ENVIRONMENT AIR AND RADIATION ADMINISTRATION

# NOTICE OF APPLICATION AND OPPORTUNITY TO REQUEST AN INFORMATIONAL MEETING

The Maryland Department of the Environment, Air and Radiation Administration (ARA) received a permit-to-construct application from Vaughn Greene Funeral Services, PA on June 8, 2020 for the installation of a Matthews Environmental Solutions Power-Pak II Plus human crematory. The proposed installation will be located at 4905 York Road, Baltimore, MD 21212.

The application and other supporting documents are available for public inspection on the Department's website. Look for Docket #09-20 at the following link:

https://mde.maryland.gov/programs/Permits/AirManagementPermits/Pages/index.aspx

Pursuant to the Environment Article, Section 1-603, Annotated Code of Maryland, the Department will hold an informational meeting to discuss the application and the permit review process if the Department receives a written request for a meeting within 10 working days from the date of the second publication of this notice. All requests for an informational meeting should be emailed to Ms. Shannon Heafey at shannon.heafey@maryland.gov.

Further information may be obtained by contacting Ms. Shannon Heafey by email at shannon.heafey@maryland.gov or by phone at (410) 537-4433.

George S. Aburn, Jr., Director Air and Radiation Administration

DEGETVED MAY 19 2020

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Air and Radiation Management Administration - Air Quality Permits Program

# APPLICATION FOR PROCESSING/MANUFACTURING EQUIPMENT

Perm	it to Construct 🖄 F	Registration Update 🗖	Initial Registration	on 🗆
Vaughn Mailing Addres	pment/Company Name Greene Funeval s 25 York Rd	Services PA		IN THIS BLOCK TION NUMBER Premises No.
	re Maryland	212 12 Zip	1-2 Registration Class	3-6 Equipment No.
Telephone Nun ( <u>410</u> ) 4	133 - 7500		7 Data Year	8-11
Mill	U.Il.		12-13	Application Date
Street Number an	cation and Telephone N らん似色 d Street Name		()	hone Number
			21 102	
	f different from above)  B= Modification to Exist New Construction Begun (MM/YY)  T B D  16-19	New Construction Completed (MM/YY T B D 20-23	Existin Operation	g Initial n (MM/YY) 0-23
Matthews Environme	quipment: Make, Model, I ental Solutions; PPII Plus (3.0	0 MMBTU/hr) / Multi-Cha	mber cremation unit to r	
Company Harle	mpensation Coverage	Binder/Policy Number  LNSWWW CO-  by the Department, the appending under Section 1-202	olicant must provide the De	Expiration Date  epartment with proof of sation Act.
6A. Number of Pie	ces of Identical Equipm	ent Units to be Regis	tered/Permitted at th	is Time1

7. Person Installing this Equipment (if different from Number 1 Name Tit	
NameTitle Company	
Mailing Address/Street_	
City/TownState	Telephone ()
8. Major Activity, Product or Service of Company at this Location  CREMATION OF HUMAN REMAINS	on
9. Control Devices Associated with this Equipment  None  X  24-0	
Simple/Multiple Spray/Adsorb Venturi Carbon Electrostatic Cyclone Tower Scrubber Adsorber Precipitator  24-1 24-2 24-3 24-4 24-5  Other  Describe	Baghouse Thermal/Catalytic Dry Afterburner Scrubber  24-6 24-7 24-8
24-9	
10. Annual Fuel Consumption for this Equipment OIL-1000 GALLONS SULFUR % GRADE NATURAL GAS-1000 F 26-31 32-33 34 35-41  COAL-TONS SULFUR % ASH%	TT3 LP GAS-100 GALLONS GRADE  3 2 42-45  WOOD-TONS MOISTURE %
46-52 53-55 56-58	59-63 64-65
OTHER FUELS ANNUAL AMOUNT CONSUMED OTHER	
(Specify Type) 66-1 (Specify Units of Measure) (	fy Type) 66-2 (Specify Units of Measure) her
X 67-1 67-2 68-69 Seasonal Variation in Operation:	Hours per Day Days Per Week Days per Year  1 2 6 3 1 2  70-71 72 73-75  Fall Percent (Total Seasons= 100%)  83-84

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12. Equivale	ent Stack Innform	nation- is I	Exhaust throu	gh Door	s, Windows	s, etc. Only	? (Y/N) N	
If not, then	Height Avove Gr	round (FT)	Inside Diameter	at Top (in	) Exit Tempe	0 0	Exit Velocity 2	0
Attach a b	lock diagram of and all existin	process/p ig equipme	NO rocess line, ir ent, including	dicating	g new equip devices and	ment as re	eported on thi points.	s form
	terials (for this of this data to be	considere	d confidential	النا ،	Y or N)		RATE	
	NAME	CAS N	O. (IF APPLICAB	LE)	PER HOUR	UNITS	PER YEAR	UNITS
1. HUMAN	REMAINS				175	lbs/hr	· · · · · · · · · · · · · · · · · · ·	
2.	THE STATE OF							
3.		1						
4.								
5.								
6.								
7.								
8.								
9.								
TOTAL		_		_		1		-
rioces	s/Product Strear		O. (IF APPLICAB	LEV I	PER HOUR	OUTP   UNITS	UT RATE PER YEAR	UNITS
1.	NAME	- OAO II	o. (II AI I LIOAL		LITTIOON	OMITO	TENTERN	UNITO
2.								
3.								
4.						1		
5.								+
6.						-		-
7.						-		
8.		_	-					-
9.		_						
TOTAL								<b>V</b>
15. Waste S	treams- Solid ar	nd Liquid	C District	7.50		OUTP	UT RATE	
1	NAME	CASN	O. (IF APPLICAE	LE)	PER HOUR	UNITS	PER YEAR	UNITS
1.								1 1 1 1 1
2,								
3.								
4.								4
5.								
6.								
7.					14			
8.								
9.								
TOTAL								

Form Number: 5

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16. Total Stack Emissions (for		3000	
Particulate Matter 4 . 9 0	Oxides of Sulfur		of Nitrogen
99-104	105 110		1 116
	105-110		11-116
Carbon Monoxide	Volatile Organic Compo	ounds )	PM-10
3 . 0 9	100 1. 3	11	4 . 9 0
177-122	123-128	V 1500 1500 1500 1500 1500 1500 1500 150	29-134
17. Total Fugitive Emissions (	for this equipment only) i	n Pounds Per Operatir	ng Day
Particulate Matter	Oxides of Sulfur	Oxides	of Nitrogen
135-139	140-144		45-149
3.1.177773			70-58 B
Carbon Monoxide	Volatile Organic Compo	bunds	PM-10
150-154	155-159		60-164
Method Used to Determine Er		All the second s	3= Stack Test 4= Other)
TSP SOX	NOX CO	VOC	PM10
2 2	2 2		2
165 166	167 168	169	170
AIR AND RA	ADIATION MANAGEMENT		
18. Date Rec'd. Local	Date Rec'd. State	Return to Local Ju	al a all a at a a
	Date Rec d. State		sy
Reviewed by Local Jur		Reviewed by State	
19. Inventory Date Mor	nth/Year Equipmer	nt Code SC	CC Code
20. Annual	171-174 175-1 Maximum Design	77 Permit to Operate	178-185 Transaction Date
Operating Rate	Hourly Rate	Month	(MM/DD/YR)
186-192	193-199	200-201	202-207
Staff Code VOC Cod	e SIP Code	Regulation Code	Confidentiality
208-210 211 212	213 214	215-218	219
	Point Description		Action
			A: Add C: Change
	220-238		239

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Air and Radiation Management Administration ● Air Quality Permits Program
1800 Washington Boulevard ● Baltimore, Maryland 21230
(410)537-3225 ● 1-800-633-6101● www.mde.maryland.gov

IENT MAY 19 2020 ov By

	F	ORM 5	EP: Emission Point Data			
Complete one (1) Form 5EP f	or EACH	emission	n point (stack or fugitive emissions	s) related to the	proposed	installation
Applicant Name: Vaughn	Green	Fune	al Services			
1. Emission Point Ide	ntificati	on Nam	e/Number			mar a
	ne/numbe		emission point and use this value o	on the attached	required (	plot plan:
2. Emission Point De	scriptio	n				
			ed equipment and control devices; ple Chamber cremation unit. No Add Or	n Control Device		
3. Emissions Schedu	le for th	e Emiss	ion Point			
Continuous or Intermittent (C/	1)?		Seasonal Variation Check box if none: ⊠ Other	erwise estimate	seasona	I variation:
Minutes per hour:		60	Winter Percent			
Hours per day:		12	Spring Percent			
Days per week: Weeks per year:		6 52	Summer Percent Fall Percent			
4. Emission Point Info	ormatio		Fall Fercent			_
Height above ground (ft):	Jimatio			Length	h:	Width:
Height above structures (ft):	<b>—</b>	40	Length and width dimension at top of rectangular stack (f	S		11.191111
Exit temperature (°F):		1100	Inside diameter at top of rou	ind stack (ft):		1.67
Exit velocity (ft/min):		1200	Distance from emission poir property line (ft):	nt to nearest		105
Exhaust gas volumetric flow ra	ate	2300	Building dimensions if emiss point is located on building		Length 105	Width 58.583
5. Control Devices As	ssociate	d with t	he Emission Point		1.4	
also required for each contr				. 78		orm 6 is
None			☐ Thermal Oxidizer	No.		
Baghouse	No	-	Regenerative			
Cyclone	No	_	☐ Catalytic Oxidizer	No.		
☐ Elec. Precipitator (ESP)	No	_	☐ Nitrogen Oxides Reduction	n No.		
☐ Dust Suppression System	No	_	☐ Selective ☐ Catalytic	☐ Non-Sel		
☐ Venturi Scrubber ☐ Spray Tower/Packed Bed	No		Other Specify:	No.		
☐ Carbon Adsorber	No					
☐ Cartridge/Canister						
Regenerative						

## FORM 5EP: Emission Point Data 6. Estimated Emissions from the Emission Point At Projected Operations At Design Capacity Criteria Pollutants (lb/hr) (ton/yr) (lb/hr) (lb/day) 0.7649 Particulate Matter (filterable as PM10) 4.9 0.40862 0.40862 Particulate Matter (filterable as PM2.5) 4.9 0.7649 0.40862 0.40862 0.7649 4.9 Particulate Matter (condensables) 0.40862 0.40862 0.0489 Volatile Organic Compounds (VOC) 0.02616 0.31 0.02616 0.3554 2.28 0.190 Oxides of Sulfur (SOx) 0.190 0.5831 0.3115 3.74 Oxides of Nitrogen (NOx) 0.3115 0.4832 0.25812 3.09 Carbon Monoxide (CO) 0.25812 Lead (Pb) At Projected Operations At Design Capacity Greenhouse Gases (GHG) (lb/hr) (ton/yr) (lb/day) (lb/hr) Carbon Dioxide (CO<sub>2</sub>) Methane (CH<sub>4</sub>) Nitrous Oxide (N2O) Hydrofluorocarbons (HFCs) Perfluorocarbons (PFCs) Sulfur Hexafluoride (SF6) Total GHG (as CO2e) At Projected Operations At Design Capacity List individual federal Hazardous Air (lb/hr) Pollutants (HAP) below: (ton/yr) (lb/hr) (lb/day)

(Attach additional sheets as necessary.)

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Air and Radiation Management Administration 

Air Quality Permits Program

SUMMARY OF DEMONSTRATIONS FOR MEETING THE AMBIENT IMPACT REQUIREMENT (26.11.15.05) AND THE T-BACT REQUIREMENT (26.11.15.06)

			DO	NOT WRITE IN	THIS SPACE
Co	ompany Name	Vaushn G	reene Funeral S	enices ?	A .
. :	Summary of T-BA starting with the o	CT Demonstration:	List all emission reduction op missions the most. Supporti	otions considered	d in determining T-BACT
<u>En</u>	nission Reduction	Option	% Emission Reduction	Co <u>Capital</u>	STS Annual Operating
1,	> 1 Second reten		Unknown		
2.	Temperature Mo	nitor and Recorder	Unknown	3,000	100
3.	No Burning of PV	C plastic bags	Unknown		

2. Identify the emission reduction option selected as T-BACT and briefly explain why this is the best selection. Supporting documentation **must** be attached.

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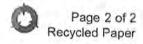
5.



3. List screening levels and highest estimated off-site concentrations (ug/m³) resulting from premises-wide allowable emissions (1) of each Toxic Air Pollutant that is covered by the regulations and discharged from the installation or source applying for the permit. See the General Instructions for more detail. Supporting documentation must be attached. SEE DISPERSION MODEL ATTACHED OFF-SITE SCREENING LEVEL(S) CONCENTRATIONS Toxic Air Pollutant CAS Number 1-HR 8-HR Annual 8-HR Annual 2\_\_\_\_\_\_ 4\_\_\_\_\_ 7\_\_\_\_\_\_ 8\_\_\_\_\_\_8\_\_\_\_\_ 10\_\_\_\_\_ 14\_\_\_\_\_ 15 \_\_\_\_\_ If unable to use a Screening Analysis, check the box and attach the Second Tier Analysis or Special Permit request to this form. (1) Premises is defined as: "all the installations or other sources that are located on contiguous or adjacent properties and that are under the control of one person or under common control of a group of persons" (COMAR 26.11.15.01B(12)).

Allowable Emissions are defined as: "the maximum emissions a source or installation is capable of discharging after consideration of any physical or operational limitations required by this subtitle or by enforceable conditions included in an applicable air quality permit to construct, permit to operate, secretarial order, plan for compliance, consent agreement, or court order" (COMAR 26.11.15.01B(2)).

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# MAN 19 2020

# MARYLAND DEPARTMENT OF THE ENVIRONMENT

# FORM 5T: Toxic Air Pollutant (TAP) Emissions Summary and Compliance Demonstration

Applicant Name:

\*\*SEE TOXYTOOL RESULTS ATTACHED\*

Step 1: Quantify premises-wide emissions of Toxic Air Pollutants (TAP) from new and existing installations in accordance with COMAR 26.11.15.04. Attach supporting documentation as necessary.

						Estimated P	Estimated Premises Wide Emissions of TAP	nissions	of TAP
Toxic Air Pollutant (TAP)	CAS	Class I or Class II?	Screen	Screening Levels (µg/m³)	(µg/m³)	Actual Total Existing TAP Emissions	Projected TAP Emissions from Proposed Installation	Premis Tota Emis	Premises Wide Total TAP Emissions
			1-hour	8-hour	Annual	(lb/hr)	(lb/hr)	(Ib/hr)	(lb/yr)
ex. ethanol	64175	11	18843	3769	N/A	09.0	0.15	0.75	1500
ex. benzene	71432	1	80	16	0.13	0.5	0.75	1.00	400
7									

(attach additional sheets as necessary.)

Note: Screening levels can be obtained from the Department's website (http://www.mde.maryland.gov) or by calling the Department.

Step 2: Determine which TAPs are exempt from further review. A TAP that meets either of the following Class I or Class II small quantity emitter exemptions is exempt from further TAP compliance demonstration requirements under Step 3 and Step 4.

Class II TAP Small Quantity Emitter Exemption Requirements (COMAR 26.11.15.03B(3)(a))

A Class II TAP is exempt from Step 3 and Step 4 if the Class II TAP meets the following requirements: Premises wide emissions of the TAP shall not exceed 0.5 pounds per hour, and any applicable 1-hour or 8-hour screening level for the TAP must be greater than 200 µg/m³

Class I TAP Small Quantity Emitter Exemption Requirements (COMAR 26.11.15.03B(3)(b))

A Class I TAP is exempt from Step 3 and Step 4 if the Class I TAP meets the following requirements: Premises wide emissions of the TAP shall not exceed 0.5 pounds per hour and 350 pounds per year, any applicable 1-hour or 8-hour screening level for the TAP must be greater than 200 ug/m³, and any applicable annual screening level for the TAP must be greater than 1 µg/m³

If a TAP meets either the Class I or Class II TAP Small Quantity Emitter Exemption Requirements, no further review under Step 3 and Step 4 are required for that specific TAP

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Page 1 of 2 Recycled Paper

# FORM 5T: Toxic Air Pollutant (TAP) Emissions Summary and Compliance Demonstration

Step 3: Best Available Control Technology for Toxics Requirement (T-BACT, COMAR 26.11.15.05)

In the following table, list all TAP emission reduction options considered when determining T-BACT for the proposed installation. The options should be listed in order beginning with the most effective control strategy to the least effective strategy. Attach supporting documentation as necessary.

Capital	=	
	Ш	Reduction
\$50,000		66
0		80

(attach additional sheets as necessary)

Step 4: Demonstrating Compliance with the Ambient Impact Requirement (COMAR 26.11.15.06)

The evaluation consists of a series of increasingly non-conservative (and increasingly rigorous) tests. Once a TAP passes a test in the evaluation, Pollutant (TAP) Regulations (COMAR 26.11.15.06)" provides guidance on conducting the evaluation. Summarize your results in the Each TAP not exempt in Step 2 must be individually evaluated to determine that the emissions of the TAP will not adversely impact public health. no further analysis is required for that TAP. "Demonstrating Compliance with the Ambient Impact Requirement under the Toxic Air following table. Attach supporting documentation as necessary.

Toxic Air	CAS	Scre	Screening Levels (µg/m³)	evels	Total TAP Emissions	emises wide Total TAP Emissions	Rate (A	Allowable Emissions Rate (AER) per COMAR 26.11.16.02A	Scree	On-sire Concentrations per Screening Analysis (ug/m³)	ons per	Compliance Method Used?
		1-hour	1-hour 8-hour	Annual	(lb/hr)	(lb/yr)	(Ib/hr)	(lb/yr)	1-hour	8-hour	Annual	AER or Screen
ex. ethanol	64175	18843	3769	N/A	0.75	1500	0.89	N/A	N/A	N/A	N/A	AER
ex. benzene	71432	80	16	0.13	1.00	400	0.04	36.52	1.5	1.05	0.12	Screen
												,

(attach additional sheets as necessary)

If compliance with the ambient impact requirement cannot be met using the allowable emissions rate method or the screening analysis method, refined dispersion modeling techniques may be required. Please consult with the Department's Air Quality Permit Program prior to conducting dispersion modeling methods to demonstrate compliance.

# **Calculation Of Emissions**

# **Estimated Emission Calculation**

Matthews Environmental Solutions (previously Matthews Cremation Division) Crematory Incinerator Model IE43-PPII Plus

Total Incenerator Burn Capacity 175 lb/hr of remains (type 4) and associated containers (type 0)
Flue gas flow rate = 1175 dscfm 12 Hours/Day X 6 Days/Week X 52 Weeks/Year
( 100 % Excess Air) = 3744 Hours/Year

# Total Emission Rate = Incinerator Burn Rate X Emission Factor

# Sulfer Dioxide (SO<sub>2</sub>)

Sulfer Dioxide (SO <sub>2</sub> )			
175 lb/hr X	2.17 lb/ton X	1 ton	= 0.190 lb/hr
		2000 lbs	= 0.355446 TPY
0.189875 lb/hr X	4.54E+05 mg/lb X	1 ppmv	= 16.55 ppmv
1175 dscfm X	60 min/hr X	0.0283 m <sup>3</sup> /f <sup>3</sup> X 2.61 m	g/m³
Nitrogen Oxide (NOx - as Nitro	gen Dioxide)		
175 lb/hr X	3.56 lb/ton X	1 ton	= 0.3115 lb/hr
3,000	107 107	2000 lbs	= 0.583128 TPY
0.3115 lb/hr X	4.54E+05 mg/lb X	1 ppmv	= 38.11 ppmv
1175 dscfm X	60 min/hr X	0.028 m <sup>3</sup> /f <sup>3</sup> X 1.88 m	g/m <sup>3</sup>
Particulates (PM & PM <sub>10</sub> )			
175 lb/hr X	4.67 lb/ton X	1 ton	= 0.408625 lb/hr
	1.07 1070017	2000 lbs	= 0.764946 TPY
0.408625 lb/hr X	7.00E+03 gr/lb X		= 0.04 gr/dscf
1175 dscfm X	60 min/hr		732.7 <b>X</b> Y22.7
Carbon Monoxide (CO)			
175 lb/hr X	2.95 lb/ton X	1 ton	= 0.258125 lb/hr
		2000 lbs	= 0.48321 TPY
0.258125 lb/hr X	4.54E+05 mg/lb X	1 ppmv	= 52.08 ppmv
1175 dscfm X	60 min/hr X	0.028 m <sup>3</sup> /f <sup>3</sup> X 1.14 m	
Hydrocarbons (TOC/VOC - met	hane)		
175 lb/hr X	2.99E-01 lb/ton X	1 ton	= 0.026163 lb/hr
27 5 10/111 A	EISSE SE INTONIA	2000 lbs	= 0.048976 TPY
0.0261625 lb/hr X	4.54E+05 mg/lb X	1 ppmv	= 9.16 ppmv
1175 dscfm X	60 min/hr X	0.0283 m <sup>3</sup> /f <sup>3</sup> X 0.65 m	

# Notes

- 1. Incinerator Emissions based on EPA emissions from Table 2.3-1 and 2.3-2 of AP-42 (5th Edition)
- 2. All conversion factors from AP-42 Appendix A.



June 04, 2020

Wright, Constable & Skeen, LLP c/o J. Neil Lanzi 102 W. Pennsylvania Avenue, Suite 406 Towson, MD 21204

Re: 4903-4907 York Road

Dear Mr. Lanzi:

This letter is in response to your zoning inquiry for the above referenced property.

Please be advised that the subject property is located in a C-2 Commercial District and authorized for use as funeral home in compliance with all applicable zoning regulations. Per Subsection 1-306(s)(2) of the Zoning Code, a funeral home use includes the use of the premises for a crematorium. The use as stated would be allowed in conjunction with the existing funeral home. Our records show no zoning violations with respect to this property.

Should you have any additional questions regarding this matter, please contact the Zoning Office at 410-396-4126.

Sincerely,

Geoffrey Veale
Zoning Administrator