

Asheville-Buncombe Air Quality Agency Facility Inspection Report

Facility Inspection Information					
Facility Name:	Asheville Mortuary Services, LLC (Asheville Area Cremations)				
Date of Inspection:	October 23, 2023	Last Inspected:	March 2, 2022		
Mailing Address:	702 Riverside Drive, Asheville, NC 28801	Physical Location:	702 Riverside Drive, Asheville, NC 28801		
Contact Name:	Dennis Jennings		Phone Number:	(828)-258-0566	
Permit #:	11-794-15B	Issued:	November 9, 2015	Expires:	November 30, 2023
Inspector(s):	Alexander (Alex) Latta				
Results:	Appears in compliance		Inspection Time:	0945 hours	

Introduction

On the above date, a comprehensive inspection was conducted at Asheville Mortuary Services, LLC (Asheville Area Cremations). The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (ABAQA Code). Asheville Mortuary Services, LLC (Asheville Area Cremations), otherwise known as the facility, specializes in funeral and cremation services. Operation of this facility is granted under permit number 11-794-15B which was issued on November 9, 2015, amended March 12, 2018 and November 13, 2018, and expires on November 30, 2023. The inspection was conducted by Alex Latta. The facility was represented by Dennis Jennings. 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) 3.0 MMBtu/hr natural gas-fired crematory incinerator

ES-1 was observed in operation during the inspection. The primary burner was operating at around 1181°F while the secondary burner was operating at around 1626°F. This unit underwent significant maintenance due to issues relating to the unit's visible emissions and appears to be operating correctly at the time of the inspection.

- ES-2: One (1) 1.5 MMBtu/hr natural gas-fired crematory incinerator

ES-2 was observed in operation during the inspection. The unit was beginning to cool down, and the primary burner was operating at around 1250°F while the secondary burner was operating at around 1650°F.

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 – The facility is required to operate the processes and equipment consistent with the application they submitted for the permit.
- 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 – This condition requires the facility 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 – 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 newer unit was last serviced on October 12, 2023. According to facility representatives, the newer unit has been repaired and appears to be operating normally. Facility representatives stated that the unit has been reinforced at the area just below the

entrance of the unit. Apparently, the refractory was bowing inward which was contributing to the various issues. The door was repaired and now it closes correctly and is not leaking fluid. Additionally, several internal parts were replaced that were worn out or damaged. The facility plans to send a follow-up report to the Agency detailing the repairs.

- 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 November 15, 2022.
- 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 October 9, 2023. The permit renewal request was due by September 1, 2023 and was therefore late. As noted below in the compliance history section, a Notice of Deficiency was issued.
- 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. The facility was only exhibiting heat waves from both units during the inspection.
- B.4 – This condition establishes the sulfur dioxide (SO₂) emission limit for the facility. ES-1 and ES-2 have an hourly emission limit of 10.3 lbs, and an hourly potential to emit of only 0.07 lbs. Thus, the facility is in compliance with this regulation.
- B.5 – This condition establishes the particulate matter (PM) emission limit for the facility. ES-1 and ES-2 have an hourly particulate emission limit of 0.20 lbs, and an hourly potential to emit of only 0.05 lbs. Thus, the facility is in compliance with this regulation.
- B.6 – The facility is limited to 1470 cremations per year for obstructed stacks and 2050 cremations for unobstructed stacks for ES-1 and ES-2 combined. For 2022, the facility conducted 1575 cremations and features unobstructed stacks.
- B.7 – The facility is maintaining continuous temperature monitoring for both the primary and secondary burners in the incinerator.
- B.8 – The facility is retaining temperature charts on site for a period of at least two (2) years from the date of the inspection and were available for review.
- B.9 – The facility is submitting annual reports as required. The most recent annual report was received January 30, 2023 and contained all the required information. The facility conducted 1575 cremations for 2022 and operated for 1969 hours.

Compliance History:

On June 14, 2022 a Notice of Deficiency (NOD) was issued for late submittal of the facility's annual report. Specific Condition & Limitation 9 of Permit to Operate No. 11-794-15B requires that this report be submitted by February 15th of each year. The Agency received the facility's report on February 28, 2022. Since the report was received by the Agency, no further action was taken and this deficiency is considered resolved.

After receiving a complaint about excessive emissions on November 30, 2022, the Agency investigated and followed up with a letter requesting the facility to submit a plan to address the visible emissions that appeared to be associated with ongoing maintenance and repair issues with one of the incinerators. The facility responded by stating that they had contacted the manufacturer to schedule maintenance as well as adjusting their operating procedures to address the excessive emissions. Agency staff went by the facility on numerous occasions over the course of several months (independent of complaints) and did not observe visible emissions in excess of the 20 percent opacity limit for more than six minutes at a time. On some occasions no visible emissions were observed. On March 24, 2023, the Agency met with the facility in response to the visible emissions and maintenance issues that have been occurring since 2022. During that meeting, the facility noted there had been difficulty getting the manufacturer of the unit to provide maintenance and repair services that could correct the ongoing issues. On June 6, 2023, a Notice of Violation (NOV) was issued for failure to properly maintain equipment since the facility still had not been able to schedule maintenance and repairs for ES-1. The facility stopped operating ES-1 and sent a letter to the agency stating that they have ordered all the parts necessary to complete the repairs. The facility called the Agency several times during this process, and repairs were made around October 12, 2023. As of the writing of this inspection report, the unit appears to have been fixed and appears to be operating correctly. The facility plans to submit documentation to the Agency showing the repairs were completed.

On September 19, 2023, a Notice of Deficiency (NOD) was issued for the late submittal of the facility's permit renewal request. General Condition & Limitation A.12 of the permit required that the renewal request be submitted at least 90 days prior to the expiration date of the permit or by September 1, 2023. The Agency received the facility's renewal request on October 9, 2023, thus resolving this issue. No further action was taken by the Agency.

Conclusion:

Based on the above information, Asheville Mortuary Services, LLC (Asheville Area Cremations) appears to be in compliance with applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature:  Date: 10/24/2023
Reviewer Signature:  Date: 10/27/2023
Director Signature:  Date: 10/31/2023