

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 3, 2005

Ms. E.J. LeBoss
Air Observations, Inc.
P.O. Box 290535
Tampa, Florida 33687

**Re: Draft Air Pollution Construction Permit No. 0990322-007-AC
Treasure Coast Crematory
Air Pollution Construction Permit for Two Refurbished Human Cremation Units.**

Dear Ms. LeBoss:

On May 3, 2005, the Palm Beach County Health Department (PBCHD) received your response to our Request For Information dated February 8, 2005. On May 23, 2005, PBCHD received additional correspondence addressing the issues discussed on our telephone conversation of May 13, 2005. After a careful review of the voluntary operational limitations proposed by Mr. Knapik to minimize the impact of the additional cremation units, we offer the following response:

1. As discussed on May 27, 2005, temperature inversions could interfere with the proper dispersion of the pollutants emitted from the facility.

In Air Pollution Its. Origin and Control, Wark and Warner state that radiation inversions "occur when the surface layers of the atmosphere during the day receive heat by conduction, convection, and radiation from the earth's surface and are warmed. If a clear night follows, then the ground surface radiates heat and quickly cools. The air layers adjacent to the earth's surface are cooled to a temperature below the layers of air at higher elevations. Thus the daytime temperature profile becomes inverted, and a stable inversion layer cloaks the lower atmosphere above the earth's surface. This type of inversion is strongest just before daylight and during periods of clear skies and light winds. It breaks up as the morning sun heats the ground and reestablishes the moving currents of rising warm air."

As radiation inversions occur during clear skies and light winds, they tend to be more prevalent during the Winter months. Restricting night operations during the Summer months alone could have very little effect on the frequency inversion induced complaints.

2. The combined emissions of individual air pollutant resulting from the unrestricted operation of all four units combined are estimated to be relatively small (less than 10 tons of any single criteria pollutant). Although restricting the total hours of operation for each incinerator to 4380 hrs/yr will result in no increase in the annual emissions, these restriction alone do not guarantee a reduction of the short term impacts commonly associated with an inversion episode.
3. It is impossible to determine the specific number of units that can be operated without causing objectionable odors during a radiation inversion episode. The only way to prevent such an occurrence would be not to operate any of these units from sundown to sunrise. Unfortunately this operating schedule is not feasible for Treasure Coast Crematory.
4. Based on the issues discussed above, the Palm Beach County Health Department (PBCHD) has determined that no restrictions in either the total hours of operations or the operating schedule will be incorporated into the construction permit at this time. As a result the facility will remain eligible to operate under a general air permit for human crematories as specified in Rule 62-210.300(4), F.A.C.

5. The permittee is encouraged to monitor and adjust operations beyond the requirements of Rule 62-296.401(5), F.A.C. and of Rule 62-210.300(4), F.A.C. in order to ensure compliance with the objectionable odor requirements.
6. Please be aware that PBCHD will investigate all objectionable odor complaints. The general permit may be modified, suspended or revoked in accordance with Chapter 120, Florida Statutes (F.S.), if the PBCHD determines that there has been a violation of any of the terms or conditions of the permit, including the objectionable odor provisions. If the general permit is revoked, the permittee could be required to obtain a small source operating permit that may incorporate restrictions in the hours of operation and in the operating schedule, as need.

If you have any other questions, please contact me at (561) 355-3136 X-1142.

Sincerely,

For the Division Director
Environmental Health and Engineering

Jose M Garcia, PE
Air Pollution Control Section

cc: Gloria Rizzo, President
Premier Funeral Services & Cremations, Inc.
d/b/a/ Treasure Coast Crematory
730 North Dixie Highway
Lake Worth, FL 33460

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