



Sectors: 2, D  
Site Record: APCD2021-SITE-03705

Application Record: APCD2023-APP-007896



Silver Lining Cremations  
Tatiana Maka  
421 S Andreason Dr  
Escondido, CA 92029

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## **AUTHORITY TO CONSTRUCT (Draft Version)**

**EXPIRES:**

After examination of your Application for an Air Pollution Control District (hereinafter referred to as "the District") Authority to Construct and Permit to Operate for equipment located at the above location, the District has decided on the following actions:

Authority to Construct is granted pursuant to Rule 20 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

Human Crematory: American Crematory, Model A-300-Trilogy, natural gas fired; with a primary chamber equipped with one 750,000 Btu/hr burners, Eclipse Therm Jet Low-NOx burner and a secondary chamber with an internal volume of 101 cubic feet, equipped with one 1.25 MMBtu/hr burner, Eclipse Therm Jet Low-NOx burner; vented to a stack with a minimum height of 26 feet above ground level.

This Authority to Construct is issued with the following conditions:

1. The incinerator shall be operated at all times in accordance with the manufacturer's instructions unless otherwise indicated in this permit. These instructions shall be posted on the equipment or kept readily available on the premises.
2. The owner or operator shall keep the crematory in good working condition and record the date and a detailed description of the type of each maintenance done on the crematory. (Rule 50 and 51)
3. Process, control, and monitoring equipment shall be inspected and maintained in accordance with manufacturer's instructions. A maintenance log shall be maintained on the premises for at least five (5) years from the date of each maintenance activity and shall be made readily available to the District upon request.
4. The start of a cremation conducted using this incinerator and the incinerator permitted under permit APCD2023-PTO-004548 shall be separated by at least 15 minutes based on the times indicated by strip chart readings required by this permit and APCD2023-PTO-004548. (Rule 1200)
5. No more than 2500 cremations shall be conducted using this equipment per calendar year. Records documenting compliance with this condition shall be maintained for a period of three (3) years and made available to the District upon request. (Rules 20.2, 1200)
6. No charge shall exceed 800 pounds. (Rules 50, 51, 53, 20.2)
7. Each charge shall be weighed prior to incineration. Process rate shall be calculated for each cremation as the initial charge weight divided by the time required for complete cremation. The average process rate for each cremation shall not exceed 200 pounds per hour. (Rule 20.2)
8. The owner / operator shall maintain the operating temperature in the secondary chamber of the crematory at or above 1600 degrees Fahrenheit prior to insertion of the charge and during the entire cremation. Records documenting compliance with this condition shall be maintained on site for a period of three (3) years and made available to the District upon request. (Rule 50 and 51)
9. The exhaust gas flowrate, as measured during source testing, shall average no less than 2700 actual cubic feet per minute during cremation, unless otherwise specified in writing by the District. (Rule 1200)
10. Temperature indicators to monitor the primary chamber and secondary chamber temperatures must be installed on the equipment and maintained in good working order. (Rules 20.2, 1200)

11. Strip chart recordings of the time and secondary chamber temperature shall be maintained for each cremation. The chart shall be annotated to indicate the beginning, ending and initial charge weight of each cremation.
12. Body bags shall be polyethylene only. (Rule 1200)
13. The crematory exhaust stack total particulate grain loading shall not exceed 0.10 grains/dscf at 12% CO<sub>2</sub> by volume excluding auxiliary fuel CO<sub>2</sub>.
14. A daily operational log shall be kept with the following information for each cremation:
  - a. date of cremation;
  - b. weight of charge;
  - c. description of each cremation container noting whether it is a casket or non-casket;
  - d. time of primary chamber start and final shutdown;
  - e. time of completion of cremation;
  - f. average process rate of cremation, lbs/hr;
  - g. time of activation of optical sensor-linked smoke control system (if activated);
  - h. name of operator.Operational logs shall be maintained on-site for a minimum of three years following the most recent log entry. [Rule 1200]
15. The opacity monitor shall be calibrated according to manufacturer instructions at least annually or more frequently if required by manufacturer instructions. The owner or operator shall maintain a copy of the manufacturer instructions on site. Each calibration performed shall be recorded in the maintenance log or daily operational log. (Rule 1200)
16. A source test shall be conducted by an independent ARB approved tester or by the District, at the applicant's expense, to determine compliance with the emission standards of this Authority to Construct and applicable District rules. The initial source test shall consist of no less than two test runs and shall be successfully conducted no later than 60 days following completion of construction. The first test run shall be conducted with no casket and with a charge between 200 and 300 pounds. The second run shall be conducted with no casket and a charge weight no less than 80 percent of the allowable charge weight listed in this Authority to Construct unless otherwise approved in advance, in writing by the APCD. If these charge weights are not available, the source test may be conducted at a lower charge weight if approved, in advance, in writing, by the APCD. At the District's discretion, the charge weight permit to operate limits may be set at 25% above the tested charge weight that passed a source test but in no case higher than the manufacturer's rated charge weight.
17. "A source test protocol shall be submitted to the District for review and approval at least 30 days prior to the initial source test. The source test protocol shall comply with the following requirements unless otherwise approved in writing by the District:
  - a. Particulate matter emissions shall be measured in accordance with San Diego APCD Test Method 5.
  - b. Visible emission evaluation shall be conducted simultaneously to the particulate matter test. This evaluation shall be conducted using EPA method 9.
  - c. Primary chamber, secondary chamber and exhaust stack temperatures shall be recorded during the particulate matter test.
  - d. Readings from the in-stack opacity monitor shall be recorded during the particulate matter test.
  - e. Source testing shall be conducted with a charge weight that is 80 percent of the charge weight limit listed in this Authority to Construct, or a charge weight approved in advance by the District."
18. Within 30 days after the completion of source testing, a final test report shall be submitted to the District for review and approval. The testing contractor shall include as part of the test report a certification that to the best of their knowledge the report is a true and accurate representation of the test conducted and the results.
19. The crematory exhaust stack shall be equipped with source test ports, scaffolding, roof access or platforms at the exhaust outlet to allow for the measurement and collection of stack gas samples consistent with all approved test protocols. The ports and platforms shall be constructed in accordance with District Method 3A, Appendix Figure 2, the stack design with the location of test ports, access provisions, etc. shall be submitted to the District Source Test Section prior to initial source testing.
20. Unless otherwise stated in writing by the District, this equipment shall be source tested at the permittee's expense at least once every two (2) permit years to demonstrate compliance with the emission standards contained in this permit. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. If the source test is performed by an independent tester, a source test protocol shall be submitted to the District 30 days prior to the test date, and a test report shall be submitted to the District within 45 days after the source test is completed.
21. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
22. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.

23. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

This Authority to Construct does not authorize operation of the above-specified equipment until written notification has been provided to the District indicating that construction (or modification) has been completed in accordance with this Authority to Construct. Upon submission of this notification, temporary Permit to Operate shall take effect and will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied.

This Authority to Construct shall be posted on or within 25 feet of the above described equipment or maintained readily available at all times on the operating premises.

Upon completion of construction (or modification) in accordance with this Authority to Construct, and prior to commencing operation, the applicant must complete and mail, deliver or email to [apcdpermits@sdapcd.org](mailto:apcdpermits@sdapcd.org) the enclosed Construction Completion Notice to the District. After mailing, delivering or emailing the notice, the applicant may commence operation of the equipment. Operation must be in compliance with all the conditions of this Authority to Construct and applicable District Rules.

This Authority to Construct does not relieve the holder from obtaining permits or authorizations, which may be required by other governmental agencies. This Authority to Construct is not authority to exceed any applicable emission standard established by this District or any other governmental agency. This authorization is subject to cancellation if any emission standard or condition is violated.

Within 30 days after receipt of this Authority to Construct, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance with Rule 25.

This Authority to Construct will expire on unless an extension is granted in writing.

This is not a Permit to Operate. Please be advised that installation or operation of this process or equipment without written authorization may be a misdemeanor subject to fines and penalties.

If you have any questions regarding this action, please contact me at (858) 414-9090 or via email at [Liliana.Jaime@sdapcd.org](mailto:Liliana.Jaime@sdapcd.org).

Liliana Jaime  
Asst APC Engineer

CC: Compliance Division