



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION**

**Reference No.: 65-0054
State Class: True Minor
Pollutant(s): VOCs and Criteria**

**Environmental Specialist: JLR, EMS
Route To: MLC**

Date Inspected: December 14, 2011

**Company: Elliott Pet Services
Location address: 277 Grouse Ridge Road
City/State/Zip: Harriman, TN 37748
Mailing Address, if different:**

**Company Contact/Title: Cameo Farr, Owner
Phone: 865-742-8266, cameoelliott@hotmail.com**

**Does Company impact an additional control area? YES/NO: No
If Yes, pollutant type:**

**Does Company have: NSPS (Part 60)? No PSD? No
 NESHAPS (Part 61)? No MACT (Part 63)? No
If YES, give subpart for NSPS, NESHAPS, MACT
Sources If YES to any, indicate point number(s):**

**Date of the last annual inspection: Never inspected
Time period covered by this inspection, from: December 2009 to December 14, 2011
Is inspection partial or comprehensive? Comprehensive**

**Total time required for this inspection (hours): 6.0
Was company in compliance during entire inspection time period? Yes
If NO, explain in final paragraph**

**If CM source: Date annual report received in EFO:
 Date annual report review complete/acknowledged by EFO:
 Did annual report have deviations from permit conditions (Y/N)?**

EXECUTIVE SUMMARY:

Elliot Pet Services operates a small animal crematory. True Minor Operating Permit 061024I was issued August 17, 2007 and expires July 1, 2012. Cameo Farr, Owner is the responsible official to represent and bind the facility in environmental permitting affairs.

There have been two air pollution related complaints filed against the facility, June 13 and December 12, 2011. The first complaint requested the Division investigate to determine whether or not this source needs a permit. The Division investigated on June 16, 2011 but the source was not in operation. On December 14, 2011, Jarrett Rudd and Erin Sturgill met with Cameo Farr, Owner, to conduct the 2011-2012 annual inspection in response to the second complaint. This complaint alleged smoke was coming from the source. Records were reviewed from December 2009 through December 14, 2011. No violations were discovered as a result of either complaint investigation. The fact sheet for the Mercury Product Disposal Control Act was emailed to Cameo Farr on December 15, 2011.

65-0054-01

Installation Description:

Animal Incinerator – Two Chamber, No. 2 Fuel Oil Fired

Operation Permit Number: 061024I

Date Issued: August 17, 2007

Date Expired: July 1, 2012

CONDITIONS:

Condition 1: The responsible official is Cameo Farr, Owner of Elliott Pet Services.

Condition 2: The total stated design heat input capacity for this source is 504,000 British Thermal Units per hour (Btu/hr). The Technical Secretary may require the permittee to prove compliance with this rate.

Condition 3: The maximum charging rate for this source shall not exceed 100 pounds per hour. This shall be based on the weight of a charge divided by the hours of operations required to fully incinerate said charge. The Technical Secretary may require the permittee to prove compliance with this rate.

Condition 4: Particulate matter emitted from this source shall not exceed 0.2% of the charging rate (0.2 pounds per hour).

Condition 5: According to Cameo Farr, only No. 2 fuel is used as fuel for this source.

Condition 6: SO₂ emitted from this source shall not exceed 0.5 lb/hr.

Condition 7: A daily log of the type of material incinerated is maintained at the source location and kept available for inspection.

Condition 8: The incinerator shall be operated in accordance with the manufacturer's recommendations. Manufacturer's operating recommendations for this incinerator is kept on site and kept available for inspection.

Condition 9: This permit is valid only for the incineration of animal remains.

Condition 10: If there is a validated complaint from the public about this operation, the Technical Secretary may require installation of automatic controls as well as monitoring and recording of the incinerator secondary chamber temperature. When required, the Technical Secretary will notify the permittee in writing that these actions must be taken.

Condition 11: If required by the Technical Secretary (as specified in Condition #10) the secondary chamber temperature shall be continuously monitored and recorded. Sensors shall be installed, maintained, and operated such that the flames from the burners do not impinge upon the sensors. The incinerator shall be operated with a minimum secondary chamber temperature of 1600°F. The secondary chamber temperature shall be measured at or beyond the chamber exit. The temperature-sensing device shall have an accuracy that is plus or minus 25°F over its operating range. The recorder must have a minimum chart speed of one (1) inch per hour for strip chart recorders and a maximum of 24 hours per chart for circular recorders. A data logger may be substituted for a recorder provided that its data resolution is at least as good as that from the specified recorders. This is not required by the Technical Secretary at this time.

Condition 12: Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (Six-minute average).

A VEE was conducted on December 14, 2011 by Erin Sturgill, and the source was found to be in compliance. All readings were zero percent opacity.

Condition 13: The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date pursuant to Division Rule 1200-3-9-.02(3).

Based upon the file review, site inspection, and review of records, Elliott Pet Services was found to be in compliance in that no compliance problems were found with any issue under the purview of these inspectors.

Janett Rudd
Inspector's Name

VEE Certification Number: 2205

Certification Expiration Date: March 27, 2012

Eric Steyer
Inspector's Name

VEE Certification Number: 2453

Certification Expiration Date: May 2, 2012

I verify that the format and content of this report conforms with established Tennessee Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

Mark L. Compton
Supervisor/Manager

12/15/11
Date