



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 15, 2012

**RE: Morgan County
Facility ID #0658000213
Before Rainbow Bridge, LLC
Notice of Violation
Non-HPV**

Certified: 70102780000197044404

Ms. Mary Beth Robinson
Before Rainbow Bridge, LLC
8015 N. Pisgah Ridge Road NW
McConnelsville, OH 43756

Dear Ms. Robinson:

We received your 4th quarter/2nd Semi-Annual reports on January 12, 2012. I reviewed your reports to determine compliance with your facility's Permit-to-Install (PTI) Operational Restrictions, and Monitoring and/or Recordkeeping Requirements.

In the reports you submitted, your crematory operating parameter records showed the following information:

Date	Time Afterburner Fired	Time of Charging	Approx. Weight of Charge	Time and Temperature of Afterburner When Processing Completed
10/12/11	5:30 PM	6:00 PM	23 lbs.	9:10 PM / 1,328
10/18/11	1:00 PM	1:30 PM	10 lbs.	3:30 PM / 1,348
12/27/11	6:00 PM	6:30 PM	6 lbs.	7:45 PM / 1,332

In reviewing the facility's PTI 06-08411, the Operational Restrictions contained in Part II.B.4. state, "During a cremation burn, the temperature of the secondary combustion chamber shall be maintained at a minimum of one thousand four hundred (1,400) degrees Fahrenheit." The information recorded shows that the temperature was not maintained at 1,400 degrees Fahrenheit during operation.

Per the terms and conditions of the Reporting Requirements listed in Part II.D.1., "The permittee shall submit temperature deviation (excursion) reports that identify all periods of time during which the secondary combustion chamber exhaust gas temperature did not comply with the temperature limitation specified above. The deviation reports shall include the following information: a. the date of the excursion; b. the time interval over

which the excursion occurred; c. the temperature values during the excursion; d. the cause(s) for the excursion; and e. the corrective action which has been or will be taken to prevent similar excursions in the future. This report shall be sent to the Ohio EPA, Southeast District Office within forty-five (45) days of the excursion."

On the three occasions listed above, the facility deviated from the terms and conditions of the permit that required the temperature of the secondary combustion chamber to maintain a temperature of at least 1,400 degrees Fahrenheit. At that time, the facility was then required to submit a deviation report within 45 days from the time of deviation (when the temperature recorded was below 1,400 degrees Fahrenheit).

Based on the above, the following violations must be addressed:

(1) Operational Restrictions

Part II.B.4. of the Permit-to-Install for EU N001

The Operational Restrictions contained in Part II.B.4. state, "During a cremation burn, the temperature of the secondary combustion chamber shall be maintained at a minimum of one thousand four hundred (1,400) degrees Fahrenheit." The information recorded shows that the temperature was not maintained at 1,400 degrees Fahrenheit during operation.

Before Rainbow Bridge, LLC failed to maintain the required 1,400 degree Fahrenheit temperature as detailed in the operational restrictions.

(2) Reporting Requirements

Part II.D.1. of the Permit-to-Install for EU N001

"The permittee shall submit temperature deviation (excursion) reports that identify all periods of time during which the secondary combustion chamber exhaust gas temperature did not comply with the temperature limitation specified above. The deviation reports shall include the following information: a. the date of the excursion; b. the time interval over which the excursion occurred; c. the temperature values during the excursion; d. the cause(s) for the excursion; and e. the corrective action which has been or will be taken to prevent similar excursions in the future. This report shall be sent to the Ohio EPA, Southeast District Office within forty-five (45) days of the excursion."

Before Rainbow Bridge, LLC failed to submit deviation reports to Ohio EPA within 45 days of the temperature deviations.

Within 30 days of your receipt of this letter, please submit to this office a plan and schedule that details the company's strategy to ensure compliance with the operational restrictions and reporting requirements of the facility's PTI.

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Acceptance by Ohio EPA of submitted information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions or concerns, please feel free to contact me at (740) 380-5259 or by email at miki.mercer@epa.ohio.gov.

Sincerely,



Mykai L. Mercer
Environmental Specialist 2
Division of Air Pollution Control
Southeast District Office

MLM/cs

cc: Dean Ponchak, SEDO-DAPC
Bruce Weinberg, CO-DAPC
Mickey Jencius, U.S. EPA, Region V