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# Air Enforcement: Arkansas Department of Energy & Environment - Division of Environmental Quality and Jacksonville Crematory Enter into Consent Administrative Order

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The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and Chapel Hill Memorial Park Cemetery, Inc. d/b/a Chapel Hill Memorial Park Crematory (“Chapel Hill”) entered into a December 13th Consent Administrative Order (“CAO”) addressing alleged violations of an air permit. See LIS No. 21-129.

The CAO provides that Chapel Hill owns and operates a crematory (“Facility”) in Jacksonville, Arkansas.

Chapel Hill operates the Facility pursuant to:

General Air Permit for Minor Source Animal/Human Remains Incinerator Facilities 1976-AGP-000 (“Permit”)

DEQ personnel are stated to have conducted a compliance inspection of the Facility on June 22nd for the time period of February 1, 2017 through May 31, 2021.

The Facility’s incinerators’ maximum hourly charging rates established in a confirmation letter are stated to be 150 pounds per hour for each incinerator. Specific Condition 11 of the Permit requires Chapel Hill to maintain records which demonstrate compliance with hourly and annual charging rates established in the confirmation letter.

The CAO provides that based on the hours the incinerator was operated and weight of each charge, on April 8, 2019 and May 24, 2021, the Facility exceeded the maximum charge rate of 150 pounds per hour. Further, the records inspected are stated to have identified:

- 72 instances in which the hours operated do not match the recorded start and stop time
- 3 instances in which no stop time was recorded
- 2 instances in which the charge rates were not recorded
- 1 instance in which the start- and mid-cycle temperature was not recorded

The Facility is also stated to have used one incinerator run log sheet to record the operation of both incinerators instead of using a separate run log sheet for each unit.

Chapel Hill responded to DEQ in regards to the inspection and stated it now has separate incinerator run log sheets for each of its two incinerators. Further, the Facility stated it is providing ongoing recordkeeping training to its staff to address recordkeeping errors.

Chapel Hill neither admits nor denies the factual or legal allegations in the CAO.

The CAO requires that to comply with Specific Conditions 10 and 11 of the Permit, Chapel Hill shall for a period of three months submit monthly copies of its incinerator run log sheets for both incinerators. A table in the CAO details the month which the reports are to represent and the respective due dates.

A civil penalty of \$6,240 is assessed, which could have been reduced to one-half if the document was signed and returned to DEQ by December 8th.

A copy of the CAO can be downloaded [here](#).