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

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The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and Denver Roller, Inc. (“DRI”) entered into a December 13th Consent Administrative Order (“CAO”) addressing alleged violations of a General Air Permit. See LIS No. 21-130.

The CAO provides that DRI owns and operates a crematory incinerator (“Facility”) in Conway, Arkansas.

The Facility is stated to utilize General Air Permit for Minor Source Animal/Human Remains Incinerator Facilities (“Permit”). Such Permit is stated to have been issued on August 23rd.

DEQ personnel are stated to have performed a compliance inspection on August 10th of the DRI Facility. The inspection is stated to have covered the reporting period of May 2017 through June 2021.

The inspection is stated to have determined that DRI failed to properly perform visible emissions (“VE”) observations at Incinerator Power Pack II Ultra (Unit 1) and Incinerator Super Power Pack 2.0 (Unit 2) during the reporting period. This allegedly violates Specific Condition 15 of the Permit.

DRI is stated to have failed to maintain a starting temperature of 1600° Fahrenheit at Units 1 and 10. Further, there was stated to be an instance where DRI failed to record a mid-cycle temperature at Unit 2. The alleged failures violate Specific Conditions 10 and 20 of the Permit.

DRI responded to an August 25th letter from DEQ notifying it of the violations and stating that:

. . . the violations to Specific Condition 15 were due to errors in the machine thinking that the unit was running when the unit was in fact in cool down. Respondent also stated that the three (3) instances of missing VE observations were due to a policy where the performance of VE observations occurred every Wednesday. Respondent stated the policy had been updated, VE observations would be performed the beginning of each week or until an observation is completed for the week. The response also supplied records for the violations to Specific Condition 20. Respondent stated that the records that reflect temperatures below 1600°F should reflect that the records were above the minimum temperature.

DRI neither admits nor denies the factual and legal allegations contained in the CAO.

The CAO assesses a civil penalty of \$3,920 which could have been reduced to one-half if the document was signed and returned to DEQ by December 23rd.

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