Montana Department of
ENVIRONMENTAL QUALITY

Steve Bullock, Governor
Tracy Stone-Manning, Director

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August 15, 2013

Mr. Ralph Mihlfred
Creel Funeral Home, Inc.
PO Box 991
Lewistown, MT 59457

Dear Mr. Mihlfred:

Montana Air Quality Permit #4930-00 is deemed final as of August 15, 2013, by the Department of Environmental Quality (Department). This permit is for the Creel Funeral Home, Inc. Crematory Operations. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Julie A. Merkel
Air Permitting Supervisor
Air Resources Management Bureau
(406) 444-3626

Shawn Juers
Environmental Engineer
Air Resources Management Bureau
(406) 444-2049

JM:SJ
Enclosure

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, Montana 59620
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Creel Funeral Home, Inc.

Montana Air Quality Permit Number: 4930-00

Preliminary Determination Issued: 6/28/2013
Department Decision Issued: 7/30/2013
Permit Final: 8/15/2013

1. *Legal Description of Site*: The legal description is Section 15, Township 15 North, Range 18 East, in Fergus County, Montana.

2. *Description of Project*: Creel Funeral Home, Inc. (Creel Funeral Home) proposes to operate a human crematory. The crematory would be capable of incinerating 150 pounds per hour, with a maximum charge of 600 pounds.

3. *Objectives of Project*: Creel Funeral Home would like to offer cremation services to their clients.

4. *Alternatives Considered*: In addition to the proposed action, the Department also considered the "no-action" alternative. The "no-action" alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Creel Funeral Home demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

5. *A Listing of Mitigation, Stipulations, and Other Controls*: A list of enforceable conditions, including a BACT analysis, would be included in MAQP #4930-00.

6. *Regulatory Effects on Private Property*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. *The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The "no-action" alternative was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Terrestrial and Aquatic Life and Habitats			XX			Yes
B	Water Quality, Quantity, and Distribution			XX			Yes
C	Geology and Soil Quality, Stability and Moisture			XX			Yes
D	Vegetation Cover, Quantity, and Quality			XX			Yes
E	Aesthetics			XX			Yes
F	Air Quality			XX			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources			XX			Yes
H	Demands on Environmental Resource of Water, Air and Energy			XX			Yes
I	Historical and Archaeological Sites			XX			Yes
J	Cumulative and Secondary Impacts			XX			Yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

The crematory is proposed to be located at an already existing funeral home operation. The extremely small amount of potential emissions of conventional pollutants would not be expected to have any discernible effects to terrestrial and aquatic life and habitats. The Department conducted a human health risk assessment for the cremation emissions. With cancer and non-cancer risks below levels the Department would consider a potential risk to the environment, any impacts to terrestrials and aquatic life and habitats would be expected to be minor, if any at all.

B. Water Quality, Quantity and Distribution

Any water usage associated with operation of the crematory would be expected to be negligible. Therefore, not more than minor effects would be expected.

C. Geology and Soil Quality, Stability and Moisture

The crematory is proposed to be located at an already existing funeral home operation. Any effects to geology or soil quality, stability, and moisture would be expected to be minor. The minute amount of emissions from operations of the crematory would not be expected to impact geology, soil quality, stability, or moisture.

D. Vegetation Cover, Quantity, and Quality

The crematory is proposed to be located at an already existing funeral home operation. The minute amount of emissions from operations of the crematory would not be expected to impact vegetation cover, quantity, and quality.

E. Aesthetics

The Montana Air Quality Permit would limit visible emissions to 10% opacity or less. Properly operated crematories of this design are not expected to have visible emissions. Any impacts to aesthetics would be expected to be minor.

F. Air Quality

The potential to emit of conventional pollutants from the crematory is extremely small. Any impacts to air quality would be expected to be minor, if any discernible amount at all.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department conducted a human health risk assessment for the cremation emissions. With the minute amount of conventional pollutants, and cancer and non-cancer risks that are far below levels the Department would consider a potential risk to the environment, any impacts to unique endangered, fragile, or limited environmental resources would be expected to be minor, if any discernible amount at all.

H. Demands on Environmental Resource of Water, Air and Energy

The energy demands of the crematory are small. The crematory would be fired on pipeline natural gas. As described in Section 7.B and 7.F above, impacts to water and air would be expected to be minimal. Demands on environmental resources would be minor, if any at all.

I. Historical and Archaeological Sites

The crematory is proposed to be located at an already existing funeral home operation. Any impacts to historical or archaeological sites would be expected to be minor.

J. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts from this project on the environment would be expected to be minor.

8. *The following table summarizes the potential economic and social effects of the proposed project on the human environment. The "no-action" alternative was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Social Structures and Mores			XX			Yes
B	Cultural Uniqueness and Diversity			XX			Yes
C	Local and State Tax Base and Tax Revenue			XX			Yes
D	Agricultural or Industrial Production			XX			Yes
E	Human Health			XX			Yes
F	Access to and Quality of Recreational and Wilderness Activities			XX			Yes
G	Quantity and Distribution of Employment			XX			Yes
H	Distribution of Population			XX			Yes
I	Demands for Government Services			XX			Yes

		Major	Moderate	Minor	None	Unknown	Comments Included
J	Industrial and Commercial Activity			XX			Yes
K	Locally Adopted Environmental Plans and Goals			XX			Yes
L	Cumulative and Secondary Impacts			XX			Yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The crematory would operate at an already existing funeral home facility. Any impacts to social structures and mores from the installation and operation of the crematory would be expected to be minor.

B. Cultural Uniqueness and Diversity

The crematory would operate at an already existing funeral home facility. Any impacts to cultural uniqueness and diversity from the installation and operation of the crematory would be expected to be minor.

C. Local and State Tax Base and Tax Revenue

The crematory would operate at an already existing funeral home facility. As an already existing business, any impacts to local and state tax base and tax revenue would be expected to be minor.

D. Agricultural or Industrial Production

The crematory would operate at an already existing funeral home facility. No discernible impacts from the operation of the crematory to agricultural or industrial production would be expected. Any impacts would be minor.

E. Human Health

The Department conducted a full human health risk assessment for the cremation emissions. With the minute amount of conventional pollutants, and cancer and non-cancer risks that are far below levels the Department would consider a potential risk, any impacts would be expected to be minor.

F. Access to and Quality of Recreational and Wilderness Activities

The crematory would operate at an already existing funeral home facility. Opacity from the operations would be limited to 10% in the Montana Air Quality Permit. Any impacts to access of or quality of recreational and wilderness activities would be expected to be minor.

G. Quantity and Distribution of Employment

Creel Funeral Home may employ one additional part time position as a result of operating a crematory. Any changes to quantity and distribution of employment would be expected to be minor.

H. Distribution of Population

The crematory would operate at an already existing funeral home facility. Creel Funeral Home may employ one additional part time position as a result of operating a crematory. Any changes to distribution of population would be expected to be minor.

I. Demands for Government Services

Installation of a crematory would require the appropriate permits, and the resources required to verify compliance with permit and regulatory conditions. The demands for government services for this operation would be expected to be minor.

J. Industrial and Commercial Activity

The crematory would operate at an already existing funeral home facility. Some short term activity to install the necessary equipment would be expected. Any impacts to industrial and commercial activity would be expected to be minor.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals for this area. MAQP #4930-00 would be issued in accordance with rules designed to protect human health and the environment.

L. Cumulative and Secondary Impacts

Overall, potential economic and social effects would be expected to be minor.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the construction and operation of a crematory. MAQP #4930-00 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program.

EA prepared by: Shawn Juers
Date: June 12, 2013