

Jasmine Forbes

From: Jasmine Forbes
Sent: Monday, September 14, 2020 2:08 PM
To: 'Rob'
Subject: RE: Toxic DeVol Crematorium

Good Afternoon,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaithersburgmd.gov

From: Rob <robs88keys@aol.com>
Sent: Monday, September 14, 2020 1:16 PM
To: Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Subject: Toxic DeVol Crematorium

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Dear Jasmine Forbes,

I am concerned about the toxic DeVol Crematorium application: SP-8415-2020. Crematoriums are an Industrial Use in Montgomery County and have no legal place in a residential neighborhood. Residents of Gaithersburg are entitled to clean air.

Crematoriums generate harmful, volatile compounds, heavy metals, and other toxic chemicals. According to the NIH website, these pollutants have been linked to cancer and other debilitating illnesses and could have severe effects on the surrounding environment and human health.

Thank you for your time and attention to this matter.

Sincerely,
Rob Harper

Sent from my iPhone

Jasmine Forbes

From: Michael Sesma
Sent: Monday, September 14, 2020 1:49 PM
To: Rob
Cc: Jasmine Forbes; Doris Stokes
Subject: Re: Toxic DeVol Crematorium

Dear Rob,

Thank you for sharing your opinion on the DeVol application. It will be included in the record for this proposal.

Best,
Mike

Michael A. Sesma
Council Member, City of Gaithersburg
301-412-4136

From: Rob <robs88keys@aol.com>
Sent: Monday, September 14, 2020 1:13:24 PM
To: Michael Sesma
Subject: Toxic DeVol Crematorium

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Dear Council Member Michael Sesma,

I am concerned about the toxic DeVol Crematorium application: SP-8415-2020. Crematoriums are an Industrial Use in Montgomery County and have no legal place in a residential neighborhood. Residents of Gaithersburg are entitled to clean air.

Crematoriums generate harmful, volatile compounds, heavy metals, and other toxic chemicals. According to the NIH website, these pollutants have been linked to cancer and other debilitating illnesses and could have severe effects on the surrounding environment and human health.

Thank you for your time and attention to this matter.

Sincerely,
Rob Harper

Sent from my iPhone

Jasmine Forbes

From: Jasmine Forbes
Sent: Monday, September 14, 2020 4:02 PM
To: 'marie day'
Subject: RE: Crematorium

Good Afternoon,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes

Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaithersburgmd.gov

-----Original Message-----

From: marie day <ovrdnbnw@icloud.com>
Sent: Monday, September 14, 2020 3:41 PM
To: Planning External Mailing <Planning@gaithersburgmd.gov>
Subject: Crematorium

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Greetings old friends in the City of Gaithersburg.

I am writing you about putting a crematorium in a residential area of Old Town. To me, this idea is not only untenable, but unconscionable. And GROSS. Really, would you want such a thing in your neighborhood? Please don't blow off that question. Stop and think, and tell me, do YOU want that in your neighborhood? NO! But it's not in YOUR neighborhood, it's in mine. I don't think any of you would answer with a hearty "yes, SURE, why NOT!"

Which makes me wonder why this NOT OK plan is being considered. We have an industrial area, where crematoriums are usually located, and it's not far away. Still gross, but a compromise.

And while Kentlands and Lakelands are coming along nicely, even overhauled and upgraded, we have crumbling buildings, owners with no accountability, and at this point, no one willing to invest in our Old Town. Our future is grim, where it was once percolating; deteriorating, where it was once hopeful.

And from my personal perspective, as an owner of a historic house, you are REALLY HARD on us! You have high expectations that we will remain a showplace, our beautiful roofs replaced with metal and our windows and down spouts custom made. Our sidewalks cleared from debris and snow. What do WE get for OUR investment? The REAL answer? Nothing. We're losing faith. All of us.

Marie Day
26 Walker Ave
Gaithersburg, MD

Sent from my iPad



September 14, 2020

Mayor Jud Ashman
City of Gaithersburg
31 S. Summit Ave.
Gaithersburg MD 20877

RE: Concept Site Plan Application SP-8415-2020 (10 and 14 East Deer Park Drive): DeVol Funeral Home ("Crematorium")

Dear Mayor Ashman and Council Members:

Please enter this letter into the record of the above-referenced case, provided on behalf of my client Landmark Realty, Inc., which owns the Montgomery House apartments located at 519 and 521 S. Frederick Avenue and the Montgomery Park apartments located at 351 S. Frederick Avenue and 9 E. Deer Park Road. Together they represent 91 affordable apartment units that house approximately 300 Gaithersburg residents. Many of these residents have submitted separate letters in opposition to the proposed Crematorium.

The Crematorium should be denied because it is not allowed under the City Code: a funeral home may not operate a crematory because it cannot carry out the "final disposition" of a body. As explained below, the legal analysis provided by City staff (which concludes that the crematorium is a permissible use) overlooks specific limitations in the Code.

A funeral home is a building which can serve as a "*temporary resting place*" for bodies pending their final disposition, and where the "*preparation of bodies for final disposition*" can occur. But the Code does not authorize a funeral home to carry out the actual "final disposition" (cremation) of a body.

Although not defined in the City Code, "final disposition" is a highly technical term in the funerary industry. Licensed professionals in the field (e.g., funeral home directors, morticians, crematory operators and cemetery owners) understand that the "final disposition" of a body means burial or cremation. State law repeatedly confirms the technical understanding of this phrase:

1. "[C]emetery' includes a crematory or other place for final disposition."¹
2. "Final disposition' means the burial, cremation, or other final disposition of a body ..."²
3. "'Authorizing agent' means the individual who has legal authority to arrange for and make decisions regarding the final disposition of a dead human body, including by cremation."³

¹ Md. Code Ann., Health-Gen. § 4-215(a) (Burial permits, final disposition, transportation, and disinterment).

² Md. Code Ann., Health-Gen. § 4-201(k) (Definitions). Many other examples are cited in the attached legal memorandum.

³ Md. Code Ann., Health-Gen. § 5-508(b) (Definitions).

Of course, families must decide what to do with the ashes following a cremation. Some of those options including placing the ashes in a columbarium; burying the ashes in a cemetery or other location; or scattering them. This decision, however, relates to the ceremonial placement of the ashes that remain following the “final disposition” of a body. Placement of the ashes does not constitute “final disposition”.

While City staff correctly recognizes that the act of cremation constitutes the “final disposition” of a body, their interpretation overlooks the clear Code limitations that restrict funeral home services to providing a “temporary resting place for dead human bodies” and “the preparation of such bodies” for final disposition.⁴

City law does not allow a funeral home to carry out the “final disposition” of a human body, and it can no more conduct a cremation on its premises than it can conduct a burial on its premises.

Please also accept into the record the attached more detailed legal analysis on this point.

Respectfully Submitted,



Michele McDaniel Rosenfeld

Attachment

Cc: Council Vice-President Laurie-Anne Sayles
Council Member Neil Harris
Council Member Michael A. Sems
Council Member Ryan Spiegel
Council Member Robert T. Wu

⁴ Montgomery County only allows crematoria in its Heavy Industrial Zone, following a conditional use approval. Frederick County allows crematories as an accessory to funeral homes in its General Commercial and Mixed Use zones.



September 14, 2020

LEGAL MEMORANDUM

RE: DeVol Crematorium: SP-8415-2020 (10 and 14 East Deer Park Drive)

I. INTRODUCTION

The above-referenced concept plan should be denied because the application does not comply with the City of Gaithersburg's Zoning Code.

DeVol Funeral home seeks to expand its existing funeral home use ("Funeral Home") to include a crematory ("Crematory"). The above-referenced pending application ("Concept Plan") is governed by the standards of the Corridor Development (CD) Zone and the general use definitions of the Gaithersburg City Zoning Code ("Code").

City staff opined that the proposed crematorium is allowed under the definition of "Funeral Home." As explained herein, the Funeral Home cannot operate the proposed Crematory under current City law, and the Concept Plan should be denied.

II. A "FUNERAL HOME" MAY NOT OPERATE A CREMATORY UNDER CITY LAW.

A. A Funeral Home May Not Conduct The "Final Disposition" Of A Body

The Code does not define a "crematory" as a distinct use. City staff has concluded that a crematory is a permissible service under the Code definition of "funeral home" and in so doing overlooked the specific limitations on the permissible scope of services set forth in the definition. The plain language of the Code simply does not allow cremation as a permitted use in a funeral home.

A funeral home is a building where certain activities are allowed with respect to human remains pending "final disposition" of a body. Specifically, a funeral home can serve as a "temporary resting place" for bodies, or engage in the "preparation of" bodies for final disposition. The permissible services do not extend to the actual "final disposition" of a body.

In Maryland, the term “final disposition” is a technical “word of art” with a very specific meaning.¹ Professionals responsible for handling human remains (e.g., funeral home directors, morticians, and people who operate cemeteries and crematories) all understand the term “final disposition” of a human body to include cremation. A survey of state law confirms that “cremation” is consistently defined and regulated as a means of “final disposition.”

Consequently, a Funeral Home can serve as the “temporary resting place of dead human bodies pending final disposition thereof,” and engage in “the preparation of such bodies for burial or other final disposition.” But cremation itself, *i.e.*, “final disposition,” is not a permissible component of a Funeral Home use.

B. Legal Analysis

The Code does not define “crematorium.” “Funeral home” is defined in the Code as follows:

Funeral home. Any building in which one or more parlors or rooms are maintained for the temporary resting place of dead human bodies pending final disposition thereof. Such building may also include the following: Space and facilities for the preparation of such bodies for burial or other final disposition; a chapel for the purpose of conducting religious or memorial services or ceremonies (and in which no emergency ambulance service is provided); rooms or space for administrative offices for conducting the business of the home; rooms or space for the housing of equipment, including motor vehicles; living quarters for not more than one family unit who are employees or owners of such funeral home or children of such employees or owners. Emergency ambulance service shall not be provided from the building.²

Maryland law uses the technical phrase “final disposition” in multiple contexts that both individually and together confirm that the cremation of human remains constitutes “final disposition” of a body. The following representative sampling of the use of this phrase in Maryland statutes makes this point:

¹ The term “words of art” is defined in Black’s Law Dictionary 1439 (5th ed. 1979) as “The vocabulary or terminology of a particular art or science, and especially those expressions which are idiomatic or peculiar to it.” *Health Services v. Holy Cross Hosp*, 290 Md. 508, 516 (1981). See also *Woodward v. Newstein*, 37 Md. App. 285, 293 (1977) (noting a word of art “is a word or phrase ‘with a special meaning in the law.’”)

² Code § 24-1 (emphases added).

1. “[C]emetery’ includes a crematory or other place for final disposition.”³
2. “[T]he following persons, in the order of priority stated, have the right to arrange for the final disposition of the body of the decedent, including by cremation under § 5-502 of this subtitle . . .”⁴
3. “‘Final disposition’ means the burial, cremation, or other final disposition of a body . . .”⁵
4. “‘Authorizing agent’ means the individual who has legal authority to arrange for and make decisions regarding the final disposition of a dead human body, including by cremation.”⁶
5. “In general. -- Except as otherwise provided in this section, a person may not cremate a body until it has been identified by:
 - (1) The next of kin;
 - (2) A person who is authorized to arrange for final disposition of the body under §§ 5-508 through 5-512 of this subtitle; or
 - (3) A medical examiner.”⁷
6. “Use of casket. -- The person arranging for final disposition of a body may specify that a casket:
 - (1) Be used before cremation;
 - (2) Be consumed during cremation;
 - (3) Be used after cremation; or
 - (4) Not be used before, during, or after cremation.”⁸

³ Md. Code Ann., Health-Gen. § 4-215(a) (Burial permits, final disposition, transportation, and disinterment).

⁴ Md. Code Ann., Health-Gen. § 5-509(c) (Disposition of body other than by will).

⁵ Md. Code Ann., Health-Gen. § 4-201(k) (Definitions).

⁶ Md. Code Ann., Health-Gen. § 5-508(b) (Definitions).

⁷ Md. Code Ann., Health-Gen. § 5-502(b) (Cremation – Required identification and authorization).

⁸ Md. Code Ann. Health-Gen. § 5-505 (Use of casket). See also Md. Code Ann. Health-Gen 5-114(a) (Burial or disposal of body): “In general. -- An individual may not bury or dispose of a body except:

- (1) In a family burial plot or other area allowed by a local ordinance;
- (2) In a crematory;
- (3) In a cemetery;
- (4) By donating the body to medical science; or
- (5) By removing the body to another state for final disposition in accordance with the laws of the other state.

Concept Plan City Exhibit # 97 includes the following staff analysis of the Code definition of “funeral home;”

As I had earlier advised, the CD Zone allows funeral homes, and as you note, the Sec. 24-1 definition includes “any building” which includes one or more parlor rooms for “temporary resting places for dead human bodies” and “space and facilities for the preparation of such bodies for burial or other final disposition . . .” Since “final disposition” isn’t otherwise limited, and after all it is clear it means other options besides burial, I can see no other way conclude that doesn’t include cremation.

Thus I had concluded that as long as the crematorium use was included as part of a building which also had one or more parlor rooms as temporary resting places (which they did indicate at the August 3 public hearing would be the case), the definition of “funeral home” would allow it. The restriction would be that a stand-alone crematorium as a single use in a building (with no parlors for temporary resting places) would not be permitted, as the definition only such preparation uses “for burial or other final disposition” where they are “also included” in buildings which have one or more parlors.

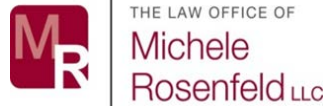
(Emphases added.)

This analysis properly recognizes cremation as a “final disposition.” At the same time, it overlooks the Code limitations that restrict funeral home services in connection with the handling of human remains to providing a “temporary resting place for dead human bodies” and “the preparation of such bodies” for burial or other final disposition.

The Code clearly does not allow a funeral home to conduct the “final disposition” of a human body. It allows for a body to be held pending cremation or burial, but does not allow cremation or burial to be carried out by the funeral home.

III. CONCLUSION

Operation of a crematorium is not a permitted service under the Code definition of “funeral home” and the Concept Plan must be denied.



September 15, 2020

Mayor Jud Ashman
City of Gaithersburg
31 S. Summit Ave.
Gaithersburg MD 20877

RE: Concept Site Plan Application SP-8415-2020 (10 and 14 East Deer Park Drive)
DeVol Funeral Home (“Crematorium”): Corrected Exhibit Number underlined below

Dear Mayor Ashman and Council Members:

Please enter this letter into the record of the above-referenced proceedings in opposition to the proposed DeVol Funeral Home crematory, on behalf Landmark Realty and the approximately 300 City residents that live in the apartments located at 519 and 521 S. Frederick Avenue, and 351 S. Frederick Avenue and 9 E. Deer Park Road (Montgomery House and Montgomery Park, respectively).

The latest Concept Plan drawings show an 8-foot “stack” height. See SP Exhibit No. 264.

The applicant’s environmental expert, during a September 9 informational meeting, suggested that interested persons look at pending crematory permit applications pending with the Maryland Department of the Environment (MDE) (“Pending Applications”) to become better informed on the topic of crematories. A review of those applications shows that **the shortest stack height among the Pending Applications for a new crematorium is 28 feet from ground level, with the tallest being 40 feet.** (See Exhibit 1.)

The images below show a scaled rendering of the proposed crematory building with a 25-foot stack. Note: a 28-foot tall stack would not fit within the exhibit frame.



See Exhibit 2: full page rendering.

As is readily apparent from these images, the stack towers above the existing skyline, and will in no way be screened by the proposed landscape plantings shown on Exhibit 264 (which, according to statements made on behalf of the applicant at the September 9 community meeting, are shown at taller heights than they will be at the time of planting).¹

Accordingly, the proposal does not satisfy the standard set forth in City Zoning Code Section 24-160G.7(4), which requires that in order for the Council to approve the proposed crematorium it must find, among other things, that “The plan will be internally and externally compatible and harmonious with existing and planned land uses in the CD zoned area and adjacent areas.”

The surrounding area consists of single-family homes, a school, a park, and multi-family affordable residential housing. The industrial nature of a stack this tall (even if clad in brick or an alternative architectural treatment) is incompatible and not harmonious with the CD zoned area and adjacent areas, and the application must be denied on these grounds.

We ask that the Mayor and Council deny the application on these grounds, in addition to the fact that a crematorium does not fall within the scope of permissible services allowed under the Funeral Home definition in the City Code.

Respectfully Submitted,



Michele McDaniel Rosenfeld

Exhibits:

1. Excerpted pending MDE crematory applications with stack heights shown
2. Full-page rendering of proposed crematorium building with 25-foot stack height

Cc: Council Vice-President Laurie-Anne Sayles
Council Member Neil Harris
Council Member Michael A. Sems
Council Member Ryan Spiegel
Council Member Robert T. Wu

¹ To date I have been unable to find in the record any regulatory or empirical basis for the eight-foot height stack shown on the Applicant’s latest submissions. Although the September 3, 2020 email from the applicant’s legal counsel transmitting those plans said that “We will be happy to discuss the methodology the project’s consultant team used to determine the height and dimensions of the chimney shown on the elevations plan at the [September 9] informational meeting,” no specifics were provided, even in response to direct questions regarding stack height.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

**AIR AND RADIATION ADMINISTRATION
APPLICATION FOR A PERMIT TO CONSTRUCT**

DOCKET #09-20

COMPANY: Vaughn Greene Funeral Services, PA

LOCATION: 4905 York Road, Baltimore, MD 21212

APPLICATION: Installation of a Matthews Environmental Solutions Power-Pak II Plus human crematory.

| <u>ITEM</u> | <u>DESCRIPTION</u> |
|-------------|--|
| 1 | Notice of Application and Opportunity to Request an Informational Meeting |
| 2 | Permit to Construct Application Forms: Form 5 Application for Processing/Manufacturing Equipment Form 5EP Emission Point Data Form 5A Summary of Demonstrations for Meeting the Ambient Impact Requirement Form 5T Toxic Air Pollutants (TAP) Emissions Summary and Compliance Demonstration |
| 3 | Calculations of Emissions |
| 4 | Zoning Approval Letter |

12. Equivalent Stack Information- is Exhaust through Doors, Windows, etc. Only? (Y/N)

N
85

If not, then

Height Above Ground (FT)

4 0

86-88

Inside Diameter at Top (in)

2 0

89-91

Exit Temperature (°F)

1 1 0 0

92-95

Exit Velocity (FT/SEC)

2 0

96-98

NOTE:

Attach a block diagram of process/process line, indicating new equipment as reported on this form and all existing equipment, including control devices and emission points.

13. Input Materials (for this equipment only)

Is any of this data to be considered confidential? N (Y or N)

| | NAME | CAS NO. (IF APPLICABLE) | PER HOUR | INPUT RATE | | UNITS |
|----|---------------|-------------------------|----------|------------|----------|-------|
| | | | | UNITS | PER YEAR | |
| 1. | HUMAN REMAINS | | 175 | lbs/hr | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |
| 7. | | | | | | |
| 8. | | | | | | |
| 9. | | | | | | |

TOTAL

14. Output Materials (for this equipment)

Process/Product Stream

| | NAME | CAS NO. (IF APPLICABLE) | PER HOUR | OUTPUT RATE | | UNITS |
|----|------|-------------------------|----------|-------------|----------|-------|
| | | | | UNITS | PER YEAR | |
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |
| 7. | | | | | | |
| 8. | | | | | | |
| 9. | | | | | | |

TOTAL

15. Waste Streams- Solid and Liquid

| | NAME | CAS NO. (IF APPLICABLE) | PER HOUR | OUTPUT RATE | | UNITS |
|----|------|-------------------------|----------|-------------|----------|-------|
| | | | | UNITS | PER YEAR | |
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |
| 7. | | | | | | |
| 8. | | | | | | |
| 9. | | | | | | |

TOTAL

MARYLAND DEPARTMENT OF THE ENVIRONMENT

**AIR AND RADIATION ADMINISTRATION
APPLICATION FOR A PERMIT TO CONSTRUCT**

**SUPPLEMENT TO
DOCKET #05-20**

COMPANY: Final Journey Crematory, Inc.

LOCATION: 519 Mabe Drive
Woodbine, MD 21797

APPLICATION: Addition of a B&L Cremation Systems Phoenix II-1 human Crematory.

| <u>ITEM</u> | <u>DESCRIPTION</u> |
|-------------|--|
| 1 | Notice of Tentative Determination, Opportunity to Request a Public Hearing, and Opportunity to Submit Written Comments |
| 2 | Fact Sheet and Tentative Determination |
| 3 | Draft Permit to Construct and Conditions |
| 4 | Supplemental Information |
| 5 | Privilege Log Not Applicable |

VII. TOXIC AIR POLLUTANT COMPLIANCE DEMONSTRATION AND ANALYSIS

The proposed construction must comply with all State imposed emissions limitations and screening levels for toxic air pollutants. The ARA has conducted an engineering and air quality review of the application. The emissions were projected based on crematory capacity, permit limits, and U.S. Environmental Protection Agency (EPA) emission factors. The U.S. EPA Screen3 model was used to project the maximum ground level concentrations from the proposed crematory, which were then compared to the MDE screening levels

- A. Quantification of Emissions – COMAR 26.11.15.04 requires the quantification of all toxic air pollutants from a source. The projected TAP emissions from the facility at its maximum permitted limit are listed in Table III.

Emission factors for crematories were obtained from the U.S. EPA Factor Information Retrieval (FIRE) software, version 6.25. The emissions are given on a full cremation cycle (single body) for human cremation, and per 150 lb remains basis for animal cremation.

- B. Control Technology (T-BACT) Requirements – COMAR 26.11.15.05 requires a new source of toxic air pollution to install and operate T-BACT in order to reduce air pollution. T-BACT is determined on a case by case basis, taking into account the potency and toxicity of each toxic air pollutant and the technical and economic feasibility of control. Final Journey, Inc. and the Department have chosen the following control methods and operating procedures, for each crematory, to minimize the emissions of toxic air pollutants, and to comply with Maryland T-BACT requirements:

1. A secondary combustion chamber with a temperature of at least 1600 °F.
2. A secondary combustion chamber with a retention time of at least 1.0 seconds.
3. A temperature monitor and recorder for the secondary combustion chamber.
4. The prohibition of the burning of halogenated plastics, including PVC body bags or pipes.
5. The prohibition of the burning of hazardous waste, or hospital, medical and infectious waste as defined in COMAR 26.11.08.01B(18).
6. A minimum stack height of 31' above the ground, and 11' above the roof peak for the two human crematories.
7. A minimum stack height of 24' above the ground, and 4' above the roof peak for the animal crematory.

- C. Ambient Impact Requirements – COMAR 26.11.15.06 requires a demonstration that the total allowable emissions from the facility will not unreasonably endanger human health. The projected maximum off-site ground level concentrations from the facility at its maximum permitted limit, in any direction, for Toxic Air Pollutants are at or below all applicable screening levels. These concentrations are listed in Tables IV, V and VI.

- D. Premises Wide Operating Limit – In order to comply with the above ambient impact requirement Final Journey, Inc. and the Department have chosen the following facility-wide (premises) operating limits on cremations:

1. No more than 9 human cremations during any rolling 8-hour period.
2. No more than 12,000 human cremations during any rolling 12-month period.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

**AIR AND RADIATION ADMINISTRATION
APPLICATION FOR A PERMIT TO CONSTRUCT**

**SUPPLEMENT TO
DOCKET #01-20**

COMPANY: Chesapeake Cremation Center, LLC

LOCATION: 808 Main Street
Stevensville, MD 21666

APPLICATION: Installation of a Matthews Environmental Solutions IEB-32-5S Pet Crematory.

| <u>ITEM</u> | <u>DESCRIPTION</u> |
|-------------|--|
| 1 | Notice of Tentative Determination, Opportunity to Request a Public Hearing, and Opportunity to Submit Written Comments |
| 2 | Fact Sheet and Tentative Determination |
| 3 | Draft Permit to Construct and Conditions |
| 4 | Supplemental Information |
| 5 | Privilege Log Not Applicable |

CHESAPEAKE CREMATION CENTER
PERMIT TO CONSTRUCT CONDITIONS

| Crematory | Permit Number |
|---|-----------------|
| Matthews IEB32-5S Animal Crematory | 035-0039-1-0006 |
| IE&E Model IE43-PPII Plus Human Crematory | 035-0039-1-0005 |
| IE&E Model IE43-PP Jr Animal Crematory | 035-0039-1-0004 |
| IE&E Model IE43-PPII Human Crematory | 035-0039-1-0003 |

Index

- Part A - Construction Conditions
- Part B - Temporary Operating Conditions
- Part C - Operating Conditions
- Part D - Monitoring
- Part E - Record Keeping and Reporting
- Part F - General Provisions
- Part G - Applicable Regulations

Part A - Construction Conditions

- (1) Except as otherwise provided in this part, each crematory shall be constructed and installed in accordance with the application and specifications provided by the vendor and manufacturer.
- (2) Each crematory shall be equipped with a secondary combustion chamber having the following retention times and operating temperatures:

| Crematory | Retention time (seconds) | Operating Temperature (Fahrenheit) |
|---|--------------------------|------------------------------------|
| Matthews IEB32-5S Animal Crematory | >1.0 | 1600 |
| IE&E Model IE43-PPII Plus Human Crematory | >1.0 | 1600 |
| IE&E Model IE43-PPJr Animal Crematory | >1.0 | 1600 |
| IE&E Model IE43-PPII Human Crematory | 1.5 | 1600 |

- (3) Each crematory shall be equipped with a temperature chart recorder and temperature sensor located near the flue gas exit of the secondary combustion chamber to continuously monitor and record the temperature of the flue gases leaving the secondary combustion chamber.
- (4) Each crematory stack shall discharge at least 29 feet above ground level and at least 9 feet above the roof line.
- (5) In order to minimize odors and ground level air pollution, each crematory stack shall vent exhaust gasses straight up without restriction or obstruction. If a rain cap is installed, it shall be designed to automatically open when the unit is operating, so as to not obstruct the upward flow of the exhaust gasses in any manner.
- (6) Each crematory shall be designed to limit particulate matter emissions to no more than 0.10 grains per standard cubic foot dry, adjusted to 12 percent carbon dioxide.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

**AIR AND RADIATION ADMINISTRATION
APPLICATION FOR A PERMIT TO CONSTRUCT**

**SUPPLEMENT TO
DOCKET #04-20**

COMPANY: Simplicity Crematory, LLC

LOCATION: 244 8th Avenue NW, Glen Burnie, MD 21061

APPLICATION: The addition of a Matthews Environmental Solutions Power-Pak II Plus human crematory.

| <u>ITEM</u> | <u>DESCRIPTION</u> |
|-------------|--|
| 1 | Notice of Tentative Determination, Opportunity to Request a Public Hearing, and Opportunity to Submit Written Comments |
| 2 | Fact Sheet and Tentative Determination |
| 3 | Draft Permit to Construct and Conditions |
| 4 | Supplemental Information |
| 5 | Privilege Log Not Applicable |

VII. TOXIC AIR POLLUTANT COMPLIANCE DEMONSTRATION AND ANALYSIS

The proposed construction must comply with all State imposed emissions limitations and screening levels for toxic air pollutants. The ARA has conducted an engineering and air quality review of the application. The emissions were projected based on crematory capacity, permit limits, and U.S. Environmental Protection Agency (EPA) emission factors. The U.S. EPA Screen3 model was used to project the maximum ground level concentrations from the proposed crematory, which were then compared to the MDE screening levels

- A. Quantification of Emissions – COMAR 26.11.15.04 requires the quantification of all toxic air pollutants from a source. The projected TAP emissions from the proposed facility at its maximum permitted limit are listed in Table III.

Emission factors for crematories were obtained from the U.S. EPA Factor Information Retrieval (FIRE) software, version 6.25. The emissions are given on a full cremation cycle (single body) basis.

- B. Control Technology (T-BACT) Requirements – COMAR 26.11.15.05 requires a new source of toxic air pollution to install and operate T-BACT in order to reduce air pollution. T-BACT is determined on a case by case basis, taking into account the potency and toxicity of each toxic air pollutant and the technical and economic feasibility of control. Simplicity Crematory, LLC and the Department have chosen the following control methods and operating procedures, for each crematory, to minimize the emissions of toxic air pollutants, and to comply with Maryland T-BACT requirements:

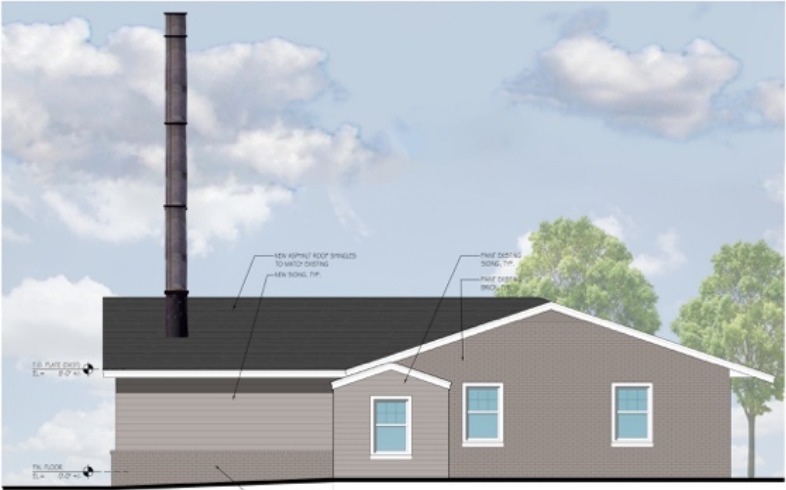
1. A secondary combustion chamber with a temperature of at least 1600 °F.
2. A secondary combustion chamber with a retention time of at least 1.0 seconds.
3. A temperature monitor and recorder for the secondary combustion chamber.
4. The prohibition of the burning of halogenated plastics, including PVC body bags or pipes.
5. The prohibition of the burning of hazardous waste, or hospital, medical and infectious waste as defined in COMAR 26.11.08.01B(18).
6. A minimum stack height of 28' above the ground, and 10' above the roof peak.

- C. Ambient Impact Requirements – COMAR 26.11.15.06 requires a demonstration that the total allowable emissions from the facility will not unreasonably endanger human health. The projected maximum off-site ground level concentrations from the facility at its maximum permitted limit, in any direction, for Toxic Air Pollutants are at or below all applicable screening levels. These concentrations are listed in Tables IV, V and VI.

- D. Premises Wide Operating Limit – In order to comply with the above ambient impact requirement Simplicity Crematory, LLC and the Department have chosen the following facility-wide (premises) operating limits on cremations:

1. No more than 11 human cremations during any rolling 8-hour period.
2. No more than 22,000 human cremations during any rolling 12-month period.

Exhibit 2: Proposed crematorium with 25-Foot Stack



4 LEFT SIDE (EAST) ELEVATION
Scale: 1/4"=1'-0"



3 REAR (SOUTH) ELEVATION
Scale: 1/4"=1'-0"



2 RIGHT SIDE (WEST) ELEVATION
Scale: 1/4"=1'-0"



1 FRONT (NORTH) ELEVATION
Scale: 1/4"=1'-0"

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 2:53 PM
To: 'Michele Rosenfeld'
Cc: Rob Bindeman
Subject: RE: RE: DeVol Crematorium: SP-8415-2020 (stack height)

I have received the letter regarding the stack height with the correct exhibit number and the letter regarding the zoning issues.

From: Michele Rosenfeld <rosenfeldlaw@mail.com>
Sent: Tuesday, September 15, 2020 2:13 PM
To: Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Cc: Rob Bindeman <rob@bindeman.com>
Subject: Re: RE: DeVol Crematorium: SP-8415-2020 (stack height)

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Ms. Forbes: Please confirm that you received the letter regarding the stack height with the corrected exhibit number, and the letter discussing the zoning issues related to the crematorium use.

Thank you for your help, Michele.

Michele Rosenfeld
The Law Office of Michele Rosenfeld LLC
1 Research Court
Suite 450
Rockville MD 20850
301-204-0913 (direct)
rosenfeldlaw@mail.com (email)
michelerosenfeldllc.com (website)

Sent: Tuesday, September 15, 2020 at 9:59 AM
From: "Jasmine Forbes" <Jasmine.Forbes@gaithersburgmd.gov>
To: "Michele Rosenfeld" <rosenfeldlaw@mail.com>
Cc: "Rob Bindeman" <rob@bindeman.com>
Subject: RE: DeVol Crematorium: SP-8415-2020 (stack height)

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration. I do want to note that Staff noticed that the revised conceptual building exhibit stamped was mislabeled. The exhibit number is 264 instead of 265. Our web admin staff is working to get that exhibit corrected on the project page.

Regards,

Jasmine Forbes



Jasmine Forbes, Planner I

Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877

Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov

Jasmine.Forbes@gaitersburgmd.gov

From: Michele Rosenfeld <rosenfeldlaw@mail.com>

Sent: Monday, September 14, 2020 5:42 PM

To: Jud Ashman <Jud.Ashman@gaitersburgmd.gov>; Laurie-Anne Sayles <Laurie-Anne.Sayles@gaitersburgmd.gov>; Neil Harris <Neil.Harris@gaitersburgmd.gov>; Michael Sesma <michael.sesma@gaitersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaitersburgmd.gov>; Robert Wu <robert.wu@gaitersburgmd.gov>

Cc: Jasmine Forbes <Jasmine.Forbes@gaitersburgmd.gov>; Rob Bindeman <rob@bindeman.com>

Subject: DeVol Crematorium: SP-8415-2020 (stack height)

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Mayor Ashman:

Please accept the attached testimony relating to the height of the crematory stack for consideration by the Mayor and Council in connection with the above-reference application and for submission into the record.

Best regards,

Michele Rosenfeld
The Law Office of Michele Rosenfeld LLC
1 Research Court
Suite 450
Rockville MD 20850
301-204-0913 (direct)
rosenfeldlaw@mail.com (email)
michelerosenfeldllc.com (website)

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 10:01 AM
To: 'Deby S'
Subject: RE: DeVol proposal

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaithersburgmd.gov

From: Deby S <dsarabia301@gmail.com>
Sent: Monday, September 14, 2020 6:25 PM
To: CityHall External Mail <cityhall@gaithersburgmd.gov>; Neil Harris <Neil.Harris@gaithersburgmd.gov>; Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Michael Sesma <michael.sesma@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; MCC Services <mccservices@gaithersburgmd.gov>; Jud Ashman <Jud.Ashman@gaithersburgmd.gov>
Cc: Dennis Enslinger <Dennis.Enslinger@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Subject: DeVol proposal

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Dear Mayor Ashman and City Council:

I support my neighbors in the Deer Park community in protecting their quality of life and property values, and understand their opposition to the proposed DeVol crematorium.

The email from MDE (Aug 20, 2020) clearly confirms that crematories "emit both federally regulated criteria pollutants such as oxides of nitrogen (NOx), volatile organic compounds (VOC), sulfur dioxide (SO2), carbon monoxide (CO), particulate matter, and hazardous air pollutants (HAP), and state regulated toxic air pollutants" in TONS/YEAR.

However, their trade group lawyer falsely claims "No toxic or harmful air emissions will be emitted from the chimney." (<https://www.fox5dc.com/news/residents-in-montgomery-county-neighborhood-push-back-against-turning-home-into-crematorium>)

A modern, well-run facility is still an incinerator. It WILL emit pollutants unsuitable for a residential area. Your constituents have made it clear they DO NOT WANT this facility in their neighborhood. I would not want it either.

MCC should reject the proposal.

Thank you.

--

Deborah Sarabia, M. En.

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 10:06 AM
To: 'Hoan Luu'
Subject: RE: DeVol Crematorium

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes

Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov Jasmine.Forbes@gaithersburgmd.gov

-----Original Message-----

From: Hoan Luu <hoankimluu@yahoo.com>
Sent: Monday, September 14, 2020 6:38 PM
To: Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Neil Harris <Neil.Harris@gaithersburgmd.gov>; Michael Sesma <michael.sesma@gaithersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Subject: DeVol Crematorium

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Please do not allow the DeVol Crematorium application # SP 8415-2020. It's right across from the high school, and not healthy for the community.

Thank you very much,
Hoan Luu

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 10:10 AM
To: 'goggingg@aol.com'
Subject: RE: DeVol Crematorium: negative impact on the harmony of the neighborhood

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaithersburgmd.gov

From: goggingg@aol.com <goggingg@aol.com>
Sent: Monday, September 14, 2020 8:33 PM
To: Jud Ashman <Jud.Ashman@gaithersburgmd.gov>
Cc: Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Michael Sesma <michael.sesma@gaithersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>; Planning External Mailing <Planning@gaithersburgmd.gov>
Subject: DeVol Crematorium: negative impact on the harmony of the neighborhood

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Mai Liis Goggin
440 Gaither St.
Gaithersburg, MD 20877
301-963-9079
goggingg@aol.com

The Honorable Mayor of Gaithersburg, Jud Ashman, Members of the Gaithersburg City Council, and Gaithersburg City Planner,
Gaithersburg City Hall
31 S Summit Ave., Gaithersburg MD 20877

Dear Mayor Ashman, Gaithersburg City Council Members, and Gaithersburg City Planner,

The issue of whether a business is harmonious with a neighborhood has to do with more than whether its architecture and the amount of traffic it generates fits in with the area: When a business impinges on the peace of mind of large numbers of the residents of the area (due to its proximity to the neighborhood and concerns that it engenders over health issues), the harmony of life in the neighborhood is negatively impacted.

My husband and I have learned that a great many of our neighbors (as well as we ourselves) find the prospect of living near to a crematorium extremely unsettling as we feel that not enough information exists to allay our worries about the negative impact of the emissions that crematoriums emit.

An additional reason why we are opposed to having a crematorium placed in our midst is a financial one: When we signed our home purchase agreement, we did so without having any way of knowing that years later our home would become vulnerable to a decrease in value because of the addition of a crematorium into our midst. There is plentiful evidence that having a crematorium in proximity to residences causes the home prices in those areas to drop.

We certainly do not agree that a crematorium at 14 E. Deer Park Dr. would be a harmonious or positive addition to our neighborhood.

Please do not approve DeVol's application, SP-8415 -2020

Regards,

Mai Liis and Paul Goggin

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 10:16 AM
To: 'Walter U.'
Subject: RE: Opposing the Crematorium built by Devol Funeral Homes on East Deer Park Rd.

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaithersburgmd.gov

From: Walter U. <sabineandwalt@gmail.com>
Sent: Monday, September 14, 2020 9:14 PM
To: Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Neil Harris <Neil.Harris@gaithersburgmd.gov>; Michael Sesma <michael.sesma@gaithersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Jud Ashman <Jud.Ashman@gaithersburgmd.gov>; Planning External Mailing <Planning@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Subject: Opposing the Crematorium built by Devol Funeral Homes on East Deer Park Rd.

This email is from an EXTERNAL source. Please use caution when opening attachments, clicking links, or responding.

Good evening Mayor and Council,

This email comes on behalf of myself, Walter Umana, and Sabine Zoepfl, my wife. We have become first time home-owners in the beautiful East Deer Park neighborhood since September 2019. We chose this area because it was safe, clean, peaceful and full of nature. Since moving into this neighborhood we soon discovered that plans of building a WaWa gas station had been approved. This WaWa gas station would be built only a few steps away from some of the homes in the East Deer Park neighborhood and this made my wife and I question the responsibility the Mayor and Council had to the people of Gaithersburg. It was unbelievable that an establishment that would cause more harm than good would be allowed to get built and that the city did the bare minimum to allow residents of Gaithersburg to voice their opinions.

As time went by we then discovered that the building of a crematorium was being proposed. You can imagine our skepticism and our lack of faith in the city to do the right thing and deny this project as it would directly and

negatively affect the people living in the surrounding neighborhoods. This crematorium does not comply with the zoning requirements and the people are becoming more aware of what can and can not be built on this property. Zoning aside this poses a health risk to not only humans but also to the precious wildlife in the area. Combine this project with the building of a gas station not even 1 mile away and this will surely cause destruction of this beautiful place I call home. Just like the wildfires going on in California today, I have no doubt that Gaithersburg will also inevitably have it's problems if the city continues to allow these projects to proceed. In the times we are living now, it seems ridiculous that projects like this would be approved, when clearly the decisions we make directly impact our environment. We should act to preserve and keep this environment a worthy place to live for us and the generations after us. It seems that there is total disregard for the people that will be directly impacted by these projects. Please put yourself, your family and your future generations in our shoes. Imagine if the city proposed to build a gas station and crematorium in your back-yard. Would you care? Would you stand up and voice your opinion? Wouldn't you have questions and concerns for the safety and health of your beloved ones and your community? Gaithersburg has so much potential to thrive as an amazing city but with projects being approved as they are now I have little hope for my beloved hometown. Please do the right thing. Hear our voices and take them into consideration as I'm sure others would do if the roles were reversed.

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 10:21 AM
To: 'klbiely7@gmail.com'
Subject: RE: DeVol Crematorium Application (Application# SP-8415-2020)

Good Morning,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaitthersburgmd.gov

From: Kelsey Biely <klbiely7@gmail.com>
Sent: Monday, September 14, 2020 6:19 PM
To: CityHall External Mail <cityhall@gaitthersburgmd.gov>
Subject: DeVol Crematorium Application (Application# SP-8415-2020)

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To whom it may concern,

I am deeply troubled it is even being considered an option to build and install a crematorium in a residential area. The location is in immediate and direct contact with, or adjacent to: residential houses, high density apartment complexes, multiple school systems, multiple churches, and parks. The reason we have zoning is to protect residents from commercial activities that are not safe, disruptive, or interferes with taxpayers quality of life. I should not be subject to industrial activities that are dangerous and could impact my health for the sake of 'convenience' to a business. The lack of effort to notify the community, engage with questions and field concerns for this plan displays a shocking disregard for the local community. I live directly across from this facility and drive by it twice a day, without local community efforts to spread the word, this would have been built without my knowledge or ability to express my worries. Forcing me to choose between the cost and issues with moving, or putting my health at risk. I am deeply disappointed I'm even having to write this email over this situation.

Do the right thing. It's that simple.

Kelsey.

Jasmine Forbes

From: Jasmine Forbes
Sent: Tuesday, September 15, 2020 12:51 PM
To: 'ROBERT BREWER'
Subject: RE: NO crematorium application SP-8415-2020

Good Afternoon,

Thank you for your correspondence related to Concept Site Plan application SP-8415-2020. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

City of Gaithersburg | 31 South Summit Avenue | Gaithersburg, MD, 20877
Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaitthersburgmd.gov

From: ROBERT BREWER <brewer000@verizon.net>
Sent: Tuesday, September 15, 2020 11:46 AM
To: Laurie-Anne Sayles <Laurie-Anne.Sayles@gaitthersburgmd.gov>; Neil Harris <Neil.Harris@gaitthersburgmd.gov>; Michael Sesma <michael.sesma@gaitthersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaitthersburgmd.gov>; Robert Wu <robert.wu@gaitthersburgmd.gov>; Jud Ashman <Jud.Ashman@gaitthersburgmd.gov>
Cc: Planning External Mailing <Planning@gaitthersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaitthersburgmd.gov>
Subject: Re: NO crematorium application SP-8415-2020

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Sir's and Ma'am's:

As a reminder, my wife and I oppose the crematorium.

We've been your constituents for at least 25 years.

We pay a part of your salary's.

I would appreciate you consider the following:

Should you act to approve the crematorium- someone will need to create and approve some restrictions on DeVol crematory operations such as hours of operation, number per day, restriction under certain weather conditions etc. If smoke can make it here from the West Coast – (see link from USA Today-)

*([Smoke from western wildfires reaches East Coast; economic losses could reach \\$150 billion](#))

it can make it the approximate three tenths of a mile to my house.

How did you plan to monitor the proposed crematorium, should it go into operation?

I'll need for you to spell this out for myself , my wife and our neighbors.

Thank you for your consideration.

Bob Brewer

205 E. Deerpark Dr

Gaithersburg,MD 20877