

Jasmine Forbes

From: Jasmine Forbes
Sent: Wednesday, September 16, 2020 6:59 PM
To: 'Chazz'
Subject: RE: Citizen Comments: No to Proposed Crematorium and No to Extension for SP-8415-2020

Good Evening,

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: Chazz <galacticfunkboots@yahoo.com>
Sent: Wednesday, September 16, 2020 4:57 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>; EnerGov-Admin <EnerGov-Admin@gaithersburgmd.gov>; Planning External Mailing <Planning@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>; Tanisha Briley <Tanisha.Briley@gaithersburgmd.gov>
Cc: galacticfunkboots@yahoo.com
Subject: Citizen Comments: No to Proposed Crematorium and No to Extension for SP-8415-2020

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

Via Email
September 16, 2020

Mayor Jud Ashman
Members of the City Council
Ms. Jasmine Forbes, City Planner
City of Gaithersburg
31 Summit Avenue
Gaithersburg, MD 20877

I believe the role of the City Council is to act in the best interest of its citizens and neighboring communities. To me this means ensuring that residents in all parts of the city enjoy where they live and have supportive services to assist them when needed. This also means ensuring that the city they serve stays economically viable so favorable conditions exist to sustain quality of life.

I have listened to the conversations about the proposed crematorium requested by The DeVol Funeral home and I've also observed the actions of the Mayor and City Council on several other issues such as the Wawa gas station and Kelley Park. I must say that I do not believe that these actions are in the best interest of all of Gaithersburg and surrounding communities.

I ask that the Mayor and City Council vote no on the proposal for several reasons.

First and foremost, numerous letters in opposition have been submitted to the public record. This should not be ignored. If you are here to serve the people, then listen to them when they say that they do not want a crematorium in their neighborhood. They have taken the time to present strong arguments including discrepancies between the proposed usage and zoning laws, concerns about the environment, and a lack of partnership between the community, DeVol Funeral Home, and the City Council.

I have not heard one argument from DeVol clearly explaining how this will have a positive impact on anyone other than DeVol. What do those of us who live in the surrounding neighborhoods benefit from this? Is it hard for the Mayor and City Council to understand this because the majority do not live in this neighborhood?

I am also asking that the Mayor and City Council deny the request to extend the period for SP-8415-2020. Doing so would be clear favoritism. As citizens we were not afforded much of an opportunity to respond to this request. Why would DeVol be given more time to bolster their arguments? Perhaps it's because they discounted the ability of citizens to organize. Well, we have organized ourselves and are pushing back hard on this proposal.

Please do the job you were elected for which is to serve and act in the best interest of all citizens of Gaithersburg.

Sincerely,

Charlene Wilson
Gaithersburg, MD

Jasmine Forbes

From: Jasmine Forbes
Sent: Wednesday, September 16, 2020 7:02 PM
To: 'Christopher R.'
Subject: RE: Resident Comment on DeVol Application SP-8415-2020

Good Evening,

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

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Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaitthersburgmd.gov

From: Christopher R. <chrisruggeri@gmail.com>
Sent: Wednesday, September 16, 2020 4:56 PM
To: Planning External Mailing <Planning@gaitthersburgmd.gov>
Subject: Resident Comment on DeVol Application SP-8415-2020

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

Please include my attached PDF for the public record in my opposition to the proposed crematorium in DeVol Application SP-8415-2020

Regards,

Christopher Ruggeri
Observatory Heights
Gaithersburg, MD

Christopher Ruggeri, Observatory Heights, Gaithersburg MD

I am expressing my disapproval of the proposed DeVol Funeral Home request to install a crematorium at their location on East Deer Park Ave. in Gaithersburg, MD. I urge the City Council to reject it on unresolved zoning conflict relating to final disposition of a body, lingering questions on air pollution, and unsourced/unreferenced anecdotal evidence provided by the applicants Environmental Engineering company.

A number of air pollutants result from the cremation process. These emissions result from fuel combustion within the furnace, combustion of the funereal casket and combustion of the body itself. A study crematorium furnace in the US found that in excess of 60 pollutants were emitted during the cremation process. The majority of these are silent killers, odorless and invisible. Many emissions from power plant smokestacks are clear and smokeless these days, but they still pollute. Emissions include a range of dioxins and furans (which are carcinogenic), metals and combustion related pollutants (USEPA, 1992).

The EEA (European Environment Agency) Air Pollutant Emission Inventory Guidebook (2009) includes information on Cremation. The major emissions from crematories are nitrogen oxides, carbon monoxide, sulphur dioxide, particulate matter, mercury, hydrogen fluoride (HF), hydrogen chloride (HCl), non-methane volatile organic compounds (NMVOCs), and other heavy metals.

Particulates such as dust, soot, ash and other unburned particles originate from the cremation container, human remains, and other contents of the container. Mercury emissions originate from the dental fillings that may contain 5 to 10 grams of mercury depending on the numbers and types used. HF and HCl results from the combustion of plastics contained in the container and from stomach contents.

NMVOCs are produced from incomplete or inefficient combustion of hydrocarbons contained in the fuels, body, and casket. Dioxins and furans result from the combustion of wood cellulose, chlorinated plastics, and the correct temperature range. It is important to note

these pollutants would rarely result in a short-term acute health effects but can lead to dangerous chronic health hazards that may not be immediately linked to the crematorium.

With the country struggling to come to terms with air pollution from large polluters such as coal fired power plants, fracking, traffic, it would be shame for the City of Gaithersburg to fully assess impact to their citizens for what is essentially a furnace, burning materials, resulting in emissions. It is essentially a power plant with all the pollution, but no power generation. It also is also important to study how much energy is expended for each body cremation.

I respectfully request the Gaithersburg City Council to mandate an INDEPENDENT Air Pollution / Environmental Impact Study, make that study publicly available. I also suggest that the City of Gaithersburg partner with Duval Funeral Home and funeral homes within the city to research and advocate more environmentally friendly alternative to cremation for internment of the dead. Such as Sea burial, coral reef,

and alkaline hydrolysis which is estimated to be 1/10th of the carbon footprint of cremation.

Questions to Ask DeVol Funeral Homes & Environmental Engineer

1. During the initial MDE permitting process for emissions, how do they know that their crematorium meets standards? Do they test a cadaver with all the possible hazardous material non removed post-mortem to ensure no pollution exceedance occurs?
2. Has the emissions from combustion of the more widely used composite fillings in dental treatment today known, published, and accounted for in pollution control?
3. Will DeVol either fully or partially fund an **INDEPENDENT** air pollution hazard environmental impact study to prove to Gaithersburg residents of this “harmless” emissions?
4. What if there is a pollution exceedance (radiological, opacity, mercury, etc.) during the cremation of a body? Does the operator cease cremation? What occurs with the partially cremated

remains? Does the operator continue cremating the body despite a pollution exceedance?

5. What are the ramifications to DeVol for continued air emission exceedances?
6. Please provide sourced scientific data to anecdotal evidence and comparisons to everyday pollution examples in your public record submittals.

7. Please provide evidence to the contrary for the below graphic, which is sourced.

Semi-trailer truck soot emissions equivalent per single crematory retort		
Corpse soot emissions rate*	0.7 ton/year	Crematory calculations
Crematory operation per year	313 day/year	
Crematory operation per day	8 hour/day	
Corpse soot emissions rate	0.000280 ton/hour	
Corpse soot emissions rate	0.559 lb/hour	
Fuel economy (fully loaded)	6 mile/gallon	Semi-trailer truck calculations
Highway speed	65 mile/hour	
Powertrain efficiency	15 (bhp*hr)/gallon	
2010 EPA Soot Emissions Regulation for Class 8 Trucks**	0.01 gram/(bhp*hour)	
Fuel consumption rate	10.83 gallon/hour	
Engine power	162.5 bhp	
Soot emissions rate	1.63 gram/hour	
Soot emissions rate	0.00358 lb/hour	
Semi-trailer truck soot emissions equivalent per single crematory retort	156	trucks per crematory ← Result
Sources:		
* < http://www.iowadnr.gov/InsideDNR/RegulatoryAir/PublicRecordsAirQuality.aspx >; Direct Link to DocDNA; "WATERLOO WILBER"; "Waterloo Wilbert Vault"		
**< http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm >		

Jasmine Forbes

From: Jasmine Forbes
Sent: Wednesday, September 16, 2020 7:17 PM
To: 'ROBERT BREWER'
Subject: RE: DeVol Application SP-8415-2020

Good Evening,

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

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Jasmine.Forbes@gaithersburgmd.gov

From: ROBERT BREWER <brewer000@verizon.net>
Sent: Wednesday, September 16, 2020 3:36 PM
To: John Schlichting <John.Schlichting@gaithersburgmd.gov>; MCC Services <mccservices@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Michael Sesma <michael.sesma@gaithersburgmd.gov>; Neil Harris <Neil.Harris@gaithersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; Jud Ashman <Jud.Ashman@gaithersburgmd.gov>
Subject: Re: DeVol Application SP-8415-2020

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Respectfully- no extension for the devol proposed crematorium, in regards to allowing the devol staff and their attorneys etc more time to try to do end around's and other tricks to try to skirt the rules.

Thank you
Bob Brewer
205 E. Deerpark Dr
Gaithersburg, MD 20877



Google Groups

Google Groups allows you to create and participate in online forums and email-based groups with a rich experienc...

Jasmine Forbes

From: Jasmine Forbes
Sent: Wednesday, September 16, 2020 7:22 PM
To: 'jchris43@gmail.com'
Subject: RE: Please do NOT reopen public record for SP-8415-2020

Good Evening,

Thank you. Your correspondence will be included in the Council's record for their consideration.

Regards,
Jasmine Forbes



Jasmine Forbes, Planner I
Planning and Code Administration

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Direct: 240-805-1069 | Main: 301-258-6330 | www.gaithersburgmd.gov
Jasmine.Forbes@gaitthersburgmd.gov

From: Judith Christensen <jchris43@gmail.com>
Sent: Wednesday, September 16, 2020 3:59 PM
To: East Gaithersburg United <eastgaithersburgunited@googlegroups.com>
Cc: Jud Ashman <Jud.Ashman@gaitthersburgmd.gov>; Ryan Spiegel <ryan.spiegel@gaitthersburgmd.gov>; Neil Harris <Neil.Harris@gaitthersburgmd.gov>; John Schlichting <John.Schlichting@gaitthersburgmd.gov>; Laurie-Anne Sayles <Laurie-Anne.Sayles@gaitthersburgmd.gov>; Michael Sesma <michael.sesma@gaitthersburgmd.gov>; Robert Wu <robert.wu@gaitthersburgmd.gov>; MCC Services <mccservices@gaitthersburgmd.gov>
Subject: Re: Please do NOT reopen public record for SP-8415-2020

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

I see that the attorney for DeVol has requested another time extension to deal with the public comments received so far. There has been ample time since February for DeVol to meet with the community and answer questions. I was unable to access the September 9 on-line meeting as it was an unfamiliar conference application and took installation and configuration to use. What was wrong with Zoom that most people use? There are 300+ comments on the record now. Please do not extend this further. DeVol has had over 6 months to reach out to the community and the community has responded.

Judy Christensen

On Wed, Sep 16, 2020 at 3:00 PM Carla Weinberg <cweinberg@gmail.com> wrote:

Exhibit 318 from Scott Wallace is an outrageous request that you must deny. He wants time to refute our arguments and will submit additional exhibits to fix or dispute faults we have found in his application. He'll submit those new pieces of his application right before the new deadline so the public has little opportunity to review and respond to those new exhibits. And round and round we go, with Mr. Wallace wanting the last word. He tightly controlled the 9/9/20 community meeting and now wants to control the public comment period.

I pointed out many deliberate errors of omission and misleading statements and now the DeVol team wants time to fix them or explain them away. **I think the council members are astute enough to judge whether or not there is merit to my objections and those of many others, without help from Mr. Wallace.**

Enough already. Deny the extension. Deny the application.

Sincerely,

Carla Weinberg

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You received this message because you are subscribed to the Google Groups "East Gaithersburg United" group.

To unsubscribe from this group and stop receiving emails from it, send an email to eastgaithersburgunited+unsubscribe@googlegroups.com.

To view this discussion on the web visit <https://groups.google.com/d/msgid/eastgaithersburgunited/F2FF50F1-2D63-4D97-AAAA-B0418FBA8987%40gmail.com>.

Jasmine Forbes

From: Jasmine Forbes
Sent: Thursday, September 17, 2020 9:06 AM
To: 'Azizollah Abrishamian'
Subject: RE: Opposition to Concept Site Plan Application SP-8415-2020, DeVol Funeral Home ("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

From: Azizollah Abrishamian <sheertandam@verizon.net>
Sent: Wednesday, September 16, 2020 9:21 PM
To: Jud Ashman <Jud.Ashman@gaithersburgmd.gov>; Laurie-Anne Sayles <Laurie-Anne.Sayles@gaithersburgmd.gov>; Neil Harris <Neil.Harris@gaithersburgmd.gov>; Michael.Sesna@gaithersburgmd.gov; Ryan Spiegel <ryan.spiegel@gaithersburgmd.gov>; Robert Wu <robert.wu@gaithersburgmd.gov>; Planning External Mailing <Planning@gaithersburgmd.gov>; Jasmine Forbes <Jasmine.Forbes@gaithersburgmd.gov>
Subject: Opposition to Concept Site Plan Application SP-8415-2020, DeVol Funeral Home ("Crematorium")

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

From: Azizollah Abrishamian <sheertandam@verizon.net>
To: Jud.Ashman@gaithersburgmd.gov <Jud.Ashman@gaithersburgmd.gov>; Laurie-Anne.Sayles@gaithersburgmd.gov <Laurie-Anne.Sayles@gaithersburgmd.gov>; Neil.Harris@gaithersburgmd.gov <Neil.Harris@gaithersburgmd.gov>; Michael.Sesna@gaithersburgmd.gov <Michael.Sesna@gaithersburgmd.gov>; Ryan.Spiegel@gaithersburgmd.gov <Ryan.Spiegel@gaithersburgmd.gov>; Robert.Wu@gaithersburgmd.gov <Robert.Wu@gaithersburgmd.gov>; Planning@gaithersburgmd.gov <Planning@gaithersburgmd.gov>; Jasmine.Forbes@gaithersburgmd.gov <Jasmine.Forbes@gaithersburgmd.gov>
Sent: Wed, Sep 16, 2020 8:07 pm
Subject: Fwd: FROM HOOSH -- QUESTIONS FROM DeVOL FUNERAL HOME

I am sorry, as you can see below, in all email addresses instead of ".gov" I had had inserted ".org" PLEASE CONFIRM RECEIPT. THANK YOU.

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

From: Azizollah Abrishamian <sheertandam@verizon.net>

To: Jud.Ashman@gaithersburgmd.org <Jud.Ashman@gaithersburgmd.org>; Laurie-Anne.Sayles@gaithersburgmd.org <Laurie-Anne.Sayles@gaithersburgmd.org>; Neil.Harris@gaithersburgmd.org <Neil.Harris@gaithersburgmd.org>; Michael.Sesna@gaithersburgmd.org <Michael.Sesna@gaithersburgmd.org>; Michael.Sesna@gaithersburgmd.org <Michael.Sesna@gaithersburgmd.org>; Ryan.Spiegel@gaithersburgmd.org <Ryan.Spiegel@gaithersburgmd.org>; Robert.Wu@gaithersburgmd.org <Robert.Wu@gaithersburgmd.org>; Planning@gaithersburgmd.org <Planning@gaithersburgmd.org>; Jasmine.Forbes@gaithersburgmd.org <Jasmine.Forbes@gaithersburgmd.org>

Sent: Wed, Sep 16, 2020 4:43 pm

Subject: Fwd: FROM HOOSH -- QUESTIONS FROM DeVol FUNERAL HOME

Mayor Jud Ashman
City of Gaithersburg
31 S. Summit Avenue
Gaithersburg, MD. 20877
September 16, 2020

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

Dear Honorable Mayor Ashman and revered City of Gaithersburg Council Members:

I reviewed some of the published comments associated with an interview recently conducted by FOX 5 DC. According to that interview, Mayor Ashman expressed that while this is only a proposal, the City is obligated to look at it and show support for small business owners.

I, personally, do not have any problem with supporting small business owners provided such support is rational, not ad hoc and not at the expense of the existing communities; whether residential, commercial or otherwise; people living in the neighborhood, other small businesses in the neighborhood, etc.

I have also reviewed a fair number of public exhibits filed by individuals expressing their solid opposition to the DeVol Funeral Home (henceforth DeVol) Plan. Without naming, among those people are individuals with compromised health and immune systems, pregnant women, young families hoping to have children, families with infants and children, elderly people with disabilities and other maladies, home owners who rely on revenue derived from renting part of or their entire homes, etc. There are also a lot minority families, with young children, renting apartments in the apartment housing facilities right across from DeVol or on the other side of 355 at the corner of 355 and West Deer Park Road. It is unfortunate that such families remain voiceless because of the fear of backlash and retribution. There also innumerable schools and play areas with thousands of children within walking distance of the DeVol Funeral Home. What about not exposing this multitude of people to daily hazardous and carcinogenic environment and, instead of supporting DeVol, to support the true small businesses by home owners who put their home for rent to draw income to support themselves and their loved ones?

In the above-mentioned interview Ms. Carol Lynn Green claimed, "No toxic or harmful air emissions will be emitted from the chimney." What else would one expect to hear from a person associated with the environmental compliance counsel for **National Funeral Directors Association**? It appears that either Ms. Green is impervious to the tremendous body of existing scientific facts, data and research to the contrary or for some other reason.

Likewise, in the above-mentioned interview, Mr. DeVol claimed, "**I never bring anything into my business that isn't safe either for the community, my employees and myself.**" (Boldface added). If Mr. DeVol is serious, then he should immediately withdraw his Application and do just that based upon the overwhelming, proven scientific research and data dissecting the serious environmental, human and other health hazards due crematoria. His failure to do so speaks volumes.

Mr. DeVol also claimed "These services that we are trying to add to our business is because the communities that we serve is asking for it." The problem is that he has yet to identify anybody, even one person, let alone any community to prove his claim.

Today, You are all citing in the seat of judgement. Please just ask yourself what is the right thing to do. Put yourself in place of those who are opposed to the DeVol's Plan and ask yourself if you would join them because you would not be willing to put yourself, family, children, grandchildren, loved ones etc. at continuous risk of exposure to serious health hazard and carcinogenic materials spewed into the atmosphere by crematoria. Please make the same decision for us as if you would do for your family, children, grandchildren, parents, grandparents, loved ones and yourself.

In the following, In opposition to DeVol's Plan, I am providing information and data strictly supported by scientific and research.

1. NO EPA OR STATE REGULATIONS REGARDING CREMATORIA AND MORE.

a. In the link below, please see EPA response to the letter from Representative Dennis Kucinich:

Paragraphs h, i --- **No EPA or State regulating crematoria,**

Paragraphs a, b, c, f -- **EPA recognition and acknowledgement about the serious health hazards due to mercury emissions from crematoria** (underlining and boldface added).

b. Also, please see the actual letter from Representative Dennis Kucinich:

Paragraphs a, b, c, f ---- Expert testimony given to Domestic Policy Subcommittee:

EPA has under-estimated crematoria's amount of mercury emission into the atmosphere by eleven (11) times (boldface added).

Source: <https://no2crematory.wordpress.com/the-toxic-truth-data/>

QUESTION: WHO REGULATES THE SERIOUS HEALTH HAZARDOUS EMISSIONS FROM CREMATORIA INTO THE ATMOSPHERE? IS THE CITY OF GAITHERSBURG WILLING TO TAKE ON SUCH RESPONSIBILITY?

2. A NOTE ON WHY EPA DOESN'T REGULATE CREMATORIES

Source: <https://no2crematory.wordpress.com/2015/01/07/a-note-on-why-epa-dosent-regulate-crematories/>

3. PCDD/Fs AND MERCURY EMISSIONS:

- a. The pollutants emitted by the combustion of organic matter with presence of other trace elements are: combustion gases (NO, CO, SO₂, PM ...), heavy metals, and polychlorinated dibenzo-p-dioxins and dinenzofurans (**PCDD/Fs**). PDD/Fs were listed by **Stockholm Convention** as Persistent Organic Pollutants of 2001 as one of the "**dirty dozen**" pollutants (boldface added).
- b. Although human cremation is an increasing practice, the number of studies regarding the potential risks derived from crematory emissions is very scarce in relation to **the most dangerous compounds (PDD/Fs and mercury)** (boldface added).
- c. It was concluded that PCCD/F emissions from a crematory did **significantly affect its surrounding environment** (boldface added).
- d. In the OSPAR Convention Area identified **crematoria as producing a significant source of mercury in the environment** and listed various options, in terms of the best available technologies (BAT) to reduce and control mercury emissions (boldface added).
- e. Recently, in a 9th International Conference on Mercury as a Global Pollutant (ICMGP) held in Guiyang, China, Reindl (2009) **concluded that there were significant uncertainties in North America data, as few studies existed concerning mercury emissions from crematories** (boldface added).
- f. On the other hand, and related with **environmental exposure to emissions around crematories**, Dummer et al. (2003) investigated the **risk of stillbirth, neonatal death and lethal congenial anomaly among babies of mothers** living close to both incinerators and crematories in Cumbria, north west England, 1956-1993. A **significant increase was noted** during this period on the risk of **stillbirth** closer to crematories. The **risk of anencephalus** was also **significantly increased** during the same period. Although most (92%) cases of anencephalus were stillborn, **the significantly increased risk of stillbirth remained** after exclusion of anencephalus cases from the analysis. From 1972 onwards **there was an increased risk of all other congenial anomalies**, excluding neural tube defects and heart defects, with increasing proximity to crematoriums, which was significant for the period 1983-1993. **These findings remained significant** after the exclusion of the most influential births. **It was concluded that there was an increased risk of lethal congenial anomaly (specifically spina bifida and heart defects) in relation to proximity to incinerators, and an increased risk of stillbirth and anencephalus in relation to crematories (Dummer 2003)** (boldface added).
- g. In this sense, **if mercury emissions** from crematories are not properly controlled, **these facilities could mean a relatively important source of atmospheric pollution** (boldface added).
- h. Another relevant aspect of toxic emissions of crematories is the noted **lack of general regulations** of these emissions. For example, **neither the European Union nor the US EPA has established specific recommendations for crematories** (boldface added).
- i. **Therefore, we think that the crematories must also be among the facilities whose emissions should be specifically regulated and monitored** (boldface added).

SOURCE: ELSEVIER, Environment International, Toxic emissions from crematories: A review by Montse Mari, Jose L. Domingo, journal homepage: www.elsevier.com/locate/envint. It include some 68 references.

QUESTION: HOW DOES DeVOL FUNERAL HOME (HENCEFORTH DeVOL) PLAN/INTEND TO MITIGATE THE SPREAD OF PCDD/Fs AND MERCURY EMISSIONS INTO THE ATMOSPHERE?

4. HEALTH HAZARDS OF CREMATING BODIES WITH BREAST IMPLANTS.

FOR DETAIL, PLEASE CLICK ON THE LINK BELOW AND SEE THE LIST OF ALL THE OTHER CHEMICALS THAT ARE USED IN MAKING SILICONE IMPLANT GEL.

Source: <http://web.archive.org/web/20041018030414/http://siliconesurvivors.net/sstoxin.html>

QUESTIONS: WILL DeVol REMOVE BREAST IMPLANTS FROM BODIES BEFORE CREMATION? WHO WOULD ACTUALLY OBSERVE SUCH REMOVAL AND CERTIFY SUCH COMPLETE REMOVAL?

5. HEALTH HAZARDS OF CREMATING BODIES WITH PLASTIC IMPLANTS.

Source: <https://www.sciencedirect.com/science/article/pii/S187802961630158X>

QUESTIONS: WILL DeVol REMOVE PLASTIC IMPLANTS FROM BODIES BEFORE CREMATION? WHO WOULD ACTUALLY OBSERVE SUCH REMOVAL AND CERTIFY SUCH COMPLETE REMOVAL?

6. PACEMAKER EXPLOSIONS IN CREMATORIA AND EFFECTS ON RESIDENTIAL NEIGHBORHOODS.

Source: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1279940/>

QUESTIONS: WILL DeVol REMOVE PACEMAKERS FROM BODIES BEFORE CREMATION? WHO WOULD ACTUALLY OBSERVE SUCH REMOVAL AND CERTIFY SUCH COMPLETE REMOVAL?

7. RADIATION CONTAMINATION FOLLOWING CREMATION OF A DECEASED PATIENT TREATED WITH RADIOACTIVE PHARMACEUTICAL.

Cremating an exposed patient volatilizes the radioactive-pharmaceutical, which can then be inhaled by workers (and released into the adjacent community) and result in greater exposure than from a living patient.

REMARK: In this respect, there are no regulation at the Federal level in the U.S.

Source: <https://jamanetwork.com/journals/jama/fullarticle/2725673>

QUESTION: WHAT IS DeVol's POLICY REGARDING CREMATING PERSONS TREATED WITH RADIOACTIVE PHARMACEUTICALS?

8. DENTAL AMALGAMS.

REMARK: In an early August meeting with City officials, a representative of DeVol claimed that they remove teeth containing dental amalgams from dead bodies before cremation.

QUESTIONS: WILL DeVol REMOVE TEETH CONTAINING DENTAL AMALGAMS FROM BODIES BEFORE CREMATION? WHO WOULD ACTUALLY OBSERVE SUCH REMOVAL AND CERTIFY SUCH COMPLETE REMOVAL?

9. CREMATORIA ENHANCE CLIMATE WARMING

Cremation of a dead body is carried out at a temperatures of more than 900 degrees Celsius or 1652 degrees Fahrenheit. This level of temperature is sustained for at least 90 minutes on the average. Just imagine the amount of heat accumulated inside a structure which is embedded with a furnace operating at the aforementioned temperature for at least one and a half hours. Where does the generated heat go? It is common sense and logical that at least a good portion if not all of such heat is spewed into the atmosphere by the crematorium. This fact was casually verified and established by someone contacting the Bethesda and the City of Alexandria crematoria. Reportedly, the crematoria operating hours were restricted to take place during the cooler parts of the day because of the excessive production of heat by the crematoria. Likewise, because of unbearable temperatures inside the building and the prohibitive cost of its cooling (reportedly the operator comes out sweating, etc.) no viewing has been allowed to take place in the interior of the buildings. Instead, in one of them, viewing has been allowed for interested parties who have been willing to stand up and view from an open garage structure outside of the building. Because crematoria spew heat into the atmosphere there may have been other operating restrictions imposed on these crematoria by their respective local Governments.

Furthermore:

- a. The energy contained in 16 gallons of gasoline is equivalent to the energy "that each human cremation uses up." An SUV consumes the same amount of gasoline to travel nearly 200 miles.
- b. based on a 32% rate of cremation in the U.S., the amount of associated energy spent to process such cremations in one year is equivalent to the energy needed to make 83 round trips to the moon and back from the U.S.
- c. based on a 32% rate of cremation in the U.S., 1,000 to 7,800 pounds of mercury is annually released into the atmosphere by crematoria in the U.S.

Source: <http://www.villagememorial.com/2015/05/cremation-emissions-toxins-air-quality.html>

10. DIMINISHING OF PROPERTY VALUES BY CREMATORIA AND LOSS OF PROPERTY TAX REVENUES BY THE CITY OF GAITHERSBURG.

The real basis of this assessment is "Common Sense." In light of this and without introducing other sources, in a recent FOX 5 DC interview, our Mayor, Mr. Jud Ashman, was quoted as expressing the following: "If someone says, 'Do you want to live next to a crematorium?' Most people will say, 'No,' Better yet, 'No' to live in a region containing crematoria.

Because of the existence of a crematorium in their neighborhoods or regions, the obvious fall out of such fact are:

- a. Property owners will not be able to sell their properties at their normal market value.
- b. Property renters will opt to leave such neighborhoods in favor of renting properties in much safer neighborhoods.
- c. Rental property owners, individuals or otherwise, will substantially lose income as a result and may go out of business.
- d. All of the above will lead to a substantial loss of tax revenue for the City of Gaithersburg.

e. It is not a smart decision-making to lose so much tax revenue, face community disapproval who, in their voting, relied on your promises to protect their lives and interests, forcing and subjecting families, children, the unborn, pregnant women, the elderly, people with compromised health and immune systems and countless other individuals to live under constant fear of exposure to very unhealthy, hazardous and carcinogenic atmospheric emissions by the crematoria, just succumbing in favor of gaining some revenue from the crematorium.

<http://www.villagememorial.com/2015/05/cremation-emissions-toxins-air-quality.html>

11. COMPLIANCE WITH CREMATORY REGULATIONS -- MARYLAND DEPARTMENT OF HEALTH.

QUESTIONS: HOW DOES DeVOL INTEND TO COMPLY WITH STANDARDS 3, 4, 5, 6(a), 6(b), 6(c), 7, 12(a), 12(b), 13, 14 PROMULGATED UNDER SECTION D. i.e. "A crematory shall maintain the following minimum standards" of Title 10 MARYLAND DEPARTMENT OF HEALTH Subtitle 29 BOARD OF MORTICIANS AND FUNERAL DIRECTORS, Chapter 18 Crematories? HOW DOES DeVOL INTEND TO PROVE COMPLIANCE WITH THIS TITLE? WILL DeVOL HIRE AN INDEPENDENT AND UNBIASED INSPECTOR CERTIFIED BY WHAT OR WHOM TO ACTUALLY, IN PERSON, OBSERVE DeVOL'S COMPLIANCE IN REAL TIME AND PROVIDE WRITTEN CERTIFICATION OR OTHERWISE?

12. For your further information I am compiling the following list of references without additional explanation. They include: **Reference on Mercury in Cremation, Mercury and the Alzheimer's Epidemic, Mercury in Cremation Vapors in Our Air and Lungs: Reindl, John. (compiler) "Summary of References on Mercury Emissions from Crematoria," References on Mercury in Deathcare Workplaces and References on Mercury in The Environment and Mammals:**

Reference on Mercury in Cremation

Bernhoft RA. "Mercury toxicity and treatment: a review of the literature" Journal of Environmental and Public Health 2012.

Carson, Rachel Silent Spring: The Classic That Launched the Environmental Movement New York: Houghton Mifflin Harcourt Mariner Books, 2002 (50th Anniversary edition)

Hyman, Mark. MD "How To Rid Your Body of Mercury and Other Heavy Metals"

<https://drhyman.com/blog/2010/05/19/how-to-rid-your-body-of-mercury-and-other-heavy-metals-a-3-step-plan-to-recover-your-health/>

Itzkoff, Dave. Robin New York: Henry Holt and Company, A New York Times Book, 2018.

Queen, Sam and Betty A. Chronic Mercury Toxicity, New Hope Against an Endemic Disease

Doctor's Guide for Lifestyle Counseling (Book 1), Queen and Company Health Communications, Inc., September 1, 1988.

[“An excellent reference text for the health professional and victim interested in learning more about mercury toxicity is Chronic Mercury Toxicity: New Hope Against an Endemic Disease. Doctor's Guide for Lifestyle Counseling by H.L. Queen (1988). The book describes the insidiousness of hg problem and, more importantly, outlines protocols for proper use of intravenous vitamin C and other treatment modalities.” — Sandra Denton, M.D. from *Health Consciousness*, June 1989]

["The book can be recommended as a suitable complement of the general practitioners library...the information, provided in this book will help physicians to realize that those important first steps in lifestyle counseling—helping patients to get rid of heavy metal excess—are of a greater importance than has generally been assumed." — V. Bencko in the *Journal of Hygiene, Epidemiology, Microbiology and Immunology*, 34, 1990, No. 1].

Walker, Morton, D.P.M. Elements of Danger Hampton Roads Publishing Co., November 1999. "Signs and Symptoms of Mercury Poisoning from Dental Amalgam" Sourced from K. D. Jorgensen, "The Mechanism of Marginal Fracture of Amalgam fillings," *Acta Odont. Scan.* 23 (1965): 347.

"A Comprehensive Integrative Medical approach to Mercury detoxification and functional rehabilitation" in Reference Guide: Detoxification Therapeutics for Heavy Metals, Toxic Chemicals and other Neurotoxins. See: <https://www.nihadc.com/library/detox-for-life-class-2-addit-resources/53-3-pdf-comprehensive-im-approach-to-mercury-detox-and-functional-rehabilitation>

Mercury and the Alzheimer's Epidemic

Andreoli, V.; Sprovieri, F. "Genetic Aspects of Susceptibility to Mercury Toxicity: An Overview" *International Journal of Environmental Research and Public Health* Vol 14, 2017.

Bento-Abreu A, et al. "The neurobiology of amyotrophic lateral sclerosis" *Eur J Neurosci* Vol 31, 2010.

Bernhoft RA. "Mercury toxicity and treatment: a review of the literature" *Journal of Environmental and Public Health* 2012.

Björkman L, et al. "Mercury in human brain, blood, muscle and toenails in relation to exposure: an autopsy study" *Environ Health* Vol. 6, 2007.

Campbell, S.R., Haley, Boyd E., Khatoun, S. and Slevin, J.T. "Aberrant GTP Tubulin Interaction in Alzheimer's Disease. *Annals of Neurology* Vol. 26, 210-215, 1989.

Cassels, Caroline "Mercury Exposure May Contribute To Alzheimer's Risk" *Medscape*, Dec, 2, 2010.

Cernichiari E, et al. "Monitoring methylmercury during pregnancy: maternal hair predicts fetal brain exposure" *Neurotoxicology* Vol. 16, 1995.

Drum DA "Are toxic biometals destroying your children future?" *Biometals* Vol. 22, 2009.

Ely, JTA. "Mercury Induced Alzheimer's Disease: Accelerating Incidence?" *Bulletin Environ Contam Toxicol.* Vol 67, 2001.

Geier, David A. et al. "A Cross-Sectional Study of Blood Ethylmercury Levels and Cognitive Decline Among Older Adults and the Elderly in the United States" *Journal of Alzheimer's Disease* Vol. 72, no. 3, 2019.

Gunnarsen, D, J. and Haley, Boyd, E. "Detection of Glutamine Synthetase in the Cerebrospinal Fluid of Alzheimer's Diseased Patients: A Potential Diagnostic Biochemical Marker" *Proc. Natl. Acad. Scie. USA* 11949-11953, 1992.

Farina, M, Rocha JBT, Aschner M "Mechanisms of methylmercury-induced neurotoxicity: evidence from experimental studies" *Life Science* Vol. 89, 2011.

Guzzi G, et al. "Dental amalgam and mercury levels in autopsy tissues: food for thought" *Am J Forensic Med Pathol* Vol. 27, 2006.

Haley, Boyd E. and Pendergrass, J.C. "Mercury-EDTA Complex Specifically Blocks Brain tubulin GTP Interactions: Similarity To Observations in Alzheimer's Disease" in Status Quo and Perspective of Amalgam and Other Dental Materials, International Symposium Proceedings, Georg Thieme Verlag, Stuttgart-New York, 1995.

Haley, Boyd E. and Pendergrass, J.C. "Inhibition of Brain Tubulin-Guanosine 5-Triphosphate Interactions by Mercury: Similarity to Observations in Alzheimer's Diseased Brain in Metal Ions in Biological Systems V34" Mercury and Its Effects on Environment and Biology, Chapter 16, edited by H. Sigel and A. Sigel. Marcel Dekker, Inc., 1996.

Haley, Boyd E. et al. "Mercury Vapor Inhalation Inhibits Binding of GTP to Tubulin in Rat Brain: Similarity to a Molecular Lesion in Alzheimer's Disease Brain" Neurotoxicology Vol. 18, No. 2, 315-324, 1997.

Haley, Boyd E. "The Relationship of the Toxic Effects of Mercury to Exacerbation of the Medical Condition Classified as Alzheimer's Disease. Nordic Journal of Biological Medicine June-July 2003.

Haley, Boyd E. et al. "Mercury Toxicity Presenting As Chronic Fatigue, Memory Impairment and Depression: Diagnosis, Treatment, Susceptibility and Outcomes in a New Zealand General Practice Setting" Neuro Endocrinol Letters Vol 27, No. 4, 416-423, 2006.

Haley, Boyd E. "A Look at the 2006 FDA Hearing On the Safety of Dental Amalgams and Possible Toxicological Concerns" Medical Veritas 1-5, October 2006.

Haley, Boyd, E. "The relationship of the toxic effects of mercury to exacerbation of the medical condition classified as Alzheimer's disease." Medical Veritas Vol. 4, 1510–1524, 2007.

Haley, Boyd, E et al. "Amelioration of Acute Mercury Toxicity By a Novel, Non-Toxic Lipid Soluble Chelator: Effect on Animal Health, Mercury Excretion and Organ Accumulation in Adult Rats" Toxicological and Environmental Chemistry Vol. 94, No. 3, 616-640, 2012.

Haley, Boyd, E et al. "New Science Challenges Old Notion That Mercury Dental Amalgam Is Safe" Toxicological and Environmental Chemistry Vol 0, No. 0, 1-8, 2013.

International Academy of Oral Medicine and Toxicology. "MULTIPLE SCLEROSIS AND DENTAL MERCURY: SUMMARY AND REFERENCES" December 22, 2016.
<https://files.iaomt.org/wp-content/uploads/MS-and-Dental-Mercury-Summary.pdf>

International Academy of Oral Medicine and Toxicology. "A COMPREHENSIVE REVIEW OF THE TOXIC EFFECTS OF MERCURY IN DENTAL AMALGAM FILLINGS ON THE ENVIRONMENT AND HUMAN HEALTH" October 2019.
<https://files.iaomt.org/wp-content/uploads/Comprehensive-Review-Dental-Mercury.pdf>

Includes a reference list of 517 science journal articles in support of the link between mercury dental amalgams and adverse health reactions.

International Academy of Oral Medicine and Toxicology (IAOMT) Position Paper against Dental Mercury Amalgam Fillings for Medical and Dental Practitioners, Dental Students, Dental Patients, and Policy Makers Originally Released on April 16, 2013 First Update on March 2, 2016; Second Update on July 23, 2019.

Johnson FO and Atchison WD "The role of environmental mercury, lead and pesticide exposure in development of amyotrophic lateral sclerosis" Neurotoxicology Vol. 30, 2009.

Leistevuo J, et al. "Mercury in saliva and the risk of exceeding limits for sewage in relation to exposure to amalgam fillings" Arch Environ Health Vol. 57, 2002.

Magos L. "Review on the toxicity of ethylmercury, including its presence as a preservative in biological and pharmaceutical products" J Appl Toxicol Vol. 21, 2001.

Mount C and Downtown C. "Alzheimer disease: progress or profit. Nature Med Vol. 12, 2006.

Mutter J “Is dental amalgam safe for humans? The opinion of the scientific committee of the European Commission” J Occup Med Toxicol Vol. 6, 2011.

Mutter J and Yeter D. “Kawasaki’s disease, acrodynia, and mercury. Curr Med Chem Vol.15, 2011.

Mutter J. et al. “Alzheimer disease: mercury as pathogenetic factor and apolipoprotein E as a moderator” Neuroendocrinol Lett Vol 25, 2004.

Mutter J. et al. “Amalgam studies: disregarding basic principles of mercury toxicity” Int J Hyg Environ Health Vol. 207, 2004.

Mutter, J. et al. “Does inorganic mercury play a role in Alzheimer’s disease? A systematic review and an integrated molecular mechanism” Journal of Alzheimer’s, 2010.

Mutter, J. et al. “Mercury and Alzheimer’s Disease” Fortschr Neurol Psychiatr. Vol 75, No. 9, 2007.

Mutter, J. et al. “A Hypothesis That Mercury May be an Etiological Factor in Alzheimer’s Disease” International Journal of Environmental Research and Public Health. Dec. 2019.

Nielsen, Jesper B. and Grandjean, Philippe, “Mercury in Hair – But From Where?” The Lancet Vol 353, February 6, 1999.

Park, Jung Duck and Zheng Wei. “Human Exposure and Health Effects of Inorganic and Elemental Mercury. Journal of Preventive Medicine and Public Health 2012; 45, No. 6, 2012.

Pigatto, PD, Costa, A & Guzzi, G 2018, “Are mercury and Alzheimer’s disease linked?” Science of the Total Environment Vol. 613-614, 2018.

Ruggieri, F.; Majorani, C.; Domanico, F.; Alimonti, A. Mercury in Children: Current State on Exposure through Human Biomonitoring Studies. Int. J. Environ. Res. Public Health Vol. 14, 519, 2017.

Sun, Y., Nfor, O.N., Huang, J. *et al.* “Association between dental amalgam fillings and Alzheimer’s disease: a population-based cross-sectional study in Taiwan” Alz Res Therapy Vol. 7, 65, 2015.

Walach, H., Mutter, J, and Deth,R. “Inorganic Mercury and Alzheimer’s Disease—Results of a Review and a Molecular Mechanism” Science Direct Nov. 2014.

Weiss, Bernard. “Lead, Manganese, and Methylmercury as Risk Factors for Neurobehavioral Impairment in Advanced Age”, Special Issue: Metals And Alzheimer’s Disease. International Journal of Alzheimer’s Disease Dec. 2010.

World Health Organization. International Program on Chemical Safety. “Inorganic mercury: Environmental health criteria” 118. Geneva: World Health Organization, 1991.

Zahir, et al. “Low dose mercury toxicity and human health” Environment Toxicology and Pharmacology Vol. 20, Sept 2005.

Mercury in Cremation Vapors in Our Air and Lungs:

Batchelder, Philip Donald, “Dust in the Wind? The Bell Tolls for Crematory Mercury” Golden Gate University Environmental Law Journal, Vol. 2, Issue 1, August 11, 2010, 45 pages.

Berglund, Sandor, “Kvicksilverutsläpp från krematorium” [Mercury emissions from crematorium], NSD [a Swedish newspaper], April 12, 2008. [http://www.nsd.se/arkiv/2008/04/12/Nyheter/3561348/Kvicksilverutsl%
E4pp-frkrematorium.aspx](http://www.nsd.se/arkiv/2008/04/12/Nyheter/3561348/Kvicksilverutsl%E4pp-frkrematorium.aspx)

“Blood and Hair Mercury Levels in Young Children and Women of Childbearing Age — United States, 1999”, MMWR Weekly, Vol. 50, No. 8, March 2, 2001 <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5008a2.htm>

Burton, V. J. “Too much Hg” Nature Vol 351, June 27, 1991.

Cain, Alexis, et. al. “Substance Flow Analysis of Mercury Intentionally Used in Products in the United States” Journal of Industrial Ecology Vol. 11, No. 3, July 2007.

Cain, Alexis, “Estimating Mercury Releases Resulting from Use of Dental Amalgam”, Testimony Before the Domestic Policy Subcommittee of the Oversight and Government Reform Committee” US Senate, May 26, 2010, 4 pages.

California Office of Environmental Health Hazard Assessment, “Air Toxicology and Epidemiology. All OEHHA Acute, 8-hour and Chronic Reference Exposure Levels (chRELs) Dec. 18, 2008” <http://oehha.ca.gov/air/allrels.html>

Carns, Warren T., Dexter, Matthew A., and Stockwell, Peter B., “Mercury in Crematoria Using Atomic Fluorescence Spectrometry” International Environmental Technology, Sept/October 2010, 49-50.

Carrier, Paul, “ Panel Kills Mercury Bill Aimed at Crematoriums”, Portland Press Herald, 5-25-05, <http://pressherald.maintoday.com/news/statehouse/050525bill.shtml?survey79072>

Cowger, Scott, “An Act To Limit Mercury Emissions from Crematoria”, Maine Legislature. <http://janus.state.me.us/legis/LawMakerWeb/summary.asp?ID=280017861>

Craft, David, “Crematory Toxic Emissions Inventories, Risk Assessments, and Risk Reduction Measures”, Monterey Bay Unified Air Pollution Control District and member, a subcommittee of the California Air Pollution Control Officers Association’s (CAPCOA) Toxics Air Risk Managers Committee (TARMAC), February 27, 2012, 54 pages.

Department for Environment, Food and Rural Affairs (Defra, UK) (2012), Process Guidance Note 5/2 (12) . Statutory Guidance for Crematoria , February 2012, 52 pages. at <http://archive.defra.gov.uk/environment/quality/pollution/ppc/localauth/pubs/guidance/notes/pgnotes/documents/pg5-02.pdf>

Dummer, T J B, Dickinson, H O, and Parker, L, “Adverse Pregnancy Outcomes around Incinerators and Crematoriums in Cumbria, north west England, 1956-93” Journal of Epidemiology & Community Health, Vol. 57, No.6, June 2003.

Edwards, Rob, “Your fillings will live on after your death ... to kill the environment” Sunday Herald Online (in the UK), February 11, 2001, http://www.sundayherald.com/news/newsi.hts?section=News&story_id=14270.

Available on the Internet for purchase through [http://pqasb.pqarchiver.com/smgpubs/Environmental Protection Agency](http://pqasb.pqarchiver.com/smgpubs/Environmental%20Protection%20Agency), <http://www.epa.gov/ttn/chiefl/le/mercury.pdf> (official document on mercury vapors)

EPA , “Mercury in Dental Amalgams” (2010) <http://www.epa.gov/mercury/dentalamalgam.html#crematoria>

EPA (1997a), “9.0 Source Test Procedures”, in Locating And Estimating Air Emissions From Sources of Mercury and Mercury Compounds, EPA-454/R-97-012, 1997, 72 pages on the Internet at <http://www.epa.gov/ttnchie1/le/mercury3.pdf>.

EPA (1997b), Mercury Study Report to Congress Volume II: An Inventory of Anthropogenic Mercury Emissions in the United States, EPA-452/R-97-004, 1997. On the Internet at <http://www.epa.gov/ttn/atw/112nmerc/volume2.pdf>.

EPA, (1997), Mercury Study Report to Congress, Volume VII: Characterization of Human Health and Wildlife Risks from Mercury Exposure in the United States

<https://www.epa.gov/sites/production/files/2015-09/documents/volume7.pdf>

EPA (1999), Emission Test Evaluation of a Crematory at Woodlawn Cemetery in The Bronx, NY, September 1999, EPA-454/R-99-049, 3 volumes, 1355 pages.

Great Lakes Regional Pollution Prevention Roundtable, "Great Lakes Mercury Emission Reduction Strategy" December 7, 2010, 133 pages

at <http://www.glrppr.org/glmst/Mercury-Emissions-Reduction-Strategy.pdf>

Künzler and Andrée, M, "More Mercury From Crematoria" Nature Vol. 349, February 28, 1991, pages 746-747.

Maccabee, Paula. "Testimony in Support of Minneapolis Ordinances to Reduce Mercury Emissions, Spills and Discharges" Just Change Consulting for Environmental Justice Advocates of Minnesota, May 1, 2006.

Mills, Allan, "Mercury and Crematorium Chimneys" Nature Vol. 346, August 16, 1990.

Nieschmidt, A. K. and Kim, N. D., "Effects of Mercury Release from Amalgam Dental Restorations during Cremation on Soil Mercury Levels of Three New Zealand Crematoria" Bulletin of Environmental Contamination and Toxicology, Vol 58, No. 5, 1997.

Reindl, John. (compiler) "Summary of References on Mercury Emissions from Crematoria"

January 12, 2015. Retired P.E. from Dane County Department of Public Works, Madison, Wisconsin. john.reindl@att.net

Reuter News, "Pull Mercury From Mouths of Dead [Proposal of the Swedish National Chemical Inspectorate For the Removal of Teeth Prior To Cremation.] May 21, 2004. And KEMI, "The Swedish Chemicals Inspectorate has not Proposed to have the Teeth of Deceased Persons Extracted", May 25, 2004.

Weier, Anita, "Cremation Adds to Mercury Load" The Capital Times page 4A, May 31, 2004

World Health Organization, Internet page on mercury,

http://www.who.int/water_sanitation_health/GDWQ/Chemicals/mercuryfull.htm#Environmental

References on Mercury in Deathcare Workplaces

Arenholt-Bindslev, D., "Dental Amalgam – Environmental Aspects" Advances in Dental Research September 1992, pages 125-130.

Basu, M. K., and Wilson, H. J., "Mercury Risk from Teeth" Nature Vol 349, Jan. 10, 1991, page 109.

Bender, Michael, "Testimony to the Domestic Policy Subcommittee of the Oversight and Government Reform Committee Hearing on 'Assessing EPA's Efforts to Measure and Reduce Mercury Pollution from Dentist Offices' ". Mercury Policy Project/Tides Center, May 26, 2010, 8 pages.

City of Palo Alto, CA, "Dental Offices and Mercury", specifically, "Dental Mercury: A Comparison of Waste Management Practices for the Dental Office" <http://www.city.paloalto.ca.us/cleanbay/dental.html>

Doughty, Caitlin. [Smoke Gets In Your Eyes & Other Lessons from the Crematory.](#) W.W. Norton Publishers, 2014. Pages: 22, 49, 106, 108, 112, and page 221 (The Art of Dying chapter).

Maloney, Susan R., Phillips, Carol A., and Mills, Allan. "Mercury in the Hair of Crematoria Workers" [The Lancet](#) Vol. 352, November 14, 1998.

Vandeven, Jay, "Mercury Use in the Dental Industry", ENVIRON International Corporation, [Environmental Law Institute](#) January 2005.

Warwick, R., O'Connor, A. & Lamey, B. "Mercury vapor exposure during dental student training in amalgam removal" [J Occup Med Toxicol](#) **8**, 27 (2013).

References on Mercury in The Environment and Mammals:

Ackerman, J.T et al. "Mercury Contamination In Resident and Migrant Songbirds and Potential Effects on Body Condition. [Environ Pollution](#). Vol. 246, 2019.

Ali, Hazrat, Khan, E. and Ilahi, I. "Environmental Chemistry and Ecotoxicology of Hazardous Heavy Metals: Environmental Persistence, Toxicity, and Bioaccumulation" [Journal of Chemistry](#) 2019.

Bank, M. S., Crocker, J. B., Connery, B. & Amirbahman, A. "Mercury bioaccumulation in green frog and bullfrog tadpoles from Acadia National Park" [Environ. Toxicol. Chem.](#) Vol. 26 2007.

Bechshoft, T., et al. "Hair Mercury Concentrations in Western Hudson Bay Polar Bear Family Groups" [Environ. Sci. Technol.](#) Vol. 50, 2016.

Cossaboon, Jennifer et al. "Seal Molting Alters Nearshore Mercury Cycling" [Proceedings of the National Academy of Sciences](#). Vol 112, No. 39, Sept 2015.

Durkalec, Maciej et al. Jan. "Bioaccumulation of Lead, Cadmium and Mercury in Roe Deer and Wild Boars from Areas with Different Levels of Toxic Metal Pollution" [International Journal of Environmental Research](#) Vol. 9, 2015.

May, Jason, et al. "Mercury Bioaccumulation in Fish in a Region Affected by Historic Gold Mining" US Geological Service, 1999.

Newman, J., Zillioux, E., Rich, E., Liang, L. & Newman, C. "Historical and Other Patterns of Methyl and Inorganic Mercury in the Florida Panther (*Puma concolor coryi*)". [Arch. Environ. Contam. Toxicol.](#) Vol. 48, 2004.

Noël, M. *et al.* "Grizzly Bear Hair Reveals Toxic Exposure to Mercury through Salmon Consumption" [Environ. Sci. Technol.](#) Vol. 48, 2014.

Obrist, D. et al. "Tundra uptake of atmospheric elemental mercury drives Arctic mercury pollution." [Nature](#) Vol. 547, 2017.

Phillips, Carol, Gladding, Toni, and Maloney, Susan "Clouds with a Quicksilver Lining" [Chemistry in Britain](#) 656, 1994.

Ritchie, C. D., et al. "Mercury in fog on the Bay of Fundy (Canada)" [Atmos. Environ.](#) Vol. 40, 2006.

Swaddle, J. et al. "Exposure To Dietary Methyl-Mercury Solely During Embryonic and Juvenile Development Halves Subsequent Reproductive Success in Adult Zebra Finches." [Journal of Environmental Science and Technology](#) Vol. 52, 2018.

Weiss-Penzias, P.S., et al. "Marine fog inputs appear to increase methylmercury bioaccumulation in a coastal terrestrial food web" [Scientific Reports](#) Vol 9, 2019.

Wolfe, M. F., Schwarzbach, S. & Sulaiman, R. A. "Effects of mercury on wildlife: A comprehensive review" Environ. Toxicol. Chem. Vol. 17, 1998.

Respectfully submitted,
Azizollah Abrishamian
9328 Edgewood Court, Gaithersburg, MD. 20877

MEMORANDUM TO: Mayor and City Council
FROM: Jasmine Forbes, Planner
DATE: August 3, 2020
SUBJECT: Preliminary Background Report
SP-8415-2020: 10 and 14 East Deer Park Drive

APPLICANT/ OWNER/DEVELOPER:

Robert DeVol
DeVol Funeral Home
2222 Wisconsin Avenue NW
Washington, DC, 20007

ATTORNEY

Scott C. Wallace
Miles & Stockbridge
11 N. Washington Street, Suite 700
Rockville, Maryland, 20850-4229

ARCHITECT

Jon Penney
Penney Design Group
8120 Woodmont Avenue
Bethesda, MD, 20814

ENGINEER

Phillip Rhodes, P.E.
A. Morton Thomas & Associates Inc.
800 King Farm Boulevard
Rockville, MD, 20850

TAX MAP REFERENCE:

Block V, Lot 1- ID# 09-02691081
Parcel P861- ID# 09-00818677

REQUEST:

Application SP-8415-2020¹ has been filed requesting concept site plan approval to expand the services for the existing DeVol Funeral Home at 10 East Deer Park. The application proposes converting an existing single-family house at 14 East Deer Park Drive to a funeral home, which includes viewing parlors and an associated crematorium. The plan also includes expansion of the existing parking lot and other minor site improvements. The subject properties are zoned CD (Corridor Development).

LOCATION:

The subject properties are situated along East Deer Park Drive. The site is currently accessible from East Deer Park Drive east of South Frederick Avenue.

¹ Exhibit 1



Location Map

REQUIRED ACTIONS

Approval of SP-8415-2020, by the City Council is dependent upon the findings required under § 24-160G.7(b) of the City Code as follows:

- (b) *The city council may approve a schematic development plan or concept plan only upon the finding that:*
- (1) *The plan is substantially in accord with architectural, signage, lighting, streetscape, parking and other regulations, requirements and guidelines adopted by the city council for applicable corridor area.*
 - (2) *The plan meets or accomplishes the purposes, objectives and minimum standards and requirements of the zone; and*
 - (3) *The plan is in accord with the area master plan and any accompanying special condition or requirements contained in said master plan for the area under consideration; and*
 - (4) *The plan will be internally and externally compatible and harmonious with existing and planned land uses in the CD zoned area and adjacent areas; and*
 - (5) *The existing or planned public facilities are adequate to service the proposed development contained in the plan; and*
 - (6) *The development staging or phasing program if any, is adequate in relation to the provision of public facilities and private amenities to service the proposed development; and*
 - (7) *The plan, if approved, would be in the public interest.*
 - (8) *The existing buildings with historic significance are considered for preservation and retention pursuant to the city's historic preservation ordinance.*

Therefore, the Applicant has the burden of showing that the application complies with the purpose and intent of the CD Zone and the master plan. Additionally, evidence must be shown that the application will be compatible and harmonious with the surrounding planned and existing land uses and will accomplish the objectives, minimum standards, and requirements of the zone.

SITE PLAN HISTORY

The subject properties were annexed into the City of Gaithersburg in 1947. The properties were comprehensively rezoned to the CD Zone as part of the Frederick Avenue Corridor Master Plan. Site Plan S-684 was approved on May 20, 1987 for the construction of the funeral home at 10 East Deer Park Drive.

MASTER PLAN HISTORY

1997, 2003 and 2009 Master Plans

The subject properties were not included in the 1997, 2003 or 2009 Master Plans as specific map designations. The 1997 Master Plan designated the land use for the subject properties as Residential-Office. The 2003 and 2009 Master Plans designated the land use for the subject properties as Commercial-Office-Residential.

Frederick Avenue Corridor Land Use Plan- 2001

The Frederick Avenue Corridor Land Use Plan was adopted on January 2, 2001, as a guide for development of the Frederick Avenue Corridor. The corridor is divided into three (3) districts: Northern Employment, Fairgrounds Commercial and Southern Residential. The subject properties are situated within the Southern Residential District, Map Designation F. In the plan, it notes that development is recommended to be in keeping with the residential character of this portion of the Corridor. Offices, light retail or live-work units in low-rise buildings are examples of what is envisioned.

ADEQUATE PUBLIC FACILITIES ORDINANCE (APFO):

Traffic Impacts

According to the Applicant's APFO statement, the funeral home will not generate more than thirty (30) peak hour trips, therefore a traffic impact study is not required. Public Works Engineering Services Division Chief, Anthony Berger, has reviewed the application and concurs with the Applicant's statement that a traffic impact study is not required for this application submission². The Plan, therefore, complies with the City's Adequate Public Facilities requirements for § 24-245.

Adequacy of School Capacity

The proposed development will be a funeral home use, therefore it will have no impact on the school system. The proposed development is exempt from the school test of the Adequate Public Facilities Ordinance (§ 24-246).

² Exhibit #14

Water and Sewer Services and Public Utilities

The subject property is currently served by Category W-1 and S-1 of Washington Suburban Sanitary Commission (WSSC) services. As referenced in the Applicant's statement, the application complies with the requirements of the City's Adequate Public Facility Ordinance (APFO) for water and sewer (§24-247).

Fire and Emergency Services

The City's Adequate Public Facilities Ordinance (APFO) requires that at least two (2) fire stations serve any development project within a ten-minute response time. The subject properties are located within a ten-minute response time of Station 3 (Rockville), Station 8 (Gaithersburg), Station 28 (Gaithersburg) and Station 32 (Travilah). Therefore, as referenced in the Applicant's statement, the site complies with the requirements for the Adequate Public Facilities requirements for Emergency Services (§ 24-248).

SURROUNDING LAND USE/PHYSICAL CHARACTERISTICS:

The property located at 10 East Deer Park Drive is 62,303 square feet and currently contains a 9,200 square foot funeral home building and parking lot. The property located at 14 East Deer Park Drive is 27,442 square feet and currently contains a 1,176 square foot residential building. The Applicant will submit a preliminary subdivision plan as part of the preliminary/final site plan application to consolidate the two (2) lots. A final record plat will be required prior to the issuance of a site development permit. The following table demonstrates the land use and zoning for the surrounding properties:

Direction	Zoning	Land Use
North	R-90 (Medium Density Residential) R-B (Low Density Residential)	Residential Office
South	R-A (Low Density Residential)	Office
East	R-A (Low Density Residential)	Residential
West	CD (Corridor Development)	Residential-Office



Zoning Map

CONCEPT SITE PLAN

The Applicant is requesting approval to expand the services for the existing DeVol Funeral Home at 10 East Deer Park. The application proposes converting an existing single-family house at 14 East Deer Park Drive to a funeral home, which includes viewing parlors and an associated crematorium. The Applicant will submit a preliminary subdivision plan as part of the preliminary/final site plan application to consolidate the two (2) lots. A final record plat will be required prior to the issuance of a site development permit.

Pursuant to the City Code, a funeral home is defined as:

“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”.

The CD zone permits all uses which are listed as permitted and not solely as special exceptions or conditional uses in all zoning districts unless otherwise prohibited. A funeral home is a permitted use in the C-2 (General Commercial) Zone. The proposed building will not be used as a stand-alone crematorium and is part of the funeral home use. As stated in the letter from the manufacturer, the equipment for the crematorium will not generate smoke or odor³.

The project will be divided into two (2) phases. The first phase includes the conversion of the single-family structure and minor improvements to the site to accommodate ADA access to the building. The Applicant plans to construct a one-story 600 square foot addition in the rear of the existing building. The building will include viewing parlors and crematorium services. The building will serve the existing clients of the funeral home and is not anticipated to generate a significant number of new families visiting. The Applicant also plans to construct a five (5) foot sidewalk along the front of 14 East Deer Park Drive to provide a pedestrian connection to an existing sidewalk that stops at the second ingress/egress entrance at 10 East Deer Park Drive.

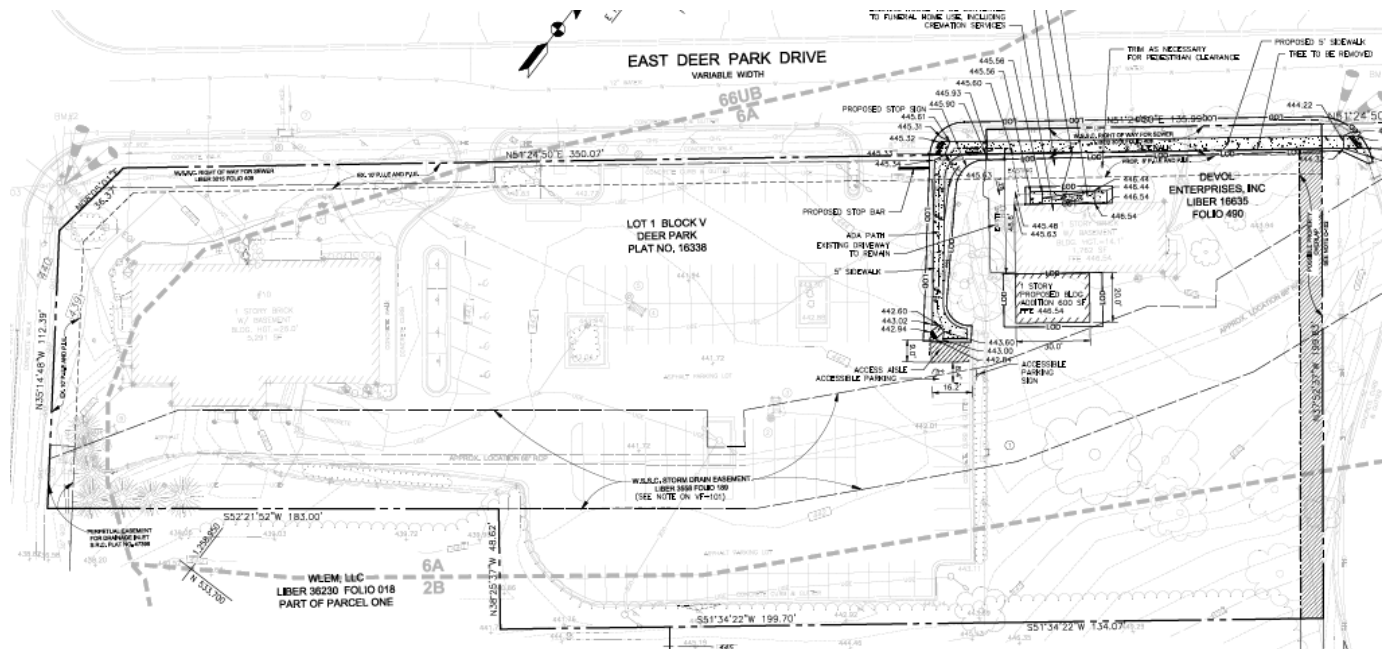


Exhibit #9: Phase One Site Plan

In the second phase of the project, the Applicant will increase the existing parking lot from 89 spaces to 111 spaces in order to accommodate occasions when there is a large funeral and decrease the amount of on-street parking required for vehicle overflow. A stormwater management facility will be provided in the new parking lot island.

³ Exhibit #19

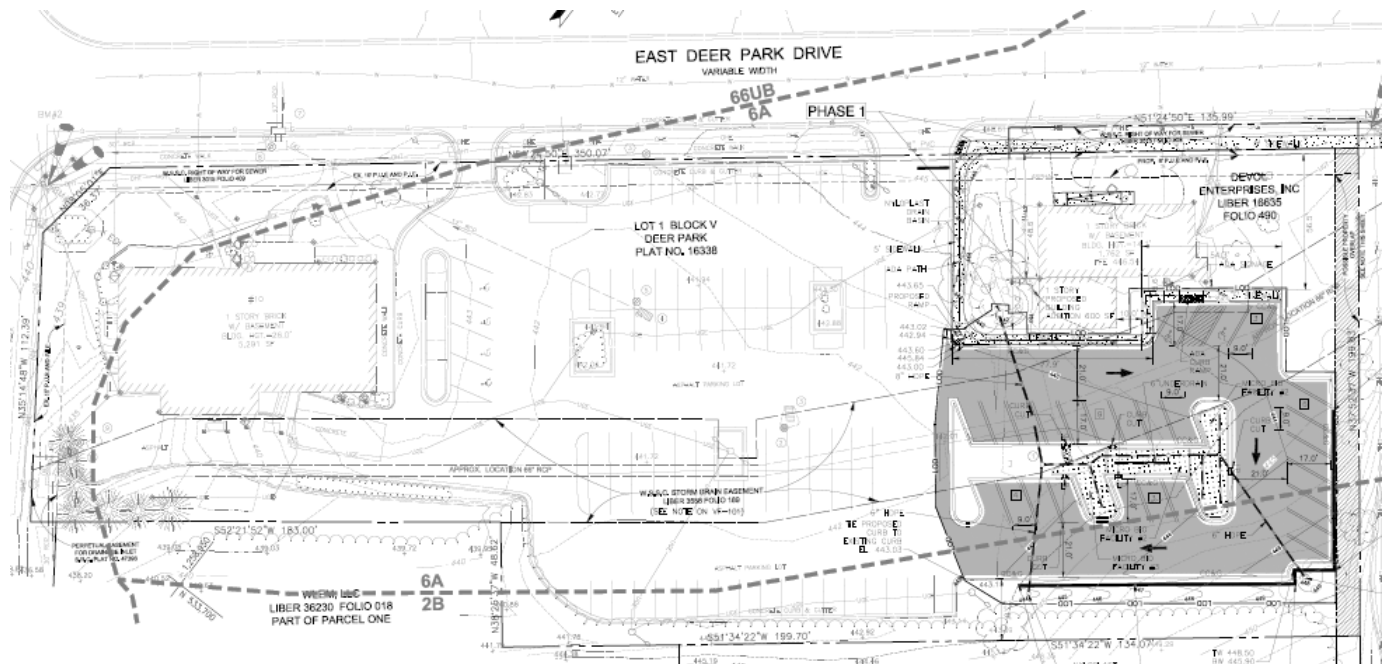


Exhibit #9: Phase Two Site Plan

As part of this application, the Applicant submitted a Preliminary Forest Conservation Plan. The Applicant plans to provide four (4) Common Hackberry trees to meet afforestation requirements.

Parking

The parking is located on an existing lot at 10 East Deer Park Drive, which contains 89 spaces and is accessible from East Deer Park Drive. The required parking calculation for a funeral home is one space per four seats plus one space per employee. The existing funeral home is required 83 spaces and provides 89 spaces. The new building at 14 East Deer Park Drive will have the funeral home require 89 spaces. There is adequate parking on the existing parking to facilitate both buildings. Phase Two of the project will provide an additional 22 spaces with a total of 111 spaces in order to accommodate occasions when there is a large funeral and decrease the amount of vehicle overflow in the street.

Architecture Elevations⁴

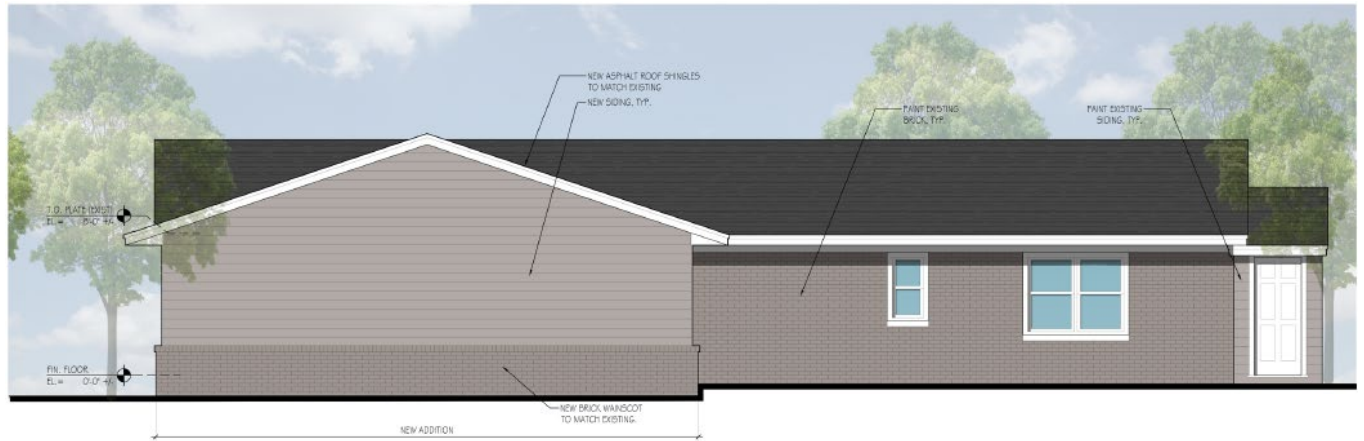
As part of the Concept Site Plan application, the Applicant has provided conceptual architectural elevations for the building. The new one-story 600 square foot addition will be clad in siding with a brick watertable. The Applicant plans to paint the brick on the existing building to match the addition. There are no other changes proposed to the existing building.

⁴ Exhibit #6



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

Exhibit #6: Conceptual Architecture Plans



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



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

Exhibit #6: Conceptual Architecture Plans



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

Exhibit #6 Conceptual Architecture Plans

STORMWATER MANAGEMENT AND SEDIMENT & EROSION CONTROL⁵

In accordance with the requirement for the submission of a Concept Site Plan, Section 24-160D.9(b), the Applicant has submitted concept stormwater management plan and sediment and erosion control plan applications, SWM-8418-2020 and SEC-8417-2020 respectively. The Department of Public Works staff is currently reviewing both plans.

⁵ Exhibits #2 and #3

SUMMARY:

The Applicant has submitted for consideration concept site plan SP-8415-2020. This a complete application as set forth in § 24-160G.7(b). A public hearing with the Mayor & City Council has been scheduled for August 3, 2020.

Because this is the initial public hearing and Staff continues to complete their analysis of the proposed project, no formal recommendation is provided at this time.

From: **dave shirey** <davebo357@gmail.com>
Date: Tue, Sep 15, 2020 at 8:32 AM
Subject: DeVol Crematorium
To: <Jud.Ashman@gaithersburgmd.gov>

As much a fan as I am of formal letters to elected officials I'll keep this brief as I'm watching my toddler and typing from my phone. My name is Dave Shirey and I live at 100 E Deer Park Dr., Two houses down from DeVol Funeral Home. I understand they've been approved for a crematorium and that this skirts previous regulations regarding crematoriums only being zoned for industrial districts. Despite that I've seen no compelling evidence to suggest that I, my asthmatic wife, nor my one year old son are at any clear risk from emissions from the site, and don't have any objections to DeVol's expansion plans.

As someone concerned about the environment I would love to see an expansion of Alkaline hydrolysis, but that may be wishful thinking for the generation most commonly needing funeral services today. Thanks for your time, I just wanted to throw one supportive comment out there as I see a lot of signs in opposition. Funeral home is as valuable a service to the community as most businesses, and I couldn't ask for quieter neighbors.

-Dave Shirey

From: **Jane Seegal** <jseegal@gmail.com>

Date: Sun, Sep 13, 2020 at 3:46 PM

Subject: Proposed Crematorium - Comments for the record

To: <jud.ashman@gaithersburgmd.gov>, <laurie-anne.sayles@gaithersburgmd.gov>, <neil.harris@gaithersburgmd.gov>, <michael.sesma@gaithersburgmd.gov>, <ryan.spiegel@gaithersburgmd.gov>, <robert.wu@gaithersburgmd.gov>

Attached is a letter describing my objections to the proposed DeVol crematorium in East Deer Park. Thank you for your consideration and any response.

Jane Seegal

Washington Grove

Mayor Jud Ashman and City Council Members
City of Gaithersburg
31 S Summit Ave
Gaithersburg, Md 20877

Mr. Mayor and Council:

I understand that you are to vote Oct. 5 on a proposal by DeVol to create a crematorium in East Deer Park. I am writing to object strenuously.

As a longtime resident of Washington Grove, I would not be far from the proposed site, which I believe would have serious public health and financial effects.

Most important, I simply cannot understand why you are even entertaining a plan that violates Gaithersburg's own zoning code, at risk to your own residents. No other crematorium in Montgomery County is in a residential neighborhood. The one exception, Pumphrey, in Bethesda, as you know, is grandfathered in.

You cannot rely on DeVol or regulators to ensure the work does not produce toxins, such as furans, PAHs, and mercury. Some of the likely toxins are potential developmental neurotoxins; schools, including Gaithersburg Elementary, are less than a mile away. Equipment ages. Funeral directors forget to ask what implants the deceased might have had. Regulators, stretched thin, are not going to be vigilant about what is expelled from the structure.

Having such a neighbor is likely to lower property values. I wonder whether you would even consider such a plan if the Funeral Home were in a wealthier part of Gaithersburg.

I hope you will do the right thing and veto this proposal.

Sincerely,

Jane Seegal
315 Grove Ave.
Washington Grove, MD 20880

April 13, 2020

From: **Richard Lindstrom** <dick.lindstrom@gmail.com>

Date: Tue, Sep 15, 2020 at 9:48 AM

Subject: Project SP-8415-2020: DeVol crematorium

To: <Jud.Ashman@gaithersburgmd.gov>, <Neil.Harris@gaithersburgmd.gov>, <Laurie-Anne.Sayles@gaithersburgmd.gov>, <Michael.Sesma@gaithersburgmd.gov>, <Ryan.Spiegel@gaithersburgmd.gov>, <Robert.Wu@gaithersburgmd.gov>

Cc: <councilmember.katz@montgomerycountymd.gov>

Dear Mr. Mayor and Councilmembers:

As a practicing scientist I do not like to become involved in legal or personal issues. But the fact that the Mayor and Council seem to be abrogating their responsibilities in the case of the DeVol crematorium (as they did with Wawa) must not go unchallenged.

It is the job of the City staff to see that the rules are followed, but it is your duty to further consider the health and welfare of the City and its residents.

If you refuse to exercise judgement in the DeVol issue beyond rote legalism, then clearly you are willing to have Gaithersburg continue to be a dumping ground for facilities that would not be permissible elsewhere in our region. Even if a plan is legal, it is not necessarily right for the community. Ethical principles apply.

Please show some active responsibility in this matter on behalf of us citizens.

Sincerely,

Richard Lindstrom

421 Gaither Street

From: **Richard Lindstrom** <dick.lindstrom@gmail.com>
Date: Tue, Sep 15, 2020 at 3:58 PM
Subject: Literature references for Project SP-8415-2020: DeVol crematorium
To: <Jud.Ashman@gaithersburgmd.gov>, <Neil.Harris@gaithersburgmd.gov>, <Laurie-Anne.Sayles@gaithersburgmd.gov>, <Michael.Sesma@gaithersburgmd.gov>, <Ryan.Spiegel@gaithersburgmd.gov>, <Robert.Wu@gaithersburgmd.gov>
Cc: <councilmember.katz@montgomerycountymd.gov>

Dear Mr. Mayor and Councilmembers:

Attached for your study and for the record are some relevant references to the professional literature on the impacts of crematoria on property values and on the extent and effects of their emissions.

None of these are arguments in favor of crematoria adjacent to a residential neighborhood.

Sincerely,

Richard Lindstrom
421 Gaither Street

Crematory impacts: references

Housing values:

- Directional heterogeneity of environmental disamenities: the impact of crematory operations on adjacent residential values, by Mark D. Agee and Thomas D. Crocker, *Applied Economics*, 2010, **42**, 1735–1745. Abstract: A hedonic study of residential house sales in Rawlins, Wyoming, was conducted to estimate the impact of an environmental shock from a new point source upon adjacent residential property values. ... Our data spans 27 months of house sales: 7 months before, and 20 months after the startup of crematory operations. Results indicate that proximity, measured both in terms of direction and distance from the crematory, imparts a statistically significant negative impact on average house sale prices – an increase of 0.3 to 3.6% of average sale price for every one-tenth mile increase up to one-half mile in distance away from the crematory, but depending on direction from the crematory....

Emissions: See <https://no2crematory.wordpress.com/the-toxic-truth-data/> for a long list, including:

- Letter from US Congress written by Dennis Kucinich on Jan 15 2010, to Lisa P Jackson, US EPA, regarding mercury as a source of pollution through dental amalgam fillings, and a weaseling response from EPA “EPA has concluded that human crematories were not solid waste incinerators; therefore it was not appropriate to regulate them under Clean Air Act Section 129.”
- “Toxic Emissions from Crematories: A review, *Environment International* **36** (2010) 131–137. Abstract: “In recent years, the cremation ratio of cadavers has increased dramatically in many countries. Crematories have been identified as sources of various environmental pollutants, being polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/Fs), and mercury those raising most concern. In contrast to other incineration processes for which the number of studies on their toxic emissions is considerable, references related to PCDD/F and mercury emissions from crematories and their health risks are very limited. In this paper, the scientific information concerning these issues, using the databases PubMed, Scopus and Scirus, is reviewed. Results show that in comparison with PCDD/F emissions from other sources, those corresponding to crematories are significantly lower, while those of mercury should not be underrated.” Summarized on the Wordpress page:
 - a. Crematories have been identified as sources of various environmental pollutants, being polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/Fs), and mercury those raising most concern.
 - b. The pollutants emitted by the combustion of organic matter with presence of other trace elements are: combustion gases (NO_x, CO, SO₂, PM...), heavy metals, and polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/Fs), among other persistent organic pollutants. Heavy metals and PCDD/Fs, stand out because of their toxicity and capacity for bioaccumulation, which means potential risks for human health. Because of their toxicological properties, together

with their persistence capacity, PCDD/Fs were listed by the Stockholm Convention on Persistent Organic Pollutants of 2001 as one of the “dirty dozen” pollutants whose levels should be significantly reduced.

c. As a result of the US Cremation Association’s meeting with the US EPA in November 1991, it became known that the **original regulations proposed for crematories were based on no actual test data**. Dental amalgams are unstable at cremation temperatures (650–700 °C), ... the free mercury metal is highly volatile.

d. Concluded that there was an increased risk of lethal congenital anomaly (specifically spina bifida and heart defects) in relation to proximity to incinerators, and an increased risk of stillbirth and anencephalus in relation to proximity to crematoriums.

- Characterizing the Emissions of Polychlorinated Dibenzo-*p*-dioxins and Dibenzofurans from Crematories and Their Impacts to the Surrounding Environment, *Environmental Science and Technology* 2003, **37**, 62-67. From the Wordpress site:

a. Two crematories in Taiwan were tested, one with no emissions controls, the other with a bag filter.

b. The one with a bag filter removed 55.1% of the dioxins/furans, but both crematories still emitted significant amount of both compounds.

c. Determined that **crematories with a low stack and no pollution controls are more of a threat to the community, but even after filtration, dioxin and furan levels are still at concentration levels well above “safe” levels**

d. US EPA has reported that there appears to be **no “safe” level for dioxin exposure**, and the levels of dioxin and dioxin-like chemicals found in the general U.S. population were “at or near levels associated with adverse health effects:

e. Stacks on tested crematories were 5 m (16.4’) and 6 m (19.7’)

- Crematory causes concern in Minneapolis neighborhood, *StarTribune*, June 14, 2013. “Some residents of a quiet south Minneapolis neighborhood are raising concerns about a nearby crematorium, demanding more details about whether smoke and vapors from an unassuming stack atop the facility are a local health risk. Neighbors of the Cremation Society of Minnesota, which has operated as a funeral home at that location since 1955, convened a meeting with the company and city officials this week to obtain more details about just what is being emitted. The crematory’s...”

From: johudson@erols.com <johudson@erols.com>
Sent: Wednesday, September 16, 2020 3:01 PM
To: MCC Services <mccservices@gaithersburgmd.gov>
Subject: DeVol Application SP-8415-2020

Dear Mayor Ashman, City Council members, and Planning and Code Department staff,

What is the advantage of living in a small jurisdiction like Gaithersburg? For a resident it means that there is access to those who govern and a chance to be heard.

Hear me.

I have been a Gaithersburg resident for 51 years. My neighbors and I are crying for help. For the past month an amazing, diverse group of residents have met, researched and collaborated to learn what it would mean to have a crematorium in our midst. It has opened our eyes!

Many of us have used the services of DeVol Funeral Home. They have been a good neighbor. Where, though, is their enthusiasm for this improvement to their business? Instead they meet the minimum requirements of the law with signs informing the neighborhood two weeks before a City Council hearing. Signs explain vaguely of a site plan change. Incomplete drawings of the concept site plan (no smokestack) are presented to the City Council. The actual furnace for the crematorium has not been selected but the one described operates at extremely high temperatures with high levels of carbon emissions.

Cremation is not the green alternative to burial. It is a serious risk to our environment. No smoke, no odor does not equal clean. Bodies contain mercury in dental fillings and those who have had radiation treatment prior to death contain dangerous radiation.

Gaithersburg is within the larger boundaries of Montgomery County which has declared a climate emergency. The County is moving forward to cut carbon emissions significantly. Where does Gaithersburg fit in this critical plan? Will the emissions from a crematory furnace be a significant addition to the allowable amount? Is DeVol Funeral Home thinking of the future?

A number of residents have sent compelling comments that are referenced by scientific and legal definitions and regulations. Please read these carefully. They have convinced me that the addition of a crematorium in the house at #14 East Deer Park Dr. does not meet the standard of zoning as expressed by Councilman Neil Harris,

“to promote the health, safety, morals, and general welfare of the community, to protect and conserve the value of buildings, and encourage the most appropriate use of the land.”

The proposal should be denied.

Toni Hudson
214 Tulip Dr.