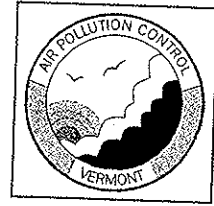


Vermont Department of Environmental Conservation  
Air Pollution Control Division



MEMORANDUM

**TO:** Advisory Committee on Mercury Pollution

**FROM:** Richard A. Valentinetti, Director Air Pollution Control Division *RW*

**DATE:** December 15, 2006

**SUBJECT:** Crematoria Mercury Emissions

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I understand that the ACMP is formulating its recommendations to the legislature regarding mercury health and environmental impacts in Vermont. I would like to express the Air Division's concerns about mercury emissions from crematoria. This has long been an issue which is being addressed to some extent in the United Kingdom, Sweden and other European countries where emissions controls are being required in some locations and other alternatives are being implemented or considered. Alternatives considered are freeze drying bodies and grinding them to dust for burial and the removal of amalgam fillings, the source of most of the mercury, prior to cremations.

Because most of the crematoria in Vermont are located in dense residential areas and the stacks on the units are generally relatively low, human exposure to mercury emissions is a concern. Although the crematoria in Vermont at this time are single unit facilities that rarely conduct more than one cremation a day, cremation in general is on the rise. There is some potential that existing crematoria could greatly increase the number of cremations requiring some facilities to add additional crematory units or new multi unit facilities to be permitted. This could result in the Air Division having to require expensive emissions controls on crematories or requiring teeth with amalgam fillings to be removed from bodies prior to cremations.

According to one EPA study (U.S. E.P.A, Int'l Mercury Market Study and the Role and Impact of US Environmental Policy, 2004), mercury in dental amalgam is the greatest reservoir of mercury in all products. Much of this reservoir of mercury will be emitted to the atmosphere as more and more individuals in the aging U.S. population choose cremation. For this reason the Air Division encourages the committee to recommend that the use of dental amalgam in Vermont be banned or rapidly phased out. Apart from the immediate health benefits to individuals, this would serve to reduce the future potential emissions from crematoria and may avoid costly mercury emissions controls or alternatives.

Thank you for your consideration in this matter.