State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
CUYAHOGA COUNTY

Street Address:
122 S. Front Street

Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 13-01521

DATE: 11/21/2002

Busch Family Funeral Chapels
James Busch
7501 Ridge Road
Parma, OH 44129

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: **USEPA** **CBAPC**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 11/21/2002**
Terms and Conditions **Effective Date: 11/21/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-01521

Application Number:	13-01521
APS Premise Number:	1318457382
Permit Fee:	**$0**
Name of Facility:	Busch Family Funeral Chapels
Person to Contact:	James Busch
Address:	7501 Ridge Road Parma, OH 44129

Location of proposed air contaminant source(s) [emissions unit(s)]:
7501 Ridge Road
Parma, **Ohio**

Description of proposed emissions unit(s):
Incinerator for the cremation of human remains using natural gas; rated capacity of 100 pounds per hour.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PM	**0.44**
OC	**0.83**
NO_x	**0.83**
CO	**2.76**
SO_2	**0.70**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
N001 - Incinerator for the cremation of human remains using natural gas; rated capacity of 100 pounds per hour. MODIFIED	OAC Rule 3745-31-05(A)(3)	PM: 0.44 tons per year (TPY) OC: 0.19 lb/hr, 0.83 TPY NO_x: 0.19 lb/hr, 0.83 TPY CO: 0.63 lb/hr, 2.76 TPY SO_2: 0.16 lb/hr, 0.70 TPY The requirements of this rule include compliance with OAC Rules 3745-17-07(A), 3745-17-09(B) and 3745-17-09(C)
	OAC Rule 3745-17-07(A)	Visible particulate emissions from this stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC Rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per 100 pounds of material charged.
	OAC Rule 3745-17-09(C)	See A.2.d

2. Additional Terms and Conditions

2.a This emissions unit shall not be operated at a capacity greater than 100 pounds per hour.

2.b The emissions unit shall be serviced on a regular basis by a qualified incinerator contractor. The interval of time between service shall not exceed six (6) months.

2.c Non-combustible material shall be removed from the material charged to this emissions unit.

2.d This incinerator and all associated equipment and grounds shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

2.e This permit supercedes the terms and conditions of PTI#13-01521 issued in May of 1986.

2.f This emission unit shall be constructed so that the stack height is a minimum of sixteen (16) feet above the ground.

B. Operational Restrictions

1. The permittee shall operate the afterburner 30 minutes prior to ignition of charge and continue its use during the entire burn cycle. This requirement is suggested by the manufacturer to ensure complete combustion.

2. This incinerator shall be operated only by adequately instructed personnel.

3. Ashes shall be removed from the primary chamber on a daily basis.

4. During the cremation burn, the temperature of the secondary combustion chamber shall be maintained at a minimum of 1400 degrees Fahrenheit.

5. The afterburner chamber shall be inspected and cleaned monthly.

6. The permittee shall start-up, operate, maintain and repair the incinerator in such a way to meet all applicable engineering standards and practices and the recommendations of the manufacturer in order to minimize the air contaminant emission releases.

C. Monitoring and/or Recordkeeping Requirements

1. Copies of contractor's invoices of maintenance and repairs shall be maintained on site.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder for the secondary combustion chamber operating temperatures. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's

recommendations, instructions, and applicable operating manual(s).

3. The permittee shall maintain copies of the records of the secondary combustion chamber temperature at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

4. A log recording the date when ashes were removed and the afterburner chamber inspected and cleaned shall be maintained.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing of all malfunctions. These reports shall be submitted to the CDAQ in accordance with the general terms and conditions of this permit.

E. Testing Requirements

1. Compliance with the visible particulate emission limit in A.1 and A.2 of the Special Terms and Conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

   Visible particulate emissions shall not exceed 20%, as a six-minute average.

   Applicable Compliance Method:

   Compliance shall be determined using USEPA Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC Rule 3745-17-03(B)(1).

   b. Emission Limitation:

   0.10 lb Particulate Emissions (PE) per 100 pounds of material charged

   Applicable Compliance Method:

   If required, compliance with this mass emission limitation shall be determined through stack testing per OAC Rule 3745-17-03(B)(8) using Methods 1-5 of 40 CFR Part 60, Appendix A.

   c. Emission Limitation:

   0.44 ton PE per year

   Applicable Compliance Method:

   Compliance with the annual limitation shall be demonstrated using the following equation at the maximum charge weight of 100 lb/hr and 8,760 hr/yr:

   (0.1 lb PE/100 lbs) x (100 lb/hr) x (8,760 hr/yr) x (1 ton/2000 lb) = 0.44 TPY PE

   d. Emission Limitation:

   0.19 lb Organic Compounds (OC) per hour

Applicable Compliance Method:

A one-time calculation based upon the design maximum rate (lbs/hr) and the OC emission factor (lbs/ton) from USEPA publication AP-42, Fifth Edition, section 2.1, table 2.1-12 (10/96) shall be performed (note: the BAT limitation is slightly higher than AP-42).

[AP-42 emission factor (lb OC/ton)] x [design maximum (lb/hr)] x (1 ton/2000 lb)

where:

3.0 lb OC/ton charged (emission factor) from AP-42 section 2.1, table 2.1-12 (10/96)

e. Emission Limitation:

0.19 lb Nitrous Oxides (NO_x) per hour

Applicable Compliance Method:

A one-time calculation based upon the design maximum rate (lbs/hr) and the NO_x emission factor (lbs/ton) from USEPA publication AP-42, Fifth Edition, section 2.1, table 2.1-12 (10/96) shall be performed (note: the BAT limitation is slightly higher than AP-42).

[AP-42 emission factor (lb NO_x/ton)] x [design maximum (lb/hr)] x (1 ton/2000 lb)

where:

3.0 lb NO_x/ton charged (emission factor) from AP-42 section 2.1, table 2.1-12 (10/96)

f. Emission Limitation:

0.63 lb Carbon Monoxide (CO) per hour

Applicable Compliance Method:

A one-time calculation based upon the design maximum rate (lbs/hr) and the CO emission factor (lbs/ton) from USEPA publication AP-42, Fifth Edition, section 2.1, table 2.1-12 (10/96) shall be performed (note: the BAT limitation is slightly higher than AP-42).

[AP-42 emission factor (lb CO/ton)] x [design maximum (lb/hr)] x (1 ton/2000 lb)

where:

10.0 lb CO/ton charged (emission factor) from AP-42 section 2.1, table 2.1-12 (10/96)

g. Emission Limitation:

0.16 lb Sulfur Dioxide (SO_2) per hour

Applicable Compliance Method:

A one-time calculation based upon the design maximum rate (lbs/hr) and the SO_2 emission factor (lbs/ton) from USEPA publication AP-42, Fifth Edition, section 2.1, table 2.1-12 (10/96) shall be performed (note: the BAT limitation is slightly higher than AP-42).

[AP-42 emission factor (lb SO_2/ton)] x [design maximum (lb/hr)] x (1 ton/2000 lb)

where:

2.5 lb SO_2/ton charged (emission factor) from AP-42 section 2.1, table 2.1-12 (10/96)

h. Emission Limitation:
0.83 ton OC per year
0.83 ton NO_x per year
2.76 tons CO per year
0.70 ton SO_2 per year

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

F. Miscellaneous Requirements

1. The incinerator shall not be used to dispose of any infectious or "red bag" waste. Applicant shall have such waste disposed of in accordance with applicable federal, state and, and local regulations.

2. A copy of these terms and conditions shall be visibly posted near the incinerator.