State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN 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: 01-08874
Fac ID: 0125073061
DATE: 8/17/2004

Veterinary Cremation Services Ltd
Louis Castelli
970 Claycroft
Gahanna, OH 43230

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 8/17/2004**
Terms and Conditions	**Effective Date: 8/17/2004**

FINAL PERMIT TO INSTALL 01-08874

Application Number:	01-08874
Facility ID:	0125073061
Permit Fee:	**$500**
Name of Facility:	Veterinary Cremation Services Ltd
Person to Contact:	Louis Castelli
Address:	970 Claycroft Gahanna, OH 43230

Location of proposed air contaminant source(s) [emissions unit(s)]:
970 Claycraft Rd.
Gahanna, **Ohio**

Description of proposed emissions unit(s):
Animal cremation unit model CAC300 Therm Tec Inc.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(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
PE	1.3

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 - Animal crematory, 300 pounds of remains per hour with an afterburner	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.30 pound per hour and 1.3 tons per year. Visible PE from the afterburner stack shall not exceed 5% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B)&(C). See section A.2.a.below.
	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-09(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-09(C)	See section A.2.b.below.

2. Additional Terms and Conditions

2.a The hourly and annual criteria pollutant emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit as vented to the afterburner. Therefore, only the charge rate and the parametric monitoring, record keeping and reporting requirements of the afterburner are necessary to ensure compliance with these emission limitations.

2.b The animal crematory incinerator, including all associated equipment, stacks and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

2.c The animal crematory , including all associated equipment and grounds, shall be designed, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

B. Operational Restrictions

1. The charge rate shall not exceed 300 pounds of remains per hour.

2. Ashes to be removed from the primary chamber on a daily basis.

3. The stack shall be designed to minimize any building down wash impacts from emissions and/or odors on employees and nearby residences. The design shall meet good engineering practices so as not to result in excessive concentrations of air contaminants and/or odors in locations at, near, or in such a configuration, as to affect any air intake for heating and cooling of buildings or at operable windows or doors.

4. All material shall be incinerated in a controlled air, multi-chamber incinerator, or equivalent technology as approved by the Director, which provides complete combustion of the remains, excluding metallic items, to carbonized or mineralized ash. Any ash that does not meet this criterion shall be re-incinerated.

5. This incinerator shall be operated only by properly trained personnel. A copy of all the training records for each operator shall be maintained on file as long as that operator is employed for that job and shall be available to the Central District Office upon request.

6. The animal crematory shall be installed, operated, and maintained in accordance with the manufacturer's specifications. The secondary combustion chamber shall be designed to have a residence time of not less than 1/2-second at a minimum of 1,600 degrees Fahrenheit, as measured by the secondary chamber indicator, before ignition of the burner to start cremation.

a. During start-up, the temperature controller for the secondary chamber shall be set at a minimum of 1600 degrees Fahrenheit; and

b. for the first cremation of the day, or for a subsequent cremation after the unit has entered or completed the cool-down state, the temperature must reach a minimum of 1600 degrees Fahrenheit, as measured by the secondary chamber indicator, before ignition of the burner to start the cremation.

7. The incinerator shall not be operated unless the temperature monitoring devices are operating properly.

8. The permittee shall not charge the incinerator with "infectious waste" as defined in OAC rule 3745-75-01(C)(5).

9. The permittee shall not incinerate any packaging material or waste not considered pathological (type four waste).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and maintain a continuous temperature monitor which measures the secondary combustion chamber temperature, in degrees Fahrenheit. The monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.

2. The temperature shall be recorded at the start of each combustion cycle (when charge is added to the chamber) and every thirty minutes until the combustion is complete.

3. The permittee shall record and maintain daily record of the following information for emissions unit N001:

a. for batch feed operations:

i. for each cremation, the temperature of the secondary chamber must be recorded just prior to main burner ignition;

ii. the weight of each charge; and

iii. the time of each charge.

b. For continuous or intermittent feed operations, a scale shall be installed near this incinerator to weigh all of the material charged to the unit. A log shall be kept to record the amount of material charged to this unit on a pounds per hour basis. Alternative arrangements may be approved by the Director provided they can be shown to be of equivalent effectiveness as a method of regulating flow into the incinerator and generating a permanent record of charging rates.

4. The permittee shall record each period of downtime for the afterburner and monitoring equipment for each day when the crematory was operated.

5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also noted the following in the operation log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

6. The permittee shall have this incinerator inspected quarterly using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written report identifying any needed repairs to the unit. If repairs are needed, the incinerator shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit. These repairs shall be completed within 30 days of the inspection. All inspection and repair reports shall be kept by the permittee for a period of 5 years and shall be made available to the Central District Office upon request.

D. Reporting Requirements

1. If a time period longer than 30 days is needed to complete the repairs as specified in the recordkeeping section of this permit, the Central District Office shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished within the required time period.

2. The permittee shall submit quarterly deviation (excursion) reports within 30 days of when the deviations occur, which provide the following information for each period during which the secondary combustion chamber exhaust gas temperature fell below the applicable limitations:

a. the date of the excursion;

b. the time interval over which the excursion occurred;
c. the temperature values during the excursion;
d. the cause(s) for the excursion; and
e. the corrective action which has been or will be taken to prevent similar excursions in the future.

3. The permittee shall submit quarterly deviation (excursion) reports which provide an identification of all hours of operation during which the charge rate exceeded the incinerator's design capacity, including the actual charge rates for all such hours of operation.

4. The quarterly deviation reports along shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   PE shall not exceed 0.30 pound per hour.

   Applicable Compliance Method:
   This limit is based on the maximum rated capacity of the emissions unit (300 pounds of waste per hour) multiplied by the allowable emission limit of 0.10 pound particulate/100 pounds charged.

   b. Emission Limitation:
   PE shall not exceed 1.3 ton per year.

   Applicable Compliance Method:
   This limit is based on the maximum rated capacity of the emissions unit (300 pounds of waste per hour) multiplied by the allowable emission limit of 0.10 pounds particulate/100 pounds charged. The result (0.3 lb particulate per hour), is then multiplied by the maximum operating schedule of 8760 hours per year, divided by 2,000 pounds per ton.

   c. Emission Limitation:
   Particulate emissions shall not exceed 0.10 pound/100 pounds of material charged.

   Applicable Compliance Method:
   If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. Emission Limitation:
   Visible emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

   Applicable Compliance Method:
   If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

F. Miscellaneous Requirements

None