



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
LAKE 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: 02-15553

DATE: 9/20/2001

Behm Family Funeral Homes Inc
Ford Behm
26 River Street
Madison, OH 44057

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/20/2001
Effective Date: 9/20/2001**

FINAL PERMIT TO INSTALL 02-15553

Application Number: 02-15553
APS Premise Number: 0243071336
Permit Fee: **\$100**
Name of Facility: Behm Family Funeral Homes Inc
Person to Contact: Ford Behm
Address: 26 River Street
Madison, OH 44057

Location of proposed air contaminant source(s) [emissions unit(s)]:
**26 River Street
Madison, Ohio**

Description of proposed emissions unit(s):
Crematory.

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 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

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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

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.22
OC	0.02
NOx	1.49
CO	0.02
SO ₂	0.20

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Human remains incinerator (K001) Power-Pak II Ultra.	OAC 3745-31-05(A)(3)	PM: 0.22 tons per year OC: 0.01 lbs/hr, 0.02 tons per year NOx: 0.68 lbs/hr, 1.49 tons per year CO: 0.007lbs/hr, 0.02 tons per year SO ₂ : 0.09 lbs/hr, 0.20 tons per year
	OAC 3745-17-09(B)	0.10 pound of particulate matter per 100 pounds of material charged.
	OAC 3745-17-07(A)	Less stringent than OAC 3745-31- 05(A)(3)
	OAC 3745-17-09(C)	See A.2.b.

2. Additional Terms and Conditions

- 2.a** Visible emissions shall not exceed five (5) percent opacity as a six-minute (6) average except for six (6) minutes in any sixty (60) minute period during which the opacity shall not exceed ten (10) percent.
- 2.b** This incinerator and all associated equipment and grounds shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

B. Operational Restrictions

1. This incinerator shall be operated only by personnel adequately trained.

2. The permittee shall operate and maintain 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.
3. This unit shall not be used to dispose of infectious or medical waste as defined in OAC 3745-75-01(C)(4).
4. During a cremation burn, the temperature of the secondary combustion chamber shall be maintained at a minimum of 1600 degrees Fahrenheit.
5. The secondary combustion chamber shall be pre-heated for at least thirty (30) minutes prior to ignition of the charge and shall continue to be used during the entire burn cycle.
6. The "Visible Emissions Alarm" shall be operated at all times the incinerator is in operation and shall be maintained in accordance with any and all recommendations of the manufacturer.

C. Monitoring and/or Recordkeeping Requirements

1. 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 manufacturers recommendations, instructions, and applicable operating manual(s).
2. 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.
3. The permittee shall operate and maintain a continuous visible emissions alarm located inside the exit stack. The visible emissions alarm shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and applicable operating manual(s).

D. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify all periods of time during which the secondary combustion chamber exhaust gas temperatures did not comply with the temperature limitation specified above, including:
 - a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;

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Facility ID: 0243071336

Emissions Unit ID: K001

- 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.

This report shall be sent to the Ohio EPA, Northeast District Office within forty-five (45) days of the excursion.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 and A.2. of these Special Terms and Conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.10 pound of Particulate Matter per 100 pounds of material charged.

Applicable Compliance Method: If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(8) (Method 1-5, 40 CFR 60, Appendix A).

- b. Emission Limitation: 0.22 tons Particulate Matter per year.

Applicable Compliance Method: Compliance with this emission limit shall be demonstrated by utilizing the following equation:

$$EPMYR = 0.1 \text{ (lbs/hour)} \times 1/2000 \text{ (tons/lbs)} \times 4380 \text{ (hours/year)}$$

where:

0.1 pounds of particulate matter per hour based on emission limitation of 0.001 lb/lb charged from OAC 3745-17-09(B)

100 lb/hr maximum allowable charging of incinerator.

EPMYR = emission of Particulate Matter, in tons per year.

- c. Emission Limitation: Visible particulate emissions shall not exceed five percent, as a six-minute average except for six minutes in any sixty minute period during which the opacity shall not exceed ten percent.

Applicable Compliance Method: USEPA Method 9 (40 CFR Part 60, Appendix A.)

2. Emission Limitation: 0.01 pound of Organic Compounds per hour, and 0.02 tons per year.

Applicable Compliance Method: Compliance with these emission limits shall be demonstrated by utilizing the following equations:

$$EOCYR = 0.01 \text{ (lb/hr)} \times 1/2000 \text{ (tons/lbs)} \times 4380 \text{ (hours/year)}$$

where:

Emission factor of 0.01 lbs Organic Compound per hour based on similar emission source as stated in PTI application.

100 lbs/hour is maximum capacity of incinerator; and

EOCYR = emission of Organic Compounds, in tons per year.

3. Emission Limitation: 0.68 pound of Nitrogen Oxides per hour and 1.49 tons per year.

Applicable Compliance Method: Compliance with these emission limits shall be demonstrated by utilizing the following equations:

$$\text{ENOYR} = 0.68 \text{ (lbs/hr)} \times 1/2000 \text{ (tons/lbs)} \times 4380 \text{ (hours/year)}$$

where:

Emission factor of 0.68 lbs Nitrogen Oxide compounds per hour based on similar emission source as stated in PTI application.

100 lbs/hour is maximum capacity of incinerator; and

ENOYR = emission of Nitrogen Oxide compounds, in tons per year.

4. Emission Limitation: 0.007 pound of Carbon Monoxide per hour and 0.02 ton per year.

Applicable Compliance Method: Compliance with these emission limits shall be demonstrated by utilizing the following equations:

$$\text{ECOYR} = 0.007 \text{ (lb/hr)} \times 1/2000 \text{ (tons/lbs)} \times 4380 \text{ (hours/year)}$$

where:

Emission factor of 0.007 lbs Carbon Monoxide compounds per hour based on similar emission source as stated in PTI application.

100 lbs/hour is maximum capacity of incinerator; and

ECOYR = emissions of carbon monoxide, in tons per year.

5. Emission Limitation: 0.09 pound of Sulfur dioxide per hour and 0.20 tons per year;

Applicable Compliance Method: Compliance with these emission limits shall be demonstrated by utilizing the following equations:

$$\text{ESOYR} = 0.09 \text{ (lb/hr)} \times 1/2000 \text{ (tons/lbs)} \times 4380 \text{ (hours/year)}$$

where:

Emission factor of 0.09 lbs Sulfur Dioxide compounds per hour based on similar emission source as stated in PTI application.

100 lbs/hour is maximum capacity of incinerator; and

ESOYR = emissions of carbon monoxide, in tons per year.

F. Miscellaneous Requirements

1. A copy of these Special Terms and Conditions shall be visibly posted near the incinerator.

NEW SOURCE REVIEW FORM B

PTI Number: 02-15553 Facility ID: 0243071336

FACILITY NAME Behm Family Funeral Homes Inc

FACILITY DESCRIPTION Crematory CITY/TWP Madison

SIC CODE 7261 SCC CODE 5-02-005-05 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Human remains incinerator

DATE INSTALLED 12/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.1 lbs/hr	0.1	0.1 lbs/hr	0.22
PM ₁₀					
Sulfur Dioxide	attainment	0.09 lbs/hr	0.09	0.09 lbs/hr	0.20
Organic Compounds	attainment	0.01 lbs/hr	0.01	0.10 lbs/hr	0.02
Nitrogen Oxides	attainment	0.68 lbs/hr	0.68	0.68 lbs/hr	1.49
Carbon Monoxide	attainment	0.007 lbs/hr	0.007	0.007 lbs/hr	0.02
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	<input type="checkbox"/>	000000c.wpd	<input checked="" type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

NEW SOURCE REVIEW FORM B

PTI Number: 02-15553 Facility ID: 0243071336

FACILITY NAME Behm Family Funeral Homes Inc

FACILITY DESCRIPTION Crematory CITY/TWP Madison

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

- A. Source Description
Human remains incinerator located in the Village of Madison, Lake County, Ohio.
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.22
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NOx	1.49
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PTI Number: 02-15553

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Madison