State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL MODIFICATION
BUTLER COUNTY
Application No: 14-05746
Fac ID: 1409010843

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/22/2008

Woodside Cemetery
Fred Wehr
1401 South Woodside Boulevard
Middletown, OH 45044

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **HCDES**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05746

Application Number: 14-05746

Facility ID: 1409010843

Permit Fee: **$0**

Name of Facility: Woodside Cemetery

Person to Contact: Fred Wehr

Address: 1401 South Woodside Boulevard
Middletown, OH 45044

Location of proposed air contaminant source(s) [emissions unit(s)]:
1401 South Woodside Boulevard
Middletown, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to correctly identify the human cremation chamber as emissions unit N002.

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

Chris Korleski
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 (i.e., postmarked) quarterly 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/PM10	0.31
NOx	4.38
CO	0.02
SO2	0.67
OC	0.02

\\cnas\dapc\prod\attachments\VFacilities/1409010843/Permits/115086\517451.wpd

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 - (N002) - 150 Pound per Hour Human Cremation Incinerator/Chamber

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.31 ton per year. Particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.07 lb/hr and 0.31 ton per year. Nitrogen Oxide (NOx) emissions shall not exceed 1.0 pound per hour and 4.38 tons per year. Carbon Monoxide (CO) emissions shall not exceed 0.005 pound per hour and 0.02 tons per year. Sulfur Dioxide (SO2) emissions shall not exceed 0.15 pound per hour and 0.67 ton per year. Organic Compound (OC) emissions shall not exceed 0.004 pound per hour and 0.02 ton per year. Visible particulate emissions from the stack shall not exceed 5% opacity as a six-minute average, except for one six-minute period in any continuous sixty-minute period during which the opacity shall not exceed 10% as a six-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(C) and OAC rule 3745-21-08(B). See terms and conditions B.1 - B.3.

\\cnas\dapc\prod\attachments\VFacilities/1409010843/Permits/115086\517451.wpd

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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 3745-17-07(A)	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 term and condition A.2.c
OAC rule 3745-21-08(B)	See term and condition A.2.d

2. Additional Terms and Conditions

2.a The hourly and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the permitted visible emissions limitations, mass emissions rates, maintenance of the secondary combustion chamber temperature above 1600 degrees F and compliance with the restrictions pertaining to the type of waste combusted.

2.c Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

2.d The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

\\cnas\dapc\prod\attachments\Facilities/1409010843/Permits/115086\517451.wpd

1. The secondary combustion chamber temperature shall be maintained at 1600 degrees Fahrenheit or greater during each cremation cycle.

2. The type of waste to be burned in this emissions unit shall be limited to type zero and four waste (pathological waste).

3. Proper operating procedures shall be employed at all times during the operation of this emissions unit. These procedures shall include a pre-heating cycle as specified by the manufacturer, or an equivalent pre-heating system. The preheated temperature for the secondary combustion chamber of the incinerator shall be at least 1600 degrees Fahrenheit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the secondary combustion chamber temperature, in degrees Fahrenheit, during each cremation cycle. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. Any modifications to the manufacturer's recommendations, deemed necessary by the permittee, shall not be made without the prior written consent of the Hamilton County Department of Environmental Services. The monitoring and recording devices shall be capable of accurately measuring the desired parameter.

2. The permittee shall maintain a log of all periods of time when the emissions unit is in operation and the secondary combustion chamber temperature was less than 1600 degrees Fahrenheit.

3. The permittee shall maintain a log of all periods of time when the emissions unit is used to combust waste types other than those permitted in term and condition B.2.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of all periods of time during which the secondary combustion chamber temperature was below 1600 degrees Fahrenheit during operation of this emissions unit. The notification shall include a copy of such record, including any corrective action(s) taken, and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of all periods of time during which the emissions unit is used to combust waste types other than those permitted in term and condition B.2. The notification shall include a copy of such record, including any corrective action(s) taken, and shall be sent to the

\\cnas\dapc\prod\attachments\/Facilities/1409010843/Permits/115086\517451.wpd

Hamilton County Department of Environmental Services within 45 days after the deviation occurs.

3. The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

\\cnas\dapc\prod\attachments\VFacilities/1409010843/Permits/115086\517451.wpd

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emissions Limitations:
   Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.31 ton per year.
   Particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.07 lb/hr and 0.31 ton per year.

   Applicable Compliance Method:
   The 0.07 pound per hour emissions limitation is based on a source test of an identical unit, as provided in the PTI application 14-05746 submitted on July 18, 2005. The 0.31 TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

   b. Emissions Limitations:
   Nitrogen Oxide (NOx) emissions shall not exceed 1.0 pound per hour and 4.38 tons per year.

   Applicable Compliance Method:
   The 1.0 pound per hour emissions limitation is based on a source test of an identical unit, as provided in the PTI application 14-05746 submitted on July 18, 2005. The 4.38 TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

   c. Emissions Limitations:
   Carbon Monoxide (CO) emissions shall not exceed 0.005 pound per hour and 0.02 tons per year.

   Applicable Compliance Method:
   The 0.005 pound per hour emissions limitation is based on a source test of an identical unit, as provided in the PTI application 14-05746 submitted on July 18, 2005. The 0.02 TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

   d. Emissions Limitations:

\\cnas\dapc\prod\attachments\/Facilities/1409010843/Permits/115086\517451.wpd

Organic Compound (OC) emissions shall not exceed 0.004 pound per hour and 0.02 ton per year.
Applicable Compliance Method:
The 0.004 pound per hour emissions limitation is based on a source test of an identical unit, as provided in the PTI application 14-05746 submitted on July 18, 2005. The 0.02 TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. Emissions Limitations:
Sulfur Dioxide (SO2) emissions shall not exceed 0.15 pound per hour and 0.67 ton per year.

Applicable Compliance Method:
The 0.15 pound per hour emissions limitation is based on a source test of an identical unit, as provided in the PTI application 14-05746 submitted on July 18, 2005. The 0.67 TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

f. Emissions Limitation:
Visible particulate emissions from the stack shall not exceed 5% opacity as a six-minute average, except for one six-minute period in any continuous sixty-minute period during which the opacity shall not exceed 10% as a six-minute average.

Applicable Compliance Method:

Compliance with the visible emissions limitation stated in term and condition A.1. shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Compliance with the secondary combustion chamber minimum temperature requirement shall be demonstrated by the monitoring and record keeping requirements specified in terms and conditions C.1. and C.2.

3. Compliance with the type of waste combusted restriction shall be demonstrated by the record keeping requirements specified in term and condition C.3.

4. The permittee shall conduct, or have conducted, a one hour visible particulate emissions test for this emissions unit in accordance with the following requirements:

a. the visible particulate emissions test shall be conducted within 6 months after startup of this emissions unit;

\\cnas\dapc\prod\attachments\Facilities/1409010843/Permits/115086\517451.wpd

b. the visible particulate emissions test shall be conducted to demonstrate compliance with the visible particulate limitation outlined in this permit;

c. the following test method(s) shall be employed to demonstrate compliance with the visible particulate limitation: Method 9 as outlined in 40 CFR Part 60, Appendix A;

d. the Method 9 test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services;

e. the visible particulate emissions test shall be conducted by a certified visible emissions evaluator who has met the specifications of Method 9 outlined in 40 CFR Part 60, Appendix A; and

f. if the Method 9 test fails to demonstrate compliance with the visible particulate limitation outlined in this permit, then stack testing shall be conducted using Method 5 from 40 CFR Part 60 to demonstrate compliance with the limit of 0.10 pound PM/100 pounds material charged.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

A comprehensive written report on the results of the visible particulate emissions test shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services. This report shall contain the following:

a. a copy of the completed visible emissions evaluation form; and

b. a copy of the visible emissions evaluator certification.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install 14-05746 issued on 9/13/2005.

\\cnas\dapc\prod\attachments\VFacilities/1409010843/Permits/115086\517451.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-05746 Facility ID: 1409010843

FACILITY NAME Woodside Cemetery

FACILITY DESCRIPTION Administrative modification to correctly identify the human cremation chamber as emissions unit N002.

CITY/TWP Middletown

SIC CODE 7261 SCC CODE 5-01-005-05 EMISSIONS UNIT ID N002

EMISSIONS UNIT DESCRIPTION Human cremation chamber

DATE INSTALLED 2005

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		0.07 lb/hr	0.15	0.07 lb/hr	0.31
PM_{10}		0.07 lb/hr	0.15	0.07 lb/hr	0.31
Sulfur Dioxide		0.15 lb/hr	0.33	0.15 lb/hr	0.67
Organic Compounds	nonattainment	0.004 lb/hr	0.01	0.004 lb/hr	0.02
Nitrogen Oxides		1.0 lb/hr	2.19	1.0 lb/hr	4.38
Carbon Monoxide		0.005 lb/hr	0.01	0.005 lb/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?

BAT is determined to be the use of a secondary combustion chamber with temperature maintained above 1600 degrees F, VE limitations and mass emission rates.

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: na

\\cnas\dapc\prod\attachments\/Facilities/1409010843/Permits/115086\517451.wpd