Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

2/3/2012

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

MARK PFEIFER
PFEIFER FUNERAL HOME AND CREMATORY
7915 E. MAIN STREET
REYNOLDSBURG, OH 43068

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125193083
Permit Number: P0083495
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to “Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
PFEIFER FUNERAL HOME AND CREMATORY

Facility ID:	0125193083
Permit Number:	P0083495
Permit Type:	Renewal
Issued:	2/3/2012
Effective:	2/3/2012
Expiration:	2/3/2022

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
PFEIFER FUNERAL HOME AND CREMATORY

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Authorization

Facility ID: 0125193083
Application Number(s): A0013870
Permit Number: P0083495
Permit Description: PTIO Renewal for 150 lb/hr Human Crematory
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 2/3/2012
Effective Date: 2/3/2012
Expiration Date: 2/3/2022
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

PFEIFER FUNERAL HOME AND CREMATORY
7915 EAST MAIN STREET
REYNOLDSBURG, OH 43068

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0083495
Permit Description: PTIO Renewal for 150 lb/hr Human Crematory

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**N001**
Company Equipment ID:	B&L Human Crematory
Superseded Permit Number:	01-08956
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. N001, B&L Human Crematory

Operations, Property and/or Equipment Description:

150 lb/hr Human Crematory

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), (PTI No. 01-08956, issued 3/31/2005)	Emissions shall not exceed: 0.14 lbs/hr of particulate emissions (PE) and 0.61 tons/yr. 0.012 lbs/hr of carbon monoxide (CO) and 0.05 tons/yr. 0.38 lbs/hr of oxides of nitrogen (NO_x) and 1.7 tons/yr. 0.003 lbs/hr of organic compounds (VOC) and 0.01 tons/yr. 0.11 lbs/hr of sulfur dioxide (SO_x) and 0.48 tons/yr. Visible particulate emissions from the afterburner stack shall not exceed 10% opacity, as a 6-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). See b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
c.	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pounds per 100 pounds of charge.
d.	OAC rule 3745-17-09(C)	See b)(2)b.

(2) Additional Terms and Conditions

a. The hourly and annual emission limitations were established to reflect the potential to emit for this emissions unit. Therefore, additional monitoring, record keeping and/or reporting requirements are not necessary to ensure compliance with these emission limitations.

b. This emissions unit and all associated equipment and grounds, shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.

c) Operational Restrictions

(1) The charge rate shall not exceed 150 pounds of human waste per hour.

(2) The crematory shall not be charged until the temperature of the secondary combustion chamber reaches 1,600 degrees Fahrenheit. The secondary combustion chamber shall allow for a 1-second (or more) retention time at 1,600 degrees Fahrenheit.

(3) The temperature monitoring device for the secondary combustion chamber must be maintained and operated properly.

(4) This incinerator is to be operated in accordance with the manufacturer's instructions on start-up and during maintenance and repairs. It is to be operated only by personnel adequately instructed in these procedures.

(5) This incinerator shall not be used to dispose of any hazardous or infectious wastes. The applicant shall have such waste disposed of in accordance with applicable Federal, state and local regulations.

(6) The permittee shall inspect this incinerator semi-annually using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall

include a written report identifying and 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. If a time period longer than 30 days is needed to complete the repairs, the Central District Office, Division of Air Pollution Control, 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. 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, Division of Air Pollution Control, upon request.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the cremation unit is in operation and when the weather conditions allow, for any visible particulate emissions from the afterburner stack serving this cremation 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 note the following in the operations log:

a. the color of the emissions;

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

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

(2) The permittee shall operate and maintain a temperature monitor which measures the combustion temperature within the secondary chamber when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring device shall be capable of accurately measuring the desired parameter. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

(3) A written log shall be kept to record the estimated body and container weights and the cremation time. 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) A logbook shall be maintained for each continuous temperature and/or opacity monitoring system installed on this incinerator to document all activities involving the monitoring systems. Appropriate records should include, as a minimum, preventive maintenance, quality assurance and corrective action activities. The logbook shall be kept on file for a period of 5 years and shall be made available for inspection by the Ohio EPA or its authorized representatives at any reasonable time.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Central District Office, Division of Air Pollution Control by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting

period of no more than twelve-months for each air contaminant source identified in this permit. The PER shall include identification of the following:

a. the day(s) and time(s) during which the afterburner temperature dropped below 1600 degrees Fahrenheit during operation of the cremation unit and the corrective actions that were taken to achieve proper operating temperature; and

b. the day(s) during which visible particulate emissions were observed from the afterburner stack and the corrective actions that were taken to eliminate the visible emissions.

It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

0.14 pounds PE per hour and 0.61 tons per year.

<u>Applicable Compliance Method:</u>

The pounds per hour data for PE was derived from a stack test of a similar emissions unit. All emissions data was provided by the manufacturer and the stack test data was derived from emissions testing performed on their products.

(0.14 lb PE/hr) X (8760 hrs/yr) X (1 ton/2,000lbs) = 0.61 tons PE / year

If required, the permittee shall demonstrated compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8).

b. <u>Emission Limitation:</u>

0.012 pounds CO per hour and 0.05 tons per year.

<u>Applicable Compliance Method:</u>

The pounds per hour data for CO was derived from a stack test of a similar emissions unit. All emissions data was provided by the manufacturer and the stack test data was derived from emissions testing performed on their products.

(0.012 lb CO/hr) X (8760 hrs/yr) X (1 ton/2,000 lbs) = 0.05 tons CO / year

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 through 4 and 10.

c. Emission Limitation:

0.38 pounds NO_x per hour and 1.7 tons per year.

Applicable Compliance Method:

The pounds per hour data for NO_x was derived from a stack test of a similar emissions unit. All emissions data was provided by the manufacturer and the stack test data was derived from emissions testing performed on their products.

(0.38 lb NO_x/hr) X (8760 hrs/yr) X (1 ton/2,000 lbs) = 1.7 tons NO_x / year

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 through 4 and 7E.

d. Emission Limitation:

0.003 pounds VOC per hour and 0.01 tons per year.

Applicable Compliance Method:

The pounds per hour data for VOC was derived from a stack test of a similar emissions unit. All emissions data was provided by the manufacturer and the stack test data was derived from emissions testing performed on their products.

(0.003 lb VOC/hr) X (8760 hrs/yr) X (1 ton/2,000 lbs) = 0.01 tons VOC / year

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 through 4 and 25a.

e. Emission Limitation:

0.11 pounds SO_2 per hour and 0.48 tons per year.

Applicable Compliance Method:

The pounds per hour data for SO_2 was derived from a stack test of a similar emissions unit. All emissions data was provided by the manufacturer and the stack test data was derived from emissions testing performed on their products.

(0.11 lb SOx/hr) X (8760 hrs/yr) X (1 ton/2000 lbs) = 0.48 tons SO_2 / year

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 through 4 and 6C.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) In accordance with ORC section 4717.13(A)(9), the permittee shall not cremate animals in a cremation chamber in which dead human bodies or body parts are cremated and the permittee shall not cremate dead human bodies or human body parts in a cremation chamber in which animals are cremated.

(2) This emissions unit is subject to OAC rule 3745-15-07, which requires that "…the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.