State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LUCAS 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: 04-01438
Fac ID: 0448011514
DATE: 3/14/2006

Toledo Cremation Service
Steve Turner
2121 Tracy Road
Northwood, OH 43619

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** **TDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 3/14/2006**
Terms and Conditions	**Effective Date: 3/14/2006**

FINAL PERMIT TO INSTALL 04-01438

Application Number:	04-01438
Facility ID:	0448011514
Permit Fee:	**$500**
Name of Facility:	Toledo Cremation Service
Person to Contact:	Steve Turner
Address:	2121 Tracy Road Northwood, OH 43619

Location of proposed air contaminant source(s) [emissions unit(s)]:
1021 Warwick Avenue
Toledo, **Ohio**

Description of proposed emissions unit(s):
Cremator 3 - new installation.

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
CO	0.15
PE	0.66

Emissions Unit ID: **N003**

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
N003 - natural gas human remains crematory, rated at 150 pounds of remains per hour with an afterburner	OAC rule 3745-31-05(A)(3)	The emissions of carbon monoxide (CO) shall not exceed 0.035 pound per hour and 0.15 ton per year. Particulate emissions (PE) shall not exceed 0.10 pound per 100 pounds of waste charged and 0.66 ton per year. Visible emissions from the afterburner shall not exceed 5% opacity as a 6-minute average.
	OAC rule 3745-17-07(A)(1)	See Section II.A.2.a and b.
	OAC rule 3745-17-09(B)	See Section II.A.2.c.
	OAC rule 3745-17-09(C)	See Section II.A.2.c.
	OAC rule 3745-21-08(B)	See Section II.A.2.d. See Section II.A.2.e.

2. Additional Terms and Conditions

2.a The permittee shall install, adjust, operate and maintain the emissions unit

covered under this permit in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

2.b The requirement of this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-09(B), OAC rule 3745-17-09(C), and OAC rule 3745-21-08(B).

2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

2.e The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all the applicable rules.

On November 5, 2002, OAC rule 3745-21-08(B) 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 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

1. The charge rate shall not exceed 150 pounds of remains per hour.

2. Ashes shall 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 configurations, as to affect any air intake for heating and cooling of buildings or at operable windows or doors.

4. All materials shall be incinerated in a controlled air, multi-chamber incinerator, or equivalent technology as approved the by 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 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 Toledo Division of Environmental Services upon request.

6. The crematory shall be installed, operated and maintained in accordance with the manufacturer's specifications. The secondary chamber shall be designed to have a residence time of not less than 1 second at a minimum 1600 degrees Fahrenheit.

   Throughout the combustion process in the primary chamber, the temperature of the secondary burner shall be maintained at a minimum of 1600 degrees Fahrenheit. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 degrees Fahrenheit.

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(B)(27).

9. 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.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain a continuous temperature monitor and recorder. The monitor shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations to record temperature at the point beyond where 1 second gas residence time is obtained in the secondary chamber combustion zone. Units shall be in degrees Fahrenheit.

2. The permittee shall record and maintain daily records of the following information for this emissions unit:

   a. Operator name;
   b. The weight of each charge; and

c. The time each charge begins.

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

4. 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 note the following in the operations log:

   a. The color of the emissions;
   b. The total duration of any visible emissions incident; and
   c. Any corrective actions taken to eliminate the visible emissions.

5. The permittee shall have this incinerator inspected quarterly using preventative 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 emissions 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 for inspection by the Ohio EPA or its authorized representatives at any time.

6. A logbook shall be maintained for the continuous temperature monitoring system installed on this emissions unit. Appropriate records shall include, as a minimum, 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 time.

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 Toledo Division of Environmental Services 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 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. <u>Emission Limitation:</u>

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

The emissions of CO shall not exceed 0.035 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

The emissions of CO shall not exceed 0.15 ton per year.

Applicable Compliance Method:

The 0.15 TPY emission limitation was developed by multiplying the 0.035 lb/hour emission rate by a maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

Particulate emissions shall not exceed 0.10 pound per 100 pounds of waste charged.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission

limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 using the procedures specified in OAC rule 3745-17-03(B)(8). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

Particulate emissions shall not exceed 0.66 ton per year.

Applicable Compliance Method:

The 0.66 TPY emission limitation was developed by multiplying the maximum rated capacity of the emissions unit (150 lbs of waste/hr) by the allowable emission limit of 0.10 lb particulate/100 lbs charged. The result (0.15 lb particulate/hr) is then multiplied by the maximum operating schedule of 8,760 hrs/yr, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

None.