

Facility ID: 0448011514 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448011514 Emissions Unit ID: N003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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) OAC rule 3745-17-09(B) OAC rule 3745-17-09(C) OAC rule 3745-21-08(B)	See Section II.A.2.a and b. See Section II.A.2.c. See Section II.A.2.c. See Section II.A.2.d. See Section II.A.2.e.

2. Additional Terms and Conditions

- (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). The requirement of this rule also includes compliance with the requirements of OAC rules 3745-17-09 (C), and 3745-21-08(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). The incinerator, including all associated equipment, stacks and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors. 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 by the Director, which provides complete combustion of the remains, excluding metallic items, to

carbonized or mineralized ash. Any ash that does not meet this criterion shall be re-incinerated.

5. This incinerator shall be operated only by properly trained personnel. A copy of all 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 Record Keeping 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:
Emission Limitation:

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.

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.

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.

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.

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

1. None