State of Ohio Environmental Protection Agency

Fairfield County **RE: Final Permit to Install**

Street ddress:
1800 \ 49
Colum 16-1049

Application No: **01-7862**

DATE: February 18, 1999

Dwayne R. Spence Funeral Home
C. Jeffrey Spence
550 Hill Road N.
Pickerington, OH 43147

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, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: USEPA
Ohio EPA, Central District Office

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Application Number: 01-7862

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APS Premise Number: 0123000250

Permit Fee: **$100.00**

Name of Facility: Dwayne R. Spence Funeral Home

Person to Contact: C. Jeffrey Spence

Address: 550 Hill Road N.
Pickerington, OH 43147

Location of proposed air contaminant source(s) [emissions unit(s)]:
550 HILL ROAD NORTH
PICKERINGTON, OH

Description of proposed emissions unit(s):
CREMATORY - UNIT NO 2.

Date of Issuance: February 18, 1999

Effective Date: February 18, 1999

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of

Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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
$N0_x$	2.98
CO	.09
PM	.44
$S0_2$	.39
VOC	.044

Part II: Special Terms and Conditions

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
Crematory- Unit # 2 (100 lbs/hr)	OAC 3745-31-05	Particulate emissions shall not exceed .44 ton per year. NO_x emissions shall not exceed .68 pound per hour and 2.98 tons per year. CO emissions shall not exceed .02 pound per hour and .09 ton per year. VOC emissions shall not exceed .01 pound per hour and .044 ton per year. Sulfur dioxide emissions shall not exceed .09 pound per hour and .39 ton per year.
	OAC 3745-17-07	Opacity shall not exceed 20% as a six minute average, except as provided by rule.
	OAC rule 3745-17-09	Particulate emissions shall not exceed .10 pound per 100 pounds of material

charged.

2. Additional Terms and Conditions

a. All material shall be incinerated in a controlled air, multi-chamber incinerator, or equivalent technology as approved by the Director, which provides complete combustion of the waste, excluding metallic items, to carbonized or mineralized ash. Any ash that does not meet this criterion shall be reincinerated.

b. This batch incinerator shall incorporate a lockout system which will prevent the ignition of waste until the exit gas temperature of the secondary combustion chamber reaches 1600 degrees Fahrenheit and which will prevent recharging until the combustion and burn-down cycles are complete.

c. The stack(s) for this batch incinerator shall be designed to minimize the impact of the emissions on employees, residents, visitors, and nearby residences. The design shall meet good engineering practices so as not to cause excessive concentrations of any air contaminant at any air intake for heating and cooling of any building or at operable windows or doors.

d. If this incinerator is mechanically fed, it must be equipped with an air lock system to prevent opening the incinerator to the room environment. The volume of the loading system shall be designed so as to prevent the overcharging of the unit to ensure complete combustion of the waste.

B. Operational Restrictions

1. The primary combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 800 degrees Fahrenheit. The secondary combustion chamber for this incinerator shall be operated so that the exit gas temperature is at a minimum of 1600 degrees Fahrenheit.

2. The secondary combustion chamber of this incinerator shall allow for a 1-second(or less) retention time at 1600 degrees Fahrenheit.

3. This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emission of objectionable odors.

4. The permittee shall have this incinerator inspected monthly using preventive 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 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 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 upon request.

5. This incinerator shall be operated only by properly trained personnel. A copy of all the training records for each operator shall be maintained on file for a period of 5 years and shall be immediately available to the Central District Office upon request.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the primary combustion exhaust gas temperature, the secondary combustion exhaust gas temperature, and the bypass stack temperature (if applicable) when the incinerator is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 2.5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. A scale (accurate to within one pound) shall be installed near this incinerator to weigh all of the material charged to the unit. A written log shall be kept to record the amount of material charged to this unit on a pounds per hour basis. 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.

3. A logbook shall be maintained for each continuous emissions 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the primary or secondary combustion chamber exhaust gas temperatures fall 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.

2. The permittee shall submit 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.

E. Testing Requirements

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

Emission Limitation:

VOC emissions shall not exceed .01 pound per hour and .044 ton per year.

Applicable Compliance Method:

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 1-4 and 25 or 25A.

Emission Limitation:

CO emissions shall not exceed .02 pound per hour and .09 ton per year.

Applicable Compliance Method:

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- 4 and 10.

Emission limitation:

Particulate emissions shall not exceed .10 pound per 100 pounds of material charged and .44 ton per year.

Applicable Compliance Method:

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 5 and the procedures specified in OAC rule 3745-17-03(B)(8).

Emission limitation:

$N0_x$ emissions shall not exceed .68 pound per hour and 2.98 tons per year.

Applicable Compliance Method:

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 -4 and 7E.

Emission limitation:

Sulfur dioxide emissions shall not exceed .09 pound per hour and .39 ton per year.

Applicable Compliance Method:

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 -4 and 6C.

*Note: The emission limitations established in this PTI for SO_2, VOC, $N0_x$, CO and PM are based upon emissions testing conducted on May 18, 1994 of a like unit.

Emission limitation:

20 percent opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

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

F. Miscellaneous Requirements

None.