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Facility Name: **Western Farm Pet Crematory**

Application Number: **02-2252**

Date: **December 21, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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.

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **Western Farm Pet Crematory** located in **Lorain** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
N003	BL 2000 animal cremation equipped with an afterburner: maximum capacity of 350 pounds/hour	Natural gas fired, equipped with an afterburner, and compliance with the terms and conditions of the permit	3745-31-05	PM: 0.10 pound per 100 pounds of refuse charge PM: 0.35 pound/hour, 1.53 TPY OC: 0.53 pound/hour, 2.32 TPY NO _x : 0.53 pound/hour, 2.32 TPY CO: 1.75 pounds/hour, 7.67 TPY Visible emissions shall not exceed 5 percent opacity as a 6 minute average.
			3745-17-07	Less stringent than limit from 3745-31-05.
			3745-17-09	PM: 0.10 pound per 100 pounds of refuse charge

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
N004	BL 2000 animal cremation equipped with an afterburner: maximum capacity of 350 pounds/hour	Natural gas fired, equipped with an afterburner, and compliance with the terms and conditions of the permit	3745-31-05	PM: 0.10 pound per 100 pounds of refuse charge PM: 0.35 pound/hour, 1.53 TPY OC: 0.53 pound/hour, 2.32 TPY NO _x : 0.53 pound/hour, 2.32 TPY CO: 1.75 pounds/hour, 7.67 TPY Visible emissions shall not exceed 5 percent opacity as a 6 minute average.
			3745-17-07	Less stringent than limit from 3745-31-05.
			3745-17-09	PM: 0.10 pound per 100 pounds of refuse charge

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	3.06
CO	15.34
OC	4.64
NO _x	4.64

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. Particulate emissions from emissions units N003 and N004 shall not exceed 0.10 pound per one hundred (100) pounds of liquid, semi-solid, or solid refuse and salvageable material charged.
2. Visible particulate emissions from emissions units N003 and N004 shall not exceed five percent opacity, as a six-minute average.

B. Operational Restrictions

1. Emissions units N003 and N004 shall be installed, operated, and maintained in accordance with the manufacturer's specifications. The permittee shall adhere to the emissions unit's start-up sequence, preheating procedures, and cool-down cycle:
 - a. Start-up: During start-up the temperature controller for the secondary chamber shall be set at 1600 degrees Fahrenheit.
 - b. Preheating: For the first cremation of the day, or if there has been a lapse of four hours since the previous cremation, the preheat cycle must be of sufficient duration to allow the secondary chamber to reach a temperature of 1600 degrees Fahrenheit, as measured by the afterburner temperature indicator, before igniting the main burner to start the cremation.
 - c. Cool-down: If more than one cremation per day is scheduled, the company shall allow for a sufficient cool-down period between cremations.
2. Emissions units N003 and N004 shall not be operated unless their respective temperature and opacity monitoring devices are operating properly.

3. The permittee shall not charge emissions units N003 and N004 with "infectious waste" as defined in OAC rule 3745-75-01(C)(4).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and properly maintain monitoring devices that accurately measure the temperature of the secondary chamber (afterburner) for each emissions units N003 and N004.
2. The permittee shall maintain daily records of the following information for each emissions units N003 and N004:
 - a. for the first cremation of the day - the temperature of the secondary chamber recorded just prior to the main burner ignition;
 - b. for the second, third, or subsequent cremations - the temperature of the secondary chamber recorded just prior to starting the preheat cycle and the temperature of the secondary chamber recorded just prior to main burner ignition; and,
 - c. the weight of each charge.

These records shall be maintained in the company's files at the facility for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for all hours of operation during which the charge rate exceeded 350 pounds per hour, including the actual charge rates for all such hours of operation for each emissions units N003 and N004.
2. The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the secondary combustion chamber exhaust gas temperatures for each emissions units N003 and N004 falls 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 deviation (excursions) reports on a semi-annual basis, i.e., January 31 and July 31.

E. Testing Requirements

1. Compliance with the particulate matter emission limitation, shall be demonstrated by using USEPA Method 5, as specified in 40 CFR 60, Appendix A.
2. Should the facility need to show compliance with the visible emission limitations of this permit, Method 9, as specified in 40 CFR 60, Appendix A, shall be used.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit (N003 or N004) in accordance with the following requirements:
 - a. the emission testing shall be conducted within ninety (90) days of start-up operations;
 - b. the emission testing shall be conducted to demonstrate compliance with the 0.10 pound of particulate matter per 100 pounds of material charged emission limit;
 - c. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. 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, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

4. Emission Limitation

0.53 pound of Organic Compounds per hour

Applicable Compliance Method

Compliance with this emission limit shall be demonstrated by utilizing the following equation:

$$E = 3.0 \text{ (lbs. OC/ton)} \times 350 \text{ (lbs./hour)} \times 1/2000 \text{ (tons/lbs.)}$$

where: 3.0 pounds of organic compounds per ton is the emission factor taken from AP-42, "Section 2.1 Refuse Combustion", Table 2.1-12. and 350 lbs/hour is maximum capacity of incinerator and E is the emission rate in pounds per hour.

5. Emission Limitation

0.53 pound of Nitrogen Oxides per hour

Applicable Compliance Method

Compliance with this emission limit shall be demonstrated by utilizing the following equation:

$$E = 3.0 \text{ (lbs. NO}_x\text{/ton)} \times 350 \text{ (lbs./hour)} \times 1/2000 \text{ (tons/lbs.)}$$

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where: 3.0 pounds of nitrogen oxides per ton is the emission factor taken from AP-42, "Section 2.1 Refuse Combustion", Table 2.1-12. and 350 lbs/hour is maximum capacity of incinerator and E is the emission rate in pounds per hour.

6. Emission Limitation

1.75 pounds of Carbon Monoxide per hour

Applicable Compliance Method

Compliance with this emission limit shall be demonstrated by utilizing the following equation:

$$E = 10.0 \text{ (lbs. CO/ton)} \times 350 \text{ (lbs./hour)} \times 1/2000 \text{ (tons/lbs.)}$$

where: 10.0 pounds of carbon monoxide per ton is the emission factor taken from AP-42, "Section 2.1 Refuse Combustion", Table 2.1-12. and 350 lbs/hour is maximum capacity of incinerator and E is the emission rate in pounds per hour.

F. Miscellaneous Requirements

1. None.