

Permit Writer	Caraline Griffith
Email Address	caraline.f.griffith@wv.gov
Company Name	Leavitt Funeral Home, Inc.
Company ID	107-00183
Facility Name	Seventh Street Parkersburg Facility
Permit Number	R13-3268
County	Wood
Newspaper	The Parkersburg News and Sentinel 485-1891
Company Contact & Email	Jon Leavitt jon@leavittfuneralhome.com
Consultant Email Address	Ernie Kassoff ernie.kassoff@facultatieve-technologies-usa.com
Regional Office (if applicable)	N/A

publish Fri Oct 16 2015  
30 days Mon Nov 16, 2015



**Permit / Application Information Sheet**  
**Division of Environmental Protection**  
**West Virginia Office of Air Quality**

<b>Company:</b>	Leavitt Funeral Home, Inc.	<b>Facility:</b>	Seventh St Pkg
<b>Region:</b>	2	<b>Plant ID:</b>	107-00183
<b>Application #:</b>	13-3268		
<b>Engineer:</b>	Griffith, Caraline	<b>Category:</b>	
<b>Physical Address:</b>	414 Seventh Street Parkersburg WV 26101	<b>SIC:</b> [7261] PERSONAL SERVICES - FUNERAL SERVICE AND CREMATORIES	
<b>County:</b>	Wood	<b>NAICS:</b> [812210] Funeral Homes and Funeral Services	
<b>Other Parties:</b>	PRES - Leavitt, Jonathan C. 304-422-6459 CONTACT - Kassoff, Ernie 330-242-6901		

<b>Information Needed for Database and AIRS</b>
1. Need valid physical West Virginia address with zip
2. Air Program
3. Inspection result
4. Pollutant and class

<b>Regulated Pollutants</b>		
CO	Carbon Monoxide	0.000 TPY
HCL	Hydrochloric acid	0.000 TPY
PM10	Particulate Matter < 10 um	0.000 TPY
SO2	Sulfur Dioxide	0.000 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	0.000 TPY
NOX	Nitrogen Oxides (including NO, NO2, NO3, N2O3, N2O4, and N2O5)	0.000 TPY

<b>Summary from this Permit 13-3268</b>		
<b>Air Programs</b>	<b>Applicable Regulations</b>	
SIP	06 13 22	
<b>Fee Program</b>	<b>Fee</b>	<b>Application Type</b>
9B	\$1,000.00	CONSTRUCTION

**Notes from Database**  
 Permit Note: Permit to build a new building to house a new crematory.

<b>Activity Dates</b>	
APPLICATION RECIEVED	08/28/2015
APPLICATION FEE PAID	09/01/2015
ASSIGNED DATE	09/01/2015
APPLICANT PUBLISHED LEGAL AD	09/07/2015
APPLICATION DEEMED COMPLETE	09/16/2015

Go to  
notice

**NON-CONFIDENTIAL**

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 107-00183  
 Company: Leavitt Funeral Home, Inc.  
 Printed: 09/22/2015  
 Engineer: Griffith, Caraline

# AIR QUALITY PERMIT NOTICE

## Notice of Intent to Approve

On August 28, 2015, Leavitt Funeral Home, Inc. applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to Construct their Seventh Street Parkersburg facility located at 414 Seventh Street, Parkersburg, Wood County, WV at latitude 39.2654 and longitude -81.5573. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-3268.

The potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 0.26 tons per year (TPY); Particulate Matter, 0.26 TPY; Sulfur Dioxide, 0.45 TPY; Oxides of Nitrogen, 1.15 TPY; Carbon Monoxide, 0.23 TPY; Volatile Organic Compounds, 0.50 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **KEYBOARD**(Day of Week, Month, Day, Year). A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed Construction will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Caraline Griffith  
WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1258  
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

[www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx](http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx)

## Griffith, Caraline F

---

**From:** Adkins, Sandra K  
**Sent:** Tuesday, September 01, 2015 1:19 PM  
**To:** jon@leavittfuneralhome.com; ernie.kassoff@facultatieve-technologies-usa.com  
**Cc:** McKeone, Beverly D; Griffith, Caraline F  
**Subject:** WV DAQ Permit Application Status for Leavitt Funeral Home, Inc.; Seventh Street Parkersburg

**RE: Application Status  
Leavitt Funeral Home, Inc.  
Seventh St Pkg  
Plant ID No. 107-00183  
Application No. R13-3268**

Mr. Leavitt,

Your application for a construction permit for the Seventh Street, Parkersburg location was received by this Division on August 28, 2015, and was assigned to Caraline Griffith. The following item was not included in the initial application submittal:

**Original affidavit for Class I legal advertisement not submitted.**

*\*Please note to use the new phone extension 1250 for future legal ads.*

*Legal ad must contain LON/LAT and be for a construction application. Please republish. Note: The crematory located on Camden Street is not being relocated. Once it is removed, you may request the permit be made inactive*

*This item is necessary for the assigned permit writer to continue the 30-day completeness review.*

Within 30 days, you should receive a letter from Caraline stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

For future reference, electronic applications must include signatures.

Should you have any questions, please contact the assigned engineer, Caraline Griffith, at 304-926-0499, extension 1258.

## **Griffith, Caraline F**

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**From:** Null, Gregory L  
**Sent:** Wednesday, September 02, 2015 1:09 PM  
**To:** Griffith, Caraline F  
**Subject:** Mid-Ohio Valley Cremation Services Inc (Leavitt Funeral Home Inc)/Permit Application Fee

This is the receipt for payment received from:

Mid-Ohio Valley Cremation Services Inc, ck# 1572, dated 8/26/15, \$1,000  
Leavitt Funeral Home Inc, R13-3268, id no 107-00183

OASIS Deposit CR 1600025094, September 2, 2015

## Griffith, Caraline F

---

**From:** Jon Leavitt <jon@leavittfuneralhome.com>  
**Sent:** Monday, September 14, 2015 4:21 PM  
**To:** Griffith, Caraline F  
**Subject:** Re: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

Ms. Griffith,  
Thank you for working those details out with Ernie. We will certainly give you an invite to see the facility.

Jon Leavitt  
Leavitt Funeral Home  
304-422-6459  
[www.LeavittFuneralHome.com](http://www.LeavittFuneralHome.com)  
Caring for Families and Celebrating Lives

On Sep 14, 2015, at 3:23 PM, Griffith, Caraline F <[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)> wrote:

Good Afternoon Again, Mr. Leavitt,

I just spoke to Mr. Ernie Kassoff regarding the inspection and he explained to me that there actually isn't much to inspect right now but the surrounding area and proposed facility lot. That will be completely fine. Mr. Doug Hammell, one of our enforcement officers, will just come by and snap a couple pictures to make sure everything looks like it will be a good location and we will be able to move on with this process. You will not need to be present for this initial "inspection," but when everything gets built and put together in the future I would love to come see and do a follow up inspection of the completed facility. I hope you all have a wonderful evening!

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

---

**From:** Griffith, Caraline F  
**Sent:** Monday, September 14, 2015 3:00 PM  
**To:** Jon Leavitt  
**Cc:** 'Ernie Kassoff'; Hammell, Douglas N  
**Subject:** Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

Good Afternoon Mr. Leavitt,

In order to go further with your permit, an inspection of the proposed facility will need to be done. Mr. Doug Hammell and I will be doing the inspection. We would like to set up a time and date that is convenient for all parties involved. Would Monday, September 21, at 1:00 pm be alright? Please let me know if this would work out for you, and if not, please let me know a date and time that you would prefer.

Thank you very much and I look forward to visiting your facility.

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

## Griffith, Caraline F

---

**From:** Griffith, Caraline F  
**Sent:** Monday, September 14, 2015 12:31 PM  
**To:** 'Ernie Kassoff'  
**Cc:** Jon Leavitt  
**Subject:** RE: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Permit Status

Mr. Kassoff,

Thank you so very much! I really appreciate you both getting back to me so promptly. I'll let you know if I have any more questions. And please, feel free to ask me about anything regarding time lines or anything else that you may need to know.

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

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**From:** Ernie Kassoff [mailto:[ernie.kassoff@facultatieve-technologies-usa.com](mailto:ernie.kassoff@facultatieve-technologies-usa.com)]  
**Sent:** Monday, September 14, 2015 12:23 PM  
**To:** Griffith, Caraline F  
**Cc:** Jon Leavitt  
**Subject:** RE: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Permit Status

Ms. Griffith,

Yes, you are correct. The program I use to provide the UTM coordinates did provide the numbers in meters rather than kilometers. Therefore, your correction from meters to kilometers is correct. The UTM coordinates are based on longitude and latitude which I utilize [www.itouchmap.com](http://www.itouchmap.com) and then use the conversion program Geographic /UTM Coordinate Converter <http://home.hiwaay.net/~taylorc/toolbox/geography/geoutm.html> to get the UTM coordinates.

I hope this clears up the first question you have and hopefully everything else will fall into place so that the permit can be issued as quickly as possible.

Please feel free to contact me directly at your convenience with any additional questions regarding the permit application.

Best regards,

**Ernie Kassoff**  
Sales Manager  
Facultative Technologies the Americas



940 Lake Road  
Medina, Ohio 44256

tel: 330.723.6339  
cell: 330.242.6901  
email: [ernie.kassoff@facultative-technologies-usa.com](mailto:ernie.kassoff@facultative-technologies-usa.com)

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**From:** Jon Leavitt [<mailto:jon@leavittfuneralhome.com>]  
**Sent:** Monday, September 14, 2015 11:45 AM  
**To:** 'Griffith, Caraline F' <[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)>  
**Cc:** Ernie Kassoff <[ernie.kassoff@facultative-technologies-usa.com](mailto:ernie.kassoff@facultative-technologies-usa.com)>  
**Subject:** RE: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Permit Status

Ms. Griffith,

I will have our Crematory Manufacturer, Ernie Kassoff, let you know about the coordinates. He helped me prepare those so we will get back to you with the information.

Thank you,

Jon Leavitt  
Leavitt Funeral Home  
403 Seventh Street  
Parkersburg, WV 26101  
304-422-6459  
[jon@leavittfuneralhome.com](mailto:jon@leavittfuneralhome.com)  
[www.leavittfuneralhome.com](http://www.leavittfuneralhome.com)



*Caring For Families and Celebrating Lives*

Please consider the environment before printing this email

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**From:** Griffith, Caraline F [<mailto:Caraline.F.Griffith@wv.gov>]  
**Sent:** Monday, September 14, 2015 11:20 AM  
**To:** [jon@leavittfuneralhome.com](mailto:jon@leavittfuneralhome.com)  
**Subject:** Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Permit Status

Good Morning Jon!

I hope you are doing well today. It is a pleasure to be working on your permit application for the Seventh Street Parkersburg Facility crematory. I was going through your permit application and have stumbled upon my first question: The UTM coordinates seem a little wonky to me (it looks like they are in meters instead of kilometers). I was just wanting to make sure that it was supposed to be:

Easting: 451.92 km  
Northing: 4,346.38 km

Instead of:

Easting: 451,924.46 km  
Northing: 4,346,380.07 km

I also wanted to let you know I received your legal affidavit on Friday, September 11, 2015. I will be able to deem it complete after a thorough inspection of your application and I will notify you by email (hopefully in the next couple of days, if not by this afternoon) when it is deemed complete.

Thank you, and I look forward to hearing back from you and working with you to get your permit out as quickly as possible!

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

## Griffith, Caraline F

---

**From:** Griffith, Caraline F  
**Sent:** Wednesday, September 16, 2015 11:44 AM  
**To:** 'Jon Leavitt'  
**Cc:** McKeone, Beverly D; 'Ernie Kassoff'  
**Subject:** Leavitt Funeral Home, Inc - Seventh Street Parkersburg Facility - Permit Application Status: Complete

**RE: Application Status: Complete  
Leavitt Funeral Home, Inc.  
Permit Application R13-3268  
Plant ID No. 107-00183**

Mr. Leavitt,

Your application for a Construction permit for an incinerator was received by this Division on August 28, 2015 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on September 16, 2015.

**In the case of this application, the agency believes it will take approximately 90 days to make a final permit determination.**

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Caraline Griffith at (304) 926-0499 ext. 1258 or reply to this email.

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

## Griffith, Caraline F

---

**From:** Griffith, Caraline F  
**Sent:** Thursday, September 17, 2015 9:29 AM  
**To:** Hammell, Douglas N  
**Subject:** RE: Leavitt's 414 7th St

Hi Doug!

The contact just got back to me. I've copied and pasted his response to the question below. ☺

Caraline

Good Morning Ms. Griffith;

The other human crematory owned by Leavitt will be shut down as soon as the new system is up and running (We will be removing the old machine as soon as the new one is commissioned). I believe the animal cremation unit located on the same property as the existing human cremator (different buildings, but on the same property parcel) will continue to operate. However, once again I believe long term plans are to relocate the animal crematory to the new crematory site with separate entrances and production areas. This would be a second phase of the project and we understand that new permits for the animal cremator move would be required.

I hope this answers your question.

Best regards,

Ernie

---

**From:** Hammell, Douglas N  
**Sent:** Thursday, September 17, 2015 9:11 AM  
**To:** Griffith, Caraline F  
**Subject:** Leavitt's 414 7th St

Hey Caraline, as discussed, planning next Tu 9-22-15 for downtown inspection at 414 7<sup>th</sup> St, proposed crematorium site. -Will the two current crematories ('ovhd'), 2711 Camden Ave, continue to be used after the new one is installed?

Tks, Doug x1093

---

**From:** Griffith, Caraline F  
**Sent:** Monday, September 14, 2015 3:23 PM  
**To:** Jon Leavitt  
**Cc:** Ernie Kassoff; Hammell, Douglas N  
**Subject:** RE: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

Good Afternoon Again, Mr. Leavitt,

I just spoke to Mr. Ernie Kassoff regarding the inspection and he explained to me that there actually isn't much to inspect right now but the surrounding area and proposed facility lot. That will be completely fine. Mr. Doug Hammell, one of our enforcement officers, will just come by and snap a couple pictures to make sure everything looks like it will be

a good location and we will be able to move on with this process. You will not need to be present for this initial "inspection," but when everything gets built and put together in the future I would love to come see and do a follow up inspection of the completed facility. I hope you all have a wonderful evening!

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

---

**From:** Griffith, Caraline F  
**Sent:** Monday, September 14, 2015 3:00 PM  
**To:** Jon Leavitt  
**Cc:** 'Ernie Kassoff'; Hammell, Douglas N  
**Subject:** Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

Good Afternoon Mr. Leavitt,

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Thank you very much and I look forward to visiting your facility.

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258

## Griffith, Caraline F

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**From:** Hammell, Douglas N  
**Sent:** Tuesday, September 22, 2015 2:51 PM  
**To:** Griffith, Caraline F  
**Cc:** Hedgecock, Jeffrey W; Porter, Margaret A  
**Subject:** Leavitt's demo at 414 7th St  
**Attachments:** ovhd.jpg; 414 7th St.jpg

Hi Caraline, checked proposed demo of 414 7th St by Leavitt's 107-131 on 9/21/15.  
There are nearby commercial bldg and hotel across the street is being renovated.

Pix at [Q:\AIR\\_QUALITYD\\_Hammell\inspections\2011\Leavitt Pburg 107-131](Q:\AIR_QUALITYD_Hammell\inspections\2011\Leavitt Pburg 107-131).

=>The site is acceptable for proposed R13 permit.

=>Please tell them to contact DAQ about asbestos abatement permit before demolition  
(304) 926-0499, Jeff Hedgecock x1252 or Meg Porter x 1698)

Doug, x1093

-----Original Message-----

**From:** Griffith, Caraline F  
**Sent:** Thursday, September 17, 2015 9:29 AM  
**To:** Hammell, Douglas N  
**Subject:** RE: Leavitt's 414 7th St

Hi Doug! The contact just got back to me. I've copied and pasted his response to the question below. ☺ Caraline

Good Morning Ms. Griffith, The other human crematory owned by Leavitt will be shut down as soon as the new system is up and running (We will be removing the old machine as soon as the new one is commissioned). I believe the animal cremation unit located on the same property as the existing human cremator (different buildings, but on the same property parcel) will continue to operate. However, once again I believe long term plans are to relocate the animal crematory to the new crematory site with separate entrances and production areas. This would be a second phase of the project and we understand that new permits for the animal cremator move would be required. I hope this answers your question. Best regards, Ernie

-----Original Message-----

**From:** Hammell, Douglas N  
**Sent:** Thursday, September 17, 2015 9:11 AM  
**To:** Griffith, Caraline F  
**Subject:** Leavitt's 414 7th St

Hey Caraline, as discussed, planning next Tu 9-22-15 for downtown inspection at 414 7<sup>th</sup> St, proposed crematorium site.

-Will the two current crematorys ('ovhd'), 2711 Camden Ave, continue to be used after the new one is installed?

Tks, Doug x1093

-----Original Message-----

**From:** Griffith, Caraline F  
**Sent:** Monday, September 14, 2015 3:23 PM  
**To:** Jon Leavitt  
**Cc:** Ernie Kassoff; Hammell, Douglas N

**Subject:** RE: Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

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love to come see and do a follow up inspection of the completed facility. I hope you all have a wonderful evening! Best regards,

-----Original Message-----

**From:** Griffith, Caraline F

**Sent:** Monday, September 14, 2015 3:00 PM

**To:** Jon Leavitt

**Cc:** 'Ernie Kassoff'; Hammell, Douglas N

**Subject:** Leavitt Funeral Home, Inc. - Seventh Street Parkersburg Facility - Inspection

Good Afternoon Mr. Leavitt, In order to go further with your permit, an inspection of the proposed facility will need to be done. Mr. Doug Hammell and I will be doing the inspection. We would like to set up a time and date that is convenient for all parties involved. Would Monday, September 21, at 1:00 pm be alright? Please let me know if this would work out for you, and if not, please let me know a date and time that you would prefer. Thank you very much and I look forward to visiting your facility. Best regards,

Caraline Griffith

Dept. of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

Engineer Trainee

Caraline.F.Griffith@wv.gov

304-926-0499 x1258

## Griffith, Caraline F

---

**From:** Griffith, Caraline F  
**Sent:** Tuesday, September 22, 2015 2:58 PM  
**To:** 'Ernie Kassoff'  
**Cc:** Hedgecock, Jeffrey W; Porter, Margaret A  
**Subject:** Leavitt Funeral Home, Inc. - Seventh Street Parkersburg - Permit Status

Hi Mr. Kassoff,

I hope you are doing well today. Mr. Doug Hammell just informed me of his "site inspection." He says everything looks great. He just said that before demolition you will need to contact DAQ regarding asbestos abatement. The proper people to contact for this would be Mr. Jeff Hedgecock or Ms. Meg Porter. I have copied both of them on this email.

Ms. Porter's phone number is 304-936-0499 x1698.

Mr. Hedgecock's phone number is: 304-936-0499 x1252.

Thank you, and if you have any questions please feel free to ask!

Best regards,

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258



940 Lake Road  
Medina, Ohio 44256

tel: 330.723.6339  
cell: 330.242.6901  
email: [ernie.kassoff@facultative-technologies-usa.com](mailto:ernie.kassoff@facultative-technologies-usa.com)

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**From:** Griffith, Caraline F [<mailto:Caraline.F.Griffith@wv.gov>]  
**Sent:** Thursday, September 17, 2015 9:15 AM  
**To:** Ernie Kassoff <[ernie.kassoff@facultative-technologies-usa.com](mailto:ernie.kassoff@facultative-technologies-usa.com)>  
**Subject:** Leavitt Funeral Home, Inc. - 7th Street Parkersburg Facility - Question

Good Morning Mr. Kassoff!

I hope you are doing well. I have a quick question regarding the other crematories owned by Leavitt in the Parkersburg area. One of our inspectors asked if the other crematories will still be in use after this new one is built. I would assume yes, but that was a good question to ask. Do you know if they will still be in use?

Thank you!

*Caraline Griffith*

Dept. of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Engineer Trainee  
[Caraline.F.Griffith@wv.gov](mailto:Caraline.F.Griffith@wv.gov)  
304-926-0499 x1258



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west virginia department of environmental protection

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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## ENGINEERING EVALUATION / FACT SHEET

### BACKGROUND INFORMATION

Application No.: R13-3268  
Plant ID No.: 107-00183  
Applicant: Leavitt Funeral Home, Inc.  
Facility Name: Seventh Street Parkersburg  
Location: Parkersburg, Wood County, WV  
NAICS Code: 812210  
Application Type: Construction  
Received Date: August 28, 2015  
Engineer Assigned: Caraline Griffith  
Fee Amount: \$1000.00  
Date Received: September 1, 2015  
Completeness Date: September 16, 2015  
Due Date: December 16, 2015  
Newspaper: *The Parkersburg News and Sentinel*  
Applicant Ad Date: September 7, 2015  
UTMs: Easting: 451.92 km Northing: 4,346.38 km Zone: 17S  
Description: This construction permit application is for the installation and operation of a human crematorium at the Seventh Street Parkersburg facility.

### DESCRIPTION OF PROCESS

The Facultative Technologies FT II Cremator is designed to burn human remains. Its automatic controls will function to cremate efficiently with the minimum of operator intervention.

The Facultative Technologies FT II Cremator is a multiple chamber design (primary and secondary) and in the case for this proposed unit will be fired with natural gas as auxiliary fuel. The cremator has a nominal burn rate of 150 – 200 pounds per hour of human cadavers. The cremator is designed with an automated loading system allowing single batch loading.

The standard process of cremating human cadavers in a Facultatieve Technologies cremator is to preheat the machine with secondary chamber (afterburner) reaching a controlled temperature of not less than 1600<sup>0</sup>F and the primary chamber reaching a minimum temperature of 1035<sup>0</sup>F. Once these parameters have been reached, the operator is instructed that the cremator is ready to process a cremation. At the time, the operator instructs the machine via the computerized touch screen to charge (automatically place into the primary chamber) the cadaver. The primary chamber door automatically opens and the cadaver is delivered via the automated loader into the cremation chamber. The door then closes and the cremation process begins with automatic control process of all functions via the onboard computer/Programmable Logical Controller (PLC). Typical process times average 72 minutes and the cremator has a sight glass where the operator can observe that the cremation process has fully completed.

Upon completion of the cremation process, the operator opens the primary chamber door and moves the cremated remains into a cooling area for final disposition. The design of the FT II cremator is to immediately charge the next cadaver into the primary chamber immediately after the cremated remains have been moved to the cooling area. No cool down period is required and thus less requirements for excess fuel usage (cooling and reheating the system) and reduction of emissions from the cremator. In addition, the process design of the FT cremator is to the use human cadaver as the primary fuel source and only uses natural gas to supplement the cremation process. Once the cremator refractory is super-heated, the use of natural gas to perform the cremation process is virtually non-existent. The only gas used is in the secondary chamber (afterburner) to maintain the regulated temperature of 1600<sup>0</sup>F.

### SITE INSPECTION

Doug Hammell of the DAQ compliance and enforcement section inspected the site on September 21, 2015. The current building is to be torn down and replaced with a new building to house the new proposed crematory. Mr. Hammell said the site was appropriate for such a facility.

#### Directions to Facility:

From 1-50 exit Division Street/WV-14/WV-95 toward Camden Avenue. Turn Right onto Avery Street. Turn right onto 7<sup>th</sup> Street. 414 7<sup>th</sup> Street is on the right.

### ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

With the submitted application, Facultatieve Technologies included a complete compliance test report of a FT II located in Providence, Rhode Island. The pollutants measured during these stack tests were filterable particulate matter and metal, Chromium being the only metal detected. This particular demonstration was conducted using U.S. EPA Methods, 1-5, 3A, 10 and 29. Over a two-day period, February 5-6, 2015, four test runs were done to calculate emissions. Average measured particulate matter rate between the four runs was 0.1508 pounds per hour. Chromium had an average of 6.74e-5 pounds per hour.

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## REGULATORY APPLICABILITY

The following state regulations apply.

### **45CSR4 – To Prevent and Control the Discharge of Air Pollutants Into the Open Air Which Causes or Contributes to an Objectionable Odor or Odors**

The purpose of this rule is to prevent and control any discharge that may cause or contribute to objectionable odors. The Leavitt Funeral Home, Inc. Seventh Street Parkersburg Facility will not be emitting any objectionable odors now or in the future.

### **45CSR6 - To Prevent and Control Air Pollution From Combustion of Refuse**

The purpose of this rule is to prevent and control air pollution from combustion of refuse. The permittee has proposed to install and operate one human crematory. This rule defines incineration as the destruction of combustible refuse by burning in a furnace designed for that purpose. The proposed crematory is designed to destroy human remains and associated containers through incineration. Thus, it meets this definition.

Per section 4.1, these crematories must meet the particulate matter limit by weight. The human crematory will have an allowable particulate matter emission rate of 0.87 pounds per hour (based on maximum design-incineration rate of 320 lb/hr). This allowable rate is higher than the estimated hourly potential of 0.30 lb/hr. Thus, the unit should be more than capable of meeting this PM standard.

The crematory is subject to the 20% opacity (visible emission) limitation in section 4.3 of this rule. The opacity and the allowable limits should be met since the crematory is equipped with a secondary chamber with the afterburner, which is designed to reduce the particulate matter and other pollutants entrained in the exhaust stream into products of complete combustion. It is estimated that at any given time during the incineration process the minimum retention time will be 2.0 seconds. The rule of thumb for nearly complete combustion is 1.0-second retention time in the secondary chamber. Thus, this particular crematory should be capable of meeting the applicable limitations of this rule.

### **45CSR13 - Permits for Modification, Modification, Relocation and Operation of Stationary sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation**

The potential-to-emit from the proposed crematories are below 6 pounds per hour and 10 tons per year for all of the criteria pollutants, which is less than the permit trigger level as defined in 45CSR§13-2.24.b. However, Rule 6 requires all incinerators be required to obtain a construction or modification permit regardless of size. Leavitt Funeral Home, Inc. has proposed to install a crematory, which is subject to Rule 6. Therefore, the facility is required to obtain a permit as required in 45CSR§6-6.1. and 45CSR§13-2.24.a. The facility has met the applicable requirements of this rule by publishing a Class I Legal Advertisement in *The Parkersburg News*

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and Sentinel on September 7, 2015, paid the \$1,000.00 application fee, and submitted a complete permit application.

As a result of this Construction, the Seventh Street Parkersburg facility will not be classified as a major source of hazardous air pollutants or major source under Title V. In addition, the emission unit is not subject to a New Source Performance Standard. Thus, the facility is not subject to Title V and will not be required to obtain an operating permit under 45CSR30. Therefore, the Seventh Street Parkersburg facility will remain classified as a "9B - Crematory Incinerator" source as defined in 45CSR22.

#### **45CSR22 Air Quality Management Fee Program**

This facility is a minor source and not subject to 45CSR30. Leavitt Funeral Home, Inc. is required to keep their Certificate to Operate current. They paid the \$1000 fee associated with a Rule 13 permit application.

### TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

#### **Chromium**

Chromium occurs in the environment primarily in two valence states, trivalent chromium (Cr III) and hexavalent chromium (Cr VI). Exposure may occur from natural or industrial sources of chromium. Chromium III is much less toxic than chromium (VI). The respiratory tract is also the major target organ for chromium (III) toxicity, similar to chromium (VI). Chromium (III) is an essential element in humans. The body can detoxify some amount of chromium (VI) to chromium (III).

The respiratory tract is the major target organ for chromium (VI) toxicity, for acute (short-term) and chronic (long-term) inhalation exposures. Shortness of breath, coughing, and wheezing were reported from a case of acute exposure to chromium (VI), while perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, and other respiratory effects have been noted from chronic exposure. Human studies have clearly established that inhaled chromium (VI) is a human carcinogen, resulting in an increased risk of lung cancer. Animal studies have shown chromium (VI) to cause lung tumors via inhalation exposure.

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. The file contains summaries of the IRIS database information on hydrogen chloride and mercury. For a complete discussion of the known health effects, refer to the IRIS database located at [www.epa.gov/iris](http://www.epa.gov/iris).

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## AIR QUALITY IMPACTS ANALYSIS

The writer deemed that an air dispersion modeling study or analysis was not necessary, because the proposed Modification does not meet the definition of a major source as defined in 45CSR14.

## MONITORING OF OPERATIONS

The manufacturer has equipped this unit with a personal computer based control system which includes a data logging function. The system is capable of monitoring the oxygen content of the flue gas, and the temperatures in the both the primary and secondary chambers. Other monitoring that is needed for this type of unit is the weight of each cremation.

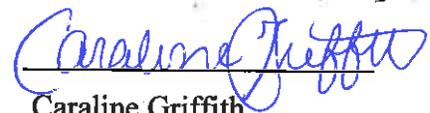
Monitoring the secondary chamber temperature is an indicator that the temperature in the secondary chamber is sufficient to ensure complete combustion of the products of incomplete combustion such as particulate matter, carbon monoxide, and volatile organic compounds. The applicant proposed operating the secondary chamber at a minimum temperature of 1,600<sup>0</sup>F, which is suggested by the manufacturer.

An annual operational limit of 3,000 hours per year for the crematory was proposed in the application. This limit is not required. Without the limit, the maximum predicted emissions rate of NO<sub>x</sub> on an annual basis is still below the operational restrictions definition of a "stationary source" under Rule 13.

To ensure compliance with the visible emission standard of Rule 6, the writer proposes requiring visible emission checks to be conducted once every quarter.

## RECOMMENDATION TO DIRECTOR

The information provided in the permit application and the conditions set forth in the permit indicates this FT II cremator should meet all applicable state rules and federal regulations when operated. Therefore, this writer recommends that a Rule 13 Modification Permit should be granted to Leavitt Funeral Home, Inc. for their proposed crematory at the Seventh Street Parkersburg facility.



Caraline Griffith  
Permit Engineer

10/13/15  
Date

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*West Virginia Department of Environmental Protection*  
*Earl Ray Tomblin*  
*Governor*

*Division of Air Quality*

*Randy C. Huffman*  
*Cabinet Secretary*

# Permit to Construct



**R13-3268**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*

**Leavitt Funeral Home Inc.  
Seventh Street Parkersburg  
107-00183**

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*William F. Durham*  
*Director*

*Issued: DRAFT*

Facility Location: 414 Seventh Street  
Parkersburg, Wood County, West Virginia  
Mailing Address: 403 Seventh Street  
Parkersburg, WV 26101  
Facility Description: Human Crematorium  
NAICS Codes: 812210  
UTM Coordinates: 451.92 km Easting • 4,346.38 km Northing • Zone 17S  
Permit Type: Construction  
Description of Change: This permit is for the construction of a new human crematorium.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

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*The source is not subject to 45CSR30.*

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**1.0. Emission Units**

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
1S	1E	Facultatieve Technologies FT II Cremator	2015	200 lbs/hr	Secondary Chamber w/Afterburner

**2.0. General Conditions**

**2.1. Definitions**

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

**2.2. Acronyms**

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 μm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10μm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppm<sub>v</sub> or ppmv</b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

### **2.4. Term and Renewal**

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-2371A. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2371, R13-2371A, R13-2371B, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

**2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

**2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

**2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

**2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable

to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

### **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

### **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

### **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.

**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements

*[Reserved]*

#### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly

authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language;
  2. The result of the test for each permit or rule condition; and,
  3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### **3.4. Recordkeeping Requirements**

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded

in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. *State Enforceable Only.*]

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**  
Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**If to the US EPA:**  
Associate Director  
Office of Air Enforcement and Compliance  
Assistance  
(3AP20)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

#### 3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

#### 4.0. Source-Specific Requirements

##### 4.1. Limitations and Standards

4.1.1. The Facultative Technologies FT II Cremator shall be operated in accordance with the following operational and emission limitations:

- a. The cremator (equipment ID. #1S) shall be operated in such a manner that the emissions discharging from emission point 1E do not exceed the following amounts for the respective pollutants.

Table #4.1.1.a. Emission Limits	
Pollutant	Hourly Emission Rate (lb/hr)
PM <sub>2.5</sub>	0.30
PM	0.30
NO <sub>x</sub>	1.35
CO	0.27
HCl	0.53

- b. The crematory shall be operated in accordance with the manufacturer's recommendations. The permittee shall not operate the cremator with an incineration rate of greater than 320 pounds per hour. The crematory shall not be operated with a temperature in the secondary chamber of less than 1600°F during the incineration cycle.
- c. The permittee shall install and maintain a temperature measuring system that measures and records the temperature of the secondary chamber at all times that the crematory is in operation.
- d. This crematory shall only cremate human remains and the associated containers in which the remains are placed. Such containers shall only be made of wood or cardboard.
- e. Visible particulate matter from emission point 1E shall not be greater than or equal to 20% opacity except for visible particulate matter emission less than 40% for a period or periods aggregating no more than 8 minutes per start-up.  
[45CSR§§6-4.3 & 4.4]

4.1.2. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
[45CSR§13-5.11.]

##### 4.2. Monitoring Requirements

4.2.1. For the purposes of demonstrating compliance with requirements of conditions 4.1.1 of this permit, the permittee shall monitor the weight of the remains plus container, the date, and start/end

times of each cremation. Records of such monitoring shall be maintained in accordance with 3.4.1 of this permit.

For 1S human cremator, temperature measurements shall be taken and recorded at the minimum in four equal block (once every 15 minutes) and calculate into hourly average for the purpose of demonstrating compliance with the temperature requirement in Condition 4.1.1.b.

- 4.2.2. For the purpose of determining compliance with the opacity limits of condition 4.1.1.e., the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.

The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40 CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per every three months (quarterly). These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

#### **4.3. Testing Requirements**

*[Reserved]*

#### **4.4. Recordkeeping Requirements**

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and

duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
  - f. Steps taken to correct the malfunction.
  - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. The permittee shall maintain records of the recorded data from the temperature measuring device and recording systems (data logger for 1S) in accordance with Condition 3.4.1. of this permit.

#### **4.5. Reporting Requirements**

- 4.5.1. Any exceedances of the allowable visible emission requirement for any emission source discovered during observations using 40 CFR Part 60, Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: The results of the visible determination of opacity of emissions, the cause or suspected cause of the exceedances, and any corrective measures taken or planned.

### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.