PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1468-00223/00003
Effective Date: 01/24/2017 Expiration Date: 01/23/2022

Permit Issued To:ERIE COUNTY SPCA
300 Harlem Road
West Seneca, NY 14224-6717

Contact: Matthew Laufer
300 Harlem Rd
West Seneca, NY 14224

Facility: ERIE COUNTY SPCA
300 HARLEM RD
WEST SENECA, NY 14224

Description:
This State Facility Permit is for an animal crematory operated by Erie County SPCA at its new location, 300 Harlem Road in West Seneca, NY.

One 2009 Crawford E model CB2400 batch load animal cremation incinerator will be used to cremate deceased animals at this facility. The unit is capable of incinerating up to 2400 lbs in approximately four hours. The unit is controlled by a security coded control panel. All operating parameters are programmed into the panel to assure proper operation. The primary and secondary burners are controlled by this panel. There are two 500,000 Btu/hr natural gas fired burners in the primary chamber and a 3,000,000 Btu/hr natural gas fired burner in the secondary chamber. Per 6 NYCRR Part 219-4.4, the primary chamber must operate at a minimum of 1400 degrees Fahrenheit and the secondary chamber must operate at a minimum of 1800 degrees Fahrenheit. There is a 2-pen strip chart attached to the incinerator that records these temperatures to prove compliance. Also, the furnace has been designed to provide for a residence time for combustion gas of at least one second at no less than 1800 degrees Fahrenheit.

Inspection and reporting: Per 219-4.11, each owner or operator of a permitted crematory facility must have the incinerator and associated equipment and instrumentation inspected annually by a qualified professional service technician (not the owner/operator) to verify that the incinerator is performing properly and in compliance with 6 NYCRR Part 219. All repairs and maintenance, necessary to ensure that the incinerator meets the manufacturer's specifications, shall be carried out as recommended. The qualified professional technician shall prepare a report detailing the inspection results, problems found and any maintenance and repairs recommended and carried out. The report shall be submitted to NYSDEC by January 30 each year, with a statement, signed by the Facility's responsible official, certifying that the condition and operation of that facility, including the calibration of all instrumentation, meet manufacturer's specifications. The report shall also include a statement certifying that the operation, monitoring, recordkeeping and routine/preventative maintenance requirements specified in this registration have been fulfilled. Any malfunctions shall be reported in accordance with 6 NYCRR 201-1.4. Records shall be kept on site for five years and shall be available for NYSDEC review upon request.

The incinerator may not be used as a storage unit. Animals placed into the incinerator must be cremated as soon as is practical to avoid the creation of a nuisance.

Per 219-4.5, no person may cause or allow emissions to the outdoor atmosphere having a six-minute average opacity of 10 percent or greater based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60 from any emission source subject to these requirements.

Per 219-4.10, the operator of the incinerator must possess an incinerator operator certificate issued by the commissioner.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: LISA M CZECHOWICZ
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

LIST OF CONDITIONS

DEC GENERAL CONDITIONS
General Provisions
Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
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Permit modifications, suspensions or revocations by the Department
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Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifcations and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item3.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;
c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:ERIE COUNTY SPCA
300 Harlem Road
West Seneca, NY 14224-6717

Facility: ERIE COUNTY SPCA
300 HARLEM RD
WEST SENECA, NY 14224

Authorized Activity By Standard Industrial Classification Code:
0751 - LIVESTOCK SERV EXC SPECIALTIES
7261 - FUNERAL SERVICE AND CREMATORIES

Permit Effective Date: 01/24/2017 Permit Expiration Date: 01/23/2022

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
Facility Level

1 6 NYCRR 211.1: Air pollution prohibited

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level

2 ECL 19-0301: Contaminant List
3 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
4 6 NYCRR Subpart 201-5: Emission Unit Definition
5 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
6 6 NYCRR 201-5.3 (c): Compliance Demonstration
7 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

8 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=U-00001

9 6 NYCRR Subpart 219-4: Compliance Demonstration
10 6 NYCRR Subpart 219-4: Compliance Demonstration
11 6 NYCRR 219-4.5 (a): Compliance Demonstration
12 6 NYCRR 219-4.5 (b): Compliance Demonstration
13 6 NYCRR 219-4.5 (b): Compliance Demonstration
14 6 NYCRR 219-4.6: This section describes other wastes that can and can not be burned in a crematory.
15 6 NYCRR 219-4.7: Compliance Demonstration
16 6 NYCRR 219-4.9: Data and calculations to be included in each application for a permit to construct a source of contamination for crematories/patholog. incin. facility.
17 6 NYCRR 219-4.10: Operator training and certification requirements.
18 6 NYCRR 219-4.11: Compliance Demonstration
19 6 NYCRR 219-4.11: Compliance Demonstration

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: **Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: **Acceptable Ambient Air Quality - 6 NYCRR 200.6**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: **Maintenance of Equipment - 6 NYCRR 200.7**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,

required to operate such device effectively.

Item D: **Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: **Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: **Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**
No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: **Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**
The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: **Proof of Eligibility for Sources Defined as Trivial**

Activities - 6 NYCRR 201-3.3 (a)
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: **Required Emission Tests - 6 NYCRR 202-1.1**

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: **Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: **Federally Enforceable Requirements - 40 CFR 70.6 (b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: **Air pollution prohibited**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 2: **Contaminant List**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:ECL 19-0301

Item 2.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0
Name: PARTICULATES

Condition 3: **Malfunctions and start-up/shutdown activities**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 201-1.4

Item 3.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 4: **Emission Unit Definition**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 4.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00001
Emission Unit Description:
One 2009 Crawford E model CB2400 batch load animal cremation incinerator will be used to cremate deceased animals at this facility. The unit is capable of incinerating up to 2400 lbs in approximately four hours. The unit is controlled by a security coded control panel. All operating parameters are programmed into the panel to assure proper operation. The primary and secondary

burners are controlled by this panel. There are two 500,000 Btu/hr natural gas fired burners in the primary chamber and a 3,000,000 Btu/hr natural gas fired burner in the secondary chamber. Per 6 NYCRR Part 219-4.4, the primary chamber must operate at a minimum of 1400 degrees Fahrenheit and the secondary chamber must operate at a minimum of 1800 degrees Fahrenheit. There is a 2-pen strip chart attached to the incinerator that records these temperatures to prove compliance. Also, the furnace has been designed to provide for a residence time for combustion gas of at least one second at no less than 1800 degrees Fahrenheit.

Condition 5: Renewal deadlines for state facility permits
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 5.1:
The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 6: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 6.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 7: **Visible Emissions Limited**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 211.2

Item 7.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

****** Emission Unit Level ******

Condition 8: **Process Definition By Emission Unit**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 8.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: 001 Source Classification Code: 5-02-005-05
Process Description:
This process consists of the cremation of animal carcasses for disposal using a natural gas-fired excess air incinerator.

Emission Source/Control: C0002 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00001 - Incinerator
Design Capacity: 600 pounds per hour
Waste Feed Method: MANUAL DIRECT FEED
Waste Type: CREMATORY WASTE (INCLUDING HUMAN AND/OR ANIMAL BODY PARTS AND ASSOCIATED ANIMAL BEDDING) ONLY

Condition 9: **Compliance Demonstration**
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR Subpart 219-4

Item 9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 9.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility shall conduct cremation of animal carcasses in non-chlorinated bags or containers only, which shall be verified via vendor certification.

-The incinerator may not be used as a storage unit. Pets placed into the incinerator must be cremated immediately.

-The crematory shall be operated and maintained in accordance with this permit and the Crawford Cremation Operation and Maintenance (O&M) Manual for a Crawford E model CB2400 incinerator to prevent the generation of hazardous and/or offensive or objectionable conditions of any type.

-Operating procedures, including the maximum allowable charge and burn rates, shall be posted conspicuously in the vicinity of each incinerator.

-Each operating day, the owner/operator shall record the following information in a permanently bound logbook at the time of occurrence:
- start-up and shutdown times for each incinerator chamber
- a detailed description of the waste and container charged
- the origin of the waste, verified by a receipt from animal hospital, veterinarian or other source
- the time and weight of the charge
- the operator's name

-A new temperature recorder chart shall be installed prior to start-up each operating day and the recorder pens shall be functioning properly.

- The incinerator grate/ floor shall be cleaned daily, at a minimum. The ash shall be stored in closed containers and shall be transferred to those containers in a way that minimizes emissions. The incinerator room shall be kept clean.

-All records of inspections, operation, monitoring, certification, maintenance, repair, waste collection/delivery and daily logbooks shall be kept in an orderly fashion and shall be maintained on site for five years for NYSDEC review.

Manufacturer Name/Model Number: Crawford E model CB2400

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR Subpart 219-4

Item 10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 10.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Routine inspection and maintenance are essential for the proper performance of the incinerators. This includes, but is not limited to, periodic (daily, weekly, monthly, annual) inspection and maintenance of the burners, ignitor plugs, hydraulic lines and cylinders, thermocouples, combustion controls, temperature controller, combustion air and draft fan, emissions monitoring (i.e. opacity monitors), secondary chamber and cremation (primary) chamber controls, chart recorder, exhaust stack, refractory condition, etc. Spare parts recommended by the manufacturer shall be kept onsite and changed, at a minimum, in accordance with the manufacturer's schedule, with the date of replacement recorded. Erie County SPCA shall submit a report to NYSDEC, annually, detailing the inspections, maintenance and repairs carried out by the owner/operator during the previous 12-month period. This information may be included with the annual inspection report required under 6 NYCRR 219-4.11 in the ASF permit. All records of maintenance and repair shall be kept onsite for five years and shall be available for review upon request.

Manufacturer Name/Model Number: Crawford E model CB2400
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 11: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.5 (a)

Item 11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person may cause or allow emissions to the outdoor atmosphere having a six minute average opacity of 10 percent or greater based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60 from any emission source subject to these requirements.

Operators of incinerators that do not utilize a continuous opacity monitor (COM) for the measuring of smoke emissions or that do not have a certified visible emissions evaluator onsite shall be required to perform the following:

1) Except during conditions of extreme weather (fog, snow, rain), observe the stack of the incinerator for any visible emissions (visible emissions do not include steam plumes**) just after the initial charge each operating day. If the initial charge does not occur during daylight hours, the exhaust stack shall be observed after the next charge made during daylight,

2) record in a permanently bound log book, the daily results of the visual observation - were any emissions observed - yes or no, weather conditions, including explanations for days when weather conditions prohibit such observations of visible emissions, date, time and name of observer and

3) maintain the data contained in this permanently bound log book for five years onsite.

If the operator observes any visible emissions, the operation of the incinerator shall be evaluated and any errors corrected immediately. If the problem cannot be rectified within one hour, the incinerator shall be shutdown, until repaired. If visible emissions greater

than zero persist, a Method 9 analysis of the emission point shall be conducted by a certified visible emissions evaluator within 2 business days of the initial occurrence. The operator must contact the Regional Air Pollution Control Engineer within one business day of performing the Method 9 analysis, during normal business hours (8:30 am to 4:45 pm), if the analysis shows an exceedence of the required standards for opacity. Upon notification, any corrective actions or future compliance schedules shall be presented to the Region for acceptance.

** NOTE ** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail down wind of the stack (other than steam).

Process Material: CADAVERS
Manufacturer Name/Model Number: Crawford E model CB2400
Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: 40 CFR 60. Method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.5 (b)

Item 12.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 12.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person may operate a crematory facility unless the

temperatures described in Section 219-4.4 of this Subpart are maintained at all times that waste is being burned in the secondary chamber.

Manufacturer Name/Model Number: Crawford E model CB2400
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1800 degrees Fahrenheit for at least one second for residence time
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.5 (b)

Item 13.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 13.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person may operate a crematory facility unless the temperatures described in Section 219-4.4 of this Subpart are maintained at all times that waste is being burned in the primary chamber, with the exception of a short period following charging time.

Manufacturer Name/Model Number: Crawford E model CB2400
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: This section describes other wastes that can and can not be burned in a crematory.
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.6

Item 14.1:
This Condition applies to Emission Unit: U-00001

Item 14.2:
(a) Municipal solid waste may not be burned in a crematory.

(b) Infectious waste (other than pathological waste and animal bedding) in excess of five percent of the total permitted hourly charging rate may not be burned in a crematory.

(c) Radioactive waste may not be burned in a crematory unless that crematory is exempt from or has been issued a permit pursuant to Part 380 of this Title.

(d) Hazardous waste may not be burned in a crematory unless that crematory is exempt from or has been issued a permit pursuant to Part 373 of this Title.

Condition 15: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.7

Item 15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

a) Any person who owns or operates a crematory facility must install, operate and maintain in accordance with this permit and manufacturer's instructions, instruments meeting specifications acceptable to the commissioner for continuously monitoring and recording the following emission and operating parameters:

(1) primary combustion chamber exit temperature;

(2) secondary (or last) combustion chamber exit temperature.

If the incinerator and/or its continuous temperature recorder is/are not functioning properly, it shall not be operated. The temperature recorder shall be maintained in accordance with the manufacturer's recommendations. Records of continuous monitoring of temperature, operation, maintenance, calibration and repair must be kept on site for a minimum of five years and shall be

available for expeditious review by NYSDEC representatives upon request.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Data and calculations to be included in each application for a permit to construct a source of contamination for crematories/patholog. incin. facility.
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.9

Item 16.1:
This Condition applies to Emission Unit: U-00001

Item 16.2:
(a) Basic engineering data relative to the waste to be burned, crematory/incinerator design, combustion air, control devices and air cleaning devices; and

(b) an impact analysis using procedures acceptable to the commissioner.

Condition 17: Operator training and certification requirements.
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.10

Item 17.1:
This Condition applies to Emission Unit: U-00001

Item 17.2:
(a) This facility may not operate except under the onsite direction of a person possessing an appropriate incinerator operator certification issued by the commissioner.

(b) Persons operating this facility must be certified in writing by the holder of an incinerator operator certification, relative to:

(1) proper operation and maintenance of equipment at that facility; and

(2) knowledge of environmental permit conditions and the impact of plant operation on emissions for that facility.

Condition 18: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.11

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
To ensure proper operation of the incinerator and compliance with emission standards, the facility operator must successfully complete the comprehensive training and certification program offered by the incinerator manufacturer for the operation, inspection and routine/preventative maintenance of the Crawford E model CB2400 incinerator. NYSDEC Certifications must be renewed every five years.

Manufacturer Name/Model Number: Crawford E model CB2400
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Compliance Demonstration
Effective between the dates of 01/24/2017 and 01/23/2022

Applicable State Requirement:6 NYCRR 219-4.11

Item 19.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Inspection and reporting: Each owner or operator of a permitted crematory facility must have the incinerator and associated equipment and instrumentation inspected annually by a qualified professional service technician (not the owner/operator) to verify that the incinerator is performing properly and in compliance with the ASF permit. All repairs and maintenance, necessary to ensure that the incinerator meets the manufacturer's specifications, shall be carried out as recommended. The qualified professional technician shall prepare a report detailing the inspection results, problems found and any maintenance and repairs recommended and carried out. The report shall be submitted to NYSDEC by January 30 each year, with a statement, signed by the Facility's responsible official,

certifying that the condition and operation of that facility, including the calibration of all instrumentation, meet manufacturer's specifications. The report shall also include a statement certifying that the operation, monitoring, recordkeeping and routine/preventative maintenance requirements specified in this permit have been fulfilled. Any malfunctions shall be reported in accordance with 6 NYCRR 201-1.4. Records shall be kept on site for five years and shall be available for NYSDEC review upon request.

Manufacturer Name/Model Number: Crawford E model CB2400
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).