



Florida Department of
Environmental Protection

Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

April 19, 2011

By Electronic Mail, Received Receipt Requested
Mark.Neal@sci-us.com

Mr. Mark Neal
Location Manager
Southeastern Crematory
619 New Warrington Road
Pensacola, Florida 32506

Dear Mr. Neal:

On April 15, 2011, a Department representative with the Air Resource Management Program inspected your facility, ID 0330091. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-0662 or e-mail jennifer.waltrip@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive that reads "Carol Melton".

Carol Melton
Air Compliance Supervisor

CM/jw/c

Enclosure

c: Karl Ruhl, Southeastern Crematory: Karl.Ruhl@sci-us.com



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO:

AIRS ID#: 0330091	DATE: <u>4/15/11</u>	ARRIVE: <u>2:53 PM</u>	DEPART: <u>4:13 PM</u>
FACILITY NAME: SOUTHEASTERN CREMATORY			
FACILITY LOCATION: 619 NEW WARRINGTON ROAD PENSACOLA 32506			
OWNER/AUTHORIZED REPRESENTATIVE: M. WILDER		PHONE: (407)628-0044	
Email:		Mobile:	
CONTACT NAME: BILL WILLIAMS		PHONE: (904)453-2321	
Email:		Mobile:	
ENTITLEMENT PERIOD: 4/21/2007 / 4/21/2012 (effective date) (end date)			

Facility Section

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: ONSITE INTRODUCTORY MEETING (check only one box for each question)

1. Name(s) of facility representative(s): Karl Ruhl
 Brief Notes: _____

2. Is the Authorized Representative still M. WILDER? ----- Yes ..No
 If no, who is?: Mark Neal
 If different, did the facility provide an administrative update within 30 days? ----- Yes ..No

3. Is the facility contact still BILL WILLIAMS? ----- Yes ..No
 If no, who is?: Karl Ruhl

4. Will facility be conducting VE test(s) during today's inspection? ----- Yes ..No
 If yes, was the compliance authority notified at least 15 days in advance? ----- Yes ..No

Emissions Unit Section
2 – CREMATORY #2 IE43-PPII

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

1. a. Complete AC application or, if no AC permit, initial GP registration received on or after August 30, 1989? ----- Yes ..No
- b. If yes, were design calculations provided then to confirm a sufficient volume in the secondary chamber combustion zone to provide for at least a 1.0 second gas residence time at 1800 degrees Fahrenheit? ----- Yes ..No
2. Crematory unit installed after February 1, 2007? ----- Yes ..No
3. Date of last inspection: _____
4. Past Visible Emissions (VE) tests:
 - a. Was a VE test performed within each of the past 4 calendar years? ----- Yes ..No
 - b. Has a VE test been performed yet within the current calendar year? ----- Yes ..No
 - c. If first year of operation, was a VE test performed within 30 days of commencing operation? ----- N/A Yes ..No
 - d. Date of last VE test: 4/3/08 (unit in long term shut down since Oct 2008)
 - e. Was the VE test report filed with the compliance authority no later than 45 days after the test? ----- Yes ..No
 - f. Did the facility demonstrate compliance during the last VE test? ----- Yes ..No
 If no, what was the problem (if known)? _____

PART II: VISIBLE EMISSIONS TESTING

(check only one box for each question)

1. **Was a visible emissions test conducted by the facility for this unit during this site visit?** ----- Yes ..No
 - a. Was the test conducted with the unit operating at a capacity of one adult-sized cadaver? ----- Yes ..No
 - b. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
 - c. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
 - d. Did the visible emission test demonstrate compliance with the limit? ----- Yes ..No
 (5% opacity, six-minute average, except that visible emissions not exceeding 15% opacity shall be allowed for up to six minutes in any one-hour)
2. **Was a visible emissions test conducted by the inspector during this site visit?** ----- Yes ..No
 - a. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? ----- Yes ..No
 - b. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
 - c. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
 - d. Did the visible emission test demonstrate compliance with the limit? ----- Yes ..No
3. **Is there any reason to ask for a special test to determine compliance with the PM and CO standards?** ----- Yes ..No
 If yes, what reason? _____

PART III: MONITORING/RECORDKEEPING REQUIREMENTS

(check only one box for each question)

1. **Were there any objectionable odors detected?** ----- Yes ..No
 An upwind/downwind survey of the facility was conducted. The observed parameters were:
 Downwind odor level detected- _____ Wind direction - _____ Upwind odor level detected- _____ (1-10)
2. **Continuous Monitoring Systems –**
 - a. Is a continuous temperature monitoring system installed on each unit to record temperatures in the secondary chamber in accordance with the manufacturer’s instructions? ----- Yes ..No
 - b. Is the temperature probe properly placed, at least at the distance where the 1.0 second gas residence time at 1,800¹ 1,600² degrees was determined? ----- Yes ..No
 (Application or initial notification: ¹ received on or after 8/30/89; ² received before 8/30/89)

PART III: MONITORING/RECORDKEEPING REQUIREMENTS (continued)

- c. Are the following records kept on file, available for inspection, for at least the past two years?
- 1) All temperature measurements ----- Yes ..No
 - 2) all continuous monitoring systems, monitoring devices, and performance testing measurements;
monitoring system all continuous performance evaluations ----- Yes ..No
 - 3) All CEMS or monitoring device calibration checks (last performed on ())----- Yes ..No
 - 4) Adjustments ----- Yes ..No
 - 5) Preventive maintenance performed on systems/devices ----- Yes ..No
 - 6) Corrective maintenance performed on systems/devices ----- Yes ..No
- d. Are the temperature charts properly documented with operator name, operator indication of when cremation in the primary chamber was begun, date, time, and temperature markings ----- Yes ..No
- e. Was the crematory unit installed after **2/1/07**? If no, skip e.(1) – (3) ----- Yes ..No
- (1) Is the crematory unit equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement? ----- Yes ..No
 - (2) Is the system calibrated to restrict combustion in the primary chamber whenever any opacity exceeds 15% opacity ? ----- Yes ..No
 - (3) Has the opacity measurement system been cleaned and checked for proper operation in accordance with the manufacturer’s recommended maintenance schedule? ----- Yes ..No

PART IV: SECONDARY COMBUSTION ZONE TEMPERATURES

(check only one box for each question)

1. If the application to construct was **BEFORE** August 30, 1989 is the:
- a. actual operating temperature of the secondary chamber combustion zone no less than **1400°F** throughout the combustion process in the primary chamber? ----- Yes ..No
 - b. secondary chamber combustion zone temperature equal to or greater than **1400°F** before the cremation process begins in the primary chamber? ----- Yes ..No
2. If the application to construct **ON** or **AFTER** August 30, 1989 is the:
- a. the actual operating temperature of the secondary chamber combustion zone no less than **1600°F** throughout the combustion process in the primary chamber? ----- Yes ..No
 - b. secondary chamber combustion zone temperature equal to or greater than **1600°F** before the cremation process begins in the primary chamber? ----- Yes ..No

PART V: ALLOWED MATERIALS

(check only one box for each question)

1. *Other than* human or fetal remains with appropriate containers or clothing, are any materials, including biomedical wastes, incinerated in the unit? ----- Yes ..No
2. Do cremation containers contain no more than 0.5 % (percent) by weight chlorinated plastics as certified by the manufacturer? ----- Yes ..No
- If yes, is the certifying documentation from the manufacturer kept on file for at least 2 years from use? Yes ..No

PART VI: EQUIPMENT MAINTENANCE

(check only one box for each question)

1. Is the crematory unit maintained in accordance with the manufacturer's specifications? ----- Yes ..No
2. Is there a written plan onsite which addresses the operating procedures during startup, shutdown and malfunction? ----- Yes ..No
3. Does the crematory allow for a visible check on the flame characteristics? ----- Yes ..No
If no, skip a. – b.
 - a. Was the flame characteristic visually checked at least once during each operating shift? ----- Yes ..No
 - b. Was the flame adjusted when necessary? ----- Yes ..No

PART VII: EU INSPECTION COMPLIANCE STATUS (check only one box)

- IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

Emissions Unit Section
3 – Cremator - Mathews Cremation Super PowerPak III

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

1. a. Complete AC application or, if no AC permit, initial GP registration received on or after August 30, 1989? ----- Yes ..No
- b. If yes, were design calculations provided then to confirm a sufficient volume in the secondary chamber combustion zone to provide for at least a 1.0 second gas residence time at 1800 degrees Fahrenheit? ----- Yes ..No
2. Crematory unit installed after February 1, 2007? ----- Yes ..No
3. Date of last inspection: 3/5/10
4. Past Visible Emissions (VE) tests:
 - a. Was a VE test performed within each of the past 4 calendar years? ----- Yes ..No
 - b. Has a VE test been performed yet within the current calendar year? ----- Yes ..No
 - c. If first year of operation, was a VE test performed within 30 days of commencing operation? ----- N/A Yes ..No
 - d. Date of last VE test: 3/16/11
 - e. Was the VE test report filed with the compliance authority no later than 45 days after the test? ----- Yes ..No
 - f. Did the facility demonstrate compliance during the last VE test? ----- Yes ..No

If no, what was the problem (if known)?

PART II: VISIBLE EMISSIONS TESTING

(check only one box for each question)

1. **Was a visible emissions test conducted by the facility for this unit during this site visit?** ----- Yes ..No
 - a. Was the test conducted with the unit operating at a capacity of one adult-sized cadaver? ----- Yes ..No
 - b. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
 - c. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
 - d. Did the visible emission test demonstrate compliance with the limit? ----- Yes ..No

(5% opacity, six-minute average, except that visible emissions not exceeding 15% opacity shall be allowed for up to six minutes in any one-hour)
 2. **Was a visible emissions test conducted by the inspector during this site visit?** ----- Yes ..No
 - a. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? ----- Yes ..No
 - b. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
 - c. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
 - d. Did the visible emission test demonstrate compliance with the limit? ----- Yes ..No
 3. **Is there any reason to ask for a special test to determine compliance with the PM and CO standards?** ----- Yes ..No
- If yes, what reason?

PART III: MONITORING/RECORDKEEPING REQUIREMENTS

(check only one box for each question)

1. **Were there any objectionable odors detected?** ----- Yes ..No
 An upwind/downwind survey of the facility was conducted. The observed parameters were:
 Downwind odor level detected- _____ Wind direction - _____ Upwind odor level detected- _____ (1-10)
2. **Continuous Monitoring Systems –**
 - a. Is a continuous temperature monitoring system installed on each unit to record temperatures in the secondary chamber in accordance with the manufacturer’s instructions? ----- Yes ..No
 - b. Is the temperature probe properly placed, at least at the distance where the 1.0 second gas residence time at 1,800¹ 1,600² degrees was determined? ----- Yes ..No
 (Application or initial notification: ¹ received on or after 8/30/89; ² received before 8/30/89)

PART III: MONITORING/RECORDKEEPING REQUIREMENTS (continued)

- c. Are the following records kept on file, available for inspection, for at least the past two years?
- 1) All temperature measurements ----- Yes ..No
 - 2) all continuous monitoring systems, monitoring devices, and performance testing measurements;
monitoring system all continuous performance evaluations ----- Yes ..No
 - 3) All CEMS or monitoring device calibration checks (last performed on (Feb 2010)) ----- Yes ..No
 - 4) Adjustments ----- Yes ..No
 - 5) Preventive maintenance performed on systems/devices ----- Yes ..No
 - 6) Corrective maintenance performed on systems/devices ----- Yes ..No
- d. Are the temperature charts properly documented with operator name, operator indication of when cremation in the primary chamber was begun, date, time, and temperature markings ----- Yes ..No
- e. Was the crematory unit installed after **2/1/07**? If no, skip e.(1) – (3) ----- Yes ..No
- (1) Is the crematory unit equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement? ----- Yes ..No
 - (2) Is the system calibrated to restrict combustion in the primary chamber whenever any opacity exceeds 15% opacity ? ----- Yes ..No
 - (3) Has the opacity measurement system been cleaned and checked for proper operation in accordance with the manufacturer’s recommended maintenance schedule? ----- Yes ..No

PART IV: SECONDARY COMBUSTION ZONE TEMPERATURES

(check only one box for each question)

1. If the application to construct was **BEFORE** August 30, 1989 is the:
- a. actual operating temperature of the secondary chamber combustion zone no less than **1400°F** throughout the combustion process in the primary chamber? ----- Yes ..No
 - b. secondary chamber combustion zone temperature equal to or greater than **1400°F** before the cremation process begins in the primary chamber? ----- Yes ..No
2. If the application to construct **ON** or **AFTER** August 30, 1989 is the:
- a. the actual operating temperature of the secondary chamber combustion zone no less than **1600°F** throughout the combustion process in the primary chamber? ----- Yes ..No
 - b. secondary chamber combustion zone temperature equal to or greater than **1600°F** before the cremation process begins in the primary chamber? ----- Yes ..No

PART V: ALLOWED MATERIALS

(check only one box for each question)

1. *Other than* human or fetal remains with appropriate containers or clothing, are any materials, including biomedical wastes, incinerated in the unit? ----- Yes ..No
2. Do cremation containers contain no more than 0.5 % (percent) by weight chlorinated plastics as certified by the manufacturer? ----- Yes ..No
- If yes, is the certifying documentation from the manufacturer kept on file for at least 2 years from use? Yes ..No

PART VI: EQUIPMENT MAINTENANCE

(check only one box for each question)

- 1. Is the crematory unit maintained in accordance with the manufacturer's specifications? ----- Yes ..No
- 2. Is there a written plan onsite which addresses the operating procedures during startup, shutdown and malfunction? ----- Yes ..No
- 3. Does the crematory allow for a visible check on the flame characteristics? ----- Yes ..No
If no, skip a. – b.
- a. Was the flame characteristic visually checked at least once during each operating shift? ----- Yes ..No
- b. Was the flame adjusted when necessary? ----- Yes ..No

PART VII: EU INSPECTION COMPLIANCE STATUS (check only one box)

- IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

Facility Section (continued)

SPECIAL CONDITIONS AND PROCEDURES

(check only one box for each question)

Administrative Changes:

- 1. Were there any changes in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or any other similar minor administrative change at the facility? ---- Yes ..No
- 2. If yes, did the facility provide written notification within 30 days of the change? ----- Yes ..No

New or Modified Process Equipment or Change in Ownership:

- 3. Since the last registration form submittal has there been ----- Yes ..No
 - a. Installation of any new process equipment? ----- Yes ..No
 - b. Alterations to existing process equipment without replacement? ----- Yes ..No
 - c. Replacement of existing equipment with equipment that is substantially different? ----- Yes ..No
 - d. A change in ownership? ----- Yes ..No
- If the any answer to 3a. – d. is Yes , was a new registration form and the appropriate fee submitted 30 days prior to the change? ----- Yes ..No

Jennifer Waltrip

April 15, 2011

Inspector's Name (Please Print)

Date of Inspection

/s/

April 2012

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Department representatives met with Mr. Karl Ruhl on April 15, 2011 for the annual air program compliance inspection. Mr. Ruhl operates and maintains required records for the two cremation units.

During the inspection the southern cremation unit (PowerPak III) was in operation and no visible emissions were observed from the stack. Circle charts were available onsite and reviewed for compliance with the continuous monitoring requirements. The unit is equipped with an opacity meter which sounds an alarm if the visible emissions reach 10%. A visible emission test for the southern unit was performed on March 16, 2011 and resulted in an average opacity of 0%.

The northern cremation unit has been out of service since October 2008 due to a crack in the ceramic liner and in the afterburner. The last emission test for the northern unit was performed on April 3, 2008.

The current person on file as the Authorized Representative is Jerald S. Mitchell, Location Manager. According to facility personnel, Mr. Mitchell is no longer the Authorized Representative. Please note that Rule 62-210.310(2)(d)1, Florida Administrative Code states that within 30 days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include any changes in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership. On April 18, 2011, the Department faxed a copy of the form to fill out and submit in order to notify the Department of the current Authorized Representative. Please ensure this form is signed and mailed to DEP NWD Air Program, 160 Governmental Center, Suite 308, Pensacola, Florida 32502.