



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0810039	DATE: <u>9-15-11</u>	ARRIVE: <u>2:30PM</u>	DEPART: <u>3:30PM</u>
FACILITY NAME: CREMATORY-BRADENTON			
FACILITY LOCATION: 912 53RD AVE W BRADENTON 34207			
OWNER/AUTHORIZED REPRESENTATIVE: JEFFERY TOALE		PHONE: (941)955-4171	
Email: jefftoale@toalebrothers.com		Mobile:	
CONTACT NAME: JEFFERY TOALE		PHONE: (941)955-4171	
Email: jefftoale@toalebrothers.com		Mobile:	
ENTITLEMENT PERIOD: 5/20/2010 / 5/20/2015 (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): Mr. Jim Cummings
 Brief Notes: Cremation Unit Operator

2. Is the Authorized Representative still JEFFERY TOALE? ----- Yes ..No
 If no, who is?: _____

If different, did the facility provide an administrative update within 30 days? ----- Yes ..No

3. Is the facility contact still JEFFERY TOALE? ----- Yes ..No
 If no, who is?: _____

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 – Human Crematory-prim/2ndarychmbrs.NG fired,opac/temp.mon/rec

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: 12/30/09
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: 3/22/10
 - 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 (1/6/11)) ----- 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

Chris Haines & Joe Panetta

9-15-11

Inspector's Name (Please Print)

Date of Inspection

Chris Haines *Joe Panetta*
 Inspector's Signature

9-15-14

Approximate Date of Next Inspection

COMMENTS: Joe Panetta and I (Chris Haines) arrived at the facility at approximately 2:30PM for an unannounced inspection. When we arrived we were met by Mr. Jim Cummings, who is the main cremation unit operator at this facility. Mr. Cummings took Mr. Panetta and I to the cremation unit and showed us that this was the new unit listed on the permit. I asked to see the required opacity monitor and asked when it was last calibrated. Mr. Cummings told me that the monitor was last calibrated when the unit was installed. We asked Mr. Cummings for his temperature, maintenance and other require records. When asked for the preventative maintenance records, and MSDS sheets for the body bags burned at this facility, Mr. Cummings said he did not have them available at that time. I inspected the calibration logs and the maintenance receipts. I instructed Mr. Cummings to fax the MSDS sheets and his preventative maintenance logs to me as soon as possible. At approximately 3:30PM, we concluded our meeting with Mr. Cummings. As of 09/19/11 I have received the records and have attached them to this report.