



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: 11442

AIRS ID#: 0810085 **DATE:** 07/30/2009 **ARRIVE:** 11:54am **DEPART:** 4:50pm
FACILITY NAME: BELSPUR OAKS PET CREMATORY
FACILITY LOCATION: 6060 28th St E
 BRADENTON 34203-5303
OWNER/AUTHORIZED REPRESENTATIVE: RAYMOND BOUNDS **PHONE:** (941)751-5044
CONTACT NAME: **PHONE:**
ENTITLEMENT PERIOD: 1/8/2006 / 1/8/2011
 (effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)
 IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.401, F.A.C.
 (check appropriate box(es))

1. Were there any objectionable odor(s) detected?----- Yes No
2. Was a visible emissions test conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
3. In order to demonstrate individual source compliance, was an annual visible emissions test conducted 60 days prior to the AGP Notification form submission, and within 60 days prior to each anniversary date? (Rule 62-296.401(6)(j), F.A.C.)----- Yes No
4. In order to demonstrate individual source compliance were the remaining applicable standards testing completed within 60 days prior to the AGP Notification form submission? (Rule 62-210.300(4), F.A.C.) Yes No
 - a) Carbon Monoxide (CO) emissions equal to or below the requirements of 100 parts per million by volume, dry basis, corrected to 7% O₂ on an hourly average basis and tested according to EPA Method 10 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
 - b) Oxygen test performed according to EPA Method 3 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
 - c) Particulate matter emissions test with results equal to or below the requirements of 0.080 grains per dry standard cubic foot (ft³) of flue gas, corrected to 7% O₂ and tested according to EPA Method 5 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
5. Was all emissions testing conducted with the source operating at the manufacturers recommended capacity?----- Yes No
6. Was CO & PM compliance demonstrated by submission of a test report for an identical crematory unit? Yes No
7. Was the Department notified at least 15 days prior to the date of the last formal compliance test?----- Yes No
8. Was the required test report filed with the Department as soon as practical, but no longer than 45 days after the test was completed?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.401, F.A.C.

(check appropriate box(es))

1. Is there **Continuous Emissions Monitoring System (CEMS)** equipment installed on each unit to record temperatures in the primary and secondary chambers where there is a 1.0 second gas residence time in the secondary chamber combustion zone in accordance with the manufacturer's instructions?----- Yes No
 - a) Do temperature probes seem to be properly placed?----- Yes No
 - b) Are the following records kept on file, available for inspection for at least two years following the recording of such measurements, maintenance, reports and records?
 - 1) All measurements (including CEMS)----- Yes No
 - 2) Monitoring device----- Yes No
 - 3) Performance Testing Measurements ----- Yes No
 - 4) CEMS Performance Evaluation----- Yes No
 - 5) All CEMS or monitoring device calibration checks----- Yes No
 - 6) Adjustments----- Yes No
 - 7) Preventive maintenance performed on systems/devices----- Yes No
 - 8) Corrective maintenance performed on systems/devices----- Yes No
2. Was this crematory unit constructed: **(check only one box)**
 - a) **BEFORE** August 30, 1989? **(If this box checked, continue on to #3 and skip #4)**
 - b) **ON** or **AFTER** August 30, 1989? **(If this box checked, skip #3 and continue on to #4)**
3. If constructed **BEFORE** August 30, 1989 is the:
 - a) secondary chamber combustion zone providing at least a 1.0 second gas residence time @ **1600°F**? Yes No
 - b) actual operating temperature of the secondary chamber combustion zone no less than **1400°F** throughout the combustion process in the primary chamber?----- Yes No
 - c) cremation in the primary chamber begun after the secondary chamber combustion zone temperature is equal to or greater than **1400°F**?----- Yes No
 - d) required monitoring equipment installed and operational, and providing continuous monitoring to record the temperature at the point or beyond where 1.0 second gas residence time is obtained in the secondary chamber combustion zone according to the manufacturer's instructions?----- Yes No
4. If constructed **ON** or **AFTER** August 30, 1989 is the:
 - a) volume in the secondary combustion zone sufficient to provide at least a 1.0 second gas residence time @ **1800° F**?----- Yes No
 - b) 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
 - c) secondary chamber combustion zone temperature equal to or greater than **1600°F** before the cremation process begins in the primary chamber?----- Yes No
5. Are appropriate leak-proof containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead animals?----- Yes No
 - a) If the answer to question 4 above is YES, is certifying documentation from the manufacturer that they are composed of 0.5% or less by weight chlorinated plastics kept on file at the site for the duration of their use and for at least two years after their use?----- Yes No
 - b) If plastic bags are used for the cremation of animals are they non-chlorinated and no less than 3 mils thick?----- Yes No
 - c) Are dead animals, which have been used for medical or commercial experimentation, or other materials, including biomedical wastes (Rule 62-210.200, F.A.C.), incinerated at this location?----- Yes No
6. During this review period, was the largest batch load cremated 500 pounds per hour or less?----- Yes No
7. Have all crematory operators been trained and certified by a Department-approved training program?--- Yes No
 - a) Are copies of the training certificates all crematory operators kept on file at the facility for the duration of the operator's employment & for an additional two years after termination of employment?----- Yes No

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-296.401, F.A.C.

A. New or Modified Process Equipment

1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?----- Yes No
2. If a crematory unit has been modified to the extent that a Department air construction permit was required, have all operators been retrained to operate the modified unit?----- Yes No
3. In the case of new or modified equipment, where a Department air construction permit was required, has the owner submitted copies of all operator training certificates?----- Yes No
 - a) submitted within the 15 day required window following the training?----- Yes No

Wendy D. Simmons and Joe Panetta

07/30/2009

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

10/01/2009

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: On July 23, 2009, Mrs. Danielle D. Henry, Compliance Manager of the Department's SW District Air Program received an anonymous complaint of thick black smoke from the middle stack(EU 03) at this facility. No black smoke or odor was noted upon approach or arrival at the facility. Inspector Joe Panetta attended this inspection for the purpose of investigating compliant issue while Inspector Simmons reviewed chart records for the facility. Inspector Panetta also attended this inspection for the purpose of gathering new information about the facility's cremation units' components. Some of the chart records information scanned at the previous inspection cut off necessary information and therefore, had to be rescanned at this inspection. Inspector Simmons scanned chart records as necessary. Inspector Panetta reviewed July chart records for completeness and potential temperature issues. Inspector Panetta conducted a review of the facility's cremation units' components and noted manufacturer information for emission units' components at the facility. Review of July chart records indicates that the facility is continuing to have potential improper operation and maintenance issues as well as inadequate record keeping issues. These ongoing items were verbally addressed by Inspector Panetta with Mr. Raymond Bounds. Inspector Panetta restated permit required record keeping and operation requirements, as in previous inspections by both Inspector Panetta and Inspector Simmons. Additionally, Inspector Panetta suggested the facility keep a log sheet/spreadsheet by each unit to document start times and operator information for reference purposes if the facility prefers not to write on the charts while they are in the recording unit. Inspector Panetta also suggested that the operator write the date and operator information on the chart prior to installing it in the cremation unit at the beginning of the day. Mr. Bounds stated that he would consider these suggestions to reduce the likelihood of inadequate recordkeeping issues in the future. Inspector Panetta also made note of missing pen ink on chart records and suggested that the facility's operators make notes on the chart somewhere when there is a malfunction of the unit or when power outages occur. Inspector Simmons also reminded Mr. Bounds that the facility is required by the general permit rules to notify the Department immediately when there is a malfunction of any kind during operation of the equipment including power outages when they occur. Inspector Simmons stated this notification could be done through email, fax, or phone call. Copies of chart records, photos taken and component information taken during this site visit are attached to this inspection report. Mr. Bounds stated that he plans to test his cremation units in October of this year and expressed that he plans to test Emission Unit #1 at the lower 1400 Degrees Fahrenheit rate so he can begin operating in that mode again. Checklist questions above were not reviewed during this inspection since there was an inspection conducted just one month ago.