



HUMAN CREMATORY

COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 1030017 006 **DATE:** 2/16/07 **ARRIVE:** 11:00 AM **DEPART:** 2:00 PM

FACILITY NAME: Cemetery Management, Inc.

FACILITY LOCATION: 5862 Ulmerton Road
Clearwater, FL

RESPONSIBLE OFFICIAL: Robert E. Simpson?

PHONE: 531-8200

CONTACT NAME: William Wood?

PHONE: 531-8200

REMITTANCE YEAR: N/A

ENTITLEMENT PERIOD: 4/9/2004 / 11/29/07
(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(5)(i), 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 cremation containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead human bodies?----- ☒ 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) Are there any other materials, including biomedical wastes (Rule 62-210.200, FAC) incinerated at this location?----- ☒ Yes ☐ No
6. Have all crematory operators been trained and certified by a Department-approved training program? ☒ Yes ☐ No
- a) Are copies of the training certificates for 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

Mike Ojo Thomas

Inspector's Name (Please Print)

2/16/07
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: *The daily operating logs and temperature charts were reviewed from 02/1/06 through 2/16/07. The inspection indicated that Cemetery Management Incorporated was in violation of the General Permit Conditions as follows: 62-296.401(5)(c), F.A.C.: Requires the Secondary chamber combustion Zone temperature is equal to or greater than the 1600 degree Fahrenheit. I noted the chart and temperature drop below 1600 degree Fahrenheit. In addition, the emission unit temperature strip chart traces data were omitted in one instance. Cemetery Management Incorporated was also in violation of 62-210.300(4)(d), F.A.C.: If for any reason, the owner or operator of any facility operating under an air general permit, does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information: (1.) A description of and cause of noncompliance; and (2.) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance. Cemetery Management Incorporated failed to notify Pinellas County Air Quality Division of the temperature drop below required 1600 degree Fahrenheit. Cemetery Management Incorporated appears to be in non-compliance regarding procedures at this time. See the attached Pinellas County inspection report form for additional information.*

Human Crematory

FACILITY: Cemetery Management, Inc. <div style="text-align: center;">Bay Area Crematory</div>			Per_ID: 2285			DISTRICT: <div style="text-align: center;">Southwest</div>		
ADDRESS: 5862 Ulmerton Road <div style="text-align: center;">Clearwater, FL</div>						CONTACT: Bill Wood Phone No: 531-8200		
ARMS No.: 1030017 006			PERMIT NO.: 1030017-005-AG			EXPIRATION DATE: 11/29/07		
EMISSION UNIT DESCRIPTION: Human Crematory: Industrial Equipment & Engineering Model IE-43-SSP (Super Power-Pak) (1600 degrees minimum secondary chamber temperature)								
INSPECTION DATE: 2/16/2007			ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____			COMPLIANCE STATUS: <input type="checkbox"/> IN <input checked="" type="checkbox"/> MNC <input type="checkbox"/> SNC		
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly								
A. General Review:								
1.	Permit File Review							<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry <i>Comments: This source was inspected to determine if it is operating within applicable regulations. I met with the facility contact Mr. Wood, the manager.</i>							<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.	Administrative Corrections. Within thirty (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: 1. Any change 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 2. Any other similar minor administrative change at the facility. Is the Authorized Representative still: <u>Robert E. Simpson?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Is the facility contact still: William Wood? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No [62-210.310(2)(d), F.A.C.] <i>Comments: Mr. Simpson stills the Authorized Representative and Mr. Wood stills the facility contact.</i>							

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			B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible emission (5 percent opacity), except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period. [Rule 62-296.401(1)(a), F.A.C.] <i>Comments: The last annual visible emissions test, conducted on 9/20/06 demonstrated an opacity of 0%.</i> <i>An AQD VE test was performed during this site visit <input checked="" type="checkbox"/>Yes or <input type="checkbox"/>No. An opacity of 0% was observed.</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Human crematory units shall operate with a secondary chamber temperature of no less than : <input checked="" type="checkbox"/> 1600 degrees Fahrenheit throughout the combustion process in the primary chamber, for construction applications received by the Department on or after August 30, 1989. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 degrees Fahrenheit. [Rule 62-296.401(5)(c), F.A.C.], or <input type="checkbox"/> 1400 degrees Fahrenheit throughout the combustion process in the primary, for construction applications received by the Department prior to August 30, 1989. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1400 degrees Fahrenheit. [Rule 62-296.401(5)(d), F.A.C.] <i>Comments: Facility is required to operate at a temperature of 1600 ° F based on <input type="checkbox"/> identical stack testing, <input type="checkbox"/> source specific stack testing and visible emissions tests, or <input checked="" type="checkbox"/>rule. Based on record reviews, the lowest operating temperatures observed was as follows:</i>

Human Crematory

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			B. Specific Conditions
			<p>@ 1500 ° F. on 1/19/06 for ~ 3 minutes. <i>I inquired to why the incinerator was operated below the required 1600 degrees Fahrenheit. Mr. wood stated the burner recovery time malfunction. He stated the manufacturer of the emission unit was notified and they came to fine-tuning the emission unit.</i></p> <p>@ 1550 ° F on 02/06/06 for ~5 minutes. <i>I inquired to why the incinerator was operated below the required 1600 degrees Fahrenheit. Mr. wood stated he had no details as to what caused the temperature to drop below 1600 degrees Fahrenheit.</i></p> <p><i>In addition, the emission unit temperature strip chart traces data were omitted on 9/06/06. I inquired as to why the emission unit strip chart traces were missing. Mr. Wood stated he was on vacation; the emission unit was operated by Mr. Lance Wiegand. Mr. Wood stated when he returned back to work he noticed the emission unit chart traces were missing. He stated Mr. Wiegand the operator no longer with them. He said it appears that the pen ran out of ink and operator failed to notice it. Mr. Wood stated he thought the operator retraced with ink pen where chart traces was trying to mark.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Human crematories shall cremate only dead human bodies with appropriate containers. The bodies may be clothed. The containers may contain no more than 0.5 percent by weight chlorinated plastics as demonstrated by the manufacturer's data sheet. If containers are incinerated, documentation from the manufacturers certifying that they are composed of 0.5 percent or less by weight chlorinated plastics must be kept on-file at the site for the duration of their use and for at least two years after their use. No other material, including biomedical waste as defined in Rule 62-210.200, F.A.C., shall be incinerated. [Rule 62-296.401(5)(e), F.A.C.]</p> <p>Comments: Reviewed records for the months of 2/1/06 through 2/16/07. The highest reported chlorine content was <u>0</u>%. Supporting documentation was verified (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No).</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>All crematory operators shall be trained by the equipment manufacturer's representatives or another qualified organization. Only operators trained by a Department-approved training program shall be allowed to operate a human crematory. A copy of the training certificate for each operator having satisfactorily completed the Department-approved training program must be submitted to the Department within 15 days of training. An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional two years after termination of employment. [Rule 62-296.401(f), F.A.C.]</p> <p>Comments: No longer applicable by rule since 1/10/07 .</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>New and existing facilities permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits, shall demonstrate individual source compliance with the visible emissions standard within 60 days prior to the submittal date of the air general permit notification form and within 60 days prior to each anniversary of such date. [Rule 62-296.401(5)(i), F.A.C.]</p> <p>Comments: The last test was conducted on 9/20/06. This is within the allowable 60 day window.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [62-297.310(7)(a)9, F.A.C.]</p> <p>Comments: The County was notified on 8/23/06, for the test that was conducted on 9/20/06.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Test Reports. - The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the test is completed. [62-297.310(8), F.A.C.]</p> <p>Comments: The last test was conducted on 9/20/06, and the test results were submitted on 10/11/06.</p>

Human Crematory

I N	M N C	S N C	
			B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Continuous Emissions Monitoring Requirements. Each human crematory shall install, operate, and maintain continuous monitors to record temperature at the point or beyond where 1.0 second gas residence time is obtained in the secondary chamber combustion zone in accordance with the manufacturer's instructions. A complete file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and adjustments, preventive maintenance, and corrective maintenance performed on these systems or devices, shall be recorded in a permanent legible form available for inspection. Continuous temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber begins, date, time, and temperature markings. The file shall be retained for at least two years following the recording of such measurements, maintenance, reports, and records. [Rule 62-296.401(5)(k), F.A.C.]</p> <p><i>Comments: Reviewed temperature charts for the months of 2/1/06 through 2/16/07. The last calibration on the temperature chart was on 11/27/06. The temperature probe appears properly placed (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No)</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Process Rate</p> <p><i>Comments: The maximum load for this crematory unit is 300 pounds. The largest body cremated during this review period was 400 pounds. Mr. Wood stated the 400 pounds human remains was first cremation of the day. He stated he preheats emission unit 1600 degrees F and load head first, placed burner switch to ignition position. The operator appears to follow the manufacturer recommendation during largest body cremation.</i></p>
			C. Selected General Conditions and Procedures
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit pursuant to Rule 62-210.300(4)(a), F.A.C., does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result. <p>[62-210.310(3)(i), F.A.C.]</p> <p><i>Comments: I asked Mr. Wood as to why he did not notify our office. He stated my boss had told him not notify AQ Division office of minor non compliance issues. I explained to Mr. Wood of Cemetery Management Incorporation responsibility to maintain compliance with general permit conditions on a continual basis and if unable to meet compliance for any reason, Cemetery Management Incorporation responsibility is to inform the AQD office of the noncompliance circumstances in accordance with General Permit Conditions # Q1&2.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>To avoid lapse of authority to operate, an owner or operator intending to use, or continue to use, an air general permit must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air operation permit or air general permit.</p> <p>[62-210.310(2)(c)2., F.A.C.]</p> <p><i>Comments: The permit expires on 11/29/07. A new notification form is required to be submitted no later than 10/30/07.</i></p>

Human Crematory

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C. Selected General Conditions and Procedures			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit. [62-210.310(2)(e)., F.A.C.]</p> <p><i>Comments: The facility had not added any additional emission unit or made any changes to the existing emission unit.</i></p>
D. Other:			
Closing Conference			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Comments: During the closing conference, I informed Mr. Wood the emission unit is deemed to be in non-compliance regarding procedures at this time.</i></p>			
<p>Other Comments:</p>			
<p>Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division</p>			
Signature(s)			Date: 2/20/07

CONTACT LOG? _Yes, ACCESS? _Yes, ARMs? __Yes

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