



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: 11440

AIRS ID#: 1010042 **DATE:** 10/21/2009 **ARRIVE:** 0942 **DEPART:** 1215

FACILITY NAME: SOUTHEASTERN CREMATORIES #19

FACILITY LOCATION: 13011 US HWY 19
HUDSON 34667

OWNER/AUTHORIZED REPRESENTATIVE: CYNTHIA SKIVER **PHONE:** (727)863-1000

CONTACT NAME: Cythia Shiver **PHONE:** (727)247-4745

ENTITLEMENT PERIOD: 3/20/2008 / 3/20/2013
(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.)?-----N/A 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.)N/A 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.)?-----N/A Yes No
 - b) Oxygen test performed according to EPA Method 3 (Ref.: Chapter 62-297, F.A.C.)?-----N/A 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.)?-----N/A 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?N/A Yes No
7. Was the Department notified at least 15 days prior to the date of the last formal compliance test?-----N/A 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?-----N/A Yes No

**Southwest District
Air Resource Management
COMPLIANCE REFERRAL FOR ENFORCEMENT REVIEW**

To: Cindy Falandysz, Enforcement Manager

Through: Danielle Henry, Compliance Manager

Date: 11/17/2009

Company: Southeastern Crematories # 19

AIRS ID: 1010042

Permit No: 1010042-005-AG

The Compliance Section refers the following for enforcement review:

07/22/2009 an inspection of this facility was conducted in conjunction with complaint # 11440 that stated "Black smoke coming from funeral home again". Ms. Shiver explained the black smoke coming from the crematory this way: *After speaking with the crematory technician, it seems that the issue resulted due to the weight of the deceased and the retort not being cooled down enough for this type of cremation. The smoking only lasted for a couple of minutes. The individual who performed the cremation has been taken off of the position and put back into a training situation and will not be placed back into the job until after careful monitoring and additional training proves that he understands fully all aspects of the cremation process. He is a new employee who had completed training and started on Monday without any supervision.*

During my site visit Ms. Shiver introduced me to the operator, Martin Murn, who was operating crematory EU002 (Unit A) during the cremation in question. Mr. Murn continued with the same explanation of the smoking event in Unit A as Ms. Shiver with the addition of stating that he had shutdown both the primary and secondary burners to try and cool down the EU002 (Unit A).

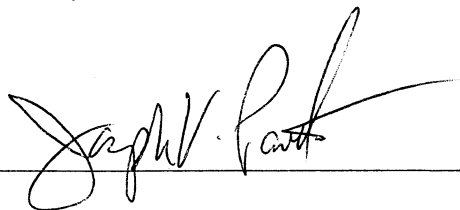
The facility may have improperly operated crematory Unit A, EU002, by shutting down the air pollution control device during a cremation on July 21, 2009 starting at 0945 for about 30 minutes during 1 hour and 47 minute cremation.

Rule 62-210.310(3) (f), F.A.C. The owner or operator shall not circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.

Attached:

- Pertinent Permit with applicable permit number (or parts thereof)
- Facility location
- Inspection Report (as necessary)

Referred by:



11/17/2009

Signature

Date

Through Air Compliance Supervisor:

Signature

Date

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? N/A 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?----N/A Yes No

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

A. New or Modified Process Equipment

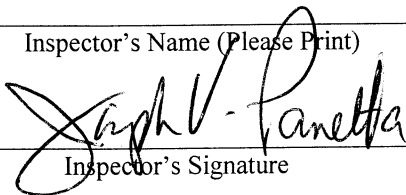
1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- 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?-----N/A 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?-----N/A 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?-----N/A Yes No
 - a) submitted within the 15 day required window following the training?----- es No

Joseph V. Panetta

10/21/2009

Inspector's Name (Please Print)

Date of Inspection



Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This inspection by Joe Panetta and James Burkholder was a Follow up inspection from complaint #11440 on July 22, 2009. Maintenance Records, Preventative Maintenance Schedule, and MSDS for plastic bags burned were made available during this inspection. So those issues are in compliance now.

A Field Warning Notice was provided to Ms. Shiver stating that the facility may have improperly operated crematory Unit A, EU002 by shutting down the air pollution control device during a cremation on July 21, 2009 starting at 0945 for about 30 minutes during a 1 hour and 47 minute cremation.

Rule 62-210.310(3) (f), F.A.C. The owner or operator shall not circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.

James Burkholder measured and drew a schematic of the cremation units.

I filled out the rest of the SWD Inspection Checklist requiring model #'s and serial #'s.

Right now we are moving ahead with Enforcement with this facility on the above issue.

After the gathering of further information; if the thermocouple is not located as required appropriate action will take place.



Florida Department of Environmental Protection
Southwest District Office

FIELD WARNING NOTICE

SCI #19

Name / Owner / Operator: _____

Address: _____

Location / Source: _____

Permit Number: 1010 042 Permit Exp. Date: _____ Date and Time: 10/21/09

The purpose of this notice is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. Florida Department of Environmental Protection (DEP) personnel conducted a field inspection on the date listed above at the location described above. Florida DEP personnel observed the following, which indicates that a violation of Florida Statutes and Rules may exist at the above described facility: (For example, Where was the activity observed? How was it discovered? Who provided information to the inspector?)

Observations: The Facility may have improperly operated crematory Unit A, E4002, by shutting down the AIR pollution control device (AKA, Afterburner) during A CREMATION ON July 21, 2009 between ~ 9:45AM for about 30 minutes.

Rule or Statute Relevant to Observations

Permit Condition No.

Unconfined Particulate Matter. Rule 62-296.320(4)(c)1, Florida Administrative Code (F.A.C.), provides that no person shall cause, let, permit, suffer or allow the emission of unconfined particulate matter from any activity, without taking reasonable precautions to prevent such emissions.	
Operating Without a Permit. Rule 62-210.300, F.A.C., provides that, unless exempted from permitting or unless specifically authorized, the owner or operator of any facility or emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department.	
Violation of Permit Condition(s). Rule 62-4.160(1), F.A.C., The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S.	
Objectionable Odor. Rule 62-296.320(2), F.A.C., provides that no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.	
Excessive Visible Emissions. Rule 62-296.320(4)(b)1., F.A.C., provides that no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity.	
Open Burning. With few exceptions, Rule 62-296.320(3), F.A.C., prohibits open burning in connection with industrial, commercial, or municipal operations.	
Constructing Without a Permit. Rule 62-4.210, F.A.C., provides that no person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department.	

Other. 62-210.310(3)(F) The owner or operator shall not circumvent any Air Pollution Control device or allow the emissions of Air Pollutants w/o proper operation of A/P

The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of the above-described statutes or rules should be ceased. The operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the administrative imposition of penalties up to \$10,000.00 pursuant to Section 403.121, Florida Statutes (F.S.), or the judicial imposition of civil penalties up to \$10,000.00 per violation per day pursuant to Sections 403.141 and 403.161, F.S.

Applicable Air Pollution Control Devices
You are requested to contact the Department at the address or telephone number below within fifteen (15) days of receipt of this Field Warning Notice. Please be advised that this Field Warning Notice is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. We look forward to your cooperation in completing the investigation and resolution of this matter.

Received by: Cynthia Skiver Issued / Posted by: Joseph V. Panetta
Print: Cynthia Skiver Print: Joseph V. Panetta
Title: General Manager