



Florida Department of Environmental Protection

Northwest District Branch Office
630-3 Capital Circle NE
Tallahassee, Florida 32301

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 29, 2009

SENT VIA E-MAIL
RockyBevis@yahoo.com

R.J. Bevis, President
North Florida Crematory
2710 North Monroe Street
Tallahassee, Florida 32303

Dear Mr. Bevis:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is **0390033**. Your facility permit **expires on February 24, 2012**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the facility inspection results, the Tallahassee Branch Office reported a facility status of **noncompliance** for the following:

The crematory unit appears to have been installed after February 1, 2007 and is equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement. **The following was not being documented:**

"Rule 62-296.401(5), F.A.C. (i) Continuous Monitoring Requirements.

Pollutant monitoring system documentation shall include indication of when the opacity measurement system was cleaned and checked for proper operation in accordance with the manufacturer's recommended maintenance schedule. The file shall be retained for at least two (2) years following the recording of such measurements, maintenance, reports, and records."

Please respond to this office, in writing, within 15 days receipt of this letter. You may include what measures you have taken to correct the above issue. Recent examples (copies) of recordkeeping may also be provided. Electronic and/or scanned correspondence is acceptable.

R.J. Bevis
May 29, 2009
Page 2

Your facility compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. You are encouraged to review the enclosed inspection checklist and its comments section. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,



Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0390033 **DATE:** 5/15/2009 **ARRIVE:** 11:00 **DEPART:** _____
FACILITY NAME: NORTH FLORIDA CREMATORY
FACILITY LOCATION: 20 SOUTH DUVAL STREET
 QUINCY 32355
OWNER/AUTHORIZED REPRESENTATIVE: R.J. BEVIS **PHONE:** (850)385-2193
CONTACT NAME: _____ **PHONE:** _____
ENTITLEMENT PERIOD: 2/24/2007 / 2/24/2012
 (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

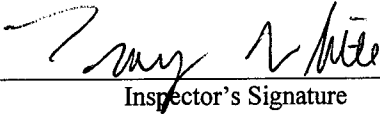
1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- 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

Tracy White

5/15/2009

Inspector's Name (Please Print)

Date of Inspection



6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

Inspection: 5/15/2009, 0390033, time 11:00 A.M.

I met with Lamar Alday, Crematory Operator. Mr. Alday provided the records as requested. The temperature data recorder charts and a crematory log were available. No problems were noted.

Mr. Alday made a copy of my Human Crematory Registration form copy. I asked Mr. Alday about the "pollutant monitoring system" requirements. He did not appear to be familiar with what I was asking. So I requested the operator's manual. The manual was provided and I pointed out the sections dealing with "Opacity Lamp On" and Section 4, Service and Maintenance.

Mr. Alday and I reviewed Rule 62-296.401(5), F.A.C, Section 5(i), Continuous Monitoring Requirements. I recommended that Mr. Alday maintain a cleaning log for the "opacity monitoring system." He did not appear to have records for this requirement.

Afterwards the machine was observed. The "Opacity Control System" components were noted. Mr. Alday then explained that he did clean those components. Again I recommended that he record when he cleaned and calibrated the assembly (as detailed in the operating manual section: Service and Maintenance).

The crematory unit was in operation. The temperature on the display and chart corresponded to 1650 degree (f). No excess emissions were noted from the stack (around 0% opacity).

Department computer records indicate the last compliance testing was on 11/25/2008.

Recommendations:

The facility is in a non-compliant status for insufficient recordkeeping. Please maintain the "Pollutant Monitoring Documentation" (i.e. opacity measurement system maintenance log) as required by Rule 62-296.401(5), F.A.C, Section 5(i), Continuous Monitoring Requirements.