



Florida Department of Environmental Protection

Northwest District Branch Office
3900 Commonwealth Boulevard, MS 55
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 29, 2011

SENT VIA EMAIL
DKFCPALFD@aol.com

Mr. Dan K. Fairchild
Chief Executive Officer
Fairchild Cremation Services
3673 Peddie Drive
Tallahassee, Florida 32303

Dear Mr. Fairchild:

A Department representative conducted two inspections for your facility to determine compliance with the Air Quality Operating Permit. The permit **expires July 31, 2013**. The program identification number for this facility is **0730068**. This letter applies only to activities covered by the Air Resources Management Program.

The Tallahassee Branch Office reported a facility status of **Non Compliance** for the following issue:

Facility non compliance status is currently under review in regard to Warning Letter NWAP 073-1890. For further information pertaining to this issue, please contact Chris Stoll at 850/595-0654.

Your assistance is appreciated. The inspection checklists are enclosed. If you have any questions, your local contact is Tracy White at 850/ 245-2960 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos

Marlane Castellanos
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn, Mary Beth Curle, Carol Melton (FDEP, Pensacola)



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730068	DATE: <u>7/12/2011</u>	ARRIVE: <u>1:18</u>	DEPART: _____
FACILITY NAME: CAPITAL CITY CREMATORY			
FACILITY LOCATION: 3673 PEDDIE DR TALLAHASSEE 32303			
OWNER/AUTHORIZED REPRESENTATIVE: DAN FAIRCHILD		PHONE: (904)386-8686	
Email: dkfcpalfd@aol.com		Mobile:	
CONTACT NAME: DAN FAIRCHILD		PHONE: (850)386-8686	
Email:		Mobile:	
ENTITLEMENT PERIOD: 7/31/2008 / 7/31/2013 (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): Dan Fairchild
 Brief Notes: _____

2. Is the Authorized Representative still DAN FAIRCHILD? ----- 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 DAN FAIRCHILD? ----- 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
1 – B&L SYSTEMS, MODEL N-20AA HUMAN CREMATORY

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: 9/22/2010
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: 8/24/2010
 - 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 9.8 % 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 ()) ----- 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

Tracy White

7/12/2011

Inspector's Name (Please Print)

Date of Inspection

Tracy White

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Dan Fairchild and Brad Bramblett, VE reader. The crematory unit was in operation and Mr. Bramblett had started the first run of his test. I noted occasional emissions of 5 to 10% opacity, but overall the unit did not appear to exceed 15% opacity during my temporary observations. I did not observe the entire test. I went inside the facility structure during the test to observe the records and the incinerator unit operation.

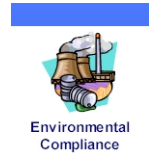
The incinerator was no less than 1600 degrees secondary chamber temperature. Records were available for inspection and maintained. No changes to container manufacturer sheets were noted (April 3, 2007 letter from Max Pak). After records inspection, I left the site. The testing was still in progress.

Some time later Mr. Fairchild contacted me and indicated that the test had a reading of 30% opacity listed on the run sheet. I contacted the FDEP NW District office and requested that they review the test. Carol Melton performed a preliminary review of the July 12th test and she indicated the following:

"The highest 6 minute average was 9.8% opacity and the next to the largest opacity 6 minute average was 6.6% opacity. This appears to be in violation of Rule 296.401(5)(b)1., FAC: "Visible emissions shall not exceed 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 period."



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730068	DATE: <u>8/09/2011</u>	ARRIVE: _____	DEPART: _____
FACILITY NAME: CAPITAL CITY CREMATORY			
FACILITY LOCATION: 3673 PEDDIE DR TALLAHASSEE 32303			
OWNER/AUTHORIZED REPRESENTATIVE: DAN FAIRCHILD		PHONE: (904)386-8686	
Email: dkfcpalfd@aol.com		Mobile:	
CONTACT NAME: DAN FAIRCHILD		PHONE: (850)386-8686	
Email:		Mobile:	
ENTITLEMENT PERIOD: 7/31/2008 / 7/31/2013 (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): Dan Fairchild
 Brief Notes: _____

2. Is the Authorized Representative still DAN FAIRCHILD? ----- 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 DAN FAIRCHILD? ----- Yes ..No
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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
1 – B&L SYSTEMS, MODEL N-20AA HUMAN CREMATORY

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: 7/12/2011
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: 7/12/2011
 - 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 1.5% for the highest six minute average.
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(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)
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PART III: MONITORING/RECORDKEEPING REQUIREMENTS

(check only one box for each question)

1. **Were there any objectionable odors detected?** ----- Yes ..No
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 (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?
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- 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
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(check only one box for each question)

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1. *Other than* human or fetal remains with appropriate containers or clothing, are any materials, including biomedical wastes, incinerated in the unit? ----- Yes ..No
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PART VI: EQUIPMENT MAINTENANCE

(check only one box for each question)

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- IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

Facility Section (continued)

SPECIAL CONDITIONS AND PROCEDURES

(check only one box for each question)

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- 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
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- 3. Since the last registration form submittal has there been ----- Yes ..No
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 - 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

Tracy White

7/12/2011

Inspector's Name (Please Print)

Date of Inspection

Tracy White

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Dan Fairchild and Henry Hernandez, VE reader. The crematory unit was in operation. I observed the entire hour of the testing with Mr. Hernandez. I did not note any excess emissions.

The incinerator was no less than 1600 degrees secondary chamber temperature. Records were available for inspection.

The test indicated compliance with opacity standards. However the facility was issued a warning letter from the District Office on August 19, 2011 (NWAP 073-1890). Compliance status for the facility is still under District office review.