



# ANIMAL CREMATORY



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0950192 **DATE:** 12/10/09 **ARRIVE:** \_\_\_\_\_ **DEPART:** \_\_\_\_\_

**FACILITY NAME:** ORANGE CO ANIMAL SERVICES

**FACILITY LOCATION:** 2769 CONROY RD  
 ORLANDO 32839

**OWNER/AUTHORIZED REPRESENTATIVE:** DAVID MORTON **PHONE:** (407)254-9150

**CONTACT NAME:** Brad Neill **PHONE:** (407)254-9150

**ENTITLEMENT PERIOD:** 11/5/2007 / 11/5/2012  
 (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(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% O<sub>2</sub> 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 (ft<sup>3</sup>) of flue gas, corrected to 7% O<sub>2</sub> 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

Allen Rainey

12/10/09

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:**

1. I, Allen Rainey, performed an INS2 inspection. I met with Mr. Brad Neill, Shelter Supervisor, who provided temperature charts and escorted me to the crematory.
2. The Crawford Equipment & Engineering Co. crematory was not in operation upon my arrival, but it was started about a half hour prior to my departure. No animals were added to the crematory during my visit. A crematory operator cleaned out bone fragments before turning on the unit. The unit is fueled by propane and has a process rate of 200 lbs./hr.
3. Mr. Neill stated Orange County is currently bidding for a new crematory.
4. I requested temperature charts from December 2007 to the present and was given temperature charts from only January 2009 to August 2009. Mr. Neill stated all other records, including maintenance/repair/calibration records, are kept off-site. The cremation date, time, number of pounds, and operator initials are recorded on a separate log sheet from the temperature charts. I reviewed all the records for January 2009 and noted several dates when operation occurred below 1,600 degrees F. or cremations began before reaching 1,600 degrees F. Many charts had no temperature markings. Because of the numerous number of noncompliant dates, I spot-checked the rest of the temperature charts that were provided up to August 2009 and told Mr. Neill which ones I wanted to be copied for our file. Before departing, Mr. Neill provided copies of some of the temperature charts. I stated I could get the rest when I returned to complete the inspection. Some of the charts I reviewed were missing the corresponding log sheet that shows the date, time, pounds and operator. The records were disorganized loosely by month in file folders.
5. It appeared that there were many dates of unexplained crematory operation. According to Mr. Neill, the unit is turned on sometimes hours before the first cremation batch is loaded. Additionally, it appears that the crematory sometimes runs long after the last batch is loaded.
6. The crematory unit is outside under roof cover and is partially sheltered by walls. It was raining during the inspection, and to avoid getting wet, I did not take a close look at the crematory.
7. Mr. Neill stated there are at least six crematory operators. Mr. Neill attended to other responsibilities while I reviewed the temperature charts and watched the operator clean out the unit.
8. Three photos were taken.
9. Noncompliance items noted thus far: Failure to record temperature markings, failure to make indication of when cremation in the primary chamber began, operation below 1,600 degrees F.
10. Questions 3 - 8 in Part II, 3 & 7 in Part III, and 2 & 3 in Part IV are not applicable. Question 5 in Part III is unknown. Questions pertaining to thermocouple placement will be determined at a later date.