



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0950192	DATE: <u>6/5/2014</u>	ARRIVE: <u>2:30</u>	DEPART: <u>3:30</u>
FACILITY NAME: ORANGE COUNTY ANIMAL SERVICES			
FACILITY LOCATION: 2769 CONROY RD ORLANDO 32839-2162			
OWNER/AUTHORIZED REPRESENTATIVE: KATHERINE LOCKETT		PHONE: (407)254-9144	
Email:		Mobile:	
CONTACT NAME: DAVID MORTON		PHONE: (407)254-9150	
Email: david.morton@ocfl.net		Mobile:	
ENTITLEMENT PERIOD: 11/3/2012 / 11/3/2017 (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

1. Name(s) of facility representative(s): Nelly Arroyo, Debra Villella, & Don Bruce

Brief Notes:

2. Is the Authorized Representative still KATHERINE LOCKETT? ----- Yes ..No
 If no, who is?: Dil Luther

If different, did the facility provide an administrative update within 30 days? ----- Yes ..No

3. Is the facility contact still DAVID MORTON? ----- Yes ..No
 If no, who is?: Debra Villella

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
2 –Animal Crematory-2chmbr,NGfired,w/temp&opac.monitor,400#/hr

PART I: FILE REVIEW PRIOR TO INSPECTION

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. Manufacturer's recommended capacity: 400 lbs for batch unit lbs/hr for ram-charged unit.
3. Crematory unit installed after February 1, 2007? ----- Yes ..No
4. Date of last inspection: 9/3/2010
5. 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: 8/23/2010
- 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

- 1. Was a visible emissions test conducted by the facility for this unit during this site visit?** ----- Yes ..No
- a. Operating capacity during test? _____ lbs for batch unit lbs/hr for ram-charged unit
- b. Was the operating capacity greater than the manufacturer's recommended capacity? ----- Yes ..No
- c. Was the test conducted with the unit operating at a capacity that is representative of normal operations? Yes ..No
- d. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
- e. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
- f. 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. Operating capacity during test? _____ lbs for batch unit lbs/hr for ram-charged unit
- b. Was the operating capacity greater than the manufacturer's recommended capacity? ----- Yes ..No
- c. Was the test conducted with the unit operating at a capacity that is representative of normal operations? Yes ..No
- d. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
- e. The visible emission test resulted in an opacity of _____ % for the highest six minute average.
- f. 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)
- 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

1. Were there any objectionable odors detected? ----- Yes ..No
An upwind/downwind survey of the facility was conducted. The observed parameters were:
Wind direction - _____ Downwind odor level detected- _____ Upwind odor level detected- _____ Scale: 1-10 (worst)
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)
- 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; all continuous monitoring system 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

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

1. Besides animal remains and, if applicable, the bedding associated with the animals and appropriate containers, are any other materials, including biomedical wastes, incinerated in the unit? ----- Yes ..No
If yes, what other materials? _____
2. Do 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

- 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

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 ..NoIf 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

Mary Lawrence

6/5/2014

Inspector's Name (Please Print)

Date of Inspection



Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Department staff, Mary Lawrence and Patrick Farris, conducted a compliance inspection at the facility on June 5, 2014. The facility was found to be out of compliance with permit No. 0950192-006-AG. The Department's findings during the inspection are the following:

- 1) Department records indicate the facility has not performed its annual Visible Emissions (VE) test since 2010.
- 2) The continuous monitoring system records were not available for review.
- 3) The cremation unit's maintenance records were not available for review.
- 4) Temperature charts were available for review. However, most of the charts were not the appropriate size for the unit. Hence, temperature markings were not accurate.
- 5) Documentation showing that the cremation containers do not contain more than 0.5% by weight chlorinated plastics was not available for review.
- 6) The cremation unit's startup, shutdown and malfunction (SSM) plan was not available for review.

The facility shall complete the following corrective actions in order to bring the emission unit back into compliance:

- The facility shall conduct a VE Test (EPA Method 9). The facility performed a VE test on June 24, 2014 and submitted it to the Department on June 26, 2014.
- The facility shall provide the Department the continuous monitoring system's maintenance (preventive and corrective), performance, calibration and adjustment records, which are required to be maintained on-site for at least 2 years. **See Corrective Action Below.
- The facility shall provide the Department the records for all maintenance performed on the cremation unit during the past 2 years. **The facility submitted 4 maintenance and repair invoices to the Department on July 29, 2014. At that time, the facility representative, Debra Vilella, indicated that the facility will begin keeping all maintenance records in a log book, which will be available for review by the Department.
- The facility shall provide the Department records that demonstrate the secondary chamber combustion zone did not operate at less than 1600 degrees Fahrenheit. According to Ms. Vilella, other than the temperature chart recordings, there are no temperature records available before August 3, 2013. Ms. Vilella indicated that the facility will begin downloading a monthly report of the specifics of the cremation unit operations, including the secondary combustion zone operating temperature.
- The facility shall immediately begin using temperature charts that are adequately sized for the unit, per the manufacturer's specifications. On July 29, 2014, Ms. Vilella indicated that the facility began using the correct temperature charts.
- The facility shall provide documentation that shows the cremation containers do not contain more than 0.5% by weight chlorinated plastics. On July 31, 2014, the facility submitted the Material Safety Data Sheet for the cremation containers indicating the absence of chlorinated plastics.
- The facility shall provide the cremation unit's SSM plan to the Department. The cremation unit's operation & maintenance manual, serving as the SSM plan, was provided to the Department on July 26, 2014.

*Note: Items left unmarked in Part III 2.e. and Part IV of this report are due to the unavailability of records and inadequate monitoring. Inspectors were unable to determine if the unit is maintained in accordance with the manufacturer's specifications, and if the secondary combustion zone temperatures are operating in compliance.