



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0610077 **DATE:** 12/16/09

ARRIVE: 1:52

DEPART: 2:44

FACILITY NAME: LOWTHER CREMATION SERVICES

FACILITY LOCATION: 1555 27TH ST

VERO BEACH 32960

OWNER/AUTHORIZED REPRESENTATIVE: THOMAS LOWTHER **PHONE:** (888)775-5795

CONTACT NAME: Kelly Wadsworth - Operator

PHONE:

ENTITLEMENT PERIOD: 1/22/2007 / 1/22/2012
(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

Wanda Parker-Garvin

12/16/09

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: On December 16, 2009, Ms. Wanda Parker-Garvin of FDEP visited the subject facility to conduct a level 2 compliance inspection. Contact was made with Mr. Tom Lowther, Owner and Mr. Kelly Wadsworth, Crematory Operator.

1. An inspection of the crematory unit (Power Pak II; Model #IE43-PPII; Serial #0250397) was conducted. The location of the thermocouple was identified and documented in a subsequent site visit on 1/25/10.

2. The temperature readings from the program logic controller (PLC), analog temperature chart, and the Department's digital thermometer were in agreement with each other. The crematory unit was cooling down from a recent burn of a 230 pound body. The following temperature readings were documented: Program Logic Controller = 1159 degrees F; Analog Temperature Chart = 1148 degrees F; Digital Thermometer = 1119 degrees F.

3. The opacity reader was operating and continually on. The stack for the unit was observed. No visible emissions were observed; a Method 9 evaluation was not necessary. No objectionable odors were detected.

4. Temperature charts, maintenance records, and MSDS sheets were reviewed. The operator licenses/certifications were reviewed and obtained. The temperature charts indicated cremations were conducted at temperatures above 1600 degrees F. Maintenance records indicated a rebricking was done on 10/29/09 and new thermocouple was installed in September 2009.

5. Question 4 in Part II, questions b) 1), and 3 in Part III, and questions 1d, 2, and 3 in Part IV are not applicable.