HUMAN CREMATORY

COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0810193 **DATE:** 09112007 **ARRIVE:** 1120 **DEPART:** 1232

FACILITY NAME: BRASOTA SERVICES, INC.

FACILITY LOCATION: 1410 Commerce Blvd, Suite R

SARASOTA 34243

RESPONSIBLE OFFICIAL: SUSAN HAGUE **PHONE:** (941)721-0126

CONTACT NAME: Mark Hague **PHONE:** (941)358-1228

REMITTANCE YEAR: **ENTITLEMENT PERIOD:** 12/2/2005 (effective date) / 12/2/2010 (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% O_2 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^3)of flue gas, corrected to 7% O_2 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: <u>OPERATING/RECORDKEEPING REQUIREMENTS</u> – 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)☐ **<u>BEFORE</u>** August 30, 1989? **(If this box checked, continue on to #3 and skip #4)**
   b)☒ **<u>ON</u>** or **<u>AFTER</u>** August 30, 1989? **(If this box checked, skip #3 and continue on to #4)**

3. If constructed **<u>BEFORE</u>** August 30, 1989 is the:
   a) secondary chamber combustion zone providing at least a 1.0 second gas residence time @ **1600^{o}F**? ☐Yes ☐ No
   b) actual operating temperature of the secondary chamber combustion zone no less than **1400^{o}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^{o}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 **<u>ON</u>** or **<u>AFTER</u>** 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^o F?**-- ☒Yes ☐ No
   b) the actual operating temperature of the secondary chamber combustion zone no less than **1600^{o}F** throughout the combustion process in the primary chamber?-- ☒Yes ☐ No
   c) secondary chamber combustion zone temperature equal to or greater than **1600^{o}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

Joseph V Panetta and Max Grondahl | 09/11/2007

Inspector's Name (Please Print) | Date of Inspection

| 2008

Inspector's Signature | Approximate Date of Next Inspection

COMMENTS: Spoke with Mr. Chuck Hague. Continued expalining GP requirements..Went over maintenance schedules and how tthey need to be kept according to manufacturer's specifications. Left him a copy of theregistraion containing rules. Highlited areas of rules.

Explained that a complete file of all temperature measurements; all continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and all adjustments, preventive maintenance, and corrective maintenance performed on these systems or devices, shall be recorded in a permanent legible form available for inspection. Continuous temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber was begun, date, time, and temperature markings. 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.

Operating at time of inspection temp 1665 F

Explained allowed Materials. Human crematory units shall cremate only human or fetal remains with appropriate containers. The remains may be clothed. The containers shall contain no more than 0.5percent by weight chlorinated plastics as demonstrated by the manufacturer's data sheet. If containers are incinerated, documentation from the manufacturers certifying that they are composed of 0.5 percent or less by weight chlorinated plastics shall be kept on-file at the site for the duration of their use and for at least two (2) years after their use. No other material, including biomedical waste shall be incinerated. Talked abour Starup, shutdown and malfunction procedures.

Viewed Records from July 1, 2007 to September 11,2007

MSDS and Preventitive Maintenace Schedules were not provided at time of inspection. This was noted on a field warning notice and provided well before specified time limit noted on warning notice. Information sent to Department in the prescibed time limit.

This inspection was attended by Joe Panetta and Max Grondahl