

## **HUMAN CREMATORY**



## COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)				
RE-INSPECTION (FUI) ARMS COMPLAINT NO:				
AIRS ID#: 1150113 DATE: <u>10/9/13</u> ARRIVE: <u>12:45</u> DEPART:	<u>2:45</u>			
FACILITY NAME: JENNINGS FUNERAL HOME AND CREMATORY				
FACILITY LOCATION: 5750 SWIFT RD				
SARASOTA 34231-6214				
OWNER/AUTHORIZED REPRESENTATIVE: DOUGLAS JENNINGS PHONE: (941)926-2223  Email: Mobile: CONTACT NAME: DOUGLAS JENNINGS PHONE: (941)926-2223				
Email: Mobile: ENTITLEMENT PERIOD: 4/10/2011 / 4/10/2016 (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):	(check ✓ only one box for each question)			
Brief Notes:				
2. Is the Authorized Representative still DOUGLAS JENNINGS?  If no, who is?:	⊠ Yes □No			
If different, did the facility provide an administrative update within 30 days?  3. Is the facility contact still DOUGLAS JENNINGS?  If no, who is?:	☐ Yes ☐No ☐No			
4. Will facility be conducting VE test(s) during today's inspection?	Yes □No  Yes □No			

## Emissions Unit Section 1 – Human Crematory-east unit.NGfired,tempM&R,opacityM,150lbs/hr

PART I: FILE REVIEW PRIOR TO INSPECTION	(check 🗹 box for each	only one question)
a. Complete AC application or, if no AC permit, initial GP registration received on or after August 30, 1989?  b. If yes, were design calculations provided then to confirm a sufficient volume in the	☐ Yes	⊠No
secondary chamber combustion zone to provide for at least a 1.0 second gas residence time at 1800 degrees Fahrenheit?	☐ Yes ☐ Yes	□No ⊠No
4. Past Visible Emissions (VE) tests:  a. Was a VE test performed within each of the past 4 calendar years?  b. Has a VE test been performed yet within the current calendar year?  c. If first year of operation, was a VE test performed within 30 days of commencing	Yes Yes	□No ⊠No
operation?	Yes	□No
e. Was the VE test report filed with the compliance authority no later than 45 days after the test?  f. Did the facility demonstrate compliance during the last VE test?  If no, what was the problem (if known)?		∐No □No
PART II: <u>VISIBLE EMISSIONS TESTING</u>	(check <b>b</b> ox for each	only one question)
1. Was a visible emissions test conducted by the facility for this unit during this site visit? a. Was the test conducted with the unit operating at a capacity of one adult-sized cadaver? b. Was the visible emissions test conducted according to EPA Method 9?	- 🔯 Yes	□No □No □No
c. The visible emission test resulted in an opacity of 0 % for the highest six minute average. d. Did the visible emission test demonstrate compliance with the limit?		□No
2. Was a visible emissions test conducted by the inspector during this site visit?  a. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver?  b. Was the visible emissions test conducted according to EPA Method 9?  c. The visible emission test resulted in an opacity of 0 % for the highest six minute average.  d. Did the visible emission test demonstrate compliance with the limit?	- ⊠ Yes ⊠ Yes ⊠ Yes	□No □No □No
3. Is there any reason to ask for a special test to determine compliance with the PM and CO standa If yes, what reason?	Yes	⊠No
PART III: MONITORING/RECORDKEEPING REQUIREMENTS	(check 🗹 box for each	only one 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)	
<ul> <li>Continuous Monitoring Systems –</li> <li>Is a continuous temperature monitoring system installed on each unit to record temperatures in the secondary chamber in accordance with the manufacturer's instructions? ————————————————————————————————————</li></ul>	- 🛛 Yes	□No
time at	Yes	□No

PART III: MONITORING/RECORDKEEPING REQUIREMENTS (continued)			
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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	ПNо	
3) All CEMS or monitoring device calibration checks (last performed on ( )	Yes	⊠No	
4) Adjustments5) Preventive maintenance performed on systems/devices	☐ Yes ☐ Yes	⊠No	
6) Corrective maintenance performed on systems/devices	Yes	∐No □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 automatical 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?(3) Has the opacity measurement system been cleaned and checked for proper operation in	∐ Yes	∐No	
accordance with the manufacturer's recommended maintenance schedule?	☐ Yes	□No	
PART IV: SECONDARY COMBUSTION ZONE TEMPERATURES	(check 🗹	•	
	box for each	h question)	
1. If the application to construct was <b>BEFORE</b> 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?		□No	
b. secondary chamber combustion zone temperature equal to or greater than <b>1400°F</b> before the cremati process begins in the primary chamber?	on ⊠ Yes	□No	
2. If the application to construct <b>ON</b> or <b>AFTER</b> 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 <b>1600°F</b> before the cremati process begins in the primary chamber?	on Yes	□No	
process organs in the primary chamber.			
PART V: <u>ALLOWED MATERIALS</u>	(check		
	box for each	h question)	
1. Other than human or fetal remains with appropriate containers or clothing, are any materials,		h question)	
Other than human or fetal remains with appropriate containers or clothing, are any materials, including biomedical wastes, incinerated in the unit?		h question) ⊠No	
including biomedical wastes, incinerated in the unit?	box for each		
	box for each		

PART VI: EQUIPMENT MAINTENANCE	(check <b>☑</b> box for each	only one 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		
<ul> <li>3. Does the crematory allow for a visible check on the flame characteristics?</li></ul>	⊠ Yes	□No □No □No		
PART VII: EU INSPECTION COMPLIANCE STATUS (check ☑ only one box)				
☐ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE				

## Emissions Unit Section 2 – Human Crematory-west unit.NGfired,tempM&R,opacityM,150lbs/hr

PA	ART I: FILE REVIEW PRIOR TO INSPECTION		only one box question)
1.	a. Complete AC application or, if no AC permit, initial GP registration received on or after August 30, 1989?	☐ Yes	⊠No
3.	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 Yes	□No ⊠No
4.	Past Visible Emissions (VE) tests:  a. Was a VE test performed within each of the past 4 calendar years?  b. Has a VE test been performed yet within the current calendar year?  c. If first year of operation, was a VE test performed within 30 days of commencing		□No ⊠No
	operation? 🔯 N/A	☐ Yes	□No
	<ul> <li>d. Date of last VE test: 9/15/12</li> <li>e. Was the VE test report filed with the compliance authority no later than 45 days after the test?</li> <li>f. Did the facility demonstrate compliance during the last VE test?</li></ul>		□No □No
PA	RT II: <u>VISIBLE EMISSIONS TESTING</u>		only one box question)
1.	Was a visible emissions test conducted by the facility for this unit during this site visit? a. Was the test conducted with the unit operating at a capacity of one adult-sized cadaver? b. Was the visible emissions test conducted according to EPA Method 9?	X Yes	□No □No □No
	<ul> <li>c. The visible emission test resulted in an opacity of 0 % for the highest six minute average.</li> <li>d. Did the visible emission test demonstrate compliance with the limit?</li></ul>		□No
2.	Was a visible emissions test conducted by the inspector during this site visit?	X Yes Yes	□No □No □No
3.	d. Did the visible emission test demonstrate compliance with the limit?		□No
	If yes, what reason?	Yes	⊠No
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PA	RT III: MONITORING/RECORDKEEPING REQUIREMENTS		only one box question)
1.	Were there any objectionable odors detected?	Yes (1-10)	⊠No
a	Continuous Monitoring Systems —  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 □No

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	ПNо	
3) All CEMS or monitoring device calibration checks (last performed on ( )	Yes	⊠No	
4) Adjustments5) Preventive maintenance performed on systems/devices	<ul><li>✓ Yes</li><li>✓ Yes</li></ul>	□No	
6) Corrective maintenance performed on systems/devices		∐No ∏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 automatic 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?(3) Has the opacity measurement system been cleaned and checked for proper operation in	∐ Yes	∐No	
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 <b>BEFORE</b> 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?b. secondary chamber combustion zone temperature equal to or greater than 1400°F before the cremater		□No	
process begins in the primary chamber?	Yes	□No	
2. If the application to construct <b>ON</b> or <b>AFTER</b> 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 <b>1600°F</b> before the cremat process begins in the primary chamber?	Yes	□No	
		_	
PART V: <u>ALLOWED MATERIALS</u>	(check 🗹	only one box	
	tor 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 🗹 or for each q	nly one box uestion)
1. Is the crematory unit maintained in accordance with the manufacture	er's specifications?	- 🛛 Yes	□No
2. Is there a written plan onsite which addresses the operating procedu shutdown and malfunction?		_	⊠No
3. Does the crematory allow for a visible check on the flame character If no, skip a. – b.	istics?	- X Yes	□No
a. Was the flame characteristic visually checked at least once during b. Was the flame adjusted when necessary?			□No □No
PART VII: EU INSPECTION COMPLIANCE STATUS (check 5	only one box)		
☐ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE	SIGNIFICANT Non-COMPI	LIANCE	
Facility Section (continued)			
SPECIAL CONDITIONS AND PROCEDURES		(check 🗹 box for each	
<ul> <li>Administrative Changes:</li> <li>Were there any changes in the name, address, or phone number of the associated with a change in ownership or with a physical relocation operations comprising the facility; or any other similar minor admin 2. If yes, did the facility provide written notification within 30 days of</li> </ul>	of the facility or any emissions un istrative change at the facility?	its or - 🔲 Yes	⊠No ∏No
New or Modified Process Equipment or Change in Ownership:  3. Since the last registration form submittal has there been	 nent?	-	⊠No ⊠No ⊠No ⊠No
d. A change in ownership?  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 Yes	⊠No □No
//s//Kenneth Wall	10/9/13		
Inspector's Name (Please Print)	Date of Inspection		
	10/2014		
Inspector's Signature	Approximate Date of Next Ins	pection	

**COMMENTS:** Ken Wall and Michael Storino conducted an INS3 of the facility. No VE observed and facility appeared in good condition. Facility was advised to develop a startup/shutdown SOP even though only owner has and ever will operate the crematory units, it is required and good to have in the event a new person is hired. Facility could not document when the last calibration was done on the units. Must conduct a calibration check during next maintenance cycle and document for the record. Body bags are supplied by the medical examiner's office, no way to document the type or content of chlorinated plastics. Will work with other crematory facilities and discuss with the medical examiner to ensure non-chlorinated plastics in the bags.