



# HUMAN CREMATORY



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 1050354	<b>DATE:</b> <u>12/09/2010</u>	<b>ARRIVE:</b> <u>1245</u>	<b>DEPART:</b> <u>1512</u>
<b>FACILITY NAME:</b> DBA GENTRY-MORRISON FUNERAL HOME			
<b>FACILITY LOCATION:</b> 1833 S. Florida Ave. LAKELAND 33801			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b> LEWIS HALL Email: lewhall@aol.com		<b>PHONE:</b> (863)688-7679 <b>Mobile:</b>	
<b>CONTACT NAME:</b> Trey Hall/Brian Konseck Email: t.hall@gentry-morrison.com		<b>PHONE:</b> (863)682-3155 <b>Mobile:</b>	
<b>ENTITLEMENT PERIOD:</b> 4/26/2007 / 4/26/2012 (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** (check  only one box for each question)

1. Name(s) of facility representative(s): LEWIS HALL  
Brief Notes: \_\_\_\_\_

2. Is the Authorized Representative still LEWIS HALL? -----  Yes    ..No  
If no, who is?: \_\_\_\_\_  
If different, did the facility provide an administrative update within 30 days? -----  Yes    ..No

3. Is the facility contact still KEN HODGES? -----  Yes    ..No  
If no, who is?: Trey Hall/Brian Konseck

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**  
**1 – HUMAN CREMATORY - B&L Syst Model N20AA**

**PART I: FILE REVIEW PRIOR TO INSPECTION**

(check  only one box for each question)

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. Crematory unit installed after February 1, 2007? -----  Yes ..No
3. Date of last inspection: 12.04.2009
4. 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: 12.04.2009
  - 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**

(check  only one box for each question)

1. **Was a visible emissions test conducted by the facility for this unit during this site visit?** -----  Yes ..No
  - a. Was the test conducted with the unit operating at a capacity of one adult-sized cadaver? -----  Yes ..No
  - b. Was the visible emissions test conducted according to EPA Method 9? -----  Yes ..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? -----  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. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? -----  Yes ..No
  - b. Was the visible emissions test conducted according to EPA Method 9? -----  Yes ..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? -----  Yes ..No
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**

(check  only one box for each 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)
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  1,800<sup>1</sup>  1,600<sup>2</sup> degrees was determined? -----  Yes ..No  
(Application or initial notification: <sup>1</sup> received on or after 8/30/89; <sup>2</sup> received before 8/30/89)

**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 ..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**

(check  only one box for each question)

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**

(check  only one box for 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  only one box for each 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
- 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**

(check  only one box for each question)

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 ..No
- 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 ..No

Joseph V Panetta

12/09/2010

Inspector's Name (Please Print)

Date of Inspection

*Joseph V. Panetta*  
Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** Spoke with Trey Hall and Brian Konseck about new rules. Went over rules explaining Maintenance Schedules, Preventive Maintenance Schedules and how the rule addresses the operation of crematories according to manufacturer's specifications.

I noticed in the paperwork and books provided during the inspection a copy of the rule/registration form. I brought this to Trey Hall's attention and 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 0.5 percent 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..

Spoke with Trey Hall and explained:

If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:

1. A description of and cause of noncompliance; and
2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

A field warning notice was left stating " Maintenance logs not available during inspection. Yearly maintenance and corrective maintenance records are available."

Brian Konseck explained that he could not find the logs, but let Trey Hall know and fax or email them to the Department. I let Brian know that during last inspection Mr. Lewis Hall provided maintenance logs.

Received logs 12/15/2010. Spoke with Compliance Manager. Place facility in compliance.

Viewed Chart Records from January 2010 to June 2010

The crematory initiative inspection may or may not prove that the thermocouple(s) may or may not be properly placed. That will be addressed after the measurements are reviewed by Department Staff.

VISIBLE EMISSIONS EVALUATION

COMPANY **DBA GENRAY - MORRISON F.A.**

UNIT

ADDRESS **1833 South Florida Ave  
Lakeland FL 33801**

PERMIT NO. **1050354** COMPLIANCE **YES** NO-

AIRS NO. **1050354** EU NO. **001**

PROCESS RATE **Human Cadaver 175 lbs** PERMITTED RATE **150 LBS Ph/1651<sup>OP</sup>**

PROCESS EQUIPMENT **After burner Cremation Unit**

CONTROL EQUIPMENT

OPERATING MODE **175 lbs** AMBIENT TEMP (BF) START **60** STOP

HEIGHT ABOVE GROUND LEVEL START **230 ft** STOP

DISTANCE FROM OBSERVER START **85 ft** STOP DIRECTION FROM OBSERVER START **349°** STOP **NNW**

EMISSION COLOR **None** PLUME TYPE CONTIN. - **None** INTERMITTENT -

WATER DROPLETS PRESENT? NO- YES- IS WATER DROPLET PLUME ATTACHED - **None** DETACHED -

POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START **Stack Exit** STOP

DESCRIBE BACKGROUND START **sky and tree** STOP

BACKGROUND COLOR START STOP SKY CONDITIONS START **Clear** STOP

WIND SPEED (MPH) START **2-3 mph** STOP WIND DIRECTION START **NNW** STOP

AVERAGE OPACITY FOR HIGHEST PERIOD RANGE OF OPACITY READINGS MIN. MAX.

SOURCE LAYOUT SKETCH

Draw North Arrow

Comments **1341.30 Crem. Plume 1341.30**

SEC	OBSERVATION DATE				START TIME				STOP TIME			
	0	15	30	45	1	15	30	45				
0	0	0	0	0	0	0	0	0				
1	0	0	0	0	0	0	0	0				
2	0	0	0	0	0	0	0	0				
3	0	0	0	0	0	0	0	0				
4	0	0	0	0	0	0	0	0				
5	0	0	0	0	0	0	0	0				
6	0	0	0	0	0	0	0	0				
7	0	0	0	0	0	0	0	0				
8	0	0	0	0	0	0	0	0				
9	0	0	0	0	0	0	0	0				
10	0	0	0	0	0	0	0	0				
11	0	0	0	0	0	0	0	0				
12	0	0	0	0	0	0	0	0				
13	0	0	0	0	0	0	0	0				
14	0	0	0	0	0	0	0	0				
15	0	0	0	0	0	0	0	0				
16	0	0	0	0	0	0	0	0				
17	0	0	0	0	0	0	0	0				
18	0	0	0	0	0	0	0	0				
19	0	0	0	0	0	0	0	0				
20	0	0	0	0	0	0	0	0				
21	0	0	0	0	0	0	0	0				
22	0	0	0	0	0	0	0	0				
23	0	0	0	0	0	0	0	0				
24	0	0	0	0	0	0	0	0				
25	0	0	0	0	0	0	0	0				
26	0	0	0	0	0	0	0	0				
27	0	0	0	0	0	0	0	0				
28	0	0	0	0	0	0	0	0				
29	0	0	0	0	0	0	0	0				

Observers Signature: **Joseph Panetta**

Date: **12/10/2010**

Observers Organization: Florida Department of Environmental Protection

Observer Name and Certified By:

EASTERN TECHNICAL ASSOCIATES

JOSEPH PANETTA

PAN716659 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

TAMPA, FL 8/11/2010 386846  
 SCHOOL LOCATION DATE OF SCHOOL CERT NUMBER  
 TMPS09 2/10/2011  
 LAST LECTURE CERTIFICATION EXP DATE BEARER



Florida Department of Environmental Protection

Southwest District Office

FIELD INSPECTION NOTICE

Name / Owner / Operator: DBA Gentry-Morrison Funeral Home

Address: 1833 S. Florida

Location / Source: Lakeland 33801

Permit Number: 1050354 Permit Exp. Date: 4/26/2012 Date and Time: 12/9/2010 1518

The purpose of this notice is to advise you of findings from a Florida Department of Environmental Protection (DEP) personnel conducted field inspection on the date listed above at the location described above.

Observations: Maintenance Logs Not Available during Inspection. Yearly maintenance and Corrective Maintenance Records are available.

Rule or Statute Relevant to Observations

Permit Condition No.

Table with 2 columns: Rule or Statute Relevant to Observations, Permit Condition No. Contains various regulatory references and observation descriptions.

The activities observed during the Department's field inspection for the above location indicate that, at this time, your facility appears to be in compliance with Florida Administrative Code and your current permit conditions.

You are requested to contact Joseph V. Panetta at the address or telephone number below within fifteen (15) days of receipt of this Field Inspection Notice if you have any questions about the above findings.

Received by: Brian Konseck Issued / Posted by: Joseph V. Panetta

Print: Brian Konseck Print: Joseph V. Panetta

Title: Embalmer