



Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

November 15, 2010

By Electronic Mail, Received Receipt Requested
jggibson@cox.net

Mr. Jeffery Gibson, Owner
Gulf Coast Pet Crematory
550 West Nine Mile Road
Pensacola, Florida 32534

Dear Mr. Gibson:

On November 12, 2010, a Department representative with the Air Resource Management Program inspected your facility, ID 0330270. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in minor non-compliance at the time of the inspection for those items specifically noted in the inspection report.

Some areas of non-compliance are identified in the inspection report. Please review the Comments section of the report in order to ensure continued compliance in the future. Please notify this office within 15 days of receipt of this letter as to what steps you have taken to correct the deficiencies listed in the report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-0663 or jennifer.waltrip@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/jw/c

Enclosure



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0330270	DATE: <u>11/12/10</u>	ARRIVE: <u>8:50 AM</u>	DEPART: <u>9:59 AM</u>
FACILITY NAME: GULF COAST PET CREMATORY			
FACILITY LOCATION: 550 W NINE MILE RD PENSACOLA 32534			
OWNER/AUTHORIZED REPRESENTATIVE: JEFFERY GIBSON		PHONE: (850)437-9639	
Email: jpgibson@cox.net		Mobile: (850)232-4971	
CONTACT NAME:		PHONE:	
Email:		Mobile:	
ENTITLEMENT PERIOD: 9/22/2007 / 9/22/2012 (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): Jeffery Gibson
 Brief Notes: _____

2. Is the Authorized Representative still JEFFERY GIBSON? ----- 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 ? ----- Yes ..No
 If no, who is?: _____

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 –Dual Chamber Animal Crematory (Power-PAK II)

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. Manufacturer's recommended capacity: 150 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: 5/11/10
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: 10/28/09
 - 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. Operating capacity during test? 65 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 0 % 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

(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:
 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; 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. 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

(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
 - 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

Jennifer Waltrip

November 12, 2010

Inspector's Name (Please Print)

Date of Inspection



November 2011

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Department personnel conducted an unannounced annual air compliance inspection of Gulf Coast Pet Crematory on November 12, 2010. Mr. Jeffery P. Gibson, owner, was available to assist during the inspection.

Circle charts were available for review and included the operator's initials, the operating rate in pounds loaded, and the date and time for each cremation. The cremation unit's temperature is set to operate at 1675°F to ensure the temperature does not drop below 1600°F.

The annual visible emissions test was conducted during the inspection. The unit was loaded with 260 pounds and scheduled to burn for approximately four hours. According to circle charts from previous cremations, this appeared to represent the normal operating rate for the unit. No emissions were noted from the stack during the 60-minute test. However, occasional emissions were noted from the entrance to the building containing the cremation unit. According to Mr. Gibson, a brick recently became dislodged from the door to the unit and this results in an occasional release of smoke from the cremation chamber. Following the inspection, Mr. Gibson faxed the Department a copy of a repair contract with Matthews International. The contract was dated September 20, 2010 and proposed removing and replacing the cremation chamber loading door brick and installing Panduit in the control panel that houses the wiring. The contract did not contain a repair date.

Please note, Rule 62-296.401(6)(e), Florida Administrative Code, states that all animal crematory units shall be maintained in proper working order in accordance with the manufacturer's specifications to ensure the integrity and efficiency of the equipment. If a crematory unit contains a defect that affects the integrity of the unit, the unit shall be taken out of service. No person shall use or permit the use of that unit until it has been repaired or adjusted.

Annual preventative maintenance and repair records were available onsite for review, but did not include calendar year 2010. Please note Rule 62-296.401(6)(e), Florida Administrative Code, states that repair records on all crematory units shall be maintained onsite for at least two (2) years. According to Mr. Gibson, the records are maintained at the main office. Please ensure that a copy of the records are available at the facility for future inspections.