



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0970005 **DATE:** 1/15/10 **ARRIVE:** _____ **DEPART:** _____

FACILITY NAME: KISSIMMEE ANIMAL DISEASE DIAGNOSTIC LAB

FACILITY LOCATION: 2700 N JOHN YOUNG PKWY
 KISSIMMEE 34741-1266

OWNER/AUTHORIZED REPRESENTATIVE: MARTIN TIER **PHONE:** (321)697-1404

CONTACT NAME: Dr. Herman Reid **PHONE:** (321)697-1404

ENTITLEMENT PERIOD: 3/26/2009 / 3/26/2014
 (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(6)(j), 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 leak-proof containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead animals?----- 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) If plastic bags are used for the cremation of animals are they non-chlorinated and no less than 3 mils thick?----- Yes No
 - c) Are dead animals, which have been used for medical or commercial experimentation, or other materials, including biomedical wastes (Rule 62-210.200, F.A.C.), incinerated at this location?----- Yes No
6. During this review period, was the largest batch load cremated 500 pounds per hour or less?----- Yes No
7. Have all crematory operators been trained and certified by a Department-approved training program?--- Yes No
 - a) Are copies of the training certificates 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

Allen Rainey

1/15/10

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

1. I, Allen Rainey, performed an INS2 compliance inspection for the Keller Mechanical & Engineering crematory, model #KM2400S, serial #62209685. The unit is fueled by natural gas. Dr. Herman Reid, Pathologist and Mr. Angel Sapuleuda, crematory operator, escorted me to the crematory and provided requested records. Use of the Keller unit began in August 2009; it took the place of the old crematory which is still on-site. A notification form was submitted to the Department on 2/26/09.
2. The crematory was not operating upon my arrival. Mr. Sapuleuda stated that before my arrival, the unit was loaded with two horses and a cow before it was started. The temperature chart shows the unit was started at 8:30 a.m., but it turned off 15 minutes later after reaching 1,350 degrees F. The Schneider Electric LCD control panel showed no system errors. Mr. Sapuleuda stated two weeks ago, the unit began cutting off 4 to 5 times a day.
3. The first cremation done this year was on 1/6/10 or 1/7/10. Cremation temperatures for both dates overlap on the same chart; Mr. Sapuleuda said the 1/7/10 cremation was of the remains of the previous day. The temperature chart was on the chart recorder, and it appears that the unit cut off about five hours after the 1/7/10 cremation started. Mr. Sapuleuda reported that there was a problem with the fuel valve, which was repaired.
4. I reviewed cremation temperature charts from January 2008 to the present. From January to December 2008, 69 cremations were done. Approximately 95% of the charts in that period have either incomplete or no temperature markings. From January to December 2009, many of the charts show either incomplete or no temperature markings, and one on 8/4/09 shows evidence that the crematory shut down while cremating. The new unit records two marks per cremation: one red (temperature), the other green (Mr. Sapuleuda is not sure what it is for). Obtained copies of selected temperature charts for Department files.
5. Reviewed maintenance/repair records in an EXCEL spreadsheet (QA Report). It shows that on 8/25/09, the small primary chamber door actuation switch that was loose was tightened. On 12/24/09, gas lines failed and regulators were replaced. On 12/28/09, the gas valves were replaced again because they were shutting off when the gas moved too fast. Obtained some copies of invoices for crematory work performed for Department files.
6. The thermocouple is located approximately 12 feet high from ground level in the secondary chamber, which is located above the primary chamber. It was not checked for temperature or measures because of height safety concerns and the unit was not operating.
7. Red body bags are incinerated. A Material Safety Data Sheet (MSDS) for the body bags was not provided upon request. Dr. Reid stated the bag manufacturer, Fisher Scientific, is having trouble providing an MSDS.
8. A crematory System and Operation Procedures (SOP) manual prepared by the facility is currently in draft form and is revised annually (copy obtained for Department files). It is for the crematories at two locations: Kissimmee and Live Oak, Florida.
9. Summary of noncompliance items discussed with Dr. Alice Agasan, Bureau Chief, Dr. Reid, and Mr. Sapuleuda: (1) no indication of start of cremation, (2) unit containing a defect was not shut down, (3) no temperature markings, (4) no MSDS (requested they be provided by 1/19/10).
10. Questions 3 - 8 in Part II, 3 & 7 in Part III, and 2 & 3 in Part IV are not applicable. Question 5 in Part III is unknown.

