



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1050394	DATE: <u>04/19/2007</u>	ARRIVE: <u>0720</u>	DEPART: <u>0840</u>
FACILITY NAME: Lasting Paws Pet Cremation, Inc.			
FACILITY LOCATION: 1818 Olive Street Lakeland 33809-			
RESPONSIBLE OFFICIAL: Larry Lupold		PHONE: (863)859-6437	
CONTACT NAME: Jerry Price		PHONE: (863)859-6437	
REMITTANCE YEAR:	ENTITLEMENT PERIOD: 12/26/2006 / 12/31/2007 (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))

- Were there any objectionable odor(s) detected?----- Yes No
- Was a visible emissions test conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
- 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
- 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
 - 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
 - Oxygen test performed according to EPA Method 3 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
 - 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
- Was all emissions testing conducted with the source operating at the manufacturers recommended capacity?----- Yes No
- Was CO & PM compliance demonstrated by submission of a test report for an identical crematory unit? Yes No
- Was the Department notified at least 15 days prior to the date of the last formal compliance test?----- Yes No
- 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

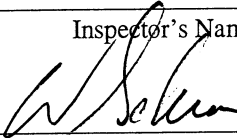
1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- 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

William Schroeder

04/19/2007

Inspector's Name (Please Print)

Date of Inspection



2008

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This is a new facility with an AC conducting initial VE to apply for GP

Spoke with Jerry Price about new rules. Went over new rules explaining Maintenance Schedules, Preventive Maintenance Schedules and how the new January 10, 2007 Rule change addresses the operation of crematories according to manufacturer's specifications. Left him a copy of the new rules. Not operating during inspection.

Explained allowed Materials. Animal crematory units shall cremate only animal remains and, if applicable, the bedding associated with the animals and appropriate containers. 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. Animal crematory units shall not cremate dead animals which were used for medical or commercial experimentation. No other material, including biomedical waste as defined in Rule 62-210.200, F.A.C., shall be incinerated.

Left examples of preventive maintenance schedules and new rule.

Described Equipment Maintenance. 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. Repair records on all crematory units shall be maintained onsite for at least two (2) years. A written plan with operating procedures for startup, shutdown and malfunction of each crematory unit shall be maintained and followed during those events. Each unit's burners shall be operated with a proper air-to-fuel ratio. If the unit so allows, the burners' flame characteristics shall be visually checked at least once during each operating shift and adjusted when warranted by the visual checks.

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.

Permitting Application - Permit Detail and Log Permit

POINT AIRS ID 1050394 STATUS A OFFICE SWD SW: TAMPA
 SITE NAME LASTING PAWS PET CREMATION, INC. COUNTY POLK
 OWNER/COMPANY LASTING PAWS PET CREMATION, INC.

Project
 AIR Permit # 1050394 001 AC Project # 001 CRA Reference # 264817
 Permit Office SWD (DISTRICT) Agency Action Issued
 Project Name AC FOR ANIMAL CREMATORY Desc Construction permit for animal crematory
 Type/Sub/Des AC 1F Source less than 5 tpy \$250 Logged 09/19/2006
 Received 09/15/2006 Issued 12/22/2006 Expires 12/31/2007 OGC
 Fee 250.00 Fee Recd 250.00 Date Override NONE

Related Party
 Role APPLICANT Begin 09/19/2006 End
 Name LUPOLD, LARRY J. Company LASTING PAWS PET CREMATION, INC.
 Address 1818 OLIVE STREET
 City LAKELAND State FL Zip 33846 Country U.S.A.
 Phone 863-859-6437 Fax 863-816-1833

Processors
 Processor ZELL_D Y Active 09/19/2006 Inactive Events

863-682-7297 office #

Jerry

Rec'd by Dept. 4/23/07

VISIBLE EMISSION TEST

Method Used (Circle One)
Method B 203A 203B Report 1636V

Company Name Hastings Paws Pet Cremation
Facility Name FOSSARD AIRS
Street Address 1818 Olive St.
City Berkland, FL State FL Zip
Phone No. 863-682-7297

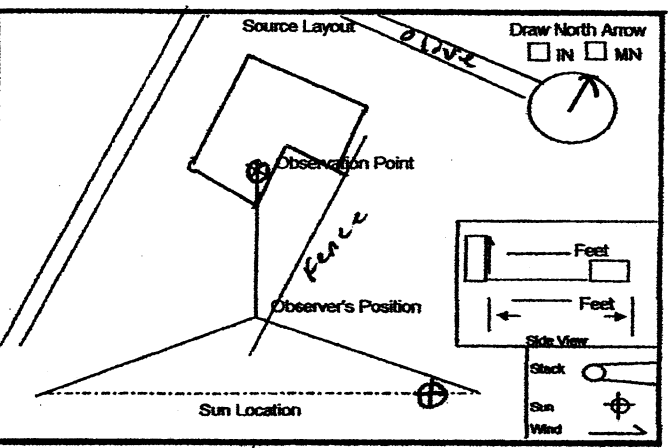
Process Crematory Unit # 297 LL Operating Mode
Control Equipment Afterburner Operating Mode

Describe Emission Point Roof top Stack
Ht of Emis. Point 20' Ht Ref to Observer 20'
Distance to Emis. Pt. 80' Direction to Emis. Pt (Degrees) 332°

Vertical Angle to Obs. Pt. 15° Direction to Obs. Pt. (Degrees) 332°
Distance and Direction to Obs. Pt from Emission Pt Same

Describe Emissions
Emission Color black Water Droplet Plume Attached Detached None X

Describe Plume Background SKY
Background Color blue Sky Conditions Clear
Wind Speed 5-7 mph Wind Direction NNW
Ambient Temp. 63°F Wet Bulb Temp. % RH

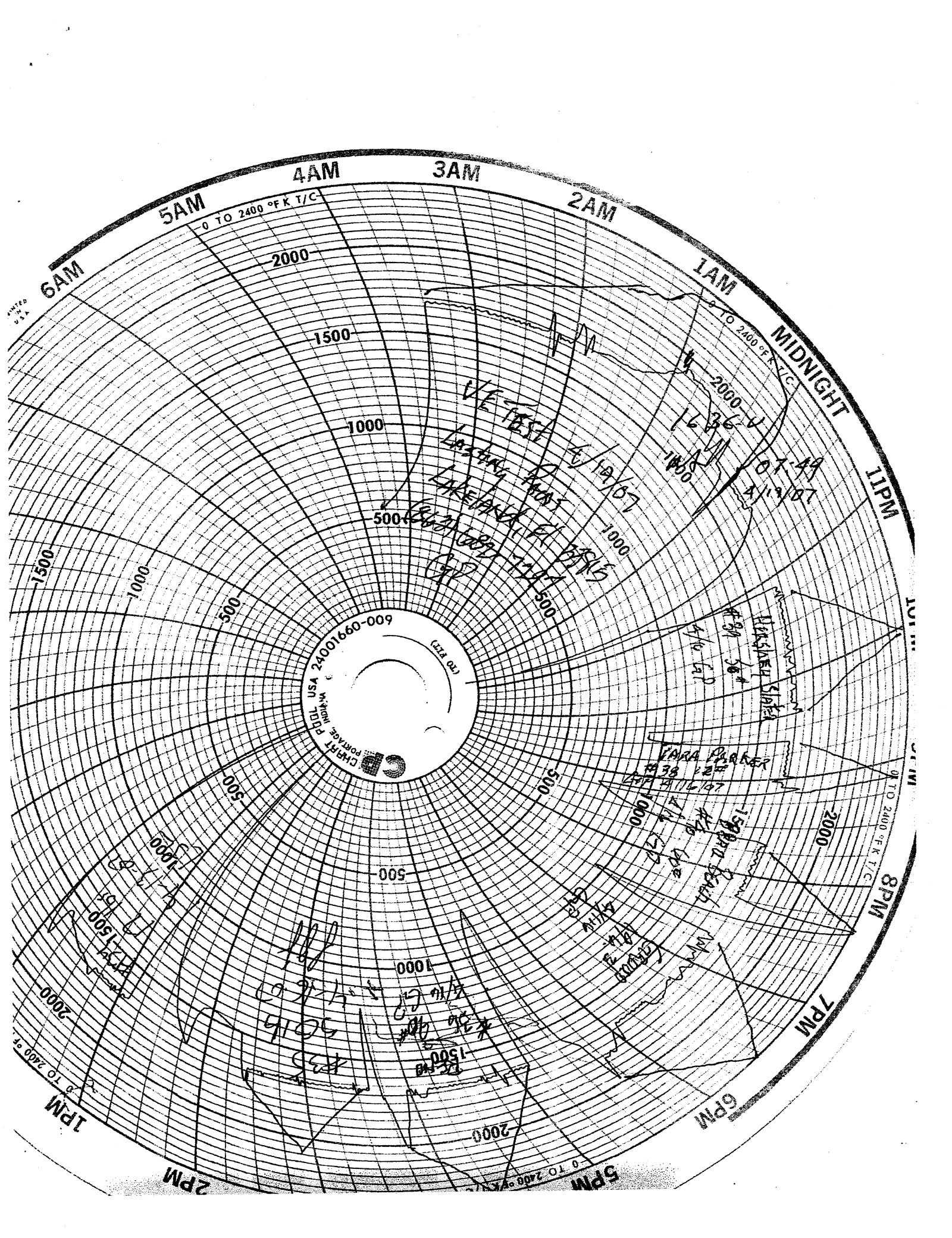


Latitude 28° 02.230' Longitude 81° 59.075' Declination

Comments W. Schmed F040

Min Sec	Start Time <u>07:49</u>				Stop Time <u>08:49</u>				
	0	15	30	45	0	15	30	45	
1	0	0	0	0	31	0	0	10	5
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	5	5	0	10	46	0	0	0	0
17	30	35	25	15	47	0	0	0	0
18	20	20	5	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	10	0	0	50	0	0	0	0
21	5	10	0	0	51	40	0	0	0
22	10	5	10	5	52	0	0	0	0
23	10	5	5	5	53	0	0	0	0
24	5	0	0	0	54	0	0	0	0
25	0	5	0	0	55	0	0	0	0
26	5	10	5	10	56	0	0	0	0
27	5	0	5	5	57	0	0	0	0
28	5	10	15	20	58	0	0	0	0
29	30	15	15	10	59	0	0	0	0
30	10	20	0	0	60	0	0	0	0

Number of Readings Above 0 % were 43 Average Opacity for Highest 6 Min Period 8.5
Range of opacity Readings Min 0 Max 40 Average Opacity for 2nd Highest 6 Min. 8.5
Observers Name (Print) William Arlington
Observers Signature W. Arlington Date 4/19/07
Organization Arlington Environmental Services, Inc.
Certified By Whitlow Enterprises Date 1/8/07



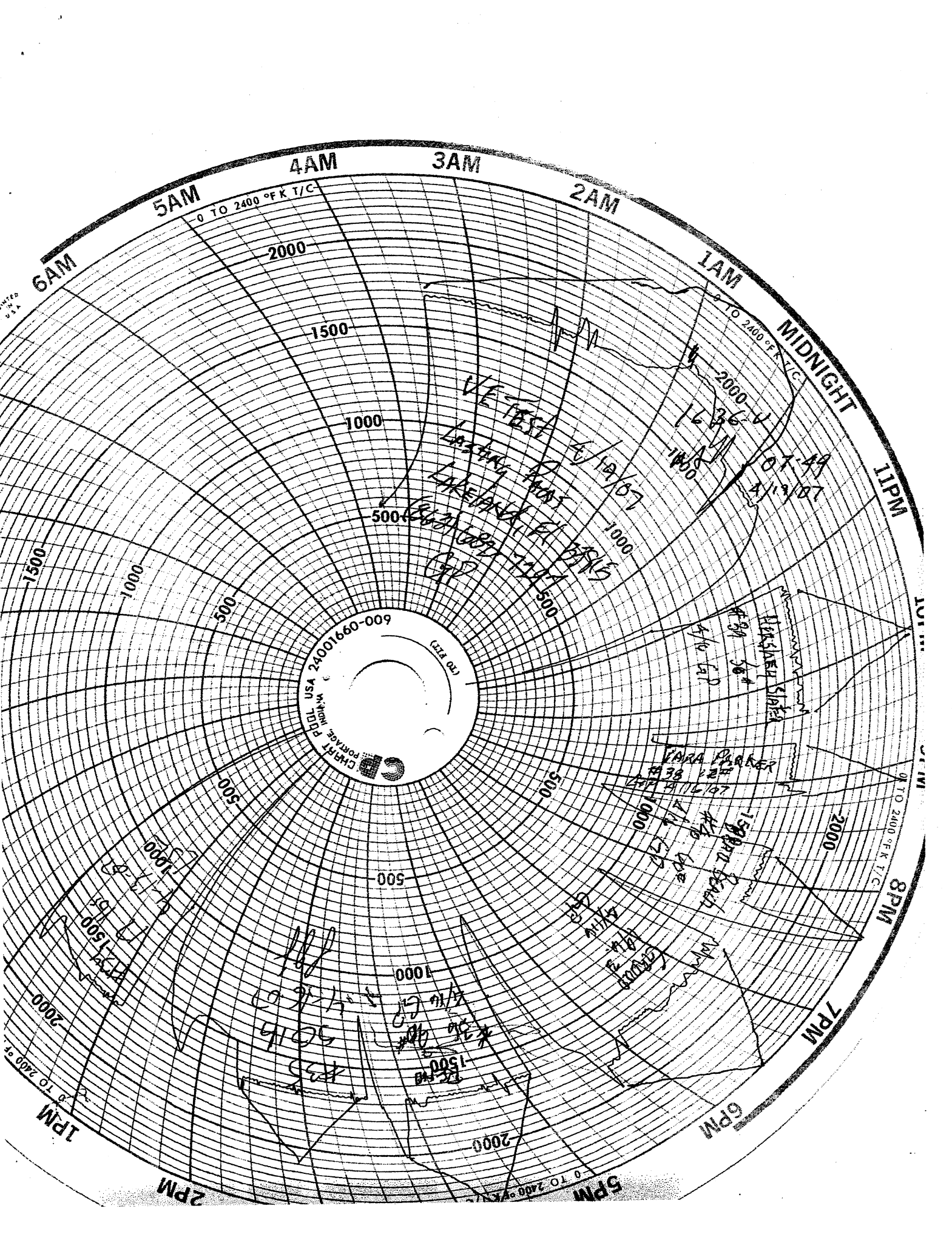
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CHART PUBL USA 24001660-009

VE TEST 4/19/07
LAKELAND FL BANKS
LAKELAND FL BANKS
LAKELAND FL BANKS

FRANKLIN STAIRS
#38 384
4/16/07

VARA PARKER
#38 384
4/16/07

4/16/07
4/16/07
4/16/07
4/16/07





Whitlow Enterprises, LLC

www.smokeschool.net

Certifies that

Bill Arlington of Arlington Environmental Services

Has met all of the requirements of EPA Reference Method 9 and 22
And is qualified as a Visible Emissions Observer

Date: January 8, 2007

This certificate is valid for 6 months after the above date

George Artie "Butch" Whitlow

President

SOUTHWEST DISTRICT
TAMPA

VISIBLE EMISSION TEST

Method Used (Circle One) 203A 203B Report 1644-U

Company Name Hasting Paws Pet Creations
 Facility Name 1052394
 Street Address 1818 Olive St.
 City Lakeland, State FL Zip _____
 Phone No. (863) 682-7297

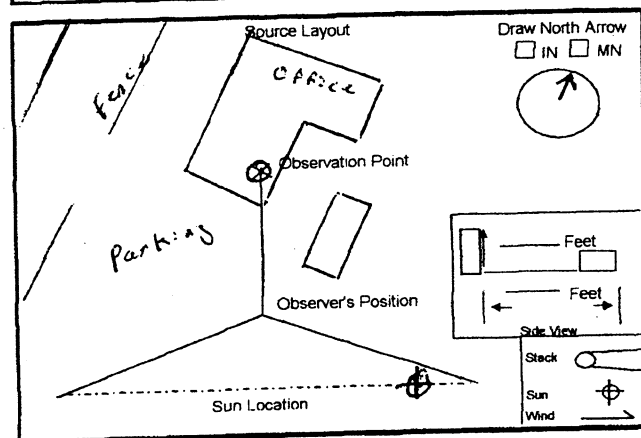
Process Creantry Unit # _____ Operating Mode 296 lbs
 Control Equipment AFTerburner Operating Mode V675-F

Describe Emission Point Roof Top Stack
 Ht of Emis. Point 20' Ht Rel to Observer 20'
 Distance to Emis. Pt. 80' Direction to Emis. Pt. (Degrees) 341°

Verticle Angle to Obs. Pt. _____ Direction to Obs. Pt. (Degrees) 341°
 Distance and Direction to Obs. Pt from Emission Pt Same

Describe Emissions
 Emission Color _____ Water Droplet Plume
 Attached _____ Detached _____ None X

Describe Plume Background SKY + Phone Wires
 Background Color blue Sky Conditions Clear
 Wind Speed 1-3 MPH Wind Direction NE
 Ambient Temp. 73°F Wet Bulb Temp. 57°F % RH 58



Latitude 28°02.230' Longitude 81°59.075' Declination _____

Comments _____

Min Sec	Start Time <u>8:00</u>				Stop Time <u>09:00</u>				
	0	15	30	45	Min Sec	0	15	30	45
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
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16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Number of Readings Above _____ % were _____
 Average Opacity for Highest 6 Min Period _____
 Range of opacity Readings
 Min _____ Max _____
 Average Opacity for 2nd Highest 6 Min _____

Observers Name (Print) William Arlington

Observers Signature W. Arlington Date 4/23/07

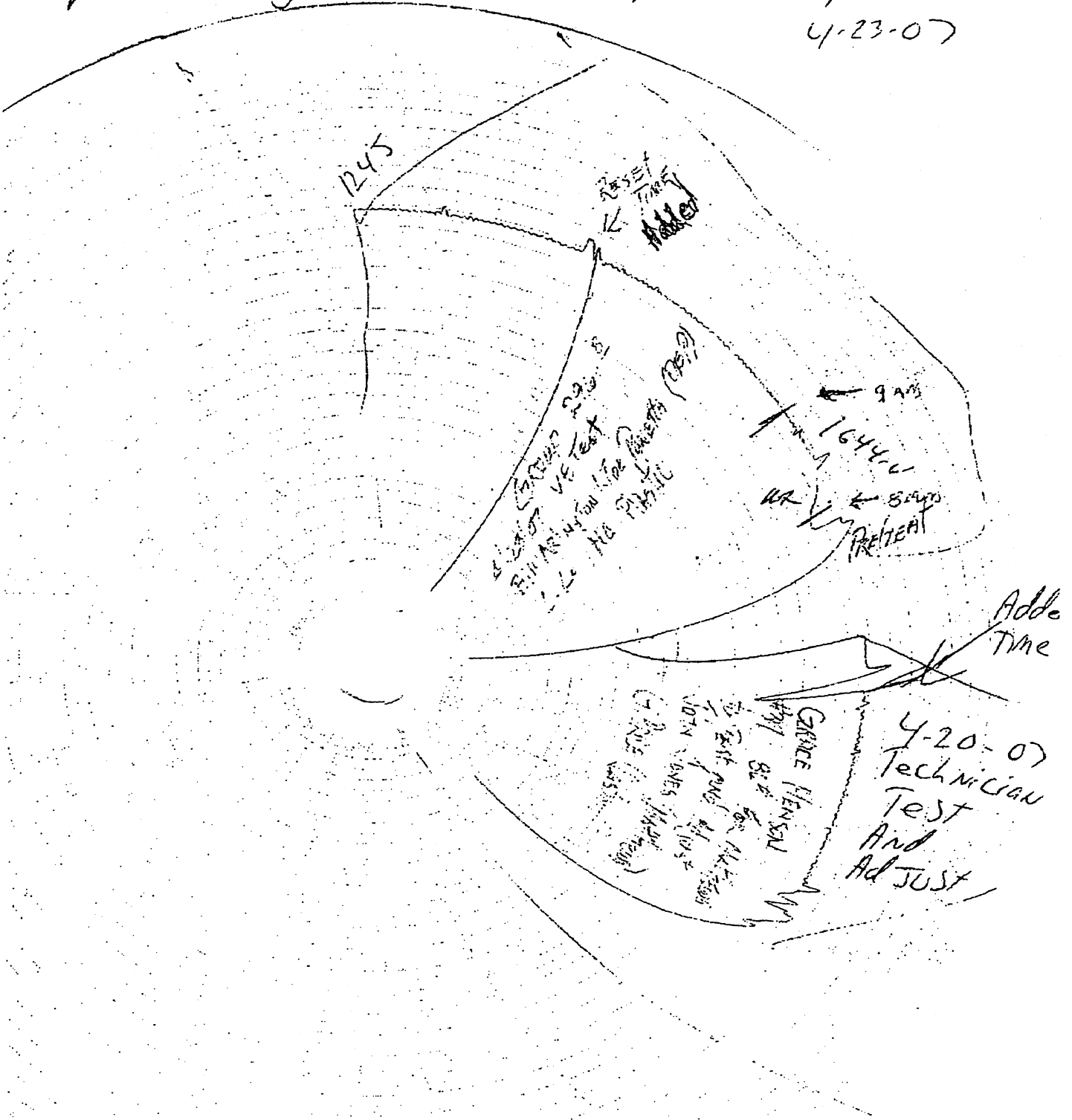
Organization Arlington Environmental Services, Inc.

Certified By Whitlow Enterprises Date 1/8/07

Lasting PAWS

Lakeland, FL

4-23-07





Whitlow Enterprises, LLC

www.smokeschool.net

Certifies that

Bill Arlington of Arlington Environmental Services

**Has met all of the requirements of EPA Reference Method 9 and 22
And is qualified as a Visible Emissions Observer**

Date: January 8, 2007

This certificate is valid for 6 months after the above date

George Artie "Dutch" Whitlow

President

VISIBLE EMISSIONS EVALUATION

COMPANY Lasting Paws	
UNIT EU 001	Power Pk Jr.
ADDRESS 1818 Olive Street Lakeland Florida	
PERMIT NO. 1050394	COMPLIANCE YES - NO -
AIRS NO.	EU NO. 001
PROCESS RATE MAX 300 LBS HR	PERMITTED RATE
PROCESS EQUIPMENT	
CONTROL EQUIPMENT	
OPERATING MODE AFLA Burner	AMBIENT TEMP (BF) START 72 STOP
HEIGHT ABOVE GROUND LEVEL START 20 STOP 20'	HEIGHT RELATIVE TO OBSERVER START 20' STOP 20'
DISTANCE FROM OBSERVER START 80' STOP 80'	DIRECTION FROM OBSERVER START SSO' STOP 80'
EMISSION COLOR None	PLUME TYPE CONTIN. ~ INTERMITTENT - NA
WATER DROPLETS PRESENT? NO - YES - N/A	IS WATER DROPLET PLUME ATTACHED - N/A DETACHED -
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START STOP N/A	
DESCRIBE BACKGROUND START Blue Sky STOP Blue Sky	
BACKGROUND COLOR START blue STOP blue	SKY CONDITIONS START Clear STOP Clear
WIND SPEED (MPH) START 1-5 mph STOP 1-5 mph	WIND DIRECTION START NE STOP NE
AVERAGE OPACITY FOR HIGHEST PERIOD 0	RANGE OF OPACITY READINGS MIN. 0 MAX. 0
SOURCE LAYOUT SKETCH	
<p style="text-align: center;">Sun Wind * Plume and Stack</p> <p style="text-align: center;">Emission Point</p> <p style="text-align: center;">Observer's Position</p> <p style="text-align: center;">140° Sun Location Line</p> <p style="text-align: right;">Draw North Arrow</p>	
COMMENTS 295.8 LBS	

OBSERVATION DATE		START TIME				STOP TIME			
9/23/07		8:00				9:00			
SEC	MIN				SEC	MIN			
	0	15	30	45		1	15	30	45
0	0	0	0	0	30	0	0	0	0
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
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13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
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19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0

Observers Signature: *Joseph Panetta*

Date: **9/23/07**

Observers Organization: Florida Department of Environmental Protection

Observer Name and Certified By:

EASTERN TECHNICAL ASSOCIATES

JOSEPH PANETTA

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.

2/14/2007	8/16/2007	TMP506
DATE OF SCHOOL	EXPIRATION DATE	LAST LECTURE
347960	PAN716659	
CERT NUMBER	STUDENT ID NUMBER	BEARER



1818 Olive St. Lakeland, FL 33815

(863) 682-7297

Fax (863) 682-7301

Joe Panetta
Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Dear Sir:

My name is Gerald Price and I was the Crematory Operator running the VE test on 4/19/07. I operated our Power-Pak Jr. by the manufactures instructions and as we know the test did not go well.

The next day Matthews (the manufacturer of the Power-Pak Jr.) sent their Service Tech, John Jones, to check the operating settings of the machine and according to Mr. Jones, several settings were found to be out of their required limits. The first was the Throat Air. This did not function properly because the sensor was getting a reflection from the side of the exhaust stack. This was fixed by painting the area around the sensor with high temperature flat black enamel and adjusting the sensitivity. There was also too much air flow when operating the Throat Air. Per Mr. Jones, this was the main cause of our smoke. When I turned the Throat Air off, the smoke stopped. The next item was the gas flow adjustments of the afterburner and the cremation burner. The afterburner was not high or hot enough and caused the afterburner to not properly maintain the temperature of the after chamber. The cremation burner was too hot causing the Cremation to burn faster than it should.

Our Power-Pak Jr. has been recalibrated and we passed the VE test conducted on 4/23/07 with 0 smoke. The manufacture also now says we should not cremate our animals in plastic bags when doing large loads. This was not part of the instruction manual nor was it stated in our Operator Training.

Thank You
Gerald Price



Cremation Division

April 24, 2007

Larry Lupold
Lasting Paws Pet Cremation, Inc.
1818 Olive Street
Lakeland, Fl. 33815

Subject: Visual Emissions Test

Dear Larry:

On April 20th a Matthews Cremation Technician made a courtesy inspection on your Power Pak Jr. to insure proper unit calibration and operation after your Visual Emissions Test on April 19th. The inspection was performed and the equipment was found to be in normal working condition and within manufacturer's standards. He also confirmed operator procedures.

Please let me know if you have additional questions on this subject. I can be reached at 1.800.327.2831, ext. 143.

Regards,

RICHARD B. KOSTO
Matthews Cremation Division
South Central Representative
Service Manager
☎ 1-800-327-2831 ext. 143
☎ 407-886-5990
✉ rkosto@matw.com

REFERRAL FOR ENFORCEMENT REVIEW

To: Danielle Henry, Enforcement Coordinator

From: Joseph V. Panetta, Environmental Specialist III

Date: May 7, 2007

Facility: Lasting Paws Pet Cremation

AIRS ID: 1050394-001-AC

The Permitting Section refers the following for enforcement review:

On April 19, 2007 a visible emissions test was witnessed by William Schroeder of the Florida DEP at the fore mentioned facility.

1 Deficiency Found:

The VE averaged 8.5 % opacity for six minutes or more.

Rule 62-296.401(6)(a)(b), F.A.C.

1. Visible emissions shall not exceed five percent (5%) opacity, six (6) minute average, except that visible emissions not exceeding fifteen percent (15%) opacity shall be allowed for up to six (6) minutes in any one (1) hour period.

Attachments:

- Inspection Report from 4/19/2007
- Permit Detail and Log permit screens for both AC
- Failed VE from 4/19/2007
- Passed VE from 4/23/2007
- Three pages containing failure explanation and documentation of service after the failure

From: Panetta, Joe

Sent: Monday, July 16, 2007 4:23 PM

To: Henry, Danielle D.

Subject: enforcement referral Lasting Paws 1050394 07.11.2007

Hi Danielle-- here is the 2 nd referrel for Lasting Paws. If I remember correctly you were going add this to the warning letter.

Thanks,

Joe

2nd REFERRAL FOR ENFORCEMENT REVIEW

To: Danielle Henry, Enforcement Coordinator

Through: Cindy Zhang -Torres

From: Joseph V. Panetta, Environmental Specialist III

Date: July 16, 2007

Facility: Lasting Paws Pet Cremation

AIRS ID: 1050394-001-AC__ Going to__ 1050394-002-AG

The Permitting Section refers the following for enforcement review:

On July 12, 2007 the Department received an Air General Permit Registration Form for an Animal Crematory from the above mentioned facility.

1 Deficiency Found:

1. Failure to submit VE and GP registration form in accordance specific condition Number 15 in Air Operating Permit 1050394-001-AC.

The GP Registration form was submitted July 12, 2007 the VE should have been performed between May 13, 2007 and July 12, 2007. An acceptable VE test was conducted 4/23/2007.

Or

If we use the VE test date of 4/23/2007 the GP Registration Form should have been submitted February 22, 2007 through April 23, 2007

Specific Condition Number 15 A

1. If an air **general permit** will be applied for then a VE test shall be conducted during the 60-day period prior to the submittal of the air general permit notification/registration form. (See Part II, item (4)(I)1 of the Animal Crematory Air General Permit form) and no later than sixty (60) days after initial start of commercial operation of the unit

Attachments:

- Failed VE test from 4/19/2007 (previous referral)
- Passed VE test from 4/23/2007 (previous referral)
- Copy GP Registration form received date stamped July 12, 2006
- Page 4 of permit 1050394-001-AC