



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 29, 2010

By Electronic Mail, Received Receipt Requested
trahanmortuary@yahoo.com

Mr. Dennis Trahan, Owner
Pensacola Crematory
430 Beverly Parkway
Pensacola, Florida 32505

Dear Mr. Trahan:

On November 19, 2010, a Department representative with the Air Resource Management Program inspected your facility, ID 0330278. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report. Please carefully review the comments section of the inspection report to ensure continued compliance in the future.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-0662 or jennifer.waltrip@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Rick Bradburn".

Rick Bradburn
Air Program Administrator

RB/jw/c

Enclosure



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0330278	DATE: <u>11/19/10</u>	ARRIVE: <u>12:35 PM</u>	DEPART: <u>1:35 PM</u>
FACILITY NAME: PENSACOLA CREMATORY-BEVERLY PKWY			
FACILITY LOCATION: 430 BEVERLY PKWY PENSACOLA 32505			
OWNER/AUTHORIZED REPRESENTATIVE: DENNIS TRAHAN Email: trahanmortuary@yahoo.com		PHONE: (850)438-6235 Mobile:	
CONTACT NAME: WILLIAM D. TRAHAN Email: trahanmortuary@yahoo.com		PHONE: (850)438-6235 Mobile:	
ENTITLEMENT PERIOD: 10/15/2009 / 10/15/2014 (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): William D. Trahan
 Brief Notes: _____

2. Is the Authorized Representative still DENNIS TRAHAN? ----- 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 DENNIS TRAHAN? ----- Yes ..No
 If no, who is?: William D. Trahan

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 – HumanCrematory-#1prim/2ndarychmbr,temp/opacitymon,LP,150#/hr

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: 2/4/10
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: 3/16/10
- 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 _____ % 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 _____ % 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 1,800¹ 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)

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 (12/28/09) ----- 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

Emissions Unit Section

2 – HumanCrematory-#2prim/2ndarychmbr,temp/opacitymon,LP,150#/hr

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
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(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
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- b. Was the visible emissions test conducted according to EPA Method 9? ----- Yes ..No
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3. **Is there any reason to ask for a special test to determine compliance with the PM and CO standards?** ----- Yes ..No
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PART III: MONITORING/RECORDKEEPING REQUIREMENTS (continued)

- c. Are the following records kept on file, available for inspection, for at least the past two years?
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 - 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
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(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
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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

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- 1. Is the crematory unit maintained in accordance with the manufacturer's specifications? ----- Yes ..No
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- 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

Jennifer Waltrip

11/19/10

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 at Pensacola Crematory on November 19, 2010. Mr. William D. Trahan was available to assist during the inspection.

Both crematory units were in operation during the inspection. No emissions were observed and no odors were detected. .

According to Mr. Trahan, the opacity control system is inspected by facility personnel on a monthly basis according to the manufacturer's specifications. The inspection includes cleaning the lenses and aligning the monitor.

Records were well-maintained and available for review for both crematory units. Records included circle charts with temperature recordings for each cremation. The circle charts are marked with the customer tag ID number and date of cremation. Each tag ID number has a separate file which includes the date of cremation, the time when cremation in the primary chamber begins and ends and the name of the operator. There was discussion as to whether it was acceptable to record this information on the files instead of directly on the circle charts. Rule 62-296.401(5)(i), Florida Administrative Code (F.A.C.), states that continuous temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber was begun, date, time, and temperature markings. The rule does not specifically state that the information shall be maintained on the circle charts. The tag ID information on the circle charts was easily matched to the tag ID information on the files and the required documentation was in a permanent legible form available for inspection. This appears to be in compliance with the rule requirements.

According to Mr. Trahan, human remains are occasionally delivered to the facility in body bags with an unknown chlorinated plastic content. Facility personnel have some concern with removing the bodies from the bags they are delivered in to bags with a known chlorinated plastic content, due to possible airborne pathogens. I suggested to Mr. Trahan that he contact the hospitals that deliver the bodies and obtain documentation for their body bags to ensure they are acceptable containers for incineration. This documentation shall be kept on file for the duration of their use and for at least two years after their use.

Please note Rule 62-296.401(5)(d), F.A.C., states that human crematory units shall cremate only human or fetal remains with appropriate containers. 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 manufacturer 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 years after their use. No other material, including biomedical waste as defined in Rule 62-210.200, F.A.C., shall be incinerated.