



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1050398 **DATE:** 08162007 **ARRIVE:** 0854 **DEPART:** 1111
FACILITY NAME: LAKELAND FUNERAL HOME
FACILITY LOCATION: 2125 S. Bartow Road
 LAKELAND 33801-6575
RESPONSIBLE OFFICIAL: DAVID WOLF **PHONE:** (863)686-2125
CONTACT NAME: DAVID WOLF **PHONE:** (863)686-2125
REMITTANCE YEAR: **ENTITLEMENT PERIOD:** 2/10/2007 / 2/10/2012
(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(5)(i), 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 cremation containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead human bodies?----- 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) Are there any other materials, including biomedical wastes (Rule 62-210.200, FAC) incinerated at this location?----- Yes No
6. Have all crematory operators been trained and certified by a Department-approved training program? Yes No
 - a) Are copies of the training certificates for 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

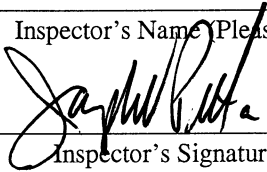
1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?-----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

Joseph V. Panetta

08162007

Inspector's Name (Please Print)

Date of Inspection



2008

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This is a new facility. Initial VE was today. VE was observed and performed by consultant and DEP. Spoke with Mr. David Wolf about rule. Went over rules explaining 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. Highlighted areas of rules we went over. Left examples of preventive schedules.

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.

Operating at time of inspection temp 1648 F

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. Each crematory unit shall be equipped and operated with a continuous monitor to record temperature at the point or beyond where 1.0 second gas residence time is obtained in the secondary chamber combustion zone in accordance with the manufacturer's instructions. In addition, each crematory unit installed after February 1, 2007, shall be equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement. Such system shall be calibrated to restrict combustion in the primary chamber whenever any opacity exceeding 15% opacity is occurring. Talked about Startup, shutdown and malfunction procedures.

Violations found--- 15 day notice not giving to the Department-2 day notice was given.

----Cremation unit on site is a Universal Cremation unit made by Keller Mechanical & Engineering model 1100H Serial # 42307582. The application stated it was Millennium III

On August 28, 2007 11:50-12:01 I spoke w/ Mr. David Wolf and he stated he new be fore sending in the registration form that he wasn't installing a Millennium III Crematory, but did know he was sending in the 1.0 residence time calculation for Millennium III thinking it was ok for the Universal Cemation Unit also. He atated he was confused because of all the different agency requirements.

REFERRAL FOR ENFORCEMENT REVIEW

To: Danielle D. Henry, Enforcement Coordinator
Through: Chris Bradley, Compliance Supervisor
From: Joseph V. Panetta, Environmental Specialist III

Date: August 28, 2007

Company: Lakeland Funeral Home
AIRS ID: 1050398-002-AG

The Permitting Section refers the following for enforcement review:

On August 16, 2007 an inspection was performed at the above facility and two violations may have occurred.

I. Failure to provide properly completed registration form on 01/10/2007.

Cremation unit on site is a Universal Cremation unit made by Keller Mechanical & Engineering model 1100H Serial # 42307582.. The applicated stted it was Millenium III.

On August 28, 2007 11:50-12:01pm I spoke w/ Mr. David Wolf and he stated he new before sending in the registration form that he wasn't installing a Millenium III Crematory, but did know he was sending in the 1.0 residence time calculation for Millenium III thinking it was ok for the Universal Cemation Unit also. He stated he was confused because of all the different agency requirements.

II. Failure to give proper VE test notification.

The test has been scheduled for 08/16/2007. The notification was received by email on 08/14/2007

Rule 62-210.310(2), F.A.C.

(e) **Equipment Changes.** The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit.

Attached:

 X Emails to and from Joe Panetta, Chris Bradley, David Wolf and Dean Myers

 X Inspection Report

 X VE TEST

Panetta, Joe

From: Bradley, Christopher
Sent: Wednesday, August 15, 2007 3:34 PM
To: 'deanhmyers@earthlink.net'
Cc: Panetta, Joe
Subject: RE: Short notice testing - Lakeland VE, Construction Window
Importance: High

Mr. Myers:

As requested, testing at the Lakeland Funeral Home is approved for tomorrow Thursday, August 16, 2007. The SWD Air Section has decided to accommodate the short test notice because we do not want the facility to operate out of compliance. That is, as you have related that waiting for the facility to provide a 15-day notification would result in the facility testing beyond the 30-day window allowed by permit for testing after initial operation.

However, please be aware that there is the possibility of enforcement action based on a late test notification for the test date the facility is requesting testing.

If you have any questions, please contact me.

Sincerely,

Chris Bradley
 Compliance Manager
 Air Program - FDEP/SW District
 813.632.7600, ext. 123
Christopher.Bradley@dep.state.fl.us

From: DEAN MYERS [mailto:deanhmyers@earthlink.net]
Sent: Tuesday, August 14, 2007 5:28 PM
To: Bradley, Christopher
Subject: RE: Short notice testing - Lakeland VE, Construction Window

Chris Bradley,

I just spoke to my client as referenced below. He said that yes, they have started the unit upon construction completion a few weeks ago and have tested it. But now they are closing in on a 30 day window to complete VE testing and have the opportunity now, but would have difficulty notifying (in 15 days) and storing a test subject all within the 30-day- from, construction window. Thanks for your understanding. We understand that a field inspector is open Thursday morning if needed.

Sincerely,
 Dean H. Myers, P.E.

----- Original Message -----

From: DEAN MYERS
To: christopher.bradley@dep.state.fl.us
Sent: 8/14/2007 1:47:47 PM
Subject: Short notice testing - Lakeland

Dear Sir:

David Wolf with Lakeland Funeral Homes Memorial Gardens 2125 S. Bartow Rd. Lakeland, has asked me to request a short notice to perform a VE test at a new facility in Lakeland. Facility #1050398-002AG He spoke with Joe P. about a

8/16/2007

short notice. Mr. Wolf reported that they have some bodies available and they would like to take care of testing this week. They can not plan future testing very well. We would like to test on August 16th about 9:00 am.

Thanks

DEAN MYERS, P.E. phone 863 682 7587

General Env. Engineering INC. Lakeland
deanhmyers@earthlink.net
Why Wait? Move to EarthLink.

8/16/2007

Panetta, Joe

From: Bradley, Christopher
Sent: Wednesday, August 15, 2007 3:54 PM
To: Panetta, Joe
Subject: FW: Short notice testing - Lakeland
Attachments: RE: Short notice testing - Lakeland VE, Construction Window

Joe:

Please make arrangements to attend this VE. In addition Please place the e-mails that I print into the facility compliance file; they will be in your inbox.

Gratefully,

Chris

From: DEAN MYERS [mailto:deanhmyers@earthlink.net]
Sent: Tuesday, August 14, 2007 1:48 PM
To: Bradley, Christopher
Subject: Short notice testing - Lakeland

Dear Sir:

David Wolf with Lakeland Funeral Homes Memorial Gardens 2125 S. Bartow Rd. Lakeland, has asked me to request a short notice to perform a VE test at a new facility in Lakeland. Facility #1050398-002AG He spoke with Joe P. about a short notice. Mr. Wolf reported that they have some bodies available and they would like to take care of testing this week. They can not plan future testing very well. We would like to test on August 16th about 9:00 am.

Thanks

DEAN MYERS, P.E. phone863 682 7587

General Env. Engineering INc. Lakeland
deanhmyers@earthlink.net
Why Wait? Move to EarthLink.

8/16/2007

EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One) Method 9 203A 203B Other: _____

Company Name Lakeland Funeral Home
 Facility Name Memorial Gardens
 Street Address 2125 S. BARTON Rd
 City LAKELAND State FL Zip 33808

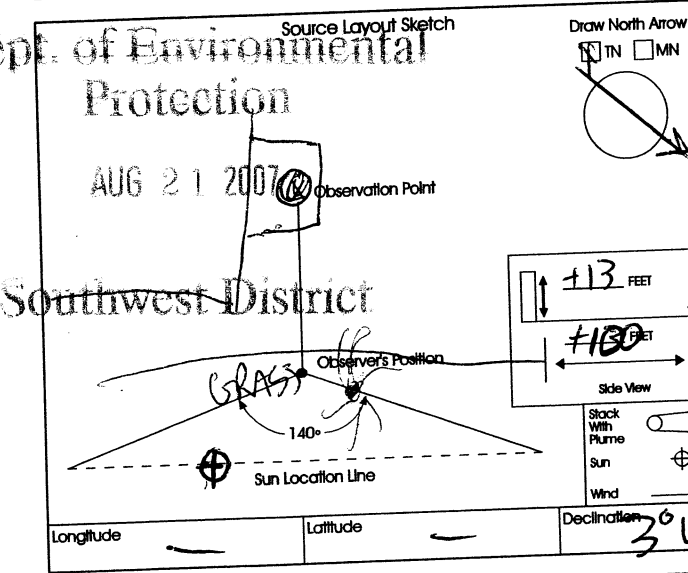
Process CREMATORY Unit # _____ Operating Mode ON - LOADED
 Control Equipment After Burner Operating Mode ON 1650°F

Describe Emission Point Black 2' dia stack top of north Bldg.
 Height of Emiss. Pt. Start 18' End 18' Height of Emiss. Pt. Rel. to Observer Start +13' End +13'
 Distance to Emiss. Pt. Start 100' End 100' Direction to Emiss. Pt. (Degrees) Start 228 End 228

Vertical Angle to Obs. Pt. _____ Direction to Obs. Pt. (Degrees) Start 228 End 228
 Distance and Direction to Observation Point from Emission Point Start 10' UP 100' End 100' UP

Describe Emissions Start None End None
 Emission Color Start None End None
 Attached Detached None

Describe Plume Background Start SKY/TREE End SKY/TREE
 Background Color Start Blue End Blue Sky Condition Start Clear End Clear
 Wind Speed Start 3 mph End 3 Wind Direction Start NE End NE
 Ambient Temp. Start 81 End 89 Wet Bulb Temp. _____ RH Percent 73



Additional Information NO OBJECTIONABLE ODORS
1661°F

ARMS# 1050398-002 AB

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

Observation Date 8-16-07 Time Zone EST Start Time 9:08 End Time 10:08

Min	Time Zone				Comments
	0	15	30	45	
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
30	0	0	0	0	0 0 0 0

30 - 60 min →

Observer's Name Dean Myers Date 8-16-07
 Observer's Signature _____
 Organization GENERAL ENV ENGINEERING
 Certified By Whitlow Date July 10'07

VISIBLE EMISSIONS EVALUATION

COMPANY Lakeland Cemetery & Memorial Gardens

UNIT _____

ADDRESS 7125 S. Brenton Road

PERMIT NO. 1050398-002-M COMPLIANCE YES - NO -

AIRS NO. 1050398 EU NO. 001

PROCESS RATE < 500 CB/Hr PERMITTED RATE < 500 CB/Hr

PROCESS EQUIPMENT Afterburner Cemetery

CONTROL EQUIPMENT Afterburner

OPERATING MODE Normal AMBIENT TEMP (BF) START 80 STOP 89

HEIGHT ABOVE GROUND LEVEL START 18 ft STOP _____ HEIGHT RELATIVE TO OBSERVER START 13 ft STOP ft

DISTANCE FROM OBSERVER START 85 ft STOP 85 ft DIRECTION FROM OBSERVER START 226° STOP 226°

EMISSION COLOR None PLUME TYPE CONTIN. - N/A INTERMITTENT - _____

WATER DROPLETS PRESENT? (NO) YES - _____ IS WATER DROPLET PLUME ATTACHED - N/A DETACHED - _____

POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START 12-18 inches Above Stack STOP Same

DESCRIBE BACKGROUND START SKY STOP SKY

BACKGROUND COLOR START Blue STOP Blue SKY CONDITIONS START Clear STOP Clear

WIND SPEED (MPH) START 1-3 STOP 1-3 WIND DIRECTION START NE STOP NE

AVERAGE OPACITY FOR HIGHEST PERIOD 0.0 RANGE OF OPACITY READINGS MIN. 0 MAX. 0

SOURCE LAYOUT SKETCH

Draw North Arrow

Sun Wind * Plume and Stack

Observer's Position

Sun Location Line 140°

COMMENTS

OBSERVATION DATE		START TIME				STOP TIME			
8-16-07		9:09				10:09			
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
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	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

Observers Signature: [Signature]

Date: 8-16-07

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 8/15/2007 352735

SCHOOL LOCATION DATE OF SCHOOL CERT NUMBER

TMPS06 2/14/2008

LAST LECTURE EXPIRATION DATE BEARER