



# Florida Department of Environmental Protection

Northwest District Office  
2353 Jenks Avenue  
Panama City, Florida 32405-4389

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

September 18, 2012

SENT VIA E-MAIL  
[ray.mobley@fam.u.edu](mailto:ray.mobley@fam.u.edu)

Dr. Ray Mobley, DVM  
Florida A&M Research & Extension Service  
4259 Bainbridge Highway  
Quincy, Florida 32352

Dear Dr. Mobley:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is 0390043. Your facility permit **expired on June 30, 2012**. This letter applies only to activities covered by the Air Resource Management Program.

The Tallahassee Branch Office reported a status of **In Compliance** for your facility. However, the below issues may require your attention.

- The permit has expired. Before resuming operation, please submit a renewal application and renew the entitlement to operate.
- The crematory unit may be in need of repair. Please review the Comments and Recommendations section of the attached inspection report.

The assistance you provided is appreciated. If you have any questions, your local contact is Tracy White at 850/245-2960 or by email at [tracy.a.white@dep.state.fl.us](mailto:tracy.a.white@dep.state.fl.us).

Sincerely,

Clifford D. Wilson III, P.E.  
Northwest District Branch Administrator

CW/tw

Enclosures

c: Dr. Glen Wright, Florida A&M ( [glen.wright@fam.u.edu](mailto:glen.wright@fam.u.edu) )  
Rick Bradburn, Mary Beth Curle, Carol Melton (FDEP, Pensacola)



# ANIMAL CREMATORY



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 0390043	<b>DATE:</b> <u>7/31/2012</u>	<b>ARRIVE:</b> <u>1:30 P.M.</u>	<b>DEPART:</b> <u>2:30 P.M.</u>
<b>FACILITY NAME:</b> FLORIDA A&M RESEARCH & EXTENSION CENTER			
<b>FACILITY LOCATION:</b> 4259 Bainbridge Hwy QUINCY 32352			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b> RAY MOBLEY		<b>PHONE:</b> (850)412-5252	
<b>Email:</b> ray.mobley@fam.u.edu		<b>Mobile:</b>	
<b>CONTACT NAME:</b>		<b>PHONE:</b>	
<b>Email:</b>		<b>Mobile:</b>	
<b>ENTITLEMENT PERIOD:</b> 6/30/2007 / 6/30/2012 <b>Facility may be operating without Entitlement!</b> <small>(effective date) (end date)</small>			

### 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): Dr. Glen Wright  
 Brief Notes: \_\_\_\_\_

2. Is the Authorized Representative still RAY MOBLEY? -----  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?: Glen Wright

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

### **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: 800  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: 9/20/2011
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: \_\_\_\_\_
  - 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? \_\_\_\_\_  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)
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  1,800<sup>1</sup>  1,600<sup>2</sup> degrees was determined? -----  Yes ..No  
 (Application or initial notification: <sup>1</sup> received on or after 8/30/89; <sup>2</sup> 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 -----  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

Tracy White

7/31/2012

Inspector's Name (Please Print)

Date of Inspection

*Tracy White*

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** I met with Dr. Glen Wright. Apparently the machine had not been operated for over a year and the unit was in need of repair (Logic controller unit w/ temperature chart recorder was inoperable, burner malfunction).

According to Department computer records, the last compliance test was on 7/21/10. Testing for 2011 is not present, however the unit does not appear to have been operated during that time period.

Note In regard to the expired entitlement (permit), the facility has been notified and has been in contact with the District office for this issue.

Recommendations:

1) The permit has expired. To avoid a non-compliant status and before resuming operation, please submit a renewal application and renew the entitlement to operate.

2) The crematory unit may be in need of repair:

"Rule 62-296.401(6)(e), Florida Administrative Code, provides: "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."

3) If the unit is to resume operation, annual compliance testing is required.