



Florida Department of Environmental Protection

Northwest District Office
3900 Commonwealth Boulevard, MS 55
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

October 17, 2012

SENT VIA E-MAIL

Erika.Leckington@talgov.com

Erica Leckington
Interim Director
Tallahassee Leon Community Animal Service Center
1125 Easterwood Drive
Tallahassee, Florida 32311

Dear Ms. Leckington:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is **0730110**. Your facility permit expires on **March 5, 2014**. This letter applies only to activities covered by the Air Resource Management Program.

The Tallahassee Branch Office reported a facility status of In Compliance. The inspection checklist is enclosed. Your facility compliance status may be subject to further review by the District program office.

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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cliff Wilson".

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

CW/tw
Enclosures

Enclosures

cc: Russell Wider, COT (Russell.Wider@talgov.com)
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:

AIRS ID#: 0730110	DATE: <u>10/04/2012</u>	ARRIVE: <u>9:30 A.M.</u>	DEPART: <u>10:30 A.M.</u>
FACILITY NAME: TALLAHASSEE-LEON COM'NITY ANIMAL SVC CTR			
FACILITY LOCATION: 1125 EASTERWOOD DR TALLAHASSEE 32311-3519			
OWNER/AUTHORIZED REPRESENTATIVE: ERIKA LECKINGTON		PHONE: (850)891-2959	
Email:		Mobile: (850)661-2431	
CONTACT NAME: RUSSELL WIDER		PHONE: (850)891-8710	
Email:		Mobile:	
ENTITLEMENT PERIOD: 3/5/2009 / 3/5/2014 (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): Perri Dale
 Brief Notes: _____

2. Is the Authorized Representative still ERIKA LECKINGTON? ----- 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 RUSSELL WIDER? ----- Yes ..No
 If no, who is?: _____

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-Animal Crematory-prim./2ndary chmbrs,monitor,NGfired,300#/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. Manufacturer's recommended capacity: 1200 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: 8/15/2011
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: 09/10/2012
 - 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 1,800¹ 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)
- 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 1/12/11) ----- 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? Sabic Poly Bags
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

10/04/2012

Inspector's Name (Please Print)

Date of Inspection

Tracy White

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Perri Dale and Russell Wider. A records review was performed. A record of note was the 9/07/2012 email from David Sewell (NCE-Crawford-EMCOTEK) to Perri Dale. The document details the recommended "PM checks procedure for the opacity device." In other words, the recommended manufacturer's recommendations for the opacity monitoring system were obtained and applicable records were maintained.

Also, Mr. Wider provided the MSDS sheets for body bags that may be incinerated. Other operation and maintenance/repair records were maintained.

Afterwards I observed the crematory unit. It was not in operation and only operated on Mondays. No changes to equipment were noted. The facility was in good condition, no objectionable odors or emissions were noted.