



ANIMAL CREMATORY

COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 0170372 **DATE:** 01192010 **ARRIVE:** 0800 **DEPART:** 1230

FACILITY NAME: CITRUS CO ANIMAL SVCS-ANIMAL CREMATORY

FACILITY LOCATION: 4030 S AIRPORT RD
INVERNESS 34450-8545

OWNER/AUTHORIZED REPRESENTATIVE: CHARLES GATTO **PHONE:** (352)527-7600

CONTACT NAME: Eva Clark, Joe Capalbo, Pattie Amon **PHONE:** (352)726-7660

ENTITLEMENT PERIOD: 11/29/2009 / 11/29/2014
(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(6)(j), F.A.C.)-----N/A ☐ 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.)?-----N/A ☐ Yes ☐ No
 - b) Oxygen test performed according to EPA Method 3 (Ref.: Chapter 62-297, F.A.C.)?-----N/A- ☐ 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.)?-----N/A ☐ Yes ☐ No
5. Was all emissions testing conducted with the source operating at the manufacturers recommended capacity?-----N/A ☐ Yes ☐ No
6. Was CO & PM compliance demonstrated by submission of a test report for an identical crematory unit?N/A ☐ Yes ☐ No
7. Was the Department notified at least 15 days prior to the date of the last formal compliance test?-----N/A ☐ 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?-----N/A ☐ 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?----- xYes ☐ 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) X **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**?----- X 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?----- x 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?-----N/A ☐ 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?----- xYes ☐ No
7. Have all crematory operators been trained and certified by a Department-approved training program?---N/A ☐ 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?-----N/A ☐ 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

01/19/2010

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This inspection was performed by Joe Panetta and Malik Pickering to meet with owner/operators and provide compliance assistance. We were here to witness an initial VE test and perform a crematory initial inspection. We gave copies of the rules, VE requirement and Florida Small Business Assistance Program Ombudsman contact information, a crematory workbook, example of a maintenance checklist, The Animal Crematory Rule (highlighted) was explained and given to the three contact people. Explained permit expires in 5 years and the need to apply at least 30 days prior to permit expiring.

I asked Mr. Charles Gatto and Julie Rosenberger to become familiar with Rule 62-296.401(5), F.A.C. and this general permit for animal crematories. Explained Operating Temperatures.

The owner or operator of any proposed new crematory unit which submits either a complete application for a permit to construct the a new unit or an initial air general permit registration for the new unit to the Department on or after August 30, 1989, shall provide design calculations 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. This information shall be provided to the Department with the air construction permit application or air general permit registration form for the proposed new unit. The actual operating temperature of the secondary chamber combustion zone shall be no less than 1600 degrees Fahrenheit throughout the combustion process in the primary chamber. The primary chamber and stack volumes shall not be used in calculating this residence time. Except as provided in subparagraph 62-296.401(6)(c)2., F.A.C., cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 degrees Fahrenheit. 2. The owner or operator of any crematory units for which construction began or for which a complete application for a permit to construct was received by the Department prior to August 30, 1989, shall maintain the actual operating temperature of the secondary chamber combustion zone at no less than 1400 degrees Fahrenheit throughout the combustion process in the primary chamber. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1400 degrees Fahrenheit.

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.

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. (f) Test Methods and Procedures. All emissions tests performed pursuant to the requirements of this subsection shall comply with the following requirements.

Explained chart recording markings:

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 crematory initiative inspection and measurements were taken of the crematory unit to determine the location of the thermocouple. I am required to input a status (MNC or In Compliance). I have put this facility in compliance until the calculations prove or disprove that the thermocouple(s) are properly placed. The location of the thermocouples will be addressed after the measurements are reviewed by Department Staff. At that time it will be determined if the status should be changed to MNC. .