



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0170373	DATE: <u>11.22.2010</u>	ARRIVE: <u>0955</u>	DEPART: <u>1240</u>
FACILITY NAME: NATURE COAST PET CREMATION			
FACILITY LOCATION: 647-2 E OVERDRIVE CIR HERNANDO 34442-9602			
OWNER/AUTHORIZED REPRESENTATIVE: WILLIAM DEAN Email: The Dean's [ldean39@tampabay.rr.com]		PHONE: (352)586-0225 Mobile: (352)586-8123	
CONTACT NAME: Eric Dean Email: The Dean's [ldean39@tampabay.rr.com]		PHONE: (352)586-0225 Mobile: (352)586-8123	
ENTITLEMENT PERIOD: 9/12/2010 / 9/12/2015 (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): Eric (William) Dean
 Brief Notes: Opening/initial inspection and crematory initiative inspection

2. Is the Authorized Representative still WILLIAM DEAN? ----- 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?: _____

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/2ndarychmbrNGfired150lbs/hrTemp/opacit

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: 150h 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: N/A
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? 46h 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 0 % 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? 46/h 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 0 % 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 11/19/2010) ----- 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

Joseph V Panetta

11/22/2010

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This facility is new. Permit recently effective 09/12/2010. This was an initial inspection. This inspection was conducted by Joe Panetta and the owner of the facility William (Eric) Dean. The VE was conducted by Air Compliance Testing In.....Technician Dustin Travaglini During the inspection is found that: This facility has not performed cremations until today to conduct a VE test. VE test was conducted with approximately 46 lbs of animal remains. I explained to Mr. William (Eric) Dean that he would be limited to this amount plus 10%.

I further explained that he needed to closely monitor the pounds per hour and as they rise and the new normal rate moves higher, the facility would need to conduct a new VE test to meet the new normal rate. Ideally you want to reach the 150 lbs per hour.

Charts not available since this was this VE test is first cremation.

Preventative maintenance schedule logs were available during the inspection.

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 1650 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 0.5percent 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. Talked about Starup, shutdown and malfunction procedures. Mr. Dean said he will not burn plastics or he will get MSDS for them.

Provided Mr. Dean with a copy of the rule, a copy of his permit acknowledgement letter and a copy of registration form form he sent to Tallahassee (explaining how how to sed permit in again in 5 years), checklist and SBEAP web address. Gave handout with the SBEAP ombudsman's contact information and a statement telling owner to stay current with rules contact the ombudsman periodically.

Using this checklist the facility seems to be in compliance at time of inspection on 12/4/2009. The crematory initiative inspection may or may not prove that the thermocouple(s) are properly placed. That will be addressed after the measurements are reviewed by Department Staff.