



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0330091 **DATE:** 8/11/2006 **ARRIVE:** _____ **DEPART:** _____
FACILITY NAME: SOUTHEASTERN CREMATORY
FACILITY LOCATION: 619 NEW WARRINGTON ROAD
 PENSACOLA, FL 32506
RESPONSIBLE OFFICIAL: Heidi Brown (heidi.stewart@sci-us.com) **PHONE:** (850)453-2321
CONTACT NAME: Karl Ruhl **PHONE:** (850)453-2321
REMITTANCE YEAR: _____ **ENTITLEMENT PERIOD:** 9/13/2002 / 9/13/2007
(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

Charles Norman

8/11/2006

Inspector's Name (Please Print)

Date of Inspection

/s/

Aug 2007

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Facility has two crematories, which are labeled #1 and #2. Crematroy #1 was manufactured in 1974 and #2 in 1997. Both were operating at inspection. The operating temperatures were being recorded on a circular chart. It had been marked with the appropriate information and indicated the crematories were operating at the proper temperatures. No visible emissions were seen coming from the stacks. Visible emissions testing was done June 7, 2006. The results were 0% opacity. The annual testing should be done within 60 days prior to the anniversary of the notification submittal date. The last submittal date was August 16, 2002. Thus, the testing window is June 17 - August 16 each year. Crematory #1 will be replaced. The Department received an Application for Air Permit - Non-Title V Source on July 17, 2006. Operators must be trained on the new crematory. Their certificates of training must be submitted to the Department within 15 days after completion of the initial compliance test. Be aware that when the new air general notification is submitted for inclusion of the new crematory, the anniversary date for testing will change based on the date it is received by the Department. The last two years of the cremation temperature records were spot checked. The records indicated compliance with the permit conditions. The Human Crematory Air General Permit Notification Form, Part II, Para (4)(m), Continous Emissions Monitoring Requirements, provides that a complete file of all measurements, including 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 adjustments, preventive maintenance, and corrective maintenance performed on these systems or devices, shall be recorded in a permanent legible form available for inspection. During the inspection the only records available were the temperature recordings. Mr. Ruhl said that Matthews Cremation Division, Apopka, Florida provides maintenance, repair and calibration as needed, but that they don't provide records to the facility. Mr. Ruhl and I discussed setting up a file and/or log to record the above requirements. He said he would obtain the required information from Matthews Crematory Division.

RECOMMENDATIONS:

1. Schedule and perform emissions testing in the 60-day window prior to the anniversary date of the air general permit notification submittal.
2. Train operators on the new crematory and submit the training certificates to the Department within 15 days of initial testing.
3. Set up a procedure to record the continuous emission monitoring information required by The Human Crematory Air General Permit Notification Form, Part II, Para (4)(m), Continous Emissions Monitoring Requirements. Within 15 days of receipt of this inspection report, submit to the Department a letter outlining the actions taken.