



# ANIMAL CREMATORY



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO: 11313

**AIRS ID#:** 0810085 **DATE:** 03/25/2009 **ARRIVE:** 2:00pm **DEPART:** 3:28 pm

**FACILITY NAME:** BELSPUR OAKS PET CREMATORY

**FACILITY LOCATION:** 6060 28TH ST EAST, No. 9  
BRADENTON 34203-

**OWNER/AUTHORIZED REPRESENTATIVE:** RAYMOND BOUNDS **PHONE:** (941)751-5044

**CONTACT NAME:** **PHONE:**

**ENTITLEMENT PERIOD:** 1/8/2006 / 1/8/2011  
(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))

- Were there any objectionable odor(s) detected?-----  Yes  No
- Was a visible emissions test conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
- 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.)-----  Yes  No
- 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
  - Carbon Monoxide (CO) emissions equal to or below the requirements of 100 parts per million by volume, dry basis, corrected to 7% O<sub>2</sub> on an hourly average basis and tested according to EPA Method 10 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
  - Oxygen test performed according to EPA Method 3 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
  - Particulate matter emissions test with results equal to or below the requirements of 0.080 grains per dry standard cubic foot (ft<sup>3</sup>) of flue gas, corrected to 7% O<sub>2</sub> and tested according to EPA Method 5 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
- Was all emissions testing conducted with the source operating at the manufacturers recommended capacity?-----  Yes  No
- Was CO & PM compliance demonstrated by submission of a test report for an identical crematory unit?  Yes  No
- Was the Department notified at least 15 days prior to the date of the last formal compliance test?-----  Yes  No
- 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 leak-proof containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead animals?-----  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?-----  Yes  No
7. Have all crematory operators been trained and certified by a Department-approved training program?---  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?-----  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

Wendy D. Simmons

03/25/2009

Inspector's Name (Please Print)

Date of Inspection

04/06/2009

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** Pre-inspection: On 12/31/2008, chart recording records were not marked with operator's name and some start/stop times were not completed at each batch cremation. On Wednesday, March 18<sup>th</sup>, 2009 the Department received a complaint that Belspur was having black smoke and very bad odor...smelled of burning flesh & hair. On March 20, 2009, I attempted an inspection at this facility but no one was at the location. Inspection Findings: Upon approach of the facility, I observed black smoke coming from one of the Belspur Oaks crematory stacks. Since I was driving, I was unable to look back to see which stack was smoking and I was unable to stop to conduct an immediate Visible Emissions Test. I proceeded to the facility and pulled in behind the neighboring building for the purpose of conducting a Method 9-Visible Emissions (VE) observation, before informing the company I was at the location. Upon exiting the vehicle I noted no objectionable odors. I immediately conducted a 15 minute VE test on the facility's three crematory stacks (see attached VE forms). After conducting the VE testing, I proceeded to the facility to look at chart records and review operations at the facility. Mr. Bounds greeted me and stated he was just about to leave. I explained to Mr. Bounds that the Department had received an anonymous complaint that there was black smoke and objectionable odor. Mr. Bounds stated he works for the local Fire Department 3 days on/3 days off. Mr. Bounds introduced me to a gentleman who also operates the units when he is not able. I asked Mr. Bounds for the chart records so that I could review them. Mr. Bounds stated that the chart records are at his home office location and stated that I should notify him in advance when I need to see them. I then asked Mr. Bounds if there had been any recent repair work done on any of his cremation units. He stated no new work had been done. I asked Mr. Bounds if he had acquired the necessary MSDS Sheets for plastic bags being used and he said just the ones that he had last time. Mr. Bounds then escorted me to the cremation units and I looked at each unit as described: At 2:40pm, Emission Unit(EU) #3 had a secondary chamber temperature of 1610 degrees, but did drop to 1597 degrees while I observed. The primary chamber temperature was 1501 degrees. A photo was taken of chart recording in progress. At 2:45pm, after a photo was taken of chart recording in progress, EU #2 had a secondary chamber temperature of 1689 degrees. At 2:57pm, the temperature on the front of EU #1 indicated approximately 1200 degrees. I asked Mr. Bounds about the temperature and he stated that this unit has some gas flow issues, but he has been unable to find a company willing to work on the unit. Mr. Bounds took a ladder and proceeded to shake something on the top of the cremation unit. He then stated, "Now you should see the temperature go up." This did make the temperature indicator on the front of the unit rise. The owner is knowingly operating this unit with maintenance issues. The digital reading on the side of the unit then indicated 1445 degrees. Mr. Bounds stated he would take EU #1 off line until repairs are made. Photos were taken of front temperature indicator before "shaking on top of unit" and chart recordings in progress. I also took photos of chart records hanging from a clipboard on EU #3. These records did not have complete information on them; no dates, operator names, start indications, and batch weights. I told Mr. Bounds that I would need to review a full two years of his chart records and requested that he send me a copy of the chart records for today, via fax or email right away. I informed Mr. Bounds I would revisit the facility soon and committed to contacting him with the full permit number and a date I plan to return to review the facility's records. On 03/25/2009, Mr. Bounds faxed a copy of the requested chart records for March 25, 2009, but the portions of the chart records that were faxed did not have load start times indicated or batch weights. Another inspection is planned for 04/06/2009. I will contact Mr. Bounds on Thursday, April 2<sup>nd</sup> to let him know when the follow-up inspection is planned for.

