



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: 11413

AIRS ID#: 0810085 **DATE:** 06/30/2009 **ARRIVE:** 12:58pm **DEPART:** 4:58pm
FACILITY NAME: BELSPUR OAKS PET CREMATORY
FACILITY LOCATION: 6060 28th St E
 BRADENTON 34203-5303
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))

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.)----- 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 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 and Joe Panetta

06/30/2009

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

after July 15, 2009

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: This inspection was conducted in response to a citizen complaint of smoke. Upon driving up to the facility, black smoke was witnessed coming from the stack of emission unit #3(center stack). Upon arrival at the facility, Inspector Simmons conducted a 12 minute Method 9 Visible Emissions (VE) test (See attached). A records review was conducted and revealed that on several days, Emission Unit #1 was operated without proper pen ink on chart recorder for secondary chamber. A Field Warning Notice (FWN) was issued for missing temperature documentation and was signed by Mr. Raymond Bounds. During records review, Inspector Simmons again noted that the facility was not timely recording permit required start time, operator information, and date on chart records. Copies were taken of records that did not have proper documentation. This is the second inspection conducted where proper documentation was not on chart recording forms as required by the facility's permit. Mr. Joe Panetta reviewed facility's records in reference to biomedical waste transport and discussed permit requirements about biomedical waste not being incinerated at the facility. A copy of the facility's last inspection by the Department of Health was scanned and is attached to this inspection report. During this inspection, it was revealed that Mr. Bounds was replacing the floor inside of Emission Unit #1. Photos were taken of this work in progress, and are attached. Inspector Simmons asked Mr. Bounds when he last calibrated the thermocouples (temperature probes) on his cremation units and what method he used to do the calibration. He stated he uses an "ice bath" method for calibrating his temperature probe units. Additionally, when asked, Mr. Bounds stated that he does this temperature probe calibration at least annually and documents this information in his maintenance records. A review of notes taken during my April 6, 2009 inspection supported this statement. Maintenance records were not reviewed during this inspection because Mr. Bounds indicated that no new maintenance had been completed on his units since the last inspection on 04/06/2009. Upon request, Mr. Bounds provided his Operation and Maintenance Manual for Emission Unit #1, this manual was scanned and is attached to this inspection report. Since the last inspection and because of recent anonymous complaints received by the Department, the facility has begun conducting spot checks for smoke and odor during the time following loading of cremation units. The facility gave permission for scanning copies of this log and these copies are also attached to this inspection report. During presentation of FWN, Inspector Simmons requested that Mr. Bounds correct missing information documentation on chart records and contact the Department within 15 days for the purpose of scheduling a reinspection of chart records. Photos were taken of charts currently in units and chart records from June 18th and 26th, 2009 with missing start time documentation in the cremation area. One chart dated, 06/18/2009, was found in the trash with debris from cremation unit(s). Photos were also taken of cremation bags that were ready to be burned and MSDS sheets for bags. At least one cremation conducted in Emission Unit #1 on 06/26/2009 dipped below the 1600

degrees F temperature for more than 1.25 hours. A cremation being conducted in Emission Unit #3 on this day also had several dips below 1600 degrees F and temperature on the unit at 13:26 was 1633 degrees F in the secondary chamber. According to time on chart record and time of photo, this chart has a discrepancy of approximately 45 minutes. The cremation being conducted in Emission unit #2 during our site visit seemed to indicate a possible power failure sometime between 12:15 and 12:30pm, but there was not documentation to that fact on the chart which was still in progress. According to time on chart record and time of photo, this chart has a discrepancy of approximately 15 minutes. The temperature in emission unit #2 was 1643 degrees F at 13:28. Some items not checked in list above are no longer required by facility's general permit entitlement. A follow-up inspection will be conducted to review chart records again for completed documentation.