



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1030035 003 **DATE:** 12/6/06 **ARRIVE:** 12:00 PM **DEPART:** 3:00 PM

FACILITY NAME: Director's Services, Inc.

FACILITY LOCATION: 3121 44th Avenue North
St. Petersburg, FL

RESPONSIBLE OFFICIAL: Phillip R Rouzer? **PHONE:** 727-527-5667

CONTACT NAME: Phillip R Rouzer? **PHONE:** 727-527-5667

REMITTANCE YEAR: N/A **ENTITLEMENT PERIOD:** 12/20/2002 / 12/20/07
(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.)
 - 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

Mike Ojo Thomas

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: *Visible emission test was not perform at time because the emission unit was not in operation. The daily operating logs and temperature charts were reviewed from 11/1/05 through 12/6/06. The inspection indicated that Director's Services Incorporated was in violation of the General Permit Conditions as follows: 62-296.401(5)(c), F.A.C.: Requires the Secondary chamber combustion Zone temperature is equal to or greater than the 1600 degree Fahrenheit. I noted the chart and temperature drop below 1600 degree Fahrenheit. Mr. Rouzer the operator of the emission unit claimed the temperature drop below 1600 degree Fahrenheit was due to power outage. In addition, the emission unit temperature strip chart traces data were omitted in various occasions. Director's Services Incorporated was also in violation of 62-210.300(4)(d), F.A.C.: If for any reason, the owner or operator of any facility operating under an air general permit, does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information: (1.) A description of and cause of noncompliance; and (2.) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance. Director's Services Incorporated failed to notify Pinellas County Air Quality Division of the temperature drop below required 1600 degree Fahrenheit. Director's Services Incorporated appears to be in non-compliance regarding procedures at this time.*

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FACILITY: Director's Services, Inc.		Per_ID: 2271	DISTRICT: Southwest
ADDRESS: 3121 44th Avenue North St. Petersburg, FL		CONTACT: Phillip Rouzer Phone No: 727-527-5667	
ARMS No.: 1030035 003	PERMIT NO.: 1030035-004-AG	EXPIRATION DATE: 12/20/07	
EMISSION UNIT DESCRIPTION: B&L Cremation Systems, Inc., Model N20AA Human Cremation Incinerator. Required Secondary Chamber temperature of 1600 degrees			
INSPECTION DATE: 12/6/2006	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	COMPLIANCE STATUS: <input type="checkbox"/> IN <input checked="" type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly			
A. General Review:			
1.	Permit File Review		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Comments: This inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Rouzer (Director) was present during the facility inspection of the emission unit.		
3.	Is the Authorized Representative still: <u>Phillip R Rouzer</u>?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Comments:		
4.	Is the facility contact still: Phillip R Rouzer?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Comments:		

I N C	M N C	S N C	
B. Specific Conditions			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The owner or operator obtains an air construction permit pursuant to subsection 62-210.300(1), F.A.C., and at least 30 days prior to the expiration date of any air construction or existing air operation permit the owner or operator submits a completed Human Crematory Air General Permit Notification Form (DEP Form No. 62-210.920(8)) to the Department. [62-210.300(4)(c)3.a., F.A.C.] Comments: This General Permit is valid until December 20 th of 2007.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No objectionable odor allowed. [Rule 62-296.401(1)(b), F.A.C.] Comments: An upwind/downwind survey of the facility was conducted. The observed parameters were: Downwind odor detected- 0; Wind direction -E Upwind odor detected-0
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible emission (5 percent opacity), except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period. [Rule 62-296.401(1)(a), F.A.C.] Comments: The last annual visible emissions test, conducted on ___?___ demonstrated an opacity of ___?___%. Note: A notification letter dated 11/2/06 was received by AQ Division office indicated Method 9 compliance test scheduled for 11/17/06. Results are to be submitted for review not later than 45 days. According to Mr. Rouzer the visible emission test was performed on the emission unit 11/17/06, and their consultant would submit copy of the VE test to the AQ Division office later. An AQD VE test was performed during this site visit <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No. An opacity of ___n/a___% was observed. Note: Visible emission test was not perform at time because the emission unit was not in operation.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Human crematory units shall operate with a secondary chamber temperature of no less than : <input checked="" type="checkbox"/> 1600 degrees Fahrenheit throughout the combustion process in the primary chamber, for construction applications received by the Department on or after August 30, 1989. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 degrees Fahrenheit. [Rule

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I N	M N C	S N C	B. Specific Conditions
			<p>62-296.401(5)(c), F.A.C.], or <input type="checkbox"/> 1400 degrees Fahrenheit throughout the combustion process in the primary, for construction applications received by the Department prior to August 30, 1989. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1400 degrees Fahrenheit. [Rule 62-296.401(5)(d), F.A.C.]</p> <p><i>Comments:</i> Facility is required to operate at a temperature of 1600° F based on <input checked="" type="checkbox"/> identical stack testing, <input type="checkbox"/> source specific stack testing and visible emissions tests, or <input type="checkbox"/> rule.</p> <p>Based on record reviews, the lowest operating temperatures observed was as follows: During the reviewed of the daily log, and the temperature charts, I found the temperature had been below 1600 degrees F on 2/3/06 and 8/31/06. I inquired to why the incinerator was operated below the required 1600 degrees Fahrenheit. Mr. Rouzer stated they experience a disruption of electrical service on 2/3/06 and 8/31/06. He stated the power outage made the unit shut off, then when power came on the needle went up but the after burner did not come on for ~ten minutes which caused the temperature to drop below 1600 degrees F.</p> <p>In addition, the emission unit temperature strip chart traces data were omitted on 1/1/06 and 1/10/06. I inquired as to why the emission unit strip charts traces were missing. Mr. Rouzer stated he was hospitalized; the emission unit was operated by Mr. Tim Brett (owner). He stated when he returned back to work he noticed the emission unit charts traces were missing. He stated Mr. Brett told him the chart malfunctioned and he had no idea what Mr. Brett did to fix it. I asked Mr. Rouzer if the emission unit manufacturer was contacted about the emission unit malfunctioned. He stated they did not contact the manufacturer of the emission unit.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Human crematories shall cremate only dead human bodies with appropriate containers. The bodies may be clothed. The containers may 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 must be kept on-file at the site for the duration of their use and for at least two years after their use. No other material, including biomedical waste as defined in Rule 62-210.200, F.A.C., shall be incinerated. [Rule 62-296.401(5)(e), F.A.C.]</p> <p><i>Comments:</i> Reviewed records for the months of 11/1/05 to 12/6/06. The highest reported chlorine content was 0%. Supporting documentation was verified (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No). Note: The facility used only cardboard for cremation.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>All crematory operators shall be trained by the equipment manufacturer's representatives or another qualified organization. Only operators trained by a Department-approved training program shall be allowed to operate a human crematory. A copy of the training certificate for each operator having satisfactorily completed the Department-approved training program must be submitted to the Department within 15 days of training An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional two years after termination of employment. [Rule 62-296.401()(f), F.A.C.]</p> <p><i>Comments:</i> The official training is to be provided by Mr. Dave Thomas of B&L systems. The certifications were verified for each operator (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No). The current trained operators are: See Permit file.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>New and existing facilities permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits, shall demonstrate individual source compliance with the visible emissions standard within 60 days prior to the submittal date of the air general permit notification form and within 60 days prior to each anniversary of such date. [Rule 62-296.401(5)(i), F.A.C.]</p> <p><i>Comments:</i> The last test was conducted on 11/15/05. This is / is not within the allowable 60 day window. Note: A notification letter dated 11/2/06 was received by AQ Division office indicated Method 9 compliance test scheduled for 11/17/06. Results are to be submitted for review not later than 45 days. According to Mr.Rouzer the visible emission test was performed on the emission unit 11/17/06, and their consultant would submit copy of the VE test to the AQ Division office later.</p>

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			B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [62-297.310(7)(a)9, F.A.C.]</p> <p><i>Comments: The County was notified on 11/03/2006, for the test that was conducted on ___?__</i> <i>Note: A notification letter dated 11/2/06 was received by AQ Division office indicated Method 9 compliance test scheduled for 11/17/06. Results are to be submitted for review not later than 45 days. According to Mr.Rouzer the visible emission test was performed on the emission unit 11/17/06, and their consultant would submit copy of the VE test to the AQ Division office later.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Test Reports. - The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the test is completed. [62-297.310(8), F.A.C.]</p> <p><i>Comments: The last test was conducted on 11/15/05, and the test results were submitted on 12/1/05.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Continuous Emissions Monitoring Requirements. Each human crematory shall install, operate, and maintain continuous monitors to record temperature at the point or beyond where 1.0 second gas residence time is obtained in the secondary chamber combustion zone in accordance with the manufacturer's instructions. 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. Continuous temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber begins, date, time, and temperature markings. The file shall be retained for at least two years following the recording of such measurements, maintenance, reports, and records. [Rule 62-296.401(5)(k), F.A.C.]</p> <p><i>Comments: Reviewed temperature charts for the months of 11/1/05 to 12/6/06. The last calibration on the temperature chart was on 11/6/06. The temperature probe appears properly placed (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No)</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Process Rate</p> <p><i>Comments: The maximum load for this crematory unit is 350 pounds. The largest body cremated during this review period was 350 pounds.</i></p>
			C. Selected General Conditions and Procedures
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within 30 days of any changes requiring corrections to information contained in the notification form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <ol style="list-style-type: none"> a. Any change in the name of the authorized representative or facility address or phone number; or b. Any other similar minor administrative change at the facility or emissions unit. <p>[62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: This is non applicable at this time.</i></p>

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C. Selected General Conditions and Procedures			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. In case of the installation of new process equipment, alteration of existing process equipment without replacement, or the replacement of existing process equipment with equipment substantially different than that noted on the most recent notification form, the owner or operator shall submit a new and complete general permit notification form with the appropriate fee pursuant to Rule 62-4.050, F.A.C., to the appropriate Department of Environmental Protection district office or local air pollution control program office to which the Department has delegated its permitting authority. [62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: The facility had not added any additional emission unit or made any changes to the existing emission unit.</i></p>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit pursuant to Rule 62-210.300(4)(a), F.A.C., does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result. <p>[62-210.300(4)(e)13., F.A.C.]</p> <p><i>Comments: I asked Mr. Rouzer as to why he did not notify our office. He stated he had forgotten to notify our office. I explained to Mr. Rouzer of Director's Services Incorporated responsibility to maintain compliance with general permit conditions on a continual basis and if unable to meet compliance for any reason, Director's Services Incorporated responsibility is to inform the AQD office of the noncompliance circumstances in accordance with General Permit Conditions # Q1&2.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>Throughout the term of the general permit:</p> <ol style="list-style-type: none"> a. The facility operates no emissions units other than a unit described in an air general permit and emissions units which are exempt from permitting pursuant to the criteria of Rule 62-210.300(3)(a) or (b), F.A.C.; b. The facility is not a Title V source as defined in Rule 62-210.200, F.A.C. <p>[62-210.300(4)(c), F.A.C.]</p> <p><i>Comments: The facility was observed only having human remains on site. The facility is not a Title V source.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A permittee's use of a general permit is limited to five years. No later than 30 days prior to the fifth anniversary of the filing of intent to use the general permit, the owner or operator shall submit a new notice of intent which shall contain all current information regarding the facility or emissions unit. Eligibility to use the general permit is not transferable and does not follow a change in ownership of the facility or emissions unit. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The owner shall remain liable for corrective actions that may be required as a result of any violations occurring in the time after the sale or legal transfer of the facility or emissions unit, but before a new owner is entitled to use an air general permit. [General Conditions - 62-210.300(4)(e)1., F.A.C.]</p> <p><i>Comments: The permit expires on 12/20/07. A new notification form is required to be submitted no later than 10/21/07.</i></p>
D. Other:			
Closing Conference			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: During the closing conference, I informed Mr. Rouzer the emission unit is deemed to be in non-compliance regarding procedures at this time.</i>			

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Other Comments:

Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division

Signature(s)

Date: 12/12/06

CONTACT LOG? __Yes_, **ACCESS?** __Yes_, **ARMS?** _Yes_

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