



HUMAN CREMATORY COMPLIANCE INSPECTION CHECKLIST



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

FACILITY: Director's Services, Inc. DBA/Site Name: DISTRICT: Southwest ADDRESS: 3121 44th Avenue North St. Petersburg, FL CONTACT PHONE: 727-527-5667 ARMS NO: 1030035 001 PERMIT NO: 1030035-005-AG Expiration Date: 11/22/12 Renewal Date: 10/22/07 Test Date: 10/25/00

EMISSION UNIT DESCRIPTION: Unit B: Human Crematory, IE&E, Model IE-43 (300 lb max. batch load), Northernmost unit. Unit must operate at >1400 degrees F by rule

INSPECTION DATE: INSPECTION COMPLIANCE STATUS (check [] only one box) [X] In Compliance; [] Minor Non-Compliance; [] Significant Non-Compliance

PART I: General Review:

- 1. Permit File Review [X] Yes [] No
2. Introduction and Entry [X] Yes [] No
Comments: I met with Phillip Rouzer and was given a detailed tour of the facility including the cold storage area.
3. Is the Authorized Representative still Phillip R Rouzer? [X] Yes [] No
Comments:
4. Is the facility contact still Phillip R Rouzer? [X] Yes [] No
Comments:
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [] Yes [X] No [62-210.310(2)(d), F.A.C.]

PART II: TESTING REQUIREMENTS - Rule 62-296. 401(5), F.A.C.

(check [] appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Compliance Demonstration [62-296.401(5)(h), F.A.C.]

- 1. [] New Facility / [] New Process Equipment- Did this facility demonstrate initial compliance no later than 30 days after beginning operation? [] Yes [X] No
2. [X] Existing Facilities Was the annual visible emissions compliance, test conducted on each crematory unit within 365 days (annually thereafter) of the previous visible emissions compliance test? [X] Yes [] No
Test Reports
1. Does the submitted visible emission test(s) demonstrate compliance with the 5 percent opacity, six-minute average, except that visible emissions not exceeding 15% opacity shall be allowed for up to six minutes in any one-hour period? [62-296.401(5)(b)1., F.A.C.] [X] Yes [] No
The last visible emission test resulted in an opacity of 0% for the highest six minute average.
2. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? [62-296.401(5)(g)] [X] Yes [] No
3. Was the department notified at least 15 days prior to the test? [62-297.310(4)(a)9. F.A.C.] [X] Yes [] No
4. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed? [62-297.310(8)(b)] [X] Yes [] No
5. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] [X] Yes [] No

PART II: TESTING REQUIREMENTS – Rule 62-296. 401(5), F.A.C.
 (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

6. Was a visible emissions test(s) conducted by the inspector during this site visit according to EPA Method 9?----- Yes No
See comment #1.
- a) The visible emission test resulted in an opacity of _____% for the highest six minute average.
 b) Did the test indicate the facility is operating in compliance with the opacity standard? ----- Yes No
7. Is there any reason to ask for a special test to determine compliance with the PM and CO standards? ----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS
 (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Were there any objectionable odor(s) detected? ----- Yes No
 An upwind/downwind survey of the facility was conducted. The observed parameters were:
 Downwind odor level detected- 0 __; Wind direction – N to NW Upwind odor level detected- 0 __ (1-10)
2. **Continuous Monitoring System** – [62-296.401(5)(i), F.A.C.]
- 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
- c) 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 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 (04/11/08)) ----- Yes No
See Comment #2.
- 4) Adjustments----- Yes No
- 5) Preventive maintenance performed on systems/devices ----- Yes No
- 6) Corrective maintenance performed on systems/devices ----- Yes No
- 7) 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
- 8) Are all the above records available for at least 2 years?----- Yes No
See Comment #3.
- 9) Was the crematory unit installed after 2/1/07? If yes go to 10)a) – c)----- Yes No
- a) 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
- b) Is the system calibrated to restrict combustion in the primary chamber whenever any opacity exceeds 15% opacity ? ----- Yes No
- c) Has the opacity measurement system been cleaned and checked for proper operation in accordance with the manufacturer’s recommended maintenance schedule? ----- Yes No
- 1 – Application received on or after 8/30/89; 2 – Application received prior to 8/30/89
3. Was this crematory unit application to construct: [62-296.401(5)(c), F.A.C.] (check only one box)
- a) **BEFORE** August 30, 1989? (If this box checked, continue on to #4 and skip #5)
- b) **ON** or **AFTER** August 30, 1989? (If this box checked, skip #4 and continue on to #5)
4. If the application to construct was **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
5. If the application to construct **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) 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

PART III: OPERATING/RECORDKEEPING REQUIREMENTS

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

process begins in the primary chamber? ----- Yes No

6. Are appropriate cremation containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead human bodies, as demonstrated by MSD sheet? ----- Yes No
[62-296.401(5)(d), F.A.C.]

a) If the answer to question 6 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

PART IV: Equipment Maintenance

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Equipment Maintenance: – [62-296.401(5)(e), F.A.C.]

1. Is the crematory unit maintained in accordance with the manufacturer’s specifications? ----- Yes No

2. Are there maintenance/repair/adjustment records kept onsite for at least 2 years? ----- Yes No

See Comment #3

3. Is there a written plan onsite which addresses the operating procedures during startup, shutdown and malfunction? ----- Yes No

4. Does the crematory allow for a visible check on the flame characteristics?----- Yes No
If yes go to 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 V: Special Conditions And Procedures

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Administrative Changes:

1. Were there any change 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? [62-210.310(2)(d), F.A.C.] ----- Yes No

Permit Effective Period – [62-210.310(3)(a), F.A.C.]

1. Is the general permit for this facility still within the 5 year effective period? ----- Yes No

2. Did the facility submit the new re-registration form at least 30 prior to permit expiration? ----- Yes No

New or Modified Process Equipment or Change in Ownership

C.. Since the last registration form submittal has there been [62-210.310 (2)(b)2, F.A.C

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 of the answers to 1a) – 1d) is **Yes** to any, a new registration form and appropriate fee should have been submitted 30 days prior to the change.----- Yes No

Noncompliance Notice: - [62-210.310(3)(i), F.A.C.]

1. Did the facility have any instances where they were unable comply with or will be unable to comply with any condition or limitation of the air general permit? ----- Yes No

See comment #4.

If the answer is **Yes**, proceed to a) and b).

a) Did the owner or operator provide immediate notification to the Department? ----- Yes No

b) Did the notification include:

1. A description of and cause of noncompliance?----- Yes No

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? ----- Yes No

PART VI: Comments

1) Two of the three units (A&C...e.u.002 & e.u.003) were in use upon my arrival (~0910 hrs). The stacks were monitored for ~ 10 minutes, during which an occasional (every 1 to 3 minutes) puff of smoke, (with an opacity of ~ 10%) lasting 1 to 2 seconds were visible from both stacks.

2) There was documentation supporting the calibration date of 04/11/08, however the documentation of the calibration itself was sketchy/non-existent. Phillip Rouzer stated that he would call B&L to schedule a chart recorder calibration for the week of 10/06/08. A faxed copy of the chart will come our way shortly there after.

3) A recent office upgrade/remodel caused the misplacement/loss of some of the maintenance records for 2008. Mr. Rouzer was able to obtain (through fax from B&L and others) and show those documents to me before my inspection was over.

4) On 01/21/08 the temperature chart recorder failed for this emissions unit. The Dept. was notified and the e.u. was not used again until the chart recorder was repaired. At no time did the temperature dip below the permitted level, i.e. 1400 deg. F.

Exit interview: I thanked Mr. Rouzer for his excellent chart recorder documentation and efforts to stay within compliance of the air general permit. I did point out that his maintenance logs were a little weak and that the chart recorder calibrations were not thoroughly documented. Mr. Rouzer has stated that he will call B&L to set up chart recorder calibrations asap and that he will work on keeping a better maintenance log.

Follow up to #2 above: 10/15/08 received satisfactory chart recorder calibration performed by B&L Cremation Services. See attached chart.

Chris R. Brodeur

Inspector's Name

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

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