

### **HUMAN CREMATORY**



### COMPLIANCE INSPECTION CHECKLIST

	ANNUAL (INS1, INS2)  RE-INSPECTION (FUI)	COMPLAINT/DISCOVERY (CI) ARMS COMPLAINT NO:		
AIRS ID#: 1030047 003 FACILITY NAME: SCI	DATE: 6/26/08  I Funeral Services of Florida, Inc.	<b>ARRIVE:</b> <u>10:00 AM</u> <b>DEPART:</b> <u>1:30</u> .c.	AM	
FACILITY LOCATION	: 4945 East Bay Drive			
	Clearwater, FL			
RESPONSIBLE OFFICE	IAL: Christa Jewell	<b>PHONE:</b> 727-536-0494		
CONTACT NAME: Jef	frey Myers	<b>PHONE:</b> 727-536-0494		
REMITTANCE YEAR:	ENTITLE	EMENT PERIOD: 12/1/07 / 12/1/12 (effective date) (end date)		
PART I: <u>INSPECTION</u> ☐ IN COMPLIANCE	COMPLIANCE STATUS (che   ☑ MINOR Non-COMPLIANO	eck  only one box)  NCE  SIGNIFICANT Non-COMPLIANCE		
(check □ appropriate	e box(es))	MENTS – Rule 62-296.401, F.A.C.	□V <sub>20</sub>	∇/ No
2. Was a visible emis 62-297, F.A.C.)?	ssions test conducted during this s	site visit according to EPA Method 9 (Ref.: Chapter	□Yes	
days prior to the A (Rule 62-296.401) 4. In order to demons	AGP Notification form submission (5)(i), F.A.C.)strate individual source compliance	one, was an annual visible emissions test conducted 60 on, and within 60 days prior to each anniversary date?	⊠Yes □Yes	<ul><li>□ No</li><li>□ No</li></ul>
a) Carbon Monox volume, dry basis, 10 (Ref.: Chapter 6 b) Oxygen test per c) Particulate matt	tide (CO) emissions equal to or be corrected to 7% $O_2$ on an hourly 62-297, F.A.C.)?	below the requirements of 100 parts per million by y average basis and tested according to EPA Method and 3 (Ref.: Chapter 62-297, F.A.C.)?	□Yes □Yes	☐ No ☐ No
dry standard cubic (Ref.: Chapter.62-		= · - · · · · · · · · · · · · · · · · ·		
5. Was all emissions	297, F.A.C.)?testing conducted with the source	o 7% O <sub>2</sub> and tested according to EPA Method 5  ce operating at the manufacturers recommended	∐Yes	□ No
capacity?6. Was CO & PM cor 7. Was the Department	297, F.A.C.)?testing conducted with the source mpliance demonstrated by submint notified at least 15 days prior to		⊠Yes □Yes ⊠Yes	<ul><li> No</li><li> No</li><li> No</li><li> No</li><li> No</li><li> No</li></ul>

#### PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.401, F.A.C. (check $\square$ 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 a) Do temperature probes seem to be properly placed?------ \times Yes \Box 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? 2) Monitoring device-----⊠Yes No 3) Performance Testing Measurements ------⊠Yes □ No □ No No □ No 7) Preventive maintenance performed on systems/devices-----⊠Yes 8) Corrective maintenance performed on systems/devices-----⊠Yes ☐ No 2. Was this crematory unit constructed: (check only one $\Box$ 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?----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

1. Since the last inspection has there been		
<ul><li>a) installation of any new process equipment?</li><li>b) alterations to existing process equipment without c) replacement of existing equipment substantiall</li></ul>	out replacement?	
recent notification form?d) If you answered <u>YES</u> to any of the above, did	the owner submit a new and complete	
notification form and appropriate fee (Rule 62-local program office?  2. If a crematory unit has been modified to the extent		
was required, have all operators been retrained to o		
3. In the case of new or modified equipment, where a	Department air construction permit was	
	Department air construction permit was erator training certificates? Yes No	
3. In the case of new or modified equipment, where a required, has the owner submitted copies of all ope	Department air construction permit was erator training certificates? Yes No	
3. In the case of new or modified equipment, where a required, has the owner submitted copies of all ope a) submitted within the 15 day required window for	Department air construction permit was erator training certificates? Yes No	

Performed compliance inspection with Chris Brodeur. I informed Mr. Moore of the following noncompliance items: a temperature violation, a couple of failures to notify of non-compliance. In addition, several required documents were not on site: Plastic MSD sheets, temperature recorder calibrations, complete SSM plan. The authorized representative [Christa Jewell] was not available so I requested Lead Operator Jacob Moore inform Ms Jewell of the noncompliance issues noted. On 7/2/08 I spoke with Christa Jewell by phone. I explained the various noncompliance items noted during the inspection and indicated a Notice of Violation would be issued.

During the inspection we provided Jacob Moore with compliance assistance by providing him with a copy of the registration form, cited the rules for which SCI was responsible and took the opportunity of explaining various aspects of the rules to him.

FAC	CILIT	Y: SCI Funeral Service	ces of Florida, Inc.	<b>PERMIT ID: 2308</b>	
	Southeastern Crematories			<b>DISTRICT:</b> Southwest	
ADDRESS: 4945 East Bay Drive			CONTACT PHONE:		
		Clearwater, FL	727-536-0494		
ARN	AS N		<b>Expiration Date:</b> 12/1/12		
1030047 003			1030047-005-AG	Renewal Date: 11/1/12	
	1030047 003 Test Date: 8/1/00				
		N UNIT DESCRIPTION: Ht 00 degrees F.	uman Crematory: IE&E Co., Model 43 S	uper Power-Pak, South stack; batch load 350	
INSI	INSPECTION DATE: ARMS INSPECTION TYPE: COMPLIANCE STATUS:				
06	/26/08	3	⊠INS2 or □INS	□IN ⊠MNC □SNC	
Т	ype o	f Inspection:	Re-inspection Compla	int Drive-by Quarterly	
	1		A. General Review:		
1.		mit File Review		∑Yes □ No	
2.	intr	oduction and Entry		∑Yes □ No	
	Con	nments: Contact was establishe	ed with Jacob Moore.		
3.				requiring corrections to information contained in	
			operator shall notify the Department in where some phone number of the facility of	riting. Such changes shall include: r authorized representative <b>not</b> associated with a	
				ssions units or operations comprising the facility	
	or	A 41 i i 1	-i-44ih		
		. Any other similar minor admine Authorized Representative		⊠ Yes □ No	
	Is t	ne facility contact still: Susan A		Yes No	
		-210.310(2)(d), F.A.C.]	Meyers became the facility contact.		
	Con	iments. As of 11/0//07 Jeffery I	meyers became the facility contact.		
N					
I N			B. Specific Conditions		
		Visible emissions - Visible en		%) opacity, six (6) minute average, except that	
		visible emissions not exceeding	g fifteen percent (15%) opacity shall be	allowed for up to six (6) minutes in any one (1)	
		hour period. [Rule 62-296.40	1(5)(b)1, F.A.C.]		
		Comments: The last annual v	risible emissions test, conducted on 08	8/01/07 demonstrated an opacity	
	of <u>0</u> %. An AQD VE test was not performed during this site visit. However, both stacks were observed when entering				
		and exiting the facility, as well noted during any of these obse		ation in EU 003. No visible emissions were	
			irranons.		
		(☑ 1600 degrees Fahrenheir received by the Departmenthe secondary chamber of 62-296.401(5)(c), F.A.C. ☐ 1400 degrees Fahrenheit by the Department prior of	t throughout the combustion process in the ent on or after August 30, 1989. Cremation of combustion zone temperature is equal to only or throughout the combustion process in the to August 30, 1989. Cremation in the principle.		
		296.401(5)(c), F.A.C.]	oustion zone temperature is equal to or greed to operate at a temperature of 1600	eater than 1400 degrees Fahrenheit. [Rule 62- ° F based on ⊠rule.	
		· •	-		

I N	M N C	S N C	B. Specific Conditions
			The following non-compliant temperature episodes were noted for this emissions unit: 03/30/07: ~5 min. below 1600; min. temp. of 1400. (notified the AQD)[operator error] 06/18/07:~6 min. below 1600; min. temp 1500 (notified the AQD)[qualified as an FAC malfunction] 11/05/07: ~5 min. below 1600; min. temp. thermocouple failure resulted in highly erratic temperature trace, (failed to notify) [qualified as an FAC malfunction] 05/02/08:~2 min. below 1600; min. temp 1550. (failed to notify)[qualified as an FAC malfunction] 05/15/08:~10 min. below 1600; min. temp 1375 (notified the AQD)[qualified as an FAC malfunction]  Noncompliance temperature summary: Three separate instances: 1 - operator error, 2 - failure to notify. Temperature charts and notification letters are attached.
			Allowed Materials - Human crematory units shall cremate only human or fetal remains with appropriate containers. The remains may be clothed. The containers shall 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 manufacturer certifying that they are composed of 0.5 percent or less by weight chlorinated plastics shall be kept on-file at the site for the duration of their use and for at least two (2) 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)(d), F.A.C.]  **Comments: Reviewed records for the months of _01/01/07 to 06/25/08 The highest reported chlorine content was _<5%. Supporting documentation was verified (\( \subseteq \text{ Yes or } \subseteq \text{ No)}. All required MSD sheets were not on site during the 6/26 inspection, but were supplied by 07/01/08 by fax. MSD sheets are attached.
			Equipment Maintenance -All human crematory units shall be maintained in proper working order in accordance with the manufacturer's specifications to ensure the integrity and efficiency of the equipment. If a crematory unit contains a defect that affects the integrity or efficiency of the unit, the unit shall be taken out of service. No person shall use or permit the use of that unit until it has been repaired or adjusted. Repair records on all crematory units shall be maintained onsite for at least two years. A written plan with operating procedures for startup, shutdown and malfunction of each crematory unit shall be maintained and followed during those events. Each unit's burners shall be operated with a proper air-to-fuel ratio. If the unit so allows, the burners' flame characteristics shall be visually checked at least once during each operating shift and adjusted when warranted by the visual checks. [Rule 62-296.401(5)(e), F.A.C.]  **Comments: The SSM plan on site did not contain a section addressing malfunctions. Mr. Moore faxed a revised SSM plan, containing a troubleshooting section on 7/108. Repair records were reviewed for the months of _01/0/06-05/31/08 The records were available and maintained on site for a period of2+ years. The design of the crematory unit (\bigcap does not) allow the burners' flame to be visually checked.
			Frequency of Testing.  1. The owner or operator of any human crematory unit using an air general permit shall have a performance test conducted for visible emissions no later than thirty (30) days after the unit commences operation, and annually thereafter.  2. The owner or operator of any human crematory unit operating under the authority of an air construction permit or air operation permit shall have a performance test conducted for visible emissions prior to submitting the application for an initial air operation permit, and annually thereafter.  3. The owner or operator of any human crematory unit shall not be required to have performance tests conducted for carbon monoxide and particulate matter, except as provided at paragraph 62-297.310(7)(b), F.A.C.  [Rule 62-296.401(5)(h), F.A.C.]  Comments: The last test was conducted on _08/01/07
			Test Notification - 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.]  Comments: The County was notified on _7/17/07, for the test that was conducted on _08/01/07  This (∑is / □is not) within the allowable 15 day window.

	M	S	
I	N	N	
N	C	C	B. Specific Conditions  Test Reports - The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days
	Ш		after the test is completed. [62-297.310(8), F.A.C.]
			<b>Comments:</b> The last test was conducted on $08/01/07$ , and the test results were submitted on $08/20/07$ This ( $\triangle$ is not) within the allowable 45 day window.
	<u> </u>		
			Continuous Monitoring Requirements- Each crematory unit shall be equipped and operated with a continuous monitor 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. In addition, each crematory unit installed after February 1, 2007, shall be equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement. Such system shall be calibrated to restrict combustion in the primary chamber whenever any opacity exceeding 15% opacity is occurring. A complete file of all temperature measurements; all continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and all 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 was begun, date, time, and temperature markings. Pollutant monitoring system documentation shall include indication of when the opacity measurement system was cleaned and checked for proper operation in accordance with the manufacturer's recommended maintenance schedule. The file shall be retained for at least two (2) years following the recording of such measurements, maintenance, reports, and records. [Rule 62-296.401(5)(i), F.A.C.]  **Comments: Reviewed temperature charts for the months of 01/01/07-06/26/08
$\boxtimes$			Process Rate
			Comments: The maximum load for this crematory unit is 350 pounds. The largest body cremated during this review period was undetermined. When questioned, Mr. Moore indicated specific operational procedures were followed for the cremation of heavier bodies.

Ţ	M N	S N			
N	C	C	C. Selected General Conditions and Procedures		
			Periods of Noncompliance - 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:  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.  [62-210.310(3)(i), F.A.C.]  Comments:  Other than documentation issues noted under other permit conditions, no periods of noncompliance were noted.		
$\boxtimes$					
			Valid Permit To avoid lapse of authority to operate, an owner or operator intending to use, or continue to use, an air general permit must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air operation permit or air general permit.  [62-210.310(2)(c)2., F.A.C.]  Comments: The permit expires on 12/1/12. A new notification form is required to be submitted no later than 11/1/12.		
			Equipment Changes - The owner or operator shall maintain records of all equipment changes. In the case of		
			installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit. [62-210.310(2)(e)., F.A.C.]		
			Comments: No changes noted.		
	D. Other:				
Clo	sing	Co	nference \times Yes \sum No		
iter on wa spo	ns: c site: s not ke w	ten Pla t avo vith	ITS: Performed compliance inspection with Chris Brodeur. I informed Mr. Moore of the following noncompliance apperature violation, a couple of failures to notify of non-compliance. In addition, several required documents were not stic MSD sheets, temperature recorder calibrations, complete SSM plan. The authorized representative [Christa Jewell] wilable so I requested Lead Operator Jacob Moore inform Ms Jewell of the noncompliance issues noted. On 7/2/08 I Christa Jewell by phone. I explained the various noncompliance items noted during the inspection and indicated a iolation would be issued.		
			inspection we provided Jacob Moore with compliance assistance by providing him with a copy of the registration form, les for which SCI was responsible and took the opportunity of explaining various aspects of the rules to him.		
Oth	ner C	Com	ments:		
Ins	pect	tor(s	s): Wayne Martin, Pinellas County, Air Quality Division		
Sig	natı	ıre(	S) Date:		
AC	CES	SS?	, ARMs?		