HUMAN CREMATORY

COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1030131 001 **DATE:** 9/13/2006 **ARRIVE:** 1:00 PM **DEPART:** 4:30 PM

FACILITY NAME: E. James Reese Funeral Home

FACILITY LOCATION: 6767 Seminole Blvd.
Seminole, FL

RESPONSIBLE OFFICIAL: **James E. Reese?** **PHONE:** 391-9954

CONTACT NAME: James E. Reese**?** **PHONE:** 391-9954

REMITTANCE YEAR: N/A **ENTITLEMENT PERIOD: 8/8/2003** / 08/08/08
(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.) ☒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% O_2 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 (ft^3)of flue gas, corrected to 7% O_2 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)

9/13/06
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: ***Visible emissions tests performed during this inspection resulted in 0% opacity. The daily operation logs and temperature charts were reviewed from 1/3/05 through 9/12/06. The inspection indicated that E. James Reese Funeral Home 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 1560 degree Fahrenheit. I noted the chart and temperature drop below 1560 degree Fahrenheit. In addition, the operator of the emission unit intentionally obliterated the strip chart traces data in various occasions to be in compliance. E. James Reese Funeral Home 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. E. James Reese Funeral Home failed to notify Pinellas County Air Quality Division of the temperature drop below required 1560 degree Fahrenheit. E. James Reese Funeral Home appears to be in non-compliance regarding procedures at this time.***

Human Crematory

FACILITY: E. James Reese Funeral Home **Per_ID:** 175		***DISTRICT:*** Southwest
ADDRESS: 6767 Seminole Blvd. Seminole, FL		***CONTACT:*** James Reese Phone No: 727-391-9954
ARMS No.: 1030131 001	***PERMIT NO.:*** 1030131-003-AG	***EXPIRATION DATE:*** 08/08/08
EMISSION UNIT DESCRIPTION: Incinerator, Human: Nortech Research and Engineering, Inc. (B&L systems, Inc.), Model N-20A (1400 degrees F)		
INSPECTION DATE: 9/13/2006	***ARMS INSPECTION TYPE:*** ☒INS2 or ☐INS_____	***COMPLIANCE STATUS:*** ☐IN ☒MNC ☐SNC

Type of Inspection: ☒Initial ☐Re-inspection ☐Complaint ☐Drive-by ☐Quarterly

A. General Review:

1.	Permit File Review	☒Yes ☐No
2.	Introduction and Entry _____ ***Comments:*** **This inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Reese (Owner) was present during the facility inspection of the emission unit.**	☒Yes ☐No
3.	***Is* the Authorized Representative still: <u>James E. Reese</u>?** ***Comments:***	☒Yes ☐No
4.	***Is* the facility contact still:** James E. Reese**?** ***Comments:***	☒Yes ☐No

IN	MNC	SNC	B. Specific Conditions
☒	☐	☐	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 August 8th of 2008.***
☒	☐	☐	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 - South Upwind odor detected-0***
☒	☐	☐	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 6/14/2006 demonstrated an opacity of 0%.* *An AQD VE test was performed during this site visit ☒Yes or ☐No. An opacity of* ***0%*** *was observed.*
☐	☒	☐	Human crematory units shall operate with a secondary chamber temperature of no less than : (☒ 1560 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 1560 degrees Fahrenheit. [Rule 62-296.401(5)(c), F.A.C.], or ☐ 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

IN	MNC	SNC	B. Specific Conditions
			secondary chamber combustion zone temperature is equal to or greater than 1400 degrees Fahrenheit. [Rule 62-296.401(5)(d), F.A.C.] ***Comments**: Facility is required to operate at a temperature of 1560^{o} F based on ☒ identical stack testing, ☐source specific stack testing and visible emissions tests, or ☐rule.* *Based on record reviews, the lowest operating temperatures observed was as follows:* ***@ 1240 ^{o} F. on 4/11/06 for ~ 10 minutes.*** ***Note: On 7/31/06 – The operator of the emission unit intentionally obliterated the strip chart traces data with white-out in various occasion to be in compliance. See attached temperature charts and logs. The operators of the emission unit white-out the temperature strip chart traces with correction fluid and the operator retraced with ink pen where chart traces was trying to mark. I inquired as why the emission unit strip chart traces were obliterated. Mr. Reese the operator of the emission unit failed to acknowledge the strip charts traces were obliterated at first. Then he later admits he white-out the charts traces with a fluid. Mr. Reese stated the plastic clip that hold the pen straight on the temperature chart arm broke and caused it to vibrate all over the chart. He stated he replaced with a new one before he started the 4th cremation and 3rd cremation, he said the unit was operating well except the chart arm was loose on the chart. Mr. Reese stated he white-out the temperatures traces with correction fluid and retraced with ink pen where chart traces was trying to mark. He stated he had a power failure on 4/11/06 that caused the light flicker and the safety cuts the crematory machine off. He said he was standing next to crematory when the power failure occurred. Mr. Reese stated he quickly restart crematory machine. He said he then white out the temperatures traces with correction fluid and retraced with ink pen where chart traces was trying to mark.*** ***I observed the emission unit during operation and I noted that the temperature charts was incorrectly placed inside the temperature recorder. The emission unit recorder was recording in 12:30 AM instead of 12:30 PM. I took photo of the emission unit temperature chart. See an attached photo. Mr. Reese stated he had forgotten to line up the temperature chart to reflect the correct time. He stated on 9/18/06 he started the crematory incinerator and when the temperature reached 1680 ^{o} F. He said he turned on the crematory incinerator and the front cremation burner start the cremation and it failed to fire after about ten attempts and the cremation would not start. Mr. Reese stated he shutdown the unit and called B&L Systems the manufacturer of the crematory incinerator. He stated the B&L Systems came within the hour and installed a new ignition & flame rod and tested the crematory incinerator. He stated the unit work fine and proceeded with cremation. See an attached statement sheets by Mr. Reese dated 9/18/2006.***
☒	☐	☐	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.] ***Comments:** Reviewed records for the months of 1/3/05 through 9/12/06**.** The highest reported chlorine content was .5%. Supporting documentation was verified (☒ Yes or ☐ No)* ***Note: Cardboard containers and cover materials have MSD sheets on site for products used at facility.***
☒	☐	☐	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.] ***Comments**: The official training is to be provided by B&L Systems. The certifications were verified for each operator (☒ Yes or ☐ No). The current trained operators are: **E. James Reese Sr. and Jr.***

IN	MNC	SNC	B. Specific Conditions
☒	☐	☐	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.] ***Comments: The last test was conducted on 6/14/06. This is within the allowable 60 day window.***
☒	☐	☐	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 5/18/06, for the test that was conducted on 6/14/06.***
☒	☐	☐	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.] ***Comments: The last test was conducted on 6/14/06, and the test results were submitted on 6/19/06.***
☒	☐	☐	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.] ***Comments:*** *Reviewed temperature charts for the months of 1/3/05 through 9/12/06. The last calibration on the temperature chart was on 8/3/2006. The temperature probe appears properly placed (☒ Yes or ☐No)*
☒	☐	☐	Process Rate ***Comments: The maximum load for this crematory unit is 350 pounds. The largest body cremated during this review period was 400 pounds. I inquired as to what procedures they follow during their largest cremation. According to Mr. Reese the 400 pounds human remains was first cremation of the day. He stated they preheat emission unit 1560 degrees F and then load head first, placed burner switch to ignition position. The operator appears to follow the manufacturer recommendation during the largest body cremation.***

IN	MNC	SNC	C. Selected General Conditions and Procedures
☒	☐	☐	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: 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. [62-210.300(4)(d)3., F.A.C.] ***Comments: This is non applicable at this time.***

IN	MNC	SNC	C. Selected General Conditions and Procedures
☒	☐	☐	**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.] ***Comments: The facility had not added any additional emission unit or made any changes to the existing emission unit.***
☐	☒	☐	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. [62-210.300(4)(e)13., F.A.C.] ***Comments: I asked Mr. Reese as to why he did not notify our office. He stated he had forgotten to notify our office. I explained to Mr. Reese of E. James Reese Funeral Home responsibility to maintain compliance with general permit conditions on a continual basis and if unable to meet compliance for any reason, E. James Reese Funeral Home responsibility is to inform the AQD office of the noncompliance circumstances in accordance with General Permit Conditions # Q1&2.***
☒	☐	☐	**Valid Permit** Throughout the term of the general permit: 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. [62-210.300(4)(c), F.A.C. ***Comments: The facility was observed only having human remains on site. The facility is not a Title V source.***
☒	☐	☐	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.] ***Comments: The permit expires on 08/08/08. A new notification form is required to be submitted no later than 06/09/08.***

D. Other:	
Closing Conference	☒Yes ☐No
Comments: During the closing conference, I informed Mr. Reese the emission unit is deemed to be in non-compliance regarding procedures at this time.	

Human Crematory

Other Comments: ***The Daily operation Logs and Temperature charts were reviewed from 1/3/05 through 9/12/06. The inspection indicated that E. James Reese Funeral Home was in violation of the General Permit Conditions as Follows:***

1.- 62-296.401(5) (c), F.A.C.**: <u>Requires the Secondary chamber combustion Zone temperature is equal to or greater than the 1560 degree Fahrenheit.</u>** ***I noted the chart and temperature drop below 1560 degree Fahrenheit. The lowest operating temperatures observed was 1240 ^{o} F. on 4/11/06 for ~ 10 minutes.***
<u>Note</u>: On 7/31/06 – The operator of the emission unit intentionally obliterated the strip chart traces data with white-out in various occasion to be in compliance. See attached temperature charts and logs. The operators of the emission unit white-out the temperature strip chart traces with correction fluid and the operator retraced with ink pen where chart traces was trying to mark. I inquired as why the emission unit strip chart traces were obliterated. Mr. Reese the operator of the emission unit failed to acknowledge the strip charts traces were obliterated at first. Then he later admits he white-out the charts traces with a correction fluid. Mr. Reese stated the plastic clip that hold the pen straight on the temperature chart arm broke and caused it to vibrate all over the chart. He stated he replaced with a new one before he started the 4th cremation and 3rd cremation, he said the unit was operating well except the chart arm was loose on the chart. Mr. Reese stated he white-out the temperatures traces with correction fluid and retraced with ink pen where chart traces was trying to mark. He stated he had a power failure on 4/11/06 that caused the light flicker and the safety cuts the crematory machine off. He said he was standing next to crematory when the power failure occurred. Mr. Reese stated he quickly restart crematory machine. He said he then white out the temperatures traces with correction fluid and retraced with ink pen where chart traces was trying to mark.

I observed the emission unit during operation and I noted that the temperature charts was incorrectly placed inside the temperature recorder. The emission unit recorder was recording in 12:30 AM instead of 12:30 PM. I took photo of the emission unit temperature chart. See an attached photo. Mr. Reese stated he had forgotten to line up the temperature chart to reflect the correct time. He stated on 9/18/06 he started the crematory incinerator and when the temperature reached 1680 ^{o} F. He said he turned on the crematory incinerator and the front cremation burner start the cremation and it failed to fire after about ten attempts and the cremation would not start. Mr. Reese stated he shutdown the unit and called B&L Systems the manufacturer of the crematory incinerator. He stated the B&L Systems came within the hour and installed a new ignition & flame rod and tested the crematory incinerator. He stated the unit work fine and proceeded with cremation. See an attached statement sheets by Mr. Reese dated 9/18/2006 and the unit service order sheet.

2. - 62-210.300(4)(d), F.A.C.**: <u>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.</u>**
E. James Reese Funeral Home failed to notify Pinellas County Air Quality Division of the temperature drop below required 1560 degree Fahrenheit. E. James Reese is deemed to be in non-compliance regarding procedures at this time.

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

Signature(s) Date: 10/13/06

CONTACT LOG? _Yes__, **ACCESS?** _Yes__, **ARMs**? __Yes__

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