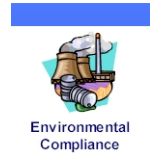




ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

Table with facility details: FACILITY: Pet Angel World Services (Florida), LLC; DBA/Site Name: Pet Angel World Memorial Center; ADDRESS: 6225 72nd Avenue North, Pinellas Park, FL; ARMS NO: 1030136 001; PERMIT NO: 1030136-009-AG; DISTRICT: Southwest; CONTACT PHONE: 413-374-5901; Expiration Date: 7/23/2014; Renewal Date: 6/23/2009; Test Date: 5/9/2000

EMISSION UNIT DESCRIPTION: Crawford Equipment & Engineering Company, Model C500P Animal Crematory. Fired on Natural Gas with a Maximum Heat Input of 1 MMBtu/hr. Maximum Batch Load Rate of 150 Pounds with a secondary chamber temperature of 1,400 degrees F.

INSPECTION DATE: 11/09/2009; only?INSPECTION COMPLIANCE STATUS (check one box) [X] In? Compliance; [] Minor Non-Compliance;? [] Significant? Non-Compliance

PART I: General Review:

Table with 5 rows of general review questions regarding permit file review, introduction and entry, authorized representative status, and administrative updates.

PART II: TESTING REQUIREMENTS - Rule 62-296.401(6), F.A.C.

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

Compliance Demonstration [62-296.401(6)(h), F.A.C.]

- 1. [] New Facility / [] New Process Equipment- Did this facility demonstrate initial compliance no later than 30 days after beginning operation?
2. [X] Existing Facilities Was an annual visible emissions compliance test conducted on each crematory unit for each calendar year?
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. limit?
2. Was the test conducted with the unit operating at a capacity that is representative of normal operations and is not greater than the manufacturer's recommended capacity?
3. Was the department notified at least 15 days prior to the test?

PART II: TESTING REQUIREMENTS – Rule 62-296.401(6), F.A.C.

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

- 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)] ----- Yes No
- 5. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] ----- Yes No
- 6. Was a visible emissions test(s) conducted by the inspector during this site visit according? ----- Yes No
 - 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- ____; Wind direction - _____ Upwind odor level detected- _____ (1-10)
- 2. **Continuous Monitoring System** – [62-296.401(6)(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 _____) ----- Yes No
 - 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
 - a) Date range for records reviewed: From: _____ To: _____
 - 9) Was the crematory unit installed after 2/1/07? If yes, go to 9) 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(6)(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

PART III: OPERATING/RECORDKEEPING REQUIREMENTS

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

- 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

- 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(6)(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, other than bedding, 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(6)(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
- 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 NoIf 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
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

I had a meeting with Ms. Sharon Martinache the Director, in order determine what caused the emission unit temperature dropped below required 1400 Degree F. and also to determine if the temperature dropped was avoidable or unavoidable.

*Ms. Martinache stated the operator that operated emission unit during the malfunction was not on duty. She stated she would further reviewed temperature chart with her operator and get back with AQD office later. After I got back to the office, Ms. Martinache emailed me a letter dated November 9, 2009, indicated that the emission unit was on automatic pilot at the time temperature dropped below the required 1400 degrees F. Based on Ms. Martinache explanation and the reviewed of the emission unit temperature charts record its was determined the temperature dropped was unavoidable. **See attached letter.***



L O V E N E V E R L E A V E S *

November 9, 2009

Pinellas County Environment Management
Air Quality Division
300 S. Garden Ave.
Clearwater, FL 33756

Attn: Mike Thomas

As discussed today I have included additional details of September 24, 2009 Crawford Incinerator malfunction.

The first burn of the evening shift was started at 11:30 PM. It completed at 12:50 AM with no problems. The operating procedure manual for the Crawford was followed. That procedure is detailed below:

- When the cremation is completed:
 1. Turn the **Cycle Timer** to **0** which will turn off all burners and leave the **Air** on to facilitate cooling.
 2. Turn the **Pollution Control Switch** to the **OFF** position.
 3. Turn the **Afterburner Switch** to the **OFF** position.
 4. Turn the **Cremation Burner Switch** to the **OFF** position.
 5. Inspect and record gas reading from gas meter.
 6. Allow unit to cool until the temperature reaches 1200 degrees
 7. Suit up in flame resistant jacket, gloves and face heat shield.
 8. Unbolt and open the loading door.
 9. Remove the cremated remains and steel tag from cremation chamber with the brush.
 10. Place cremains, steel ID tag and CAF in a cooling pan.
 11. Set aside and let cool.
 12. Indicate on the wheel when cremation in the primary chamber was begun and stopped. Also, note the lowest temperature attained during the cremation.

The cremation operations procedures were then started for burn number two. Those procedures are detailed below:

2. Open the loading door.

6225 72ND AVE. NORTH / PINELLAS PARK, FL 33781 / OFFICE 727.648.1456 / FAX 727.645.3141 / WWW.PETANGELMEMORIALCENTER.COM

3. Load the animal / animals to be cremated (ID# 29550)
4. Place yellow copy of the Cremation Authorization Form (CAF) in the clip on the side of the control panel.
5. Place the steel ID tag on the floor of retort in front of animal and approximately 4 inches inside door.
6. Close the loading door and screw the door bolts closed
7. Turn the **Cycle Timer** dial to **4**
8. Turn the **Pollution Control Switch** to the **ON** position
9. Turn the **Afterburner Switch** to the **ON** position

At that point, 1:00 AM, the afterburner did not light because of a malfunction of the afterburner reset. There was a small increase in the secondary chamber temperature but when the afterburner reset function turned the burner off, the temperature continued to drop, indicating the only combustion taking place was a result of the animal in the chamber and not due to additional fuel provided by the operator or unit. It should be noted that the cremation burner was off during the entire time the secondary chamber temperature was below 1600 degrees. It was determined that the lens on the flame detector was likely dirty based on experience. The lens was cleaned and the unit was restarted at 1:25 AM. Note that at the time of restart the recording pen drops to show the restart.

Routine maintenance procedures include cleaning the lens on the flame detector. However, occasionally the lens gets enough soot on it between cleanings to cause a malfunction. The lens was not broken and the cleaning corrected the problem. We have since shortened the time between routine maintenance schedule and we now visually check the after chamber flame detector eye every two weeks.

When the temperature reached 1645 Degrees, at 1:30 AM, the cremation burner was turned to auto and the cremation completed at 2:00 AM. Operations continued throughout the night with no further problems.

Since the problem was identified and corrected by the operator there was no need to contact the manufacturer at that time. The manufacturer was contacted later and they stated that we follow the correct procedure.

Because the ID number was entered on the wheel at the time the cremation was expected to be carried out, the subsequent burns, until 5:15 AM were entered in the wrong section of the wheel. That was noticed and the ID number for the 5:45 AM burn was correctly placed. Attached is a copy of the wheel with the correct placement of all burn times.

At your suggestion I have contacted the manufacturer to review the situation and have been assured that we are compliant in regard to this situation. Additionally, I will be speaking with an environmental engineer at Matthews Cremation as well as Southern Environmental, our air quality contractor. If there is any additional discovery I will forward to you immediately.

Sincerely,

Sharon Martinache
Regional Director

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| <i>Exit Interview: During the closing conference, I informed Ms. Martinache that AQ Division office will expect her response to determine if the temperature dropped below 1400 degrees F was avoidable or unavoidable.</i> |
| |
| |
| |

Mike Ojo Thomas _____
Inspector's Name

11/9/2009 _____
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

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