



HUMAN CREMATORY COMPLIANCE INSPECTION CHECKLIST



Environmental Compliance

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

Facility: Eternal Rest Funeral Home; DBA/Site Name: Suncoast Crematory; Address: 2966 Belcher Road North, Dunedin, FL; District: Southwest; Contact Phone: 727-733-2300; ARMS NO: 1030217 001; Permit NO: 1030217-004-AG; Expiration Date: 9/28/12; Renewal Date: 8/29/12; Test Date: 7/3/00

EMISSION UNIT DESCRIPTION: Incinerator, Human: Industrial & Engineering Company, Model IE43-PPII Cremator. 300 Lb. Maximum Batch Load with a 1600 degree F Minimum Secondary Chamber Temperature

INSPECTION DATE: 06/11/09; 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 was met on site by Tracy Scalisi (office manager). After approx. a 5 minute wait I was introduced to Michael Daniel Jackman (crematory operator). Mr. Jackman gave me a tour of the crematory spaces (retort, cooler and dry storage) then made the temperature chart recorder documentation available to me.
3. Is the Authorized Representative still Charles Scalisi? [X] Yes [] No
Comments:
4. Is the facility contact still David Penhallegon, LFD? [] Yes [X] No
Comments: David Penhallegon left the employ of Suncoast Crematory in March of '09. Mr. Jackman started with Suncoast in late March. On 06/23/09 Mr. Scalisi sent a faxed document (attached) notifying the DEM of the change of facility contact to reflect that Charles Scalisi is now the Authorized Representative and the Facility contact.
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 [] No
2. [X] Existing Facilities Was an annual visible emissions compliance test conducted on each crematory unit for each calendar year: [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

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)

- 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 to EPA Method 9?----- Yes No
- a) The visible emission test resulted in an opacity of _____% for the highest six minute average. ----- Yes No
- 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 - West 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? ----- Yes No
- 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

See Comment #1

- 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
- 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(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

PART III: OPERATING/RECORDKEEPING REQUIREMENTS

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

- @ 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 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
- See comment # 2.**
- 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
- See comment # 4.**
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

See comment # 5.

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) – 1)d) 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

1) The facility does not have the temperature chart recorder calibration documentation on premises. Other retort maintenance is weak. Mr. Scalisi has scheduled Matthews in to perform maintenance to the retort and calibrations of the burner firing rates and the chart recorder. A follow-up to check for follow through on these items is scheduled for 08/05/09.

2) The msds for all combusted items were not readily available. On 06/23/09 Mr. Scalisi faxed the missing data, see attached documents, and stated that all body bags that do not have a msds on file are disposed of through the bio-waste disposal and not burned.

3) Records to verify the completion of the manufacture's recommendation for semi and annual maintenance were not readily available. Mr. Scalisi has ordered retort inspection/repairs/calibrations to comply with this requirement.

4) The manufacture's operation manual was on site. This manual includes start up, shut down and some basic trouble shooting procedures. Mr. Jackman has since supplied more detail, via fax, on emergency procedures, see attached document.

5) The facility contact has changed. Mr. Scalisi has sent a fax, documenting this change.

Neither Mr. Jackman nor Mrs. Scalisi could provide all the necessary documentation to complete my inspection. Mr. Scalisi was called, notified of my presence and asked to come in early while Mrs. Scalisi looked for the documents. Soon after Mr. Scalisi's appearance it became evident that the administrative side (record keeping) was in some disarray. Mr. Scalisi was eventually able to produce the retort manufacturer's training and operational manuals as well as some billing information on maintenance performed on the retort. Some msd sheets for combustibles were also produced.

Exit Interview: During the exit interview with Mr. Scalisi, I read and explained several sections (specifically FAC 62-296.401(5)(2)(d), (e) and (i)) of the air general permit to him. Mr. Scalisi commented that he had relied heavily on the past crematory operator (ex facility contact David Penhalligon) to be current with these rules and record keeping responsibilities. Further Mr. Scalisi apologized for the confusion in locating the necessary documents and requested that I wait while a thorough search of the office could be made. I explained to Mr. Scalisi the need for all necessary documentation to be readily accessible for inspection and that all office staff needed to know the whereabouts of said documents. I further explained that due to the complete and accurate documentation of the temperature chart recorder requirements (and all DEM notifications of periods of non-compliance associated with the retort) a period of time would be allowed to produce the SSM, missing MSDS and calibration records for the retort.

After several follow-up phone conversations and faxes, Mr. Scalisi has produced all of the required documentation, except for the yet to be completed manufacturer's maintenance and calibrations. As this work is scheduled to be performed within the next 30 to 45 days, a follow-up inspection has been scheduled for 08/05/09.

Chris R. Brodeur

 Inspector's Name

06/11/09

 Date of Inspection

 Inspector's Signature

06/10

 Approximate Date of Next Inspection