



ANIMAL CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0950149 **DATE:** 3/31/08 **ARRIVE:** 8:23 AM **DEPART:** 11:30 AM
FACILITY NAME: GREENBRIER MEMORY GARDENS
FACILITY LOCATION: 3703 W KELLY PARK RD
 APOPKA 32703
OWNER/AUTHORIZED REPRESENTATIVE: Mr. Barry Grimm **PHONE:** (407)886-2620
CONTACT NAME: **PHONE:**
ENTITLEMENT PERIOD: 3/15/2007 / 3/15/2012
 (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(6)(j), 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% O₂ 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 (ft³) of flue gas, corrected to 7% O₂ 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 leak-proof containers containing no more than 0.5 % (percent) by weight chlorinated plastics used during the cremation of dead animals?----- 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) If plastic bags are used for the cremation of animals are they non-chlorinated and no less than 3 mils thick?----- Yes No
 - c) Are dead animals, which have been used for medical or commercial experimentation, or other materials, including biomedical wastes (Rule 62-210.200, F.A.C.), incinerated at this location?----- Yes No
6. During this review period, was the largest batch load cremated 500 pounds per hour or less?----- Yes No
7. Have all crematory operators been trained and certified by a Department-approved training program?--- Yes No
 - a) Are copies of the training certificates 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

Norma Ali & Efren Vazquez

3/31/08

Inspector's Name (Please Print)

Date of Inspection

3/31/09

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: The annual visible emission audit and records review of Greenbrier of Central Florida, Inc. Was conducted on March 31, 2008. Norma Ali and Efren Vazquez from Orange County EPD, met with Mr. Barry Grimm, President of Greenbrier of Central Florida and Steve Web, Consultant from Coastal Air Consulting, Inc., conducted the visible emission test. Mr. Grimm, was present for the records review.

A visual emissions audit was conducted on six (6) of the facility's crematories. The six (6) crematories included a Matthews Cremation Division Model IEB-50 (new Unit #5), an IEE Power-Pak Jr. (EU001), an IEE Super Power-Pak (EU004), an IEE Power-Pak I (EU002), and two IEE Power Pak II (EU003 + EU006). Emission units, 002, 003, 004, 005 and 006 were operating at or above the required secondary temperature of 1,600 degrees Fahrenheit, as required by current permit (0950149-010-AG). Emission unit 001 was operating at or above the required secondary temperature of 1,400 degrees Fahrenheit, as required by current permit (0950149-010-AG). Temperature charts for all units from the audit were provided by Mr. Grimm. The opacity observed for five (5) of the six crematories was 0%. Opacity observed for Unit #3 was 1.7% for the worst 6-minute average. No objectionable odors were noticed during the visible emissions audit.

A records audit was conducted from 03/07 to the present. During the records review Norma Ali noticed that two charts from unit #1 were showing odd readings on two of the charts, one of them dated on 6/23/07, 6/26/07 and 7/23/07, which showed temperatures under the 1400 degrees temperature limit for that unit. Inspectors asked Mr. Grimm about it. And he replied that he wasn't sure and might had possible been a power outage. The rest of the readings before and after them, looked to be in compliance. Inspectors checked with J. Kasper and he believes that what ever was the problem, it was fixed right away. Records on site from 01/04 to present. The charts are utilized at least for two (2) days in order to conserve paper. Temperatures charts appeared to have the proper markings.

Crematory operator certifications are not required anymore. Appropriate containers are used in the incineration process. The facility has the crematories inspected/maintenad on 'as needed basis' by the manufacturer, which also uses the units to test new devices for that kind of equipment.

Facility is in compliance.