



# ANIMAL CREMATORY



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0950149 **DATE:** 3/8/2010 **ARRIVE:** 8:55 AM **DEPART:** 1:20 PM  
**FACILITY NAME:** GREENBRIER MEMORY GARDENS  
**FACILITY LOCATION:** 3703 W KELLY PARK RD  
 APOPKA 32712-5134  
**OWNER/AUTHORIZED REPRESENTATIVE:** BARRY GRIMM **PHONE:** (407)886-2620  
**CONTACT NAME:** **PHONE:**  
**ENTITLEMENT PERIOD:** 11/1/2009 / 11/1/2014  
 (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% O<sub>2</sub> 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<sup>3</sup>) of flue gas, corrected to 7% O<sub>2</sub> 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 & Bill Rhodes

3/8/10

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

3/8/2011

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** The annual visible emission audit and records review of Greenbrier of Central Florida, Inc. were conducted on March 8, 2010. Norma Ali and Bill Rhodes from Orange County EPD, met with Mr. Barry Grimm, President of Greenbrier of Central Florida, and Stephen 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 IEB Series 20, which replaced the 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).

On this date, inspector Bill Rhodes, used the Fluke 714 Meter to verify and compare the temperature readings from the thermocouple for each one of the units' charts and digital displays. The numbers were very close. The differences were not significant. All emission units were operating at or above the required temperature of 1,600 degrees Fahrenheit, on the secondary chamber as required by current permit 0950149-011-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 #4 was 3.54% for the worst 6-minute average. No objectionable odors were noticed during the visible emissions audit.

The charts from all units and the maintenance log were provided for review, from January 2009 to March 2010. All readings were in compliance.

Facility appeared to be in compliance at the time of inspection.