HUMAN CREMATORY

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0830004 **DATE:** 9/3/09 **ARRIVE:** 9:10 a.m. **DEPART:** 11:35 a.m.

FACILITY NAME: ROBERTS FUNERAL HOMES

FACILITY LOCATION: 606 SW 2ND AVE

OCALA 34471-0915

OWNER/AUTHORIZED REPRESENTATIVE: BRUCE SESSLER **PHONE:** (352)622-4141

CONTACT NAME: Bruce Sessler **PHONE:** (352)622-4141

ENTITLEMENT PERIOD: 12/14/2008 (effective date) / 12/14/2013 (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

Allen Rainey — Inspector's Name (Please Print)

9/3/09 — Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I, Allen Rainey, performed an INS3 by witnessing visible emissions testing performed by Southern Environmental Services and conducting a compliance inspection. Contact was made with Bruce Sessler, Authorized Representative of Roberts Funeral Home, Dale Wingler, Southern Environmental Services, Dale Bergman, Crematory Operator of Roberts Funeral Home, Joey Luckado of LEFTInc, and Matthew Crumbaker of Pure Flame.

1. Cremation for the visible emissions (VE) test for the Matthews Power Pak II (Model #0560603) began at 9:30 and ended at 12:05. A VE test was not done for the B&L unit due to problems with the unit. Both the digital logic control and chart recorder showed 1,675 degrees F. at the start of the cremation. The Power Pak unit is labeled "Unit #3," and the B&L unit is labeled "Unit #2."
2. Stewart Enterprises has a maintenance contract with Matthews. Bruce Sessler reported that he has told Matthews technicians not to touch the units because something fails after their service visit. He stated that the last Matthews service call was on 8/13/09, and since then the B&L unit's afterburner has repeatedly failed. Mr. Crumbaker arrived during the inspection to repair the unit. He stated there was a problem with the air/gas mixture. The VE test for the B&L unit will be rescheduled with Central District staff. Mr. Luckado stated Matthews has been contracted for the past three years and that at the end of this year, another company will likely be contracted.
3. The thermocouple locations on both units were measured. The Power Pak II thermocouple is located on the left side of the unit 37" from the front side. The stack is on the right side of the unit near the back. The B&L thermocouple is located on the right side of the unit 43" from the back side, under the former clean-out door. The stack is on the left side near the back.
4. Reviewed temperature chart records from September 2007 to August 2009. The crematory operator's name or initials are not recorded. Markings for the time cremations began were not recorded until June 2008. There are approximately 9 cremations recorded on the charts with two to four cremations per day.
5. Charts for the Power Pak unit demonstrate the operators are attentive to temperature fluctuations. There were no more than three times when temperatures fell below 1,600 degrees F. for no longer than 15 minutes. Notations for a rebuild/curing cycle, a timer reset and a power outage were made on 9/11/08, 6/16/09 and 7/23/09, respectively.
6. Charts for the B&L unit show that temperatures fell below 1,600 degrees F. numerous times for no longer than 15 minutes during cremations from February 2008 to August 2009. Some of the insptances in August 2009 were caused by afterburner failure prior to the start of cremations. All of the other instances appear to be caused by the operators, when the unit door was opened to reposition the body (notations OD RP for "open door reposition body" were made on the charts). Mr. Bergman stated the temperature had been increased 50 degrees in March 2009 to compensate and stated it may need to be raised another 50 degrees. Copies of the charts were requested.
7. Copies of the charts from February 2008 to August 2009 for the B&L unit were requested to be sent to the Central District.
8. Body bags are not incinerated.
9. Questions 4a - c, 6 and 7 in Part II, 3, 5a & b and 6 in Part III, and 1d, 2 and 3 in Part IV are not applicable.