



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1270169 **DATE:** 2/3/09 **ARRIVE:** 10:45 a.m. **DEPART:** 12:45 p.m.
FACILITY NAME: ALL FLORIDA CREMATORY
FACILITY LOCATION: 145 S HWY 17-92
 DEBARY 32713-
OWNER/AUTHORIZED REPRESENTATIVE: William Long **PHONE:** (386)668-8880
CONTACT NAME: Eric Hill **PHONE:** (386)668-8880
ENTITLEMENT PERIOD: 9/14/2006 / 3/28/2012
 (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(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% 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 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

2/3/09

Inspector's Name (Please Print)

Date of Inspection

2/3/10

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

1. The B & L Crematory Systems, Inc. unit was cool and not in operation at the time of the inspection. Model number N20AA, serial number 565-348-01.
2. The unit burns natural gas.
3. Four certified employees currently operate the unit.
4. Questions in Part II, numbers 3 - 8, Part III, number 3 and Part IV, numbers 1(d), 2 & 3 are not applicable.
5. Performed random review of temperature chart records from December 6, 2006 to February 1, 2009. One temperature chart is used per day, with three to five cremations per chart. The recordings show cremations occurred at the required temperature of 1,600 degrees F.
6. Requested maintenance, repair and calibration records from January 2007 to January 2009. Reviewed maintenance and repair records from January 2007 to April 2008 as provided. The records indicate a complete refractory rebrick was performed on April 7, 2008, the opacity monitor was replaced on January 21, 2008, a maintenance inspection was performed on August 11, 2008, the Veri-Flame was re-set and a CB igniter was replaced on October 8, 2008, and the Veri-Flame wiring was replaced on January 13, 2009. Not all records requested from January 2007 to January 2009 were provided for inspection. Susan Morales of the facility agreed that the records will be mailed to the FDEP office within two weeks of the inspection. Questions 1(b)(4) - (8) in Part III will be answered upon receipt of the documentation. Eric Hill, unit operator, reports that all valves, and major components are original and only the floor and ceiling have been rebricked.
7. Calibration stickers inside the control box indicate the unit was calibrated on February 2007, January 28, 2008 and August 13, 2008. Calibration records were not provided and are to be mailed as indicated above.
8. I was unable to determine if temperature biases have been programed into the unit.
9. Body bags are incinerated. Documentation certifying the plastic content was not made available upon request and is to be mailed within two weeks of the inspection. Question5(a) in Part III will be answered upon receipt of the documentation. Material Safety Data Sheets (MSDS) or equivalent certification records have been requested for all types of bags incinerated. One of the cardboard box designs uses plastic zip ties.
10. A copy of the applicable portions of Rules 62-210.310(2), (3) & (5)(c), 62-296.401(5) and 62-297.310(7)(b), Florida Administrative Code, was furnished to Mr. Hill.