



HUMAN CREMATORY COMPLIANCE INSPECTION CHECKLIST



Environmental Compliance

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

Facility: Veterans Funeral Care, District: Southwest, Address: 15381 Roosevelt Boulevard, Clearwater, FL, Contact Phone: 727-467-0922, ARMS NO: 1030512 001, Permit NO: 1030512-002-AG, Expiration Date: 10/9/11, Renewal Date: 9/9/11, Test Date: 7/28/00

EMISSION UNIT DESCRIPTION: Model IEE Power-Pak II. Maximum capacity of 750 pounds, loads greater than 300 pounds requires special operating procedures. Secondary (afterburner) chamber has a minimum temperature of 1600 degrees F. Training by Grove Scientific/Luis Llorens

INSPECTION DATE: 07/15/09, 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 by Jimmie Rudolph Jr. and given a tour of the facility.
3. Is the Authorized Representative still James Rudolph? [X] Yes [] No
Comments:
4. Is the facility contact still James Rudolph? [X] Yes [] No
Comments:
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 [X] 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? [X] Yes [] No
The last visible emission test resulted in an opacity of 9.8% for the highest six minute average.
2. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? [X] Yes [] No
3. Was the department notified at least 15 days prior to the test? [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 test was completed? [X] Yes [] No
5. Was the facility visible emissions test(s) conducted according to EPA Method 9? [X] Yes [] No

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)

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.
 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 - W 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?
 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 (05/11/07)) ----- 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
 a) Date range for records reviewed: From: 08/01/08 To: 07/14/09
 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 @ **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

PART III: OPERATING/RECORDKEEPING REQUIREMENTS

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

- 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
 - 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
- 3. Is there a written plan onsite which addresses the operating procedures during startup, shutdown and malfunction? ----- Yes No
- 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

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 NoIf the any of the answers to 1a) – 1d) 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

See comment #2

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). An email from a Matthew's associate dated 05/11/07 mentions finding the chart recorder to be offset by 25 degrees and further states that this was corrected. No Chart documentation can be found to verify this. I have asked Jimmy Rudolph Jr. to supply to DEM documentation of a chart calibration.

2). Veterans Funeral Care has done a fine job of documenting the instances of non-compliance. Included with the notices have been explanations of the non-compliance and steps taken to prevent further incidences. I did find, however, a non-compliance temperature episode on 07/10/09 that the Department had not received notification on. As this was the only instance found (and of very short duration), that we did not receive notification on, I asked that Veterans follow through with a notification asap.

Pursuant to Consent Order A08-056 a low temperature alarm system has been installed. Veterans' operating policy is to keep the alarm set for 1625 degree F which should give the operator ample time to take action, before the temperature exceeds the limit. The alarm's audible warning is broadcast at 100 db and according to the operator can be clearly heard in the far reaches of the office. This alarm was installed by Matthews Cremation on 01/07/09.

Exit Interview: I notified Jimmy Rudolph Jr. that the facility was in compliance. Noting, however, that a calibration check for the chart recorder could not be found, I read and underlined, the Air General Permit section to Mr. Rudolph pertaining to this requirement. Mr. Rudolph felt strongly that this documentation existed but since Office Manager Blair Kriever was not present, the documentation could not, immediately, be found. I allowed as this was possible and asked that a fax or email with this information be sent to DEM within a week's time.

The facility was clean, orderly and with the exception of the equipment calibration noted above all documentation was available for inspection. I thank Mr. Rudolph Jr. for his assistance in maintaining compliance with permit # 1030512-002-AG.

Chris R. Brodeur

Inspector's Name

07/15/09

Date of Inspection

Inspector's Signature

07/10

Approximate Date of Next Inspection

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