



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: 10/9/2011, Renewal Date: 9/9/2011, Test Date: 7/28/2000

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: 7/2/10, 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 met with Blair Kriever, General Manager/Controller for the facility. He provided all requested documents, answered my questions, and gave me 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? [62-296.401(5)(b)1., F.A.C.] [X] Yes [ ] No
The last visible emission test resulted in an opacity of 0% for the highest six minute average.
2. Was the test conducted with the unit operating at a capacity of one (1) adult-sized cadaver? [62-296.401(5)(g)] [X] Yes [ ] No
3. Was the department notified at least 15 days prior to the test? [62-297.310(4)(a)9. F.A.C.] [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? [62-297.310(8)(b) [X] Yes [ ] No
5. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] [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

See comments section

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 - variable 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  1,800<sup>1</sup>  1,600<sup>2</sup> 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 ( 11/19/09 )) -----  Yes  No  
 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: July 16, 2009 To: July 1, 2010  
 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  
 c) secondary chamber combustion zone temperature equal to or greater than **1600°F** before the cremation

**PART III: OPERATING/RECORDKEEPING REQUIREMENTS**

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

- 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 days prior to permit expiration? -----  Yes  No

**New or Modified Process Equipment or Change in Ownership** - [62-210.310 (2)(b)2, F.A.C]

- C.. Since the last registration form submittal 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 with equipment that is substantially different? -----  Yes  No
  - d) A change in ownership? -----  Yes  No
 If 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
  - b) Did the notification include:
    - 1. A description of and cause of noncompliance?-----  Yes  No
    - 2. Dates and times of noncompliance; or if not corrected, the anticipated time noncompliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance? -----  Yes  No

**PART VI: Comments**

The facility installed an audible alarm to sound when the temperature falls below 1625°F per a Consent Order condition in 2008-2009. All non-compliance instances were properly documented and notifications were sent to the AQ office.

The annual visible emissions test will be scheduled for September or October of this year. A visible emission test was not performed by the inspector during the inspection due to poor weather conditions (i.e. rain and dark sky).

*Exit Interview:* I informed Mr. Kriever that the facility has been keeping excellent records, is organized and well maintained. I also informed him that it appears the facility is in compliance at this time.

Shannon Ransom

**Inspector's Name**

**Date of Inspection**

**Inspector's Signature**

**Approximate Date of Next Inspection**