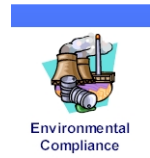




HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

Facility: Gee & Sorensen Funeral Home and Cremation Services
DBA/Site Name: Hospice & Veterans Crematory Services
Address: 3180 30th. Avenue North, St. Petersburg, FL
ARMS NO: 1030516 001
PERMIT NO: 1030516-002-AG
District: Southwest
Contact Phone: 727-323-5111
Expiration Date: 5/10/12
Renewal Date: 4/10/12
Test Date: 7/17/00

EMISSION UNIT DESCRIPTION: Human Crematory: B&L Systems, Model Phoenix II-1. Must operate at 1,600 degrees F. in the secondary chamber. Nominal batch weight of 300 pounds. Larger weights require special operating procedures.

INSPECTION DATE: 09/11/08
INSPECTION COMPLIANCE STATUS (check [] only one box)
[] In Compliance; [X] 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: Eric Drews introduced himself as the primary operator and record keeper of the retorts. He and Richard Sorensen gave me a tour of the facility.
3. Is the Authorized Representative still Richard Sorensen? [X] Yes [] No
Comments:
4. Is the facility contact still Richard Sorensen? [X] Yes [] No
Comments: Eric Drews is the "answer man" for information, i.e. the main operator.
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 62-296.414, 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. [X] New Facility / [] New Process Equipment-
Did this facility demonstrate initial compliance no later than 30 days after beginning operation?----- [X] Yes [] No
2. [] Existing Facilities
Was the annual visible emissions compliance, test conducted on each crematory unit within 365 days (annually thereafter) of the previous visible emissions compliance test?----- [] Yes [X] 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 limit? [62-296.401(5)(b)1., F.A.C.] ----- [X] Yes [] No
The last visible emission test resulted in 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

PART II: TESTING REQUIREMENTS – Rule 62-296.414, F.A.C.
 (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

See comment.

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)] ----- Yes No
5. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.]----- Yes No
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 0 % 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 – S.E. 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?

Note: This facility has been operating since 06/20/08, therefore records for two years are not available. All responses to the questions below are relative to this start date.

- 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 _____) ----- Yes No
- See comment.**
- 5) Adjustments ----- Yes No
 - 6) Preventive maintenance performed on systems/devices ----- Yes No
 - 7) Corrective maintenance performed on systems/devices ----- Yes No
 - 8) 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
 - 9) Are all the above records available for at least 2 years? ----- Yes No
- See note above.**
- 10) Was the crematory unit installed after 2/1/07? If yes go to 10)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

PART III: OPERATING/RECORDKEEPING REQUIREMENTS
 (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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 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.]
- See Comment**
- 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
- See note under Part III, question 2.**
- 3. Is there a written plan onsite which addresses the operating procedures during startup, shutdown and malfunction? ----- Yes No
- See comment**
- 4. Does the crematory allow for a visible check on the flame characteristics?----- Yes No
 If yes go to a) – b) below
 - 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

- 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? -----	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
c) Replacement of existing equipment with equipment that is substantially different? -----	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
d) A change in ownership? -----	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> 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.-----	<input type="checkbox"/> Yes	<input type="checkbox"/> No

PART VI: Comments

<i>Part II. Question 3. DEM was notified, by fax, on 07/08/08 of test scheduled for 07/17/08. Late notice accepted.</i>
<i>Part III. Question 3. To date, the chart recorders have not been calibrated. I spoke with Mr. Drews on 09/18/08 in regards to the calibration of the chart recorders. Mr. Drews indicated that he will call B&L on 09/19/08 to schedule an appointment for next week.</i>
<i>Part III. Question 2.(8) All temperature charts inspected did not contain a signature. Some charts did not have dates and a few did not indicate when cremation began. Mr. Drews admitted to some confusion as to the requirements for documentation and that in the future he will make sure that the big five are listed (Time of combustion, temp., signature, date and time).</i>
<i>Part III. Question 5. (b) . See Excel document : spreadsheets\1030516 65997.xls</i>
<i>Part III. Question 6 and 6(a). MSD sheets were not available. Eric Drews stated that he would fax DEM the MSDS for combustibles by end of business on 09/17/08. Phoned Eric Drews on 09/18/08 and asked disposition of MSDS. Mr. Drews responded that he was in possession of the document and was expecting me to pick them up...Mr. Drews will mail the documents on 009/19/08.</i>
<i>Part IV. Question 3. A S.S.M. procedure was not available. . Eric Drews stated that he would fax DEM the S.S.M by end of business on 09/17/08. Phoned Eric Drews on 09/18/08 and asked disposition of the S.S.M. Mr. Drews responded that he was in possession of the document and was expecting me to pick them up...Mr. Drews will mail the document on 09/19/08.</i>
<i>Part IV. Question 4. Eric Drews indicated that the flame was not used as an indicator for flame adjustment.</i>
<i>In closing Mr. Sorensen and Mr. Drews were advised on the requirements for temperature chart documentation. The sections of FAC rule 62-210.310(5)(c) regarding record keeping of equipment maintenance and calibration logs were stressed as well.</i>

Chris R. Brodeur

Inspector's Name

09/11/08

Date of Inspection

Inspector's Signature

09/09

Approximate Date of Next Inspection

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