



Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 12, 2009

BY ELECTRONIC MAIL

trahanmortuary@yahoo.com

Mr. Dennis Trahan, Owner
Trahan Family Funeral Home and Crematory
430 Beverly Parkway
Pensacola, Florida 32505

Dear Mr. Trahan:

On May 5, 2009, Department representatives with the Air Resource Management Program inspected your facility, ID 0330278. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-8300, extension 1222 or e-mail Jennifer.Waltrip@dep.state.fl.us.

Sincerely,

/s/

Erica Mitchell
Air Compliance Supervisor

EM/jw/c

Enclosure



HUMAN CREMATORY



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0330278 **DATE:** 5/5/09 **ARRIVE:** 1:03 **DEPART:** 1:32
FACILITY NAME: PENSACOLA CREMATORY
FACILITY LOCATION: 430 BEVERLY PKWY
 PENSACOLA 32505
OWNER/AUTHORIZED REPRESENTATIVE: DENNIS TRAHAN **PHONE:** (850)438-6235
CONTACT NAME: BJ Trahan **PHONE:** (850)438-6235
ENTITLEMENT PERIOD: 4/29/2007 / 4/29/2012
(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

Jennifer Waltrip

5/5/09

Inspector's Name (Please Print)

Date of Inspection

/s/

May 2010

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Department personnel conducted an unannounced annual air program compliance inspection on May 5, 2009 at the Pensacola Crematory located in Escambia County. Mr. BJ Trahan was present to assist during the inspection.

During the inspection, the cremation unit was not in operation and personnel from B&L Cremations Systems were onsite making repairs. Circle charts were available and reviewed for compliance with the continuous monitoring requirements. Mr. Trahan informed us that cremation in the primary chamber is not begun until the secondary chamber reaches 1650 degrees Fahrenheit.

The unit is equipped with a continuous in-stack opacity meter which sounds an alarm and restricts combustion in the primary chamber if the visible emissions reach 3%.

B&L Cremation Systems performs annual preventative maintenance on the unit which includes calibration of the thermocouple and opacity meter.

At the time of the inspection, the most recent annual visible emission test was performed by Pensacola P.O.C., Inc. on March 7, 2008 and resulted in an average opacity of 0%. Please note that if March 7, 2008 is the most recent testing, the next annual visible emission testing is due on or before December 31, 2009.

Mr. Trahan mentioned plans to install a second cremation unit. Rule 62-210.310(2)(b)2, Fla. Admin. Code states that an owner or operator shall re-register the facility in the case of proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), Fla. Admin. Code. The registration form can be found at <http://www.dep.state.fl.us/Air/forms/nontv.htm>. If there are any questions concerning re-registration, please call Dick Dibble at 850/921-9586 or via e-mail at: Dickson.Dibble@dep.state.fl.us.