



AIR POLLUTION CONTROL DISTRICT

POLICY: INSPECTION PROCEDURES AND GUIDELINES

EFFECTIVE: February 23, 2023

POLICY NUMBER: 16

GENERAL:

This policy and procedure document will provide guidance to Air Pollution Control (APC) inspectors regarding conducting stationary source inspections on behalf of the Imperial County Air Pollution Control District (ICAPCD). APC inspectors are responsible for performing detailed inspections of source operations to determine compliance with ICAPCD, State and Federal requirements. This policy provides staff with specific criteria for verifying compliance with regulations. This policy shall be followed in all inspections regardless of the size of the source or purpose of the inspection to ensure consistency among ICAPCD staff.

POLICY STATEMENT:

ICAPCD Rule 108, *Inspections*, cites the authority for conducting inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations, to ensure that required records are being kept, and to conduct tests of air pollution sources. In many cases, the inspector may be the only person from the ICAPCD who visits a particular site or witnesses the operation of specific equipment, whether or not the source has a valid permit. The method the inspector used for conducting inspections and determination of compliance must be uniform in order to ensure consistent enforcement of ICAPCD Rules. This policy will also ensure the inspector provides good customer service and acts in a professional manner.

I. GENERAL INSPECTION PROCEDURES

A. Pre-Inspection Preparation

Inspectors should spend adequate time preparing for an inspection. Review of the compliance history in Permits Pro Database Program is necessary. The review shall include, but is not limited to, past inspections, complaints, Notices of Violations (NOVs), breakdowns, Title V reports including deviations and source test documentation. Review of the current Permit to Operate (PTO) and Authority to Construct (ATC) conditions is also necessary.

Inspectors need to gather all equipment necessary to conduct the inspection. This may include safety equipment (PPE), County Identification, ATC and PTO conditions, other written documentation reviewed in Permits Pro, approved forms for visible emissions observations, camera, and a cell phone.

B. Safety

Policy 23, *Safety While Conducting Inspections*, discusses this subject and should be referred to.

C. Right to Entry

Policy 24, *Access to the Facility*, discusses this subject and should be referred to.

D. Unannounced Inspections

Policy 26, *The Unannounced Inspection*, discusses this subject and should be referred to.

E. Sign-in at Facilities

Many facilities require the inspector to sign and date a log or other type of sign-in sheet. This is appropriate only if the signature does not limit the liability of the facility in regards to the safety of the inspector or limit the access to any area of the facility or access to specific records. If either of the aforementioned are the reason for the signature, contact your supervisor for guidance.

F. Sensitive and/or Confidential Information/trade Secrets

The inspector can request information that may be considered sensitive, confidential or trade secret during the inspection. Unless necessary and relevant to a violation, this information will remain confidential and any written documentation will be labeled as such by the facility representative (permit holder), so long as the documentation/information meets the requirements of ICAPCD Rule 102, *Public Records*.

G. Frequency of Inspections

It is the policy of the ICAPCD that all sources which operate under an ICAPCD permit be inspected at least once per year. Certain sources require more frequent inspection based upon their potential to emit or actual emissions. Major source facilities, which hold a federal Title V permit and those which qualify as synthetic minor sources, shall be inspected twice each year.

H. Source Test Observation and Enforcement

Source tests are conducted for the purpose of demonstrating compliance with ICAPCD rules, state or federal regulations, ATC or PTO emission limits, special agreements, or gathering emissions data. For detailed procedures regarding source testing, please refer to ICAPCD Policy 16.A, *Approval, Observation, and Evaluation of Source Tests*.

I. Inspection Reports

The inspector shall complete an Inspection Report for each inspection conducted and submit the document to the Enforcement Division Manager for review and approval within thirty (30) days after the inspection takes place, unless the inspector has yet to receive a final source test report from the source/permittee needed for his/her report. Finally, the Enforcement Division Manager may grant an extension of time for completing and submitting the report upon request by the inspector.

II. ON SITE INSPECTION PROCEDURES

Since every facility or process is different, specific inspection procedures will depend on the type of facility being inspected. Inspectors should use their own observations and the statements obtained during conversations or interviews with facility employees to determine if the facility is in compliance with ICAPCD rules and requirements. The inspector's job is to adequately document the compliance status of the facility. Documentation may consist of photos, observations, notes, reports, samples, statements, and/or records.

A. Opening Conference

An opening conference provides an opportunity for the inspector to explain the scope of the inspection and gather general information regarding the facility operations, management structure (to confirm ownership), and any special safety concerns. The inspector should explain the need to take photographs of various equipment, emissions sources, and control equipment. The inspector should also determine if the facility wants to take duplicate samples, if necessary. The inspector should document the name and title of the individual who granted permissions for the ICAPCD Inspection, and also request that a facility representative accompany him/her on the inspection.

B. Physical Inspection

The physical inspection will be conducted as the facility representative accompanies the inspector throughout the facility. The inspector will direct the inspection by asking to see specific equipment, records or processes using the ATC or PTO conditions as a guide. Observing and asking critical questions about the equipment and processes will help the inspector to determine compliance with ICAPCD rules and permit conditions.

1. Identify Emission Points

Using the ATC and PTO Conditions and equipment list as a guide, identify all emissions and potential emission points. Observe the equipment or process and note the state of operation. Record any visible emissions observed using Visible Emission Evaluation form(s) and procedures if necessary.

2. Equipment Description

Confirm that the equipment description on the current ATC or PTO equipment description list accurately describes the equipment or process permitted. This information includes, but is not limited to, confirming serial numbers, model numbers, the manufacturer, horsepower/capacity, and other listed specifications. If the equipment description is incomplete or inaccurate, the inspector will issue a NTC or NOV as appropriate. Additionally, the inspector will instruct the facility to submit a new permit or permit modification application to the ICAPCD to address the discrepancy.

3. Applicable ATC or PTO Conditions/Rules and Regulations

Use the ATC or PTO conditions as a guide for determining compliance when observing permitted equipment. Each piece of permitted equipment shall meet all conditions in the current ATC or PTO. If the permitted equipment does not meet a condition(s) in the current ATC or PTO, the inspector will issue a NTC or NOV. Some examples of relevant information include:

- Current hours of operation and status of equipment
- Process rate information (current, minimum/maximum, annual)
- Type and rate of fuel being burned
- Current gauge reading
- Waste handling

4. Recordkeeping

Some records are maintained at the physical location of the equipment. Discussing the records that are required for a piece of equipment can help determine where the records are maintained. If records are at the equipment location, review them and note any deficiencies or violations. Other records may be maintained in a facility office or on a facility computer. Review these during the post-inspection interview. Inspectors may request three years of records for non-Title V facilities and five years of records for Title V facilities, but should at a minimum review records created on or after the date of the last inspection. In the event the inspector discovers a violation while reviewing the facility's records, the inspector will issue a NTC or NOV to the facility.

5. Unpermitted Equipment

During the course of the inspection, be alert to any equipment that may potentially emit air contaminants that is not currently permitted. This may include an entire new piece of equipment or equipment that has been added on to existing, permitted equipment. If an inspector is unsure if equipment requires a permit, contact an engineer at the Permitting Division to verify if it needs to be permitted. Additionally, the inspector will log the unpermitted equipment information in their Inspection Report to properly track the equipment/emission point year-to-year, and re-inspect the unpermitted equipment each subsequent year to verify the equipment's exempt status remains valid. If the equipment in question does

need to be permitted, an NOV shall be issued and a permit application given to the facility.

6. Waste Handling

Waste materials must be handled in a way so as to limit the amount of emissions released. Determine the types and amounts of waste materials being stored and shipped off-site, how the materials are being stored or used, and the location where the waste materials are being shipped.

7. Documentation During the Inspection

Documentation in the form of photos (e.g. photos of engine hour meter, fuel flow meter, Magnehelic gage, etc.), notes, and copies of records should be obtained during the inspection. Approved ICAPCD forms appropriate for the type of equipment observed shall be completed as thoroughly as possible during the inspection.

C. Statements

Record statements pertinent to the inspection at hand, which have been made by any of the involved parties, including the facility operator, employees, the public and/or the compliance inspector. Use direct quotes whenever possible. Record the date and time of conversations, and who made the statement(s).

D. Post Inspection Interview

The following elements should be covered with the owner/operator in a post-inspection meeting. This meeting should be conducted after the inspection.

1. Review the ATCs, PTOs, and/or Portable Equipment Registration Certificates, including the requirements to keep copies available near the permitted equipment (if applicable). Emphasis should be placed on the requirement for compliance with stated permit conditions.
2. Review with the facility representatives the results of equipment inspection.
3. Review records and advise the owner/operator of any deficiencies/violations.
4. Issue appropriate documentation (i.e., NOV or NTC) and review compliance options.
5. Review annual or semi-annual reporting requirements and submittal dates.
6. For Title V sources, review deviation reporting requirements.
7. Refer the facility to the ICAPCD's website for obtaining forms, applications, current rules and policies. Inform them they can keep up to date on rule changes and ICAPCD meeting dates, and find bulletins and other helpful information at the ICAPCD's website.

8. Ask if there is any additional assistance the ICAPCD can provide.


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