



## I. GENERAL INSPECTION PROCEDURES

### A. Pre-Inspection Preparation

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

Inspectors need to gather all equipment necessary to conduct the inspection. This may include safety equipment, District identification, ATCs, PTOs and other written documentation reviewed in PAS, approved forms for observations, camera, sample and/or analyzer equipment, maps of the area and cell phone.

### B. Joint Inspections

When requested by the Permit Services Division (PSD), inspectors shall arrange for an engineer to accompany the inspector when conducting start-up inspections. ATCs will specify which sources or equipment are to be scheduled for joint inspections.

Inspectors should try to contact the appropriate engineer at least five days prior to conducting the inspection and make arrangements to meet at the facility. Inspectors should be flexible in arranging the time of the inspection with the engineer. Inspectors are not expected to provide transportation for the engineer but carpooling is encouraged.

The inspector shall make every effort to assure that an engineer participates in all scheduled joint inspections unless the engineer declines to participate. If, due to unforeseen circumstances, the inspector is unable to contact the engineer prior to conducting the start-up inspection, contact shall be made with the engineer's supervisor to see if a substitute may be arranged. If PSD does not attend the inspection, the inspector shall contact the engineer as soon as possible after the inspection and offer to arrange for a follow-up inspection that will be conducted jointly with the engineer.

Inspectors shall include in the report whether the start-up inspection was completed jointly with an engineer or whether the engineer declined to participate in the inspection.

C. Safety

Inspectors should familiarize themselves with the potential hazards that may be encountered during an inspection, take the proper personal protective equipment and take appropriate safety precautions. They should consult the facility information in PAS and the District Safety Operations Manual prior to beginning an inspection.

If before or during an inspection the inspector feels that a situation is unsafe or if they lack the proper safety equipment or training, the inspection shall be terminated until such time that proper safety conditions can be established.

D. Unannounced Inspections

With very few exceptions, all inspections are to be unannounced. The benefits of seeing equipment as it normally operates offset any difficulties of adhering to these guidelines. If a source demonstrates compliance during an unannounced inspection there is good reason to believe they will operate that way for the rest of the year.

1. Guidance For Conducting Unannounced Inspections

- a. Conduct the inspection when the source is normally in operation.
- b. The inspector may have a regular environmental department contact with some sources, particularly larger facilities. Without setting a date for the inspection, determine if the source contact has any time when they will definitely not be available for inspections. These times might include regular staff meetings, or vacations. Once known, do not conduct the inspection during those times.
- c. With any contact with the source, inform them that the unannounced inspections are required and that you will expect to be accommodated. Determine who can accompany the inspector if the normal contact is not available. Make sure you have contact numbers for key personnel.
- d. Ask for any required records at the first inspection. You may schedule a later time to review records in depth, but verify the records are being kept during the initial inspection.
- e. Because you may find the intended source unavailable, be sure to have inspection materials for other sources at the ready.

2. Exceptions to Unannounced Inspections

- a. Continuously Operating Un-Staffed Facilities (or those not staffed with someone who can accompany the inspector, including those

conducted with a consultant). An example would be oil production operations.

- i. Contact the source the day of the inspection and set a time for that day. If the source has multiple permits, do not mention which equipment is to be inspected. An exception to this exists for some sources that have nothing that can be changed before the inspection, and no records to check. An example is a small oil company that due to limited throughput or low vapor pressure does not have leak-tight requirements on their tanks and does not have other equipment subject to emissions limits or fugitive emissions (engines, boilers, heater-treaters, or liquid loading facilities). An inspection may be scheduled for these facilities.
  - ii. Supervisor approval is required if a longer notification period is necessary. This includes approval to schedule a later inspection date at the source's request.
  - iii. Some sources may need equipment on site in order to conduct an inspection. An example is tank inspections that require a manlift. If the facility does not generally have this equipment available, the inspection *for that equipment* may be scheduled (but must be conducted as soon as possible).
- b. Multiple Day Inspections
- i. Begin the inspection by contacting the source on the day of the inspection. You may arrange further days of inspection during that week, but do not schedule for subsequent weeks. Avoid letting the source know what equipment is to be inspected during the week. Repeat this process as required.
- c. Variable Operating Un-Staffed Facilities, such as silo load-ins, peaker plants, farms (CMPPs), soil-remediation sites, and telecommunications sites.
- i. These facility inspections have to be scheduled in order to see the equipment operate.
- d. ATC inspections may be scheduled, but to save time, they should be considered as the annual inspection for that equipment and be combined with annual inspections of other equipment to get the most from travel time.

- e. Breakdown and NOV follow-up inspections may be arranged, but as above, the inspector should save time by doing some of the annual with the breakdown.
- f. Other exceptions require supervisor approval.
- g. Inspectors should begin the inspection as soon as possible after arrival at a source (generally no longer than 30 minutes). If a longer wait is proposed by the source the inspector should contact their supervisor for guidance.

E. Right of Entry

Health and Safety Code (H&SC) Section 41510 and District Rule 1070 grant the legal authority for inspectors to enter a facility or private property that emits or have the potential to emit air contaminants so as to conduct an inspection. Inspectors should always remain friendly, patient, helpful, and professional during all stages of the inspection.

1. Inspectors should introduce themselves, provide identification to the person in charge at the facility and then explain the reason for the inspection.
2. If entry is denied, the inspector should politely explain the District's inspection policy and give the source another opportunity to grant entry. If entry is denied because a key person is unavailable, the inspector should offer to conduct the inspection and then return when that person is available to discuss the findings.
3. If the inspector believes the key person must accompany him/her on the inspection or if there is an emergency or other valid reason not to conduct the inspection at that time, then he/she may postpone the inspection to a later date. The inspector must be reasonably certain the facility is not stalling or trying to conceal anything. The inspector should NOT make an appointment for the return visit. Instead, the inspector should inform the source that the inspection will be conducted at another unannounced time. The inspector shall notify their supervisor of the postponement.
4. If access has been denied and the inspector does not believe that there is a valid reason to postpone the inspection, the inspector shall contact their supervisor for guidance.
5. If all attempts to gain entry fail, the applicable supervisor shall instruct the inspector/AQFA to issue an NOV for violating H&SC 41510, and the

inspector should contact his/her supervisor to discuss additional measures that may be taken.

6. A supervisor may consider any or all of the following options:
  - a. Contact the source and explain the purpose of the inspection and the District's authority to inspect.
  - b. Suspend the source's permits using H&SC Section 42304.
  - c. Consult with the Regional Manager and/or Compliance Director.
  - d. Consult with District Counsel and determine if an inspection warrant is needed.

F. 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.

G. 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.

II. ON SITE INSPECTION PROCEDURES

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 the District Rules, the ATCs, the PTOs and/or the Portable Equipment Registration Certificates. 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, and any special safety concerns. The inspector should explain the need to take photographs and determine if the facility wants to take duplicate samples, if necessary. The inspector should 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 PTOs and ATCs as a guide. Observing and asking critical questions about the equipment and processes will help the inspector to determine compliance with District Rules and Permit conditions. Recording data observed using the appropriate approved District forms will help document compliance status.

### 1. Identify Emission Points

Using the ATCs and PTOs as a guide, identify all emission and potential emission points. Observe the equipment or process and note the state of operation. Record any visible emissions observed using the Visible Emissions Evaluation form and procedures if necessary. For additional information, see Visible Emissions Policy, COM 2075.

### 2. Equipment Description

Confirm that the equipment description on the current ATC or PTO accurately describes the equipment or process permitted. If the equipment description is incomplete or inaccurate, a new Permit or permit modification may need to be applied for an issued.

### 3. Applicable Permit Conditions/Rules and Regulations

Use written permit conditions as a guide for determining compliance when observing permitted equipment. Each piece of permitted equipment shall meet all conditions on the current ATC or PTO. Some examples of relevant information include:

- a. Current Hours of Operation and status of equipment
- b. Process Rate Information (current, minimum/maximum, annual)
- c. Type and rate of fuel being burned
- d. Current gauge readings
- e. Amount of emergency supplies (i.e., extra bags or filters on site)
- f. 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 can request three years of records for non-Title V facilities and five years of records for Title V facilities.

5. Unpermitted Equipment

During the course of the physical inspection, be alert to any equipment that may potentially emit air contaminants that is not currently permitted. This may include an entirely 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 PSD for a determination. If required equipment was installed without a permit from the District, an NOV should be issued and an 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, the name of the company that picks up the waste materials, and the location where the waste materials are being shipped.

7. Documentation During the Physical Inspection

Documentation in the form of photos, notes, and copies of records should be maintained during the inspection. Approved District forms appropriate for the type of equipment observed shall be completed as thoroughly as possible during the physical inspection. Use of these forms will help the inspector determine compliance with permit conditions and District Rules.

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.



#### 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 physical inspection.

1. Review the ATCs, PTOs, and/or Portable Equipment Registration Certificates, including the requirement 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 results of equipment inspection.
3. Review records and advise the owner/operator of any deficiencies/violations.
4. Issue appropriate documentation (i.e., NOV, NTC, and “Record of Corrective Action”) and review compliance options. For additional information, see Notice of Violation Policy, COM 1175.
5. Review the requirement to obtain ATCs for any modifications or new equipment that may be needed in the future.
6. For facilities that are designated Title V:
  - a. Review reporting requirements and submittal dates (RRM, ACC)
  - b. Review deviation reporting requirements
  - c. Review minor modification application requirements for ATCs.
7. Refer the facility to the District’s web site for obtaining forms, applications, current Rules and policies. Inform them they can keep up to date on rule changes and District meeting dates, and find bulletins and other helpful material in the Compliance Assistance section.
8. Discuss any new upcoming rules that may impact the source, and ask if there is any assistance the District can provide.