

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

MOBILE SOURCE OPERATIONS SECTION

OPERATIONAL ORDER	NUMBER 12	EFFECTIVE DATE March 17, 1997 Revised: July 24, 2000
SUBJECT REMOTE VISUAL OBSERVATION INSPECTION PROCEDURES	ORIGINATING UNIT MOBILE SOURCE OPERATIONS SECTION	

I. **GENERAL**

A. Remote visual observations will be performed on an as needed basis by a Vehicle Emissions Compliance Officer (VECO) or a covert officer. The need for these inspections shall be identified by the following criteria:

1. Citizen complaint
2. VECO or covert officer observations

Remote Observation Reports (ROR) may be completed in conjunction with a Special Inspection operation if the Covert Officer observes any activity that would otherwise be noted in the Special Inspection Report.

3. Inspection data reports (failure rates too low, improper data entry, etc.)
4. Annual remote visual observation inspection

It is the goal of the Mobile Source Operations Section (MSOS) to perform remote visual observations once per year per inspector at high volume emissions inspection stations (i.e., those performing more than 4,000 tests per year).

B. After identifying the station scheduled for observation, the observer should consult the station information folder to determine location, inspection bay designation, and other pertinent data for the observation.

C. Vehicles for remote visual observations will be obtained from the appropriate source. A covert vehicle is ideal due to the undercover status. A regular state vehicle is not the ideal source due to the easily recognized blue license plates, but may be used if it is the only available option.

D. The vehicle will be driven to a location in the area of emissions inspection station. A remote visual observation point shall be chosen, and any emissions inspection activity will be observed. As much detail as possible shall be noted regarding the description of the individual performing the inspection and the inspection process. The emissions inspector is required to perform the inspection in its entirety, and any assistance from other persons should be noted.

F. Upon arrival at a vantage point, the observer shall note the exact time the observation starts

- c. Model
 - d. Tag Number
3. Verification of Vehicle Identification Number (VIN) from Vehicle
- a. The inspector should examine the VIN directly from the vehicle.
 - b. The VIN has several locations on the vehicle, but if the emissions inspector uses the registration or any other document alone, this should be noted.
4. Preliminary Inspection (or "Pre-Inspection Safety Check")
- The inspector should check for the presence of a gas cap; exhaust leaks; fluid leaks; visible smoke; engine, brake or transmission mechanical problems or engine, radiator or transmission fluid leaks; overheated engine; and, for vehicles to be tested on the dynamometer (dyne), tire condition and a check of drive wheel tire pressure using a tire gauge.
5. Components (Not all vehicles will have all listed components; observation should be made of the inspector's movements and actions with respect to visual inspection in sufficient detail to facilitate an investigating officer's determination of whether the inspector has performed proper emissions inspection procedures.)
- a. Air Injection System - inspector should be checking for air pump, diverter valve, check or air aspiration valve, air manifold, air nozzle, manifold vacuum signal line, etc.
 - b. Exhaust Gas Recirculation System - inspector should be checking for exhaust gas recirculation valve, vacuum hoses, vacuum transducers, solenoids, etc.
 - c. Positive Crankcase Ventilation (PCV) system - inspector should be checking for valve, hoses, oil filler cap, dipstick.
 - d. The Catalytic Converter - the inspector should check the vehicle to ensure that the catalytic converter is present.
 - e. Evaporative System - inspector should be checking for evaporative canister, vacuum lines, purge valve(s), gas cap, etc.; depending on the vehicle, these may be located in several different areas including in the engine compartment, under the front fender, or under the rear fender.

6. Miscellaneous Procedures

- a. Additional required inspection procedures include: use of a cooling fan if bay temperatures exceed 72⁰F.; proper restraint of vehicles tested on a dyne; positive method of exhaust removal from the facility; accessories turned off; a check for visible smoke (any presence of visible smoke should be noted by the observing officer).
- b. A notation as to the test type selected by the inspector shall also be made.

7. Sketch of Observation Position

Before the remote visual observation is concluded, a rough sketch of the observation point should be made (if the remote visual observation is performed in conjunction with a special inspection, the sketch may be made after the special inspection has concluded and the observer has left the location). Included in the sketch should be roads, station office, service bays, analyzer location and other data that might be applicable.

8. The report may be completed manually, or prepared using word processing. The Remote Observation Report is in a word processing program on the network. The report should be filled out, using complete sentences for clarity. Times should be noted of pertinent observations.

III. INVESTIGATION OF ROR

A. Logging and Assignment

1. The covert officer shall forward the ROR to the Mobile Source Technical Officer (MSTO) for review.
2. After review, the MSTO shall log the following information in the manual log:
 - a. Log #
 - b. Date
 - c. Station Name
 - d. Station #
 - e. Observers Name

f. VECO Assigned

g. Due date

3. The MSTO will then forward the ROR to the VECO to proceed with the investigation.
 - a. The investigation of the ROR shall be assigned to the VECO in whose area the station is located.
 - b. In unusual circumstances, the Program Manager (PM) may designate another VECO to conduct the investigation.
4. VECOs shall complete ROR investigations within the assigned thirty (30) days, unless an extension is granted by the PM. Investigations are complete when the ROR has been finally approved by the PM. VECOs must therefore allow sufficient time for the review and approval process to be completed by the due date.

C. Recommendations

1. The VECO will investigate the ROR, carefully examine all the facts, and make a recommendation as follows:
 - a. No Violation Occurred

If the emissions inspection facility appears to have fulfilled its responsibility by performing an emissions inspection according to procedure, or a minor non-inspection error has been noted, the station may be recommended for "No Violation Occurred." The "Comments" section shall be completed to indicate this recommendation.
 - b. Violation Occurred

The "Comments" section will be completed to state the disposition of such an alleged violation, to include whether such matter was resolved with the issuance of a Notice of Violation (NOV).
 - c. Other
 - (1) This category shall be used for minor inspection procedural violations, non-inspection errors considered "not in compliance," or an irresolvable dispute of the facts which will not be resolved with the issuance of an NOV.

(2) Additional comments explaining this recommendation will be required. Such comments shall include whether additional training was provided, and note reference to specific rule(s), regulation(s), or Information Bulletin(s) as appropriate. All such information shall be entered in the "Comments" section.

2. Upon completion of the investigation, the VECO shall complete the "Recommendation" and "Comments" sections.

The "Comments" section shall include the report numbers of vehicle emissions inspections that were reviewed at the station.

IV. APPROVAL PROCESS

- A. The completed ROR with the VECO's comments and recommendations shall be forwarded to the PM for review and approval.
- B. If the PM does not concur with the VECO's recommendations, the matter will be discussed with the VECO in order to reach a resolution. Once the matter has been resolved and the VECO has made appropriate changes (edits) to the ROR and/or taken other necessary action, the report will be resubmitted to the PM for additional review and concurrence.
- C. If the PM concurs with the recommendations, such concurrence will be noted by the PM's signature & date. This action constitutes final approval of the ROR.
- D. The VECO will then take appropriate action as approved.
- E. The ROR will then be forwarded to the MSTO for appropriate logging & filing.
- F. The PM or Regional Compliance Manager may perform the review and approval functions in either person's absence.

LIST OF ATTACHMENTS

OPERATIONAL ORDER #12

Special "Remote Observation" Procedures

ATTACHMENTS:

Attachment 1 Remote Observation Report (ROR)
Attachment 2 Reverse of ROR
Attachment 3 ROR Log Page

