

COMMONWEALTH OF VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

FINAL APPROVAL OF September 14, 2001 REVISION

FIELD OPERATIONS MANUAL FOR AIR INSPECTORS  
Air Standard Operating Procedures (ASOPs)

ASOP-2: INSPECTIONS

Per Collaboration Process Development Memo Dated July 20, 2000

- Revision coordinated by Manager, Office of Air Compliance Coordination
- Reviewed by regional Air Compliance Managers and designees
- Presented to Senior Management Team for review and comment
- Finalized by Manager, Office of Air Compliance Coordination



09/18/2001

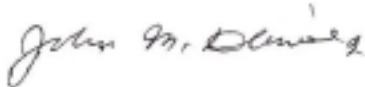
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Alice G. Nelson

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Date

- Approved by Division Director of Air Programs



09/18/2001

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John M. Daniel, Jr.

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Date

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DEPARTMENT OF ENVIRONMENTAL QUALITY

**FIELD OPERATIONS MANUAL FOR AIR INSPECTORS**  
**Air Standard Operating Procedures (ASOPs)**

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ASOP - 2  
INSPECTIONS

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## I. PURPOSE

A major responsibility of stationary source air inspectors within DEQ is to determine the compliance status of sources in relation to the Air Pollution Control Law, the SAPCB Regulations for the Control and Abatement of Air Pollution (the Regulations), air permit requirements, and Consent Order conditions. The air inspection program is designed to ensure that potential or current noncompliance situations are discovered and resolved in a timely manner. Information obtained from the stationary source inspection program is recorded and tracked in DEQ's Comprehensive Environmental Data System (CEDS), including inspection activities, emissions inventory, and enforcement.

## II. DEFINITIONS

For purposes of this guidance and any related use, the following words or terms have the meaning stated:

- **CFR** - mean the federal Code of Federal Regulations.
- **CMS**- refers to EPA's Compliance Monitoring Strategy for targeting inspections and establishing the federal §105 grant commitment between DEQ and EPA. This ASOP is based on April 25, 2001, version of the EPA CMS Policy.
- **FCE** - "Full Compliance Evaluation". A Full Compliance Evaluation (FCE) is a comprehensive evaluation of the compliance status of a facility. It addresses all known regulated pollutants at all identified emission units.
- **INSPECTOR**- Any DEQ employee designated as having the authority to conduct official compliance evaluations (aka. inspections).
- **MACT**- "Maximum Achievable Control Technology" (40 CFR 63), adopted by reference in the state Regulations
- **MAJOR SOURCE** - means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and under control of the same person (or persons under common control)) belonging to a single major industrial grouping. A stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group(i.e., all have the same two digit code) as described in the Standard Industrial Classification Manual, 1987.

A major source as defined in §112 of the CAAA, emits or has the potential to emit, an aggregate 10 tons per year or more of any hazardous air pollutant or

25 tons per year or more of any combination of hazardous pollutants (40 CFR 63.2).

A major stationary source as defined in part D of the CAAA (Nonattainment Provisions) of Title I as follows:

Marginal Ozone areas	100 TPY (VOC/NO <sub>x</sub> )
Moderate Ozone areas	100 TPY (VOC/NO <sub>x</sub> )
Serious Ozone and Ozone Transport areas	50 TPY (VOC/NO <sub>x</sub> )
Severe Ozone areas	25 TPY (VOC/NO <sub>x</sub> )
Extreme Ozone areas	10 TPY (VOC/NO <sub>x</sub> )

In CEDS, major sources (also referred to as Title V facilities) are designated by Pollutant Classification code "A" and CMS Classification code "A".

- **MEGA-SITE-** When identifying mega-sites according to EPA's CMS Policy (dated April 2001), DEQ should consider the following factors: the number and types of emission units; the volume and character of pollutants emitted; the number and types of control and monitoring systems; the number of applicable regulatory requirements; the availability of monitoring data; the degree of difficulty in determining compliance at individual units and at the entire facility; and the footprint of the facility. If, because of the above factors, DEQ believes that the facility cannot be fully inspected for all applicable requirements within one fiscal year, the facility should be considered a mega-site. Examples of industries that may have qualifying facilities are petroleum refining, kraft pulp mills, shipyards, chemical manufacturing, and pharmaceutical production. In CEDS, the CMS Classification code for Mega-sites is "M".
- **MINOR SOURCE OR TRUE MINOR SOURCE** - Actual and potential emissions below all applicable major source thresholds. In CEDS, the Pollutant Classification code for a minor source is "B".
- **NESHAP-** "National Emission Standards for Hazardous Air Pollutants" (40 CFR 61), adopted by reference in the state Regulations.
- **NSPS-** "New Source Performance Standards" (40 CFR 60), adopted by reference in the state Regulations.
- **PCE** - "Partial Compliance Evaluation". A Partial Compliance Evaluation (PCE) is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility.

- **POTENTIAL TO EMIT (PTE)**<sup>1</sup> - means the maximum capacity of a stationary source to emit any air pollutant under its physical or operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is state and federally enforceable.
- **SAPCB REGULATIONS** - means the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.
- **STATIONARY SOURCE**- Any building, structure, facility or installation which emits or may emit any air pollutant. A stationary source shall include all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same "Major Group" (i.e. which have the same two-digit code) as described in the Standard Industrial Classification Manual.
- **SYNTHETIC MINOR SOURCE**<sup>2</sup> - Potential emissions fall below all applicable major source thresholds if and only if the source complies with Federally enforceable regulations or limitations. In CEDS, the Pollutant Classification code used for synthetic minor sources is "SM". The CMS Classification code used for synthetic minor sources emitting or having the potential to emit at or above 80% of the major source threshold for any pollutant(s) is designated as "S".

### III. STATIONARY SOURCE INSPECTIONS

#### A. INTRODUCTION

To ensure that the regulated community is complying with applicable state and federal air regulations, the inspector must be familiar with the SAPCB Regulations, be able to determine which rules are applicable to which sources, and be able to apply that knowledge by evaluating compliance with that rule. Likewise, if a source has an air permit, the inspector must evaluate the source for compliance with each condition. Inspectors must also be familiar with the data elements and requirements of CEDS. Inspection activities are documented in and generated from CEDS. After

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<sup>1</sup>As defined in 9 VAC 5-10-20 of the SAPCB Regulations.

<sup>2</sup> As defined in 9 VAC 5-10-20 of the SAPCB Regulations.

the supervisor has signed an inspection report, a copy of that report is sent to the facility with a cover letter (see Exhibit 2-A).

DEQ conducts inspections of various types for various purposes-- to meet federal grant commitments, to assist sources in understanding and complying with air regulations, to find and resolve noncompliance, to investigate complaints, to evaluate source reports, to check on equipment and construction status, and to determine permit applicability. Inspections can be short and focused on a single purpose or emission unit, or they can be comprehensive for the entire facility. Inspection types are categorized below. The inspection types, previously referred to as levels 0 through 4, have been redefined in the EPA Compliance Monitoring Strategy (CMS) Policy, effective April 25, 2001 (see Paragraph C below).

Inspectors may also discover air pollution problems or issues while in the field. Field surveillance provides for the systematic observation of stationary sources. Observations are made of industrial areas and the exteriors of facilities for visible emissions, odors, contaminant damage, new facility construction and/or expansion, and other evidence of potential air pollution. The goal of surveillance is to observe sources during field activities and to identify facilities that need to be registered or permitted. To conserve agency resources, inspectors are encouraged to coordinate surveillance activities with other routine duties (i.e., plant visits, inspections, complaint investigations, etc.). Inspectors should document surveillance activities in a field logbook, summarizing significant observations, noting dates and times. Activities that result in compliance determinations should be documented in an inspection report.

## **B. PROCEDURES**

### **1. Preparing for the Inspection**

Before visiting a facility or reviewing a source report, inspectors first conduct a review of all relevant information in the source files (including electronic data in CEDS). Inspectors educate themselves about the facility and its history in order to be fully prepared for the inspection. Data to be reviewed includes:

- a. Permits issued
- b. Compliance/enforcement history
- c. Details about the process
- d. Information about equipment
- e. Control strategies
- f. Applicable regulations
- g. Emissions data
- h. Facility contacts

- i. Production rates
- j. Correspondence on outstanding issues
- k. Applicability determinations
- l. Agency decisions/interpretations
- m. Outstanding events, enforcement, or permit applications

2. **Notifying Source of Inspection**

As a general rule, most inspections should be conducted unannounced. Inspectors want to observe the facility in its normal mode of operation in order to evaluate ongoing compliance. However, some facilities operate sporadically and the site visit will need to be scheduled in advance. In addition, some inspections require that particular plant personnel be present during a visit, which necessitates advance notice and coordination. No more than a few days notice should be given prior to an announced inspection, but exceptions can be made on a case-by-case basis.

3. **Presenting Credentials**

Upon arrival at a site, inspectors should be prepared to present credentials. For this purpose, inspectors are provided with DEQ identification (ID) cards and standard business cards. Inspectors should clearly and professionally state who they are and the purpose of their inspection. Identification should be presented voluntarily at this time, or be readily available if requested by plant personnel.

4. **Signing Liability Waivers<sup>3</sup>**

At a facility, inspectors should not sign any agreement (or badge on which such an agreement is contained) waiving liability in the event that the employee is injured while on site. Signing such an agreement would hold the company harmless if an injury occurs on site. Nor is the agreement binding to the State even if the injury occurs while on official state business.

If a company insists that an inspector sign a liability waiver in order to access the facility, the inspector should leave the site and

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<sup>3</sup> Memorandum from Dennis H. Treacy, Assistant Attorney General, to Richard N. Burton, Executive Director, State Water Control Board, re: Waiver of Liability Badges for Inspectors Visiting Facilities, dated February 18, 1992.

promptly inform his or her supervisor. An inspection warrant may be necessary in order to conduct the inspection.

#### 5. **Signing Confidentiality Agreements<sup>4</sup>**

While at a facility, DEQ employees should not sign any agreement to keep information confidential. Such an agreement subjects the inspector to unnecessary personal liability because it is binding only to the individual, not to DEQ, the Commonwealth, the Board, or the employee in his official capacity.

DEQ employees cannot agree to keep information confidential that must be made available under the Freedom of Information Act. Likewise, DEQ employees cannot release information that is protected under Section 10.1-1314 of the Virginia Air Pollution Control Law and under 9 VAC 5-170-60 of the SAPCB Regulations. Therefore signing a confidentiality waiver does not protect the facility any more than the law and regulations already provide them.

If the company refuses to grant the inspector access to the facility without a signed confidentiality agreement, the inspector should leave the site and promptly inform his or her supervisor. An inspection warrant may be necessary in order to conduct the inspection.

#### 6. **Using a Field Logbook**

Field logbooks (or equivalent as directed by supervisor) are used by inspectors to record pertinent information as they go about their daily activities. They are not intended to be detailed journals of hourly activities; rather, they serve as tools for remembering the substance of daily interactions for future reference. For example, logbooks can be used to record field notes during an inspection, or to jot down key points about an enforcement case discussed during a phone conversation. A list of action items agreed upon during a meeting can be noted in the logbook and referred to later when writing a follow up letter to the facility.

Logbook entries should be a source of information not recorded elsewhere, such as in an inspection report or an applicable requirement checklist. They are used to record observations during field surveillance or follow-up conversations, especially when that information is not reported officially.

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<sup>4</sup> Memorandum from Deborah Love Field, Assistant Attorney General, to Wallace N. Davis, Assistant Executive Director, re: Confidentiality Agreements, dated September 1, 1988.



Information documented in field logbooks could potentially be used as evidence in enforcement cases or other litigation. Therefore, in order to be defensible, the logbooks should be bound with sequential pre-numbered pages, and the writing should be done in water-resistant, permanent ink.

There are no standard requirements for logbook entries, but an inspector should include the following information, as appropriate for the event\*:

- a. Any information relative to the site or event
- b. Site location and/or registration number
- c. Site entry procedures, events, and contacts (especially if there were problems)
- d. The names of site contacts, their titles and phone numbers
- e. Times of specific events
- f. Deviations from any established protocol or procedure
- g. Interview, phone call, or meeting notes
- h. Discussion of unusual conditions
- i. Sampling information
- j. Photograph/video log
- k. Items or material taken or given

## 7. **Understanding Right of Entry**

~~9 VAC 5-20-100~~ 9-VAC 5-170-130 states that "(w)henever it is necessary for the purposes of these regulations, the board may at reasonable times enter any establishment or upon any property, public or private, for the purpose of obtaining information or conducting surveys or investigation as authorized by Section 10.1-1315 of the Virginia Air Pollution Control Law."

The facility shall allow authorized DEQ representatives, upon the presentation of credentials:

- a. To enter upon the premises on which the facility is located or in which any records are required to be kept under the terms and conditions of a permit or the SAPCB Regulations;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of a permit or the SAPCB Regulations;

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\* Conducting Environmental Compliance Inspections, Inspector's Field Manual, Eighth Edition, EPA Office of Environmental Assessment Investigations and Engineering Unit, November 1997, #EPA 910/9-91-047, p. 6.

- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of a permit or the SAPCB Regulations; and
- d. To sample or test at reasonable times.

The time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation, or during an emergency.

## **8. Obtaining Inspection Warrants<sup>5</sup>**

If entry is denied, or the inspection is refused, prohibited, or otherwise interfered with, the Director has the authority to seek from a judge or magistrate having jurisdiction a warrant compelling such entry or inspection. The inspector should contact their supervisor as soon as possible to report the problem of access and to determine if an inspection warrant is appropriate.

## **9. Conducting Entry and Exit Interviews**

An entry interview is simply a brief discussion with the facility personnel upon arrival at the site. The inspector explains the purpose of the visit, inspection procedures, areas of the facility to be covered during the inspection, records he or she wants to review, etc. Facility personnel use this opportunity to discuss plant safety procedures, required safety equipment to be worn in the plant, and other matters in preparation for the inspection. Obtaining business calling cards from each of the facility representatives will enable the inspector to keep contact information up to date and accurate.

Often it is difficult to hear conversation and ask questions while in the field around loud equipment, therefore the inspector may want to discuss issues and ask as many questions as possible during the entry interview first. Thorough file review and preparation for the inspection will enable the inspector to focus more effectively during the entry interview.

The exit interview is a debriefing with facility personnel after the field inspection. The inspector will request additional data if compliance is uncertain, discuss field observations, and explain any findings of noncompliance. During the exit interview, the

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<sup>5</sup> Section 10.1-1307.3, paragraph 4b, of the Virginia Air Pollution Control Law.

inspector should inform the facility representatives of DEQ procedures for finalizing the inspection and providing the company with a copy of the inspection report. If any enforcement is to follow, the inspector should explain the process and what they can expect to happen next. The inspector should verify who the appropriate facility representative is for compliance and enforcement matters.

The exit interview is also a good opportunity to discuss any opportunities the inspector may have noticed for pollution prevention or emissions reductions at the plant. Referral information can be provided to the facility for additional DEQ assistance: compliance assistance, pollution prevention, small business assistance, special loans and project funds, etc.

#### **10. Collecting Field Evidence**

The inspector may want to obtain field evidence, such as samples and photographs, while on site. Evidence should be thoroughly documented and tracked according to agency "Chain of Custody" procedures. Specific details about field conditions (temperature, operating rate, etc) at the time the evidence was taken should be recorded in the inspector's logbook or equivalent. Evidence should be properly sealed and labeled and filed in order to preserve the integrity of the item.

#### **11. Safety**

Inspectors must abide by Department and regional safety policies at all times in the performance of their duties. Unsafe situations should be reported to the inspector supervisor as appropriate. If the inspector is unable to make a compliance determination because of unsafe conditions or facility policy, document the circumstances and inform the supervisor. Staff should never place themselves in danger. Field inspections should only be undertaken when it is safe to do so.

### **C. INSPECTION TYPES**

#### **1. Partial Compliance Evaluation**

A Partial Compliance Evaluation (PCE) is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. PCEs can be combined over the course of a year (or up

to three years at mega-sites) to satisfy the requirements of a Full Compliance Evaluation (FCE).

PCEs can be conducted on or off-site, and result in a compliance determination for the particular aspect of the facility that was evaluated. For example, an inspector may conduct an initial site visit to evaluate the boilers. He or she may return another day to inspect the printing operation. Another day the inspector may evaluate a source report while in the office. Each time the inspector evaluates a portion of the facility, an additional PCE is recorded in CEDS.

In CEDS, the "Inspection Type" selections differentiate between on and off-site evaluations. It is important to track site visits in order to ensure that an adequate field presence is maintained and that minimal EPA grant requirements are met.

## **2. Full Compliance Evaluation**

A Full Compliance Evaluation (FCE) is a comprehensive evaluation of the compliance status of a facility. It addresses all known regulated pollutants at all identified emission units.

A Full Compliance Evaluation should include the following:

- a. A review of all required reports received during the fiscal year, and to the extent necessary, the underlying records. This includes all monitored data reported to the regulatory agency (e.g., CEM and continuous parameter monitoring reports, malfunction reports, excess emission reports). It also includes a review of Title V certifications, semi-annual monitoring and periodic monitoring reports, and any other reports required by permit.
- b. An assessment of control device and process operating conditions as appropriate. An on-site visit to make this assessment may not be necessary based upon factors such as the availability of continuous emission and periodic monitoring data, compliance certifications, and deviation reports. Examples of source categories that may not require an on-site visit to assess compliance include, but are not limited to, gas-fired compressor stations, boilers in large office and apartment

buildings, peaking stations, and gas turbines.

- c. A visible emission observation as needed to verify compliance.
- d. A review of facility records and operating logs.
- e. An assessment of process parameters such as feed rates, raw material compositions, and process rates.
- f. An assessment of control equipment performance parameters (e.g., water flow rates, pressure drop, temperature, and electrostatic precipitator power levels).
- g. Major emission units should be observed while in operation, unless other adequate means of determining compliance are specified

A Full Compliance Evaluation must be completed within the fiscal year in which the CMS commitment is made, except in the case of extremely large, complex facilities (mega-sites). Regulatory agencies may take up to three years to complete a Full Compliance Evaluation at a mega-site, provided the agency is conducting frequent on-site visits or Partial Compliance Evaluations throughout the entire evaluation period.

A Full Compliance Evaluation may be done in stages through a series of Partial Compliance Evaluations. A Full Compliance Evaluation is completed once all applicable requirements have been evaluated and results are documented in CEDS.

### **3. Investigation**

An Investigation is a more in-depth assessment that involves significant research and evaluation. An Investigation can sometimes take months or years to complete. This inspection type is usually reserved for sector or enforcement initiatives. This type should not be selected in CEDS unless directed by supervisor.

### **4. Other**

An "Other" inspection type is reserved for those inspection activities that DEQ wants to keep state-private. They will not be uploaded into AIRS/AFS, but are for internal DEQ tracking purposes only. This inspection type should not be selected in CEDS unless directed by supervisor.

## **D. INSPECTION FREQUENCY AND TARGETING**

### **1. CEDS Inspection Plan**

The CEDS Inspection Planning module is used by DEQ to prioritize stationary sources and determine inspection frequency. Using a number of variables and data input for each source, CEDS ranks the facilities by priority. Then, given the number of hours inspectors have available to perform inspections, divided by the amount of time it takes for each inspection, CEDS divides the facilities on the ranked list into two categories, facilities included in the inspection plan and facilities not included in the plan. Facilities included in the plan are scheduled for inspection during the fiscal year. The CEDS inspection plans for each fiscal year become part of DEQ's grant commitment with EPA. The inspection plans designate which facilities, and how many, at a minimum, will be inspected during each fiscal year (October 1 through September 30).

### **2. Federal CMS Policy**

In the federal CMS Policy, which addresses only major sources, and a limited subset of synthetic minors, EPA recommends the following minimum frequencies:

- A Full Compliance Evaluation should be conducted, at a minimum, once every two years at all Title V major sources except those classified as mega-sites. For mega-sites, a Full Compliance Evaluation should be conducted, at a minimum, once every three years.
- A Full Compliance Evaluation should be conducted, at a minimum, once every five years at synthetic minor sources that emit or have the potential to emit at or above 80 per cent of the Title V major source threshold.
- An on-site visit should be conducted, at a minimum, once every five years at all Title V major sources to ensure a compliance presence in the field, verify record reviews, observe modifications or new construction, and identify any major permit deviations.
- In those years when a Full Compliance Evaluation is not conducted, DEQ should continue to review annual compliance certifications, and the underlying reports supporting those

certifications (e.g., semi-annual and periodic monitoring reports, continuous emission and continuous parametric monitoring reports, and malfunction and excess emission reports)

- Sources may be inspected more frequently than scheduled if noncompliance or other issues arise that require DEQ's presence at a facility.

### **3. State Inspection Obligations**

Virginia is required to conduct other inspections that may or may not be addressed in the 105 Grant with EPA, but are legal obligations nonetheless. For example, Virginia is obligated to comply with inspection commitments set forth in its State Implementation Plan (SIP), such as determining compliance with Existing Source Rules in the SAPCB Regulations. Another example is the Stage II program in the non-attainment areas of Northern Virginia and Richmond. Stage II inspections are not addressed in the 105 Grant; however, Virginia's plan for these areas to return to compliance with the National Ambient Air Quality Standard (NAAQS) for ozone specifies that inspections will be conducted at least once every year at all gasoline stations requiring Stage II vapor recovery systems. In its attainment plan, Virginia takes credit for a certain amount of reductions in volatile organic compound emissions from these vapor recovery systems, but only if our inspection program is carried out effectively.

## **E. THE CEDS INSPECTION REPORT**

### **1. “Applicable Requirements (A/R)” Screen**

Permit conditions and other regulatory requirements that the facility is subject to are listed condition by condition in the “Applicable Requirements (A/R)” screen in the CEDS database.

#### **a. “Other Requirements” Button**

The inspector (or designee) enters each requirement from a permit issued prior to CEDS, or from any other regulatory or enforcement order requirement, into the “Other Requirements” portion of the A/R screen. Data entry into this portion of CEDS is labor intensive, especially when the facility has multiple existing (pre-CEDS) permits, or is subject to a complicated MACT standard. Use of blocking

and copying narrative from a WORD document into CEDS can save time for this task.

Each A/R entry should contain a permit date and condition number (if from a permit), or the regulatory or enforcement order citation as the “Basis” of the A/R, and a narrative description of the requirement. The narrative description should cite the process or equipment to which the requirement applies, and any operational or emissions limitations specified.

The inspector should focus on entering only those requirements that are “enforceable”, i.e. *those for which compliance can be determined*. If the upcoming inspection will only cover a portion of the facility, such as the boilers, only those A/Rs regarding the boilers should be checked off in the “Checklist Selection” box for that particular inspection.

Checklist items can be selected and de-selected from the universe of A/Rs, which is saved and stored in this screen, in order to tailor inspection checklists prior to each inspection.

**b. “Permit Conditions” Button**

A check appearing in the checkbox under the “Permit Conditions” button on the A/R screen indicates that a permit has been generated in CEDS. These permit conditions can be viewed by clicking the “Permit Conditions” button. The inspector can scroll through the conditions one by one, selecting those enforceable conditions that he or she wants to verify during the inspection. The benefit of this part of CEDS is that the inspector does not have to retype permit narratives, as with pre-CEDS permits. If the inspector wants to summarize or reword a permit condition, the inspector types alternate wording in the “Compliance Narrative”, which will overwrite the permit narrative on the inspector's checklist.

**c. “Inspection Checklist Report” Button**

The listing of applicable requirements selected from the “Other Requirements” portion of the A/R screen, as well as those selected from the “Permit Conditions” portion of the



A/R screen, form the basis of an inspection checklist that can be printed off and used by the inspector in the field.

## **2. "Air Inspection" Screen**

### **a. "General Inspection" Screen**

The first page of the inspection report is generated from data that the inspector enters in this screen. The cyan (blue) fields are mandatory for the record to be saved; however, all applicable fields should be completed before generating the report.

In the Comment field, the inspector should note which equipment or processes were in operation during the inspection, and their operating rates. The inspector should explain how he or she came to a determination of compliance or noncompliance at the facility and why. The inspector should also record relevant comments made by plant personnel concerning facility operations, plans, or schedules. Any significant issues discussed during the inspection, such as permitting issues or potential compliance problems, should be noted for future reference. The inspection comments typed into CEDS should be grammatically correct and professional.

The inspector should avoid making sweeping, general statements such as "source is well run" or "everything looks good". Comments should be specific and factual, based on what was observed during the inspection. The inspector should not make premature determinations if further evaluation is necessary. State what follow up action will be taken to verify compliance.

The Comments field can support up to 4000 characters. Actual technical findings, such as parameter readings, should be documented in the "Observations" portion of the checklist and not be duplicated in the Comments section.

### **b. "Checklist Observations" Screen**

The inspector documents his or her observations and indicates the compliance status for each applicable requirement evaluated during the inspection. Each "Observations" field can support up to 2000 characters, but should be brief and factual, including actual readings or values obtained during the site visit.

**c. "Inspection Report" Button**

When data entry is complete, the inspector clicks on the "Inspection Report" button. The report can be viewed on screen prior to printing. The inspector signs and dates the printed report, and submits the original to his or her supervisor. A copy of the inspection report is sent to the source after being reviewed and signed by the inspector's supervisor. A cover letter is included with the report (Exhibit 2-A).

Exhibit 2-A  
Inspection Cover Letter Template

Date

Name  
Source  
Address

Dear [name]:

Enclosed is a copy of the report generated as a result of an inspection conducted by the Department of Environmental Quality on [date].

The inspection report is based on observations made during the inspection and information reviewed in support of report generation. The existence of an inspection report indicating compliance with the applicable requirements listed in the report is not verification that your operation is in compliance with all applicable provisions of the Regulations for the Control and Abatement of Air Pollution. Regional staff evaluate all sources for compliance with the regulations on a continuous basis.

Please contact inspector/supervisor [optional] at [phone number] should you have any questions regarding the content of this report.

Sincerely,

Name  
Air Compliance Manager