



SANTA BARBARA COUNTY  
AIR POLLUTION CONTROL DISTRICT  
POLICIES AND PROCEDURES

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This policy and procedure provides guidance to field staff for conducting source inspections. The purpose of conducting facility inspections is to determine compliance with District rules, regulations, and permit conditions. There are five principles of an inspection to follow:

1. Every source is unique. Consequently, staff should approach each source with the intent to conduct a unique and comprehensive review, inspection and analysis.
2. There are many sources of information at each inspection, and staff should develop a systematic approach for collecting the necessary information.
3. Prepare for the inspection by reviewing the file. Knowing the facility enables staff to obtain important information.
4. Know which rules apply to a specific source.
5. Concentrate the inspection on emission sources, rather than on production processes.

All inspections should be conducted with a representative of the source present at all times. Attention should be focused on phenomena and processes which will indicate the compliance status of the facility. If staff is familiar with the facility there is no need to spend a great deal of time inspecting the process. Staff should walk through the process to verify that there have not been any changes and collect data needed to verify permitted operational conditions. Most of the inspection should take place at or near the emission point(s) and/or at any air pollution control equipment.

If staff is not familiar with the process of the facility, they should request a tour and explanation of the process from beginning to end. The purpose of such a detailed tour is to provide staff with an understanding of all the processes which have the potential to produce air pollution and to identify each potential emission point.

Staff should document inspection observations by taking careful notes, completing inspection checklist forms, obtaining hard copy operational records, taking samples and taking photos.

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Policies and Procedures Memoranda are intended to provide agency staff, applicants and the public guidance relative to standardized District procedures. These policies and procedures shall not be interpreted in conflict with District Rules and Regulations or administrative policies, and may be modified or updated periodically without advance notice.

All inspections should contain the following elements:

1. Prior to the inspection, research the facility file to familiarize yourself with the process, emissions, applicable rules, permit conditions and compliance history of the source.
2. Prepare an inspection checklist in a manner consistent with the Compliance Policy & Procedure 3100.009 *Inspection Checklists*, or obtain an approved source or process-specific inspection checklist.
3. Upon arrival at the facility, contact a responsible person to explain your purpose, explain what it is you want to inspect, and obtain legal access to the facility.
4. Conduct the inspection.
5. Obtain as much relevant information about the equipment and its operation as you can, documenting equipment which may produce air pollutant emissions. Exempt equipment should also be documented.
6. Obtain appropriate samples, as necessary.
7. Take careful and complete notes on what you observe and on responses by the contact person to your questions.
8. Document the inspection with photographs.
9. Document the visible emission evaluation, as necessary.
10. Obtain records of operating data which would indicate compliance status.
11. Determine the compliance status of the facility.
12. Document violations by issuing Notice of Violations.
13. Document the inspection in an inspection report written as stipulated in the Compliance Policy & Procedure 3100.I.F *Inspection Reports*.
14. If staff is unable to obtain sufficient information to determine the compliance status at the time of the inspection then a Request for Information (California Health and Safety Code Section 42303) letter should be issued in accordance with the Compliance Policy & Procedure 3100.I.C *Using the Request for Information*.