



SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES

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Topic:	<u>Inspection Notes</u>		
Distribution:	<u>Compliance Division Staff</u>		

This policy and procedure provides guidance to field staff on the recording of notes regarding observations, events, actions, and conversations.

Inspection notes are a very important tool for keeping the sequence of events of an inspection clear, especially in lengthy investigations lasting several days or weeks. Furthermore, these may be essential in recalling the facts of the inspection months or years later if a case goes to court. Inspection notes are not equivalent to an inspection report. They are, however, one of the tools to be used by the inspector to document the inspection. The inspection report will be prepared from notes and inspection checklists consistent with Compliance Policy and Procedure 3100.009 *Inspection Checklists*.

In addition to documenting inspection-related activities, notes may be recorded for telephone conversations or other events and actions that may be relevant to the compliance status of any source (e.g., verbal notification of SCDP inspection request).

All field staff should record notes regarding observations, events, actions, and conversations: 1) while conducting an inspection; 2) during pre and/or post inspection activities; and 3) which occur during the course of daily work activities that are or may be relevant to the compliance of any source with District rules and regulations. All notes should contain a corresponding date of recording.

Notes should be recorded following the basic protocol of reporting events (i.e., record information which answers the questions: who, where, what, why, and when). Notes should record all information necessary to prepare a report in a manner consistent with Compliance Policy and Procedure 3100.I.F *Inspection Reports*.

EXAMPLE:

1. Who owns the source (e.g., responsible person, address, phone number)?
2. Where is the source/violation located?
3. What occurred and was observed during the inspection?

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.

4. Why was the inspection conducted (e.g. complaint, routine)?
5. When was the inspection conducted/violation observed?

All recorded notes should report only the facts within the realm of personal knowledge. If information is obtained from a document or conversation and not confirmed by personal observation, (e.g., verbal breakdown report or reported violation that lasted only a short period of time precluding personal observation) the information is considered hearsay and District staff may not testify to its validity in the courtroom. Where information is recorded that is not documented by personal observation, the source of the information should be identified, maintaining the distinction between hearsay and personal knowledge and therefore reducing the possibility of misinterpreting the information at a later date.

Inspection notes should be accurate. All information which is based on estimates (e.g., emission estimates) or which contain a degree of uncertainty should be stated as such. Notes should be as detailed as possible. For example, if a reading from a pump is written down, also note the identification of the pump, location, color, manufacturer, and year if possible.

Finally, in some cases the District staff will have to make logical deductions in order to make a compliance determination. The deductive process should be recorded.

EXAMPLE: If the maximum permitted usage rate is 20 gal/year, the amount on hand at the beginning of the year was 2 gallons, the amount purchased during the year was 10 gallons, the amount on hand at the end of the year was 1 gallon, then the source was in compliance with the usage rate condition.