

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Inspection Reports

Distribution: All Policy Holders

This policy and procedure document provides guidance to inspectors in the preparation of inspection reports. Written inspection reports are used to document all inspections conducted by District staff. The report must be complete and comprehensive but should also be concise, covering all of the essential elements of an inspection and avoiding inappropriate digressions and unrelated information. The report should paraphrase important aspects of any field interview, all information gathered and observations made and any enforcement action taken. The report is a statement of fact and should not contain subjective conjecture or conclusions which cannot be supported by facts contained within the report and supporting material. The inspection report not only documents the compliance status of the source but may also be used as evidence in a legal proceeding, as well as being used to refresh the inspector's memory prior to testimony. The inspection report also serves as a technical reference so that other District staff can become familiar with the source.

REPORT INFORMATION

Report Form (APCD-9):

The Report Form is used to record generic information which is in the same format for all sources. This information includes:

1. Date of inspection
2. Person contacted at the inspection
3. Reason for the inspection
4. Location of the source
5. Mailing address of the source
6. Equipment or operation inspected
7. Compliance status of source
8. Enforcement action taken
9. Name of inspector

Description of events and findings:

The written description of events and findings is the body of the report and contains the information necessary for determining the compliance status of the source. This description should briefly summarize the following information:

1. Pre-inspection field interview

2. Description of process or reference to a complete, current and accurate description which exists in the file. Include drawings and maps to illustrate the location and process flow of the source.
3. Description of emission points or reference to a complete, current and accurate description which exists in the file
4. Description of equipment and processes inspected
5. Inspection observations
6. Operational parameters observed
7. Responses of contact person to questions which relate to compliance status
8. Reference to all applicable Rules and Permit Conditions and evaluation of compliance status with regard to each applicable Rule and/or Permit Condition
9. Reference to all operational data, information, evidence, samples, photographs and emission data gathered

SUPPLEMENTAL INFORMATION

Inspection Checklist:

The inspection checklist is a source or source category specific form which lists the equipment and operations to be inspected and provides a checklist of compliance parameters and spaces for data and information. The inspector uses the inspection checklist as a guide to ensure that all of the essential elements of compliance status are observed and verified. Each inspection checklist is unique and designed to serve a specific permit. However, parts of some checklists will be generic to certain types of equipment, i.e. boilers, paint spray booths, vapor degreasers, sandblasting pots, etc. The inspection checklist should be attached to the report as supplemental information. The data on the checklist should be summarized in the description of events and findings in the body of the report. Unless a category specific inspection checklist exists which is appropriate for the source to be inspected, an inspector should prepare an inspection checklist for each inspection as part of the pre-inspection file review in accordance with the Inspection Checklist policy and procedure document (I.D.5).

Photographs:

Photographic evidence is an important documentation of events, conditions and equipment. Photographs help to support the written description and provide District engineers and other inspectors with clear pictures of permitted equipment. Photographs may also be used as evidence in legal proceedings. The following procedures should be used when taking photographs during an inspection:

1. If you are on private property always ask permission prior to taking any photographs.
2. Log the date, time, subject and geographical orientation of each photograph.
3. Label each photograph with the date, time, location, name of source and name of equipment depicted in the photograph.
4. With adhesive tape or glue affix photographs to a sheet of blank paper and attach to the inspection report.

Visible Emission Evaluation:

The Visible Emission Evaluation is the documentation of an inspector's observations of visible emissions. This document is the legal evidence of an official observation by a Certified Visible Emission Evaluator. The form should be comprehensive and accurate and be recorded with neat, legible writing and graphics (see Visible Emission Evaluation Procedure, I.D.1). The Visible Emission Evaluation should be attached to the inspection report. Visible Emission Evaluations should be conducted on all sources of actual or potential visible emissions.

Samples:

Sample acquisition should be recorded in the body of the report and the sample identification number should be referenced. After the analysis of the sample has been completed, a copy of the analysis results should be attached to the report. Refer to the Chain of Custody procedures (III.B) for proper handling and documentation of samples and evidence.

SUBMITTAL OF INSPECTION REPORTS FOR REVIEW

Upon completion of the report, the inspector will submit it to the Inspector Supervisor for review. Additionally, all copies of inspection reports which document inspections of offset sources will be submitted to the Supervising Engineer of the Permit Compliance Section. Reports will be submitted for review in accordance with the following schedule:

Inspector submits draft of report to typing within TWO working days of completion of the inspection.

Clerk returns typed draft of inspection report to inspector within THREE working days of submittal to typing.

Alternatively, inspector uses computer word processor to produce typed draft of inspection report within FOUR working days of completion of inspection.

Inspector submits typed draft inspection report for supervisor review within FIVE working days of completion of inspection.

Supervisor reviews report and either approves it for file, or returns report to inspector for correction or rewrite within THREE working days of submittal of report for review.

Inspector rewrites or corrects report and submits to supervisor for review within TWO working days of return for revision.

Supervisor approves rewritten report for file within THREE working days of re-submittal.

Inspection reports which document violations will be submitted for review on a schedule in accordance with the Notice of Violation policy and procedure document (VII.A).

During the review process the inspection report will be routed under the cover of a review tracking sheet.