

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

Policy No. VIII.E
Supersedes Date 08-16-90
Date April 6, 1990

Draft _____
Final X
Pages 2

Topic: Field Recommendation For Permit Condition Revision

Distribution: All Policy Holders

This policy and procedure document provides guidance to inspectors on the proper procedure to follow in making recommendations for revision of permit conditions. It is the policy of the Regulatory Compliance Division that all permit conditions be enforceable. If during the course of conducting an inspection the inspector determines that either 1) an existing permit condition is unenforceable or 2) compliance with an applicable APCD rule or regulation cannot be determined due to the lack of an enforceable permit condition, the inspector shall follow the procedures outlined below:

1. Document in the inspection report that compliance with the existing permit condition(s) or applicable APCD rules or regulations cannot be determined by providing a) a succinct discussion of the issues and background (state the facts); and b) recommended solutions for revision of the permit condition or addition of new conditions.
2. Submit the inspection report to your supervisor, or for those sources which are the responsibility of the permit compliance section, to the project manager for review and approval.
3. Upon approval of the inspection report, complete and submit the Engineering Referral Form, (ENF-18) to your supervisor for transmittal to the Engineering Division (Attn: Engineering Supervisor).

Inspectors are urged to discuss their findings of "unenforceability" with their supervisor or the project manager prior to completing their inspection report if they are unsure about the enforceability of the permit condition or what documentation is necessary to demonstrate compliance with an applicable condition or APCD rule or regulation.

ENGINEERING REFERRAL FORM

FACILITY ID _____ ATC/PTO _____ SOURCE _____

LOCATION _____

INSPECTOR _____

TYPE OF REFERRAL:

_____ Permit Requirement

_____ Emission Calculation

_____ Information Required by Engineer

_____ Other _____

_____ Permit Condition Interpretation

DESCRIPTION OF SITUATION:

Background _____

Existing Situation _____

Question _____

INSPECTOR RECOMMENDATION:

Options _____

Inspector Recommendation _____
