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 _______________________________________

_______________________________________________________________

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11/89