

Planning for a Facility Inspection

Presented by:

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Overview of Presentation

- Who Gets Inspected?
- Types of Inspections
- How to Prepare for Inspection?
- Inspection Process
- Inspection Report
- What's Next?

Who Gets Inspected?

- Any Facility – Permitted or Unpermitted

Federal, state or local EPA offices have the authority to inspect a company at any reasonable time.



Title V Permits Allow...

Inspection and entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-3-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-3 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-3-9-.02(11)(e)3.(ii)

Be Prepared not Surprised

- Review facility permits annually
- Ensure all required records are maintained according to the permit requirements
- All data is compliance data
- Keep files neat and orderly
- Archive data as long as required
- Build redundancy into environmental staff

Different Types of Inspections

• Scheduled Inspections

- Pre-construction Permitting
- Operating Permit Compliance
- Source Testing Observation
- Permit Modifications
- Multi-media Audit

• Surprise Inspections

- Public Complaints
- Incident Investigation
- Recent Notice of Violation
- Surprise Visit
- Unannounced Follow-up Inspection

Different Types of Inspectors

- Inspectors can vary by style
- Inspectors will change over time
- Inspectors can differ in their interpretation of rules

TIP

Always document anything an inspector tells you to do (or not do).

Ask for a copy of the inspection report.

Do your homework and check the regulations/permits.

Don't assume anything!

How to Prepare for Inspection?

- Consider external audit
- Plan route for facility tour
- Clear your schedule
- Let the inspector take the lead
- Engage the right people
- Stay calm

How to Prepare for Inspection? (Cont.)

- Have a copy of these documents available during the inspection:
 - All permits
 - Past stack tests
 - Compliance reports
 - Correspondence with agency related to facility compliance
 - All records that are required by the Operating Permit

How to Prepare for Inspection? (Cont.)

What does the internet say about you?



The Inspector Is At The Door – Now What?

- Inspector has right to access any regulated facility
- Engage environmental personnel
- Discuss the scope of the inspection activities.

TIP

In the event of a surprise inspection, it is important to ask for the nature of the inspection.

Be sure to inform the inspector of any safety procedures established for your facility.



What is the inspector looking at?

Generally, inspections consist of **site walk-through**

- Stacks
- Dust collectors
- Observe control equipment
- Changes in the facility from previous inspection
- New equipment or process changes
- Is an odor present

During the Inspection

- Take thorough notes
 - Why are they there?
 - What is the inspector saying?
 - What are they looking for?
 - What are they asking about?

TIP

Engage someone else to take notes during inspection

During the Inspection (cont.)

- No matter how it goes, keep your composure
- Answer any questions honestly and simply
- Listen first, talk second
- If you do not know something, admit it
- If you cannot find something, ask for more time

Post Inspection Meeting

- Records review
- Review notes
- Findings of compliance status
- Other issues
- Inspector may request additional information
- Ask for copy of inspection report

After the Inspection ...

- Have an internal inspection recap
- What issues were discussed?
- Were any records incomplete?
- How can you fix these things?

What's the Worst that Could Happen?

- Unpermitted Source
- Incomplete Recordkeeping
- Violation of Permit Condition

Recordkeeping Example...

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-3 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

Recordkeeping Example (cont.)...

Stack ID	Time of Event	Type of Malfunction	Time Complete	Employee
Flare	1/12/16 5:30PM	Low Temperature Shutdown	1/12/16 6:30PM	G. Latif

NO!

They had to record:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began
3. Type of malfunction and/or reason for shutdown
4. Time the air contaminant source returned to normal operation
5. Employee must sign, date, and indicate the time of each log entry

Recordkeeping Example (cont.)...

Stack ID	Time of Event	Type of Malfunction	Time Complete	Employee	Date/Time Log Entry Made
Flare	1/12/16 5:30PM	Low Temperature Shutdown	1/12/16 6:30PM	G. Latif	1/15/16 8:00AM

NO!

All information shall be entered in the log within 24 hours

Recordkeeping Example (cont.)...

Stack ID	Time of Event	Type of Malfunction	Time Complete	Employee	Date/Time Log Entry Made**
Flare	1/12/16 5:30PM	Low Temperature Shutdown	1/12/16 6:30PM	G. Latif	1/13/16 8:00AM

**Site personnel need to complete the above information within 24 hours of the incident

Conclusion

- Always be courteous, cooperative, and remain calm.
- The inspector is doing his/her job and you are doing yours.
- Pay attention to the inspector's observations.
- There are bound to be some surprises.
- Have a consultant do a compliance audit



Thank you!

Questions?

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