

AIR POLLUTION CONTROL DISTRICT  
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Surveillance

Distribution: All Policy Holders

This document provides direction to inspectors in the systematic patrol and surveillance of the geographical area to which they have been assigned. An inspector will conduct patrol and observation of the assigned area for the purpose of verifying the compliance of permitted sources and discovering non-permitted sources which require APCD permits to operate.

#### POLICY

The policy of the Regulatory Compliance Division is for inspectors to conduct systematic surveillance at regular intervals and record surveillance activities in inspection reports, the surveillance grid clearance form.

#### PROCEDURE

Inspectors will prepare and submit to the supervisor a map divided into grid sections with labelled coordinates. Each grid section will be no larger than can be effectively patrolled in an eight-hour work shift. With this grid map, the inspector will also submit a schedule for conducting a systematic surveillance of his/her area. The scheduled surveillance will be distributed evenly throughout a six-month period so that the area is completely surveyed twice per year. After each grid has been patrolled, the inspector will complete the surveillance grid clearance form and submit the completed form to the inspector supervisors.

During the grid surveillance the inspector will conduct the following types of inspections:

1. Initial inspections of sources which may need APCD permits but which do not have permits to operate.
2. Agricultural burning investigations.
3. Non-agricultural burning investigations.
4. Off-site visible emissions evaluations of permitted and non-permitted sources.
5. Drive-by inspections and occasional unannounced on-site inspections of permitted sources.

The primary goal of surveillance inspections is to verify compliance with APCD requirements for permits to operate. However, the inspector will use this opportunity to determine compliance with all APCD rules. During all inspections, inspectors will use the procedures outlined in the inspection policy and procedure documents. All violations discovered during surveillance will be documented and notices of violation will be issued in the field in accordance with the notice of violation policy document.

The inspector supervisors will review new permit lists provided to the APCD by various planning agencies in the county. Facilities listed which may need APCD permits will be referred to inspectors for investigation during surveillance activities.

The inspector supervisors will track the surveillance program by reviewing the completed surveillance grid clearance forms to verify that all areas are surveyed twice per year.