



What to Expect from an Air Quality Inspection

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Inspections

- Inspection Authority
- Elements of an inspection
- The Inspections
- How to prepare for the inspection
- Goals of the inspection

Inspection Authority

- What gives Air Quality inspection authority?
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT - Act 451 of 1994 Section 324.5526
- Who Gets Inspected?
 - Any Facility – permitted or unpermitted
 - Majority of inspections are un-announced.
- Different Types of Inspections
 - Scheduled Inspections
 - Inspector Initiated Inspections (Self-initiated)
 - Complaint initiated

Elements of an Inspection

- Preparation
 - How does the inspector get ready?
 - Past inspection reports
 - Permits
 - Applicable Federal Regulations
 - Correspondence
 - Compliance history
 - MAERS Reports
 - Past Stack Tests
 - What if you are a new facility or you have never had an inspection?
 - Your website
 - Aerial photos
 - Other regulatory sites
- The AQD inspector approaches...
 - What is your inspector looking at?
 - Stacks
 - Dust collectors
 - Changes in the facility
 - What is your inspector smelling?
 - Is an odor present
 - Is it a normal smell for your process or industry
 - If detected could it be associated with an upset or malfunction

- The inspector is at the door. Now what?? Invite them in!!
 - Pre-Inspection Meeting -Your inspector will:
 - Introduce themselves and provide photo identification
 - Identify purpose of inspection
 - Ask about new equipment or process changes
 - What does the inspector provide?
 - Inspection Brochure
 - Boiler Card

The Air Inspection

- Facility Inspection
 - During the inspection, your inspector will:
 - Ask questions about the processes and process equipment, including control and monitoring equipment
 - Air- Use Permit(s) as a reference
 - Check condition of process equipment
 - Take notes
 - Walk through the facility
 - Observe Control Equipment
 - Check Recording Devices
 - Take Notes
- What happens next?
 - Your inspector may:
 - Request additional information
 - Write up an inspection report
 - If violations were observed a Violation Notice (VN) is sent
- Your Inspection Report
 - Your AQD inspector will:
 - E-mail a copy of the FINAL inspection report to you
 - Ask for your input via an online survey (You may remain anonymous!)

How to Prepare for an Air Inspection

- Know your Facility!
 - Things you should be able to tell your inspector:
 - Facility operations and equipment
 - Stacks and other piping
 - Control equipment
 - Permitted or exempt
 - Hazardous Waste Generator Status
- Do you have an AQD Permit?
 - The permit will identify requirements:
 - Emission and material Limits
 - Operational Restrictions
 - Recordkeeping, monitoring, reporting
- Comply with Permit Conditions
 - Have records available, paper or electronic (most recent 2 years on-site, remaining 3 years off-site)
 - Have more than one person know where records are kept and how to access them
 - Keep compliance records in a centralized location or database
 - Make sure records meet permit or standard requirements
 - If a consultant is maintaining records, these should be supplied to you on a regular basis

- Federal Regulations
 - Are you subject???
 - MACT Standards (NESHAP)
 - New Source Performance Standards (NSPS)
- Online Databases
 - [Review your status on Enforcement & Compliance History Online \(ECHO\)](https://echo.epa.gov/) (<https://echo.epa.gov/>)
 - TRI Data
 - Compliance Status
 - Violation Notices Issued
 - Recent Inspections
- Check out the AQD Website www.michigan.gov/air
 - Search for source information by SRN, City, Source Name and Zip Code.
 - The following information is available on AQD's page:
 - Inspection Reports
 - PTI's
 - ROP's
 - Annual Emissions Information
 - Stack Test Executive Summaries
 - Violation Notices
 - Source Response to Violation Notices
 - Enforcement Documents

Inspector's Goals

- Of course...
 - Complete a full compliance inspection
 - Determine your compliance with applicable rules and regulations as well as with any permit condition
- Also...
 - Ensure your understanding of the rules and regulations you are subject to.
 - Make sure you understand your compliance status
 - Help you answer any questions or concerns you may have
 - Have an open communication
 - Provide you with excellent customer service

Moving Forward

- When should you contact your inspector?
 - If you are thinking of installing a new process
 - If your business is growing or changing
 - You are getting close to your emission limits
 - If you have a question about permitting or exemptions
 - If you have had a malfunction or release.
 - If you have any questions about your facility operations with respect to Air Quality rules and regulations
- In short, anytime you have questions or concerns related to air quality.

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