

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





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Inspection Authority

What gives Air Quality inspection authority?

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT Act 451 of 1994 Section 324.5526



The department may, upon the presentation of credentials and other documents as may be required by law, and upon stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part. If in connection with an investigation or inspection, samples of air contaminants are taken for analysis, a duplicate of the analytical report shall be furnished promptly to the person who is suspected of causing the air pollution.

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



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Elements of an Inspection

Preparation

How does the inspector get ready?

Will look at:

- ü Past inspection reports
- ü Permits
- ü Applicable Federal Regulations
- ü Correspondence
- ü Compliance history
- ü MAERS Reports
- ü Past Stack Tests

Preparation

What if you are a new facility or you have never had an inspection?

- Your website
- Aerial photos
- Other regulatory sites

What does the internet say about your facility?

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?

- Information!
 - Introduction
 - Why they are there
 - What they hope to accomplish



Boiler NESHAP Card- Air





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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

Facility Inspection

Walk Through the Facility



Facility Inspection



**Observe Control
Equipment**

Facility Inspection

Check Recording Devices



Facility Inspection



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



Do you have an AQD Permit?

The permit will identify requirements:

- Emission and material Limits
- Operational Restrictions
- Recordkeeping, monitoring, reporting

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

August 1, 2008

PERMIT TO INSTALL
No. 999-08

DEQ

ISSUED TO
Sample Corporation

LOCATED AT
123 S. Main St
Anytown, Michigan 48888

IN THE COUNTY OF
Ingham

STATE REGISTRATION NUMBER
29999

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(8).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 7/1/2008	
DATE PERMIT TO INSTALL APPROVED: 8/1/2008	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

Comply with Permit Conditions

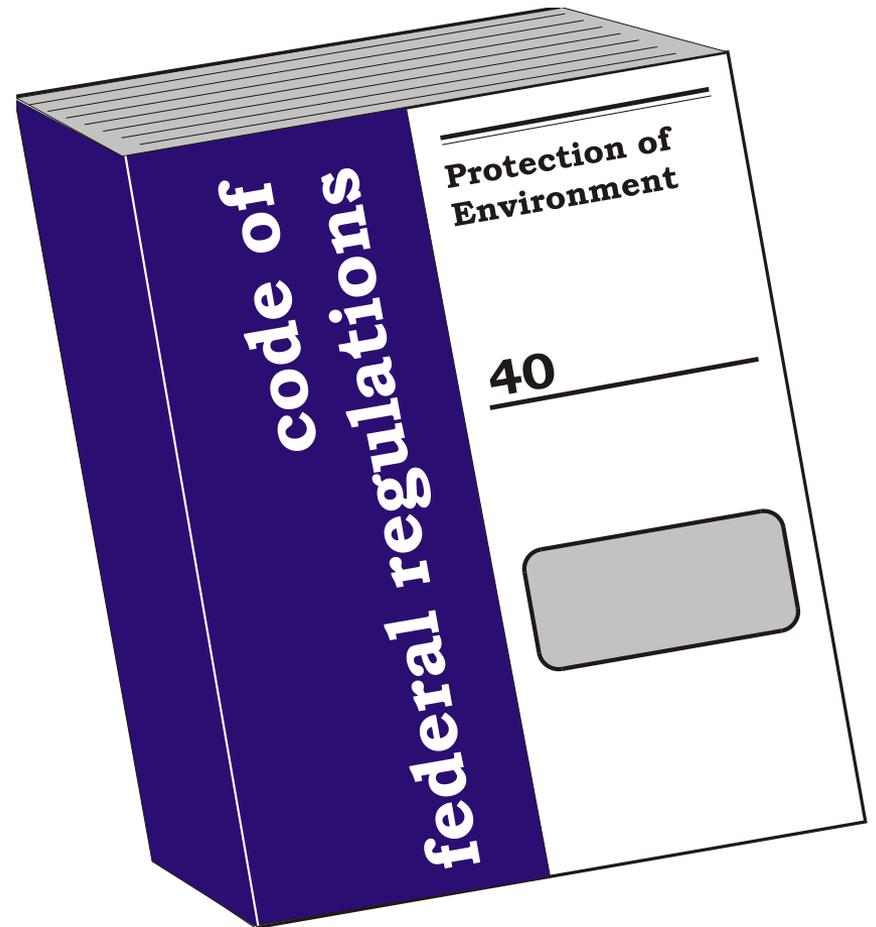


- Have records available, paper or electronic
(most recent 2 years on-site, remaining 3 years off-site)
- Have more than one person know where records are kept and how to access them
- Keep compliance records in a centralized location or database
- Make sure records meet permit or standard requirements
- 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/>

- 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 screenshot shows the DEQ website interface. At the top, there is a navigation bar with links for DEQ, Contacts, Permits, Online Services, Programs, and Locations. Below this is a search bar. The main navigation menu includes ABOUT THE DEQ, AIR, LAND, WASTE, WATER, and SUSTAINABILITY. The AIR section is selected, and the sub-menu shows DEQ > AIR > COMPLIANCE. The main content area is titled 'Air Quality Source Information' and contains the following text:

Effective January 1, 2013, Air Quality Division will begin to post inspection reports, stack test report executive summaries, enforcement documents, and annual compliance reports. Permits to Install (PTI), Renewable Operating Permits (ROP), and public comment documents have been available on-line. Information is listed below.

Available File Naming Conventions*

Identified by State Registration Number (SRN), an Unidentified Facility Number (beginning with the letter "U"), or an Establishment Number (beginning with the letters "EN").

Annual Emissions Query

- Stack Test Report Executive Summaries (SRN_TEST)
- Enforcement Documents (SRN_ACO or SRN_CJ)
- Inspection Reports (SRN_SAR and SRN_FCE)
- Violation Notices (SRN_VN)
- Dry Cleaning Violation Notices (EN_DCVN, EN = Establishment Number)
- Asbestos Violation Notices (SRN_ASBN)
- Response to Violation Notice (SRN_RVN)
- Further Information Regarding File Naming Conventions

Source Files (includes Asbestos and Dry Cleaning Sources)

New source files are added once per week and the lists are updated every Monday morning.

- By Source ID No. (SRN, Establishment No., U-Number)
- By City
- By Source Name
- By ZIP Code
- By Contractor (ASBN files only)
- By Owner (ASBN files only)

Public Comment Documents

- Consent Order
- Permits to Install (PTI)
- Renewable Operating Permits (ROP)

What is available on AQD's page?

The following information is available:

- Inspection Reports
- PTI's
- ROP's
- Annual Emissions Information
- Stack Test Executive Summaries
- Violation Notices
- Source Response to Violation Notices
- Enforcement Documents





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Inspection Goals

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.

Thank you!



Office of Environmental Assistance

800-662-9278

www.michigan.gov/deq

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