

What to Expect from an Air Quality Inspection

Monica Brothers
DEQ, Air Quality Division
269-567-3552 | brothersm@michigan.gov

Inspections

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

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

Elements of an Inspection Preparation

How does the inspector get ready?

- Will look at:
 - ✓ Past inspection reports
 - ✓ Permits
 - ✓ Applicable Federal Regulations
 - ✓ Correspondence
 - ✓ Compliance history
 - ✓ MAERS Reports
 - ✓ 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

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?

Boiler NESHAP Card – Air

- Directs you to an online quiz that will help you determine what portion of the rule applies to you:
 - www.deq.state.mi.us/eforms/BoilerTool/quiz.html

The Air Inspection

During the inspection, your inspector will:

- Walk through the facility - Ask questions about the processes and process equipment, including control and monitoring equipment, including observing control equipment.
- Air- Use Permit(s) as a reference
- Check condition of process equipment
- 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
- Recordkeeping Requirements

Do you have a 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)
- Make more than one person aware of 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 - by SRN, City, Source Name and Zip Code

What is available on AQD's page?

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

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 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.

