CLEAN AIR ACT (CAA) - STATIONARY SOURCES – TRAINING REQUIREMENTS FOR CAA STATIONARY SOURCES INSPECTORS

EPA Order 3500.1 establishes minimum and consistent Agency-wide training and development programs for employees conducting, participating in, or assisting with environmental compliance inspections/field investigations. EPA's training program consists of three parts:

1) Occupational Health and Safety Course
   a. EPA Employees
   b. Non-EPA Employees
2) Basic Inspector Training (BIT) Curriculum
3) Program-Specific Curriculum

The Occupational Health and Safety Curriculum consist of a mandatory Health & Safety Training specified by the HQ or Regional Health & Safety Officer. The Basic Inspector Curriculum consists of the Basic Inspector Training (BIT) offered by the National Enforcement Training Institute (NETI). The Program-Specific Curriculum establishes the mandatory and recommended training in legal, programmatic, and technical subjects for each major media program or specific program compliance inspection/field investigation activity. This document sets out the program-specific curriculum for the CAA Stationary Sources Program and required refresher training.

You must complete the Occupational Health & Safety, BIT, and CAA Stationary Sources Program-specific training to become a credentialed Compliance Inspector/Field Investigator in the CAA Stationary Sources Program. Once you have completed both the Occupational Health and Safety Curriculum and the Basic Inspector Curriculum, you may request an “Inspector-In-Training” credential. This credential allows you to participate in field activities, including on-the-job training, in the company of a CAA Stationary Source Lead Compliance Inspector/Field Investigator.

If you are not yet a CAA Stationary Sources credentialed Compliance Inspector/Field Investigator (for example, if you are a newly hired inspector, a Compliance Inspector/Field Investigator in a program other than the CAA Stationary Sources Program, or a previously credentialed Compliance Inspector/Field Investigator that has allowed your credentials to lapse for greater than a year) and want to become one, you must complete and document that you meet all mandatory requirements for new CAA Stationary Sources Program inspectors in the section below entitled “Requirements for New CAA Stationary Sources Program Inspectors.”

In order to obtain Compliance Inspector/Field Investigator credentials, you and your supervisor are required to document and certify, and submit to your regional or headquarters credentials contact, documentation of completion of the Occupational Health and Safety training, BIT, and CAA Stationary Sources program-specific training. Once you and your supervisor have certified that you have completed all required training and you have obtained your credentials, you are a credentialed Compliance Inspector/Field Investigator and can conduct, participate in, or assist in CAA Stationary Sources inspections. Records of your training must be tracked and be available upon request. Beginning in 2014, the Talent Management System (TMS) will be piloted in a number of regions. The TMS will be the Agency’s official repository for tracking all employees’ training. If your region is not part of the pilot, you may track your inspector training in an equivalent database until the TMS is implemented in your region.

As a credentialed Compliance Inspector/Field Investigator in the CAA Stationary Sources Program, you must annually complete the mandatory refresher requirements for currently credentialed CAA Stationary Sources Program inspectors in the section below entitled “Mandatory Requirements for

Currently Credentialed CAA Stationary Sources Program Inspectors" to maintain your credentials. These mandatory annual training requirements include: the Occupational Health and Safety refresher training; CAA Stationary Sources Program-specific refresher training; and Inspection Skills Refresher Training.

These requirements will be updated from time-to-time. Inspectors and supervisors should verify that they have the most recent version of these requirements by checking the Inspector Wiki Site. During the current and future "re-credentialing" processes, inspectors and supervisors must ensure that they have met all of the requirements that applied at the time the inspector obtained their original Compliance Inspector/Field Investigator credentials, in addition to each year's most recent mandatory refresher training. If an individual has commenced program-specific training to obtain new Compliance Inspector/Field Investigator credentials, and that program-specific training is updated before that person has obtained their credentials, they may choose to complete the training that existed at the time they commenced their program-specific training or they may start over with the new and most recent program-specific training. The requirements listed below are minimum requirements and a supervisor may, at any time, require additional training as necessary. These courses, and related guidance documents, can be accessed at the Inspector Wiki Site or by clicking on the highlighted links provided below, as available.

Requirements for New CAA Stationary Sources Inspectors

Mandatory Training Courses:

- If you are conducting opacity reading inspections, you are required to complete one of the following opacity method trainings:
    - Visible Emissions (VE) EPA Method 9 Training (8-hour course) Recertification required every six months.
    - Method 22 – no certification required
    - Alt 082 - no certification required
- CAA Confidential Business Information* (Course Registration / Launch Course)
- Air Pollution Orientation Course (APTI SI-422) 5 hours
- Introduction to Baseline Source Inspection Techniques (APTI SI-445) 25 hours

* Only if CBI materials are handled.

Mandatory Self-Study

CAA Stationary Sources Inspectors must read and/or familiarize themselves with the following self-study materials. When the requirement says to "read," the inspector should read and know the material. The inspector will be tested to ensure a minimum knowledge level. When the requirement says to "be familiar," the inspector should read through the material to gain appropriate familiarity with the scope and organization of the information should they need to access it expeditiously in the future.

Complete the following:

- CAA Compliance Monitoring Strategy (2014) (Self-study Registration / Launch Self-study)
- National Stack Testing Guidance (2009) (Self-study Registration / Launch Self-study)

- Review of a minimum of two completed CAA stationary inspection reports. (The new inspector's supervisor can require the review of more than 2 reports if deemed necessary).

Be familiar with the following guidance/reference manuals:
Air Regulations

- Clean Air Act Civil Penalty Policy (1991)
- Policy on Timely and Appropriate Enforcement Response to HPV (8/14)
- Federally Reportable Violations (FRV)
- Federal Air Rules for Reservations*

*Required only if inspections are conducted on Tribal reservations.

(Note: For each of the listed CFR readings: To access all of the listed sections, begin by clicking on the link and scroll to the next required reading in the section by using the "Next" link near the top right hand of the page.)

- 40 CFR Sections 50.1-12: National Primary and Secondary Ambient Air Quality Standards
- 40 CFR Sections 51.100-232: Requirements for Preparation, Adoption, and Submittal of Implementation Plans
- 40 CFR Sections 52.01-34: Approval and Promulgation of Implementation Plans-General Provisions
- 40 CFR Sections 60.1-19: Standards of Performance for New Stationary Sources-General Provisions
- 40 CFR Sections 63.1-16: National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions
- 40 CFR Sections 51.166and 52.21: Prevention of Significant Deterioration of Air Quality
- 40 CFR Section 51.165: Permit Requirements
- 112(r)(1) guidance (General Duty Clause)

Volatile Organics - VOC's

- Hazardous Organics NESHAP (HON) Inspection Tool (Volume 1 & Volume 2)
- Process-Based Self-Assessment Tool for the Organic Chemical Industry (EPA 305-B-97-002, 4/97)
- Inspection Manual: Federal Equipment Leak Regulations for the Chemical Manufacturing Industry: (3 Volume Set) Volume 1, Volume 2 and Volume 3 (EPA 305-B-98-011, 12/98)

Mandatory On-the-Job Training (OJT)
OJT includes inspection preparation procedures, the inspection, and post inspection procedures. You must:

1) Accompany an experienced credentialed Compliance Inspector/Field Investigator, as determined by the inspector's supervisor, on 2 CAA Stationary Sources inspections.

An experienced Inspector should be a credentialed EPA or State/local inspector with the appropriate level of knowledge and experience in conducting inspections in the CAA stationary sources program, as determined by the supervisor of the inspector seeking the credential. In determining whether a credentialed Compliance Inspector/Field Investigator is "experienced", the supervisor should consider the number of years and frequency of inspections for that individual. Generally, 2-5 years' experience or 25 documented inspections conducted in the CAA stationary sources program would be an indication that the person is an experienced credentialed Compliance Inspector/Field Investigator.

and

2) Conduct at least 1 CAA Stationary Sources OJT inspection while being observed by an experienced credentialed Compliance Inspector/Field Investigator, as described above.

Evaluations should be documented, kept on file, and be used by the inspector's supervisor to determine readiness to conduct, participate in, or assist with inspections. An inspector's supervisor may require more OJT inspections, based on the supervisor's assessment of readiness, as appropriate.

Mandatory Requirements for Currently Credentialed CAA Stationary Sources Inspectors

Bi-annually complete the bulleted item below:

- Visible Emissions (VE) EPA Method 9 Training (8-hour course) Re-certification required every 6 months.

Annually complete each of the bulleted Items below:

- Inspectors should complete 8 modules from the Occupational Health and Safety Course to fulfill their annual health and safety refresher requirement. Inspectors should select 8 modules that reflect the type of field work and anticipated hazards typical of their assignments.

  Occupational Health and Safety Refresher (8 hours annually)
  EPA Employees
  Non-EPA Employees

  - Complete at least one CAA program-specific annual refresher. An inspector can meet this requirement by completing an APTI , California Air Resource Board (CARB), or a course listed on the Inspector Wiki listed under "Program Specific Training". APTI or CARB courses can be either a classroom or an on-line course and must be relevant and topical to stationary source compliance and approved by the inspector's supervisor. An inspector may not repeat an annual refresher course to fulfill this requirement.

- In addition, other classroom or on-line training approved by the Monitoring, Assistance, and Media Programs Division (MAMPD) Director after consultation with the air enforcement managers, may be used to fulfill this requirement. The approved courses will be listed on the Inspector Wiki.

- At least one refresher training course from the Inspector Wiki listed under the section entitled "Inspection Skills Refresher Training." This refresher training includes topics such as "Chain of Custody," "Interviewing Techniques," and "Being a Witness." This training can be found by navigating to the Inspector Wiki, selecting "Training – Credentials," then selecting "Take Refresher Training to Maintain Existing Federal Inspector Credentials," then scrolling down to "Inspection Skills Refresher Training." To satisfy this annual requirement, an inspector may not repeat an Inspection Skill Refresher Training Course until all have been completed. Upon completion of all of the listed courses, the inspector and supervisor may select other similar inspector refresher training to meet this annual requirement or repeat a course from the list of "Inspection Skills Refresher Training" courses.

- Continue to be familiar with the following guidance/reference manuals:

Air Regulations

- Clean Air Act Civil Penalty Policy (1991)
- How to Review and Issue Clean Air Act Applicability Determinations and Alternative Monitoring: NSPS, NESHAP (EPA 305-B-99-004, 2/99)
- Policy on Timely and Appropriate Enforcement Response to HPV (8/14)
- Federally Reportable Violations (FRV)

Volatile Organics - VOC's

- Hazardous Organics NESHAP (HON) Inspection Tool (Volume 1 & Volume 2)
- Process-Based Self-Assessment Tool for the Organic Chemical Industry (EPA 305-B-97-002, 4/97)
- Inspection Manual: Federal Equipment Leak Regulations for the Chemical Manufacturing Industry: (3 Volume Set) Volume 1, Volume 2 and Volume 3 (EPA 305-B-98-011, 12/98)

- Become familiar with new regulations and policies as they are issued.