



**APC-PERM-P-02-Permit Writer SITE Visits – 012418**  
**Policy for Permit Writer and Reviewer Site Visits**

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**EFFECTIVE DATE: JANUARY 24, 2018**

**SIGNATURES:**

A handwritten signature in blue ink that reads "Michelle W. Avery".

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Technical Secretary

A handwritten signature in blue ink that appears to read "James P. [unclear]".

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Drafter / Preparer

**PURPOSE**

The purpose of this policy is to specify the criteria for permit writers to visit facilities that they have or will be permitting in order to improve customer service and improve working relationships with permittees, better understand the facility and its operations, and to enable permit writer to develop permit conditions that can reasonably be complied with by the facility and are readily enforceable by field office inspectors. This policy applies to all permit writers and reviewers in the Permitting, Emissions Inventory, Regulatory Development Programs. This policy does not apply to staff in these programs that do not write or review permits.

## Policy for Permit Writer and Reviewer Site Visits

### When are Site Visits Required?

#### Title V and Conditional Major Facilities

The permit writer should visit each assigned Title V and Conditional Major facility at least once during the permit term.

The permit writer and reviewer should visit a facility prior to a public hearing or public meeting. If the public hearing is for a greenfield facility (i.e., one that has yet to be constructed), the site visit should consist of a visit to the location of the proposed facility to understand the location and its proximity to residences, schools, hospitals, nursing homes, parks, playgrounds, etc.

Permit reviewers should visit a facility if the reviewer is assigned to review a permit within a source category for which the reviewer has never visited a facility in that category.

The permit writer should accompany a field services inspector on at least one site inspection of a facility that has a permit that was written by the permit writer or for which the permit writer will be writing a permit. The permit writer should contact the field services inspector sufficiently in advance of any timeframe needed to conduct this type of site visit in order allow for coordination of schedules. These visits may require scheduling flexibility on both the permit writer's and field services inspector's part.

Additional site visits may be needed in the following situations. The permit writer and reviewer should consult with their manager to determine if a site visit is warranted:

1. When the facility is assigned to a new permit writer;
2. After significant enforcement action has been taken to ensure the facility has returned to compliance;
3. After a major modification; or
4. If a large volume of complaints are received.

Field Services should also be consulted before visits related to situations 2, 3, and 4 in order to avoid duplication of effort.

#### True Minor Facilities

The permit writer should visit true minor facilities if they are assigned a source type for which they are not familiar with.

The permit writer and reviewer should visit a facility prior to a public meeting. If the public meeting is for a greenfield facility (i.e., one that has yet to be constructed), the site visit should consist of a visit to the location of the proposed facility to understand the location and its proximity to residences, schools, hospitals, nursing homes, parks, playgrounds, etc.

Additional site visits may be needs in the following situations. The permit writer and reviewer should consult with their manager to determine if a site visit is warranted:

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1. After significant enforcement action has been taken to ensure the facility has returned to compliance;
2. After a major modification or expansion; or
3. If a large volume of complaints are received.

Field Services should also be consulted of visits related to these situations in order to avoid duplication of effort.

**Who Should Accompany the Permit Writer or Reviewer on the Site Visit?**

Inexperienced permit writers and reviewers should be accompanied by an experienced permit writer or reviewer. (The permit writer’s/reviewer’s manager should be consulted for clarification if necessary.)

The permit writer and reviewer should contact the field office inspector prior to site visits and the visits should be coordinated visits with the field staff when possible. The field inspector may also be aware of any clothing restrictions or requirements for the facility to be visited. Note that at least one site visit must be conducted during a field office inspection as specified above.

**What Equipment and Clothing is Necessary for the Site Visits?**

The permit writer should use their Division-provided PPE for site visits unless special equipment (such as safety shoes with metatarsal guards at facilities handling molten metal) is required.

- Safety Shoes
- Ear plugs
- Eye protection
- Hard hats

The permit writer or reviewer should consult with the APC procurement officer if he or she does not have such equipment. (Sufficient lead time should be allowed for obtaining safety shoes.)

The permit writer should wear appropriate clothing on the site visits (e.g., blue jeans, loose-fitting clothing) that is comfortable and appropriate for visiting industrial sites.

**Exceptions to this Policy**

The permit writer or reviewer may request an exemption from this policy for individual site visits if the site visit would not be beneficial to either the permit writer or the permittee (e.g., unmanned sites, facilities that are very similar to others that the permit writer or reviewer have already visited.) Exceptions for individual site visits must be approved by the manager and will be reported to the Deputy Director on a monthly basis.

Revision Number	Date	Brief Summary of Change
0	January 24, 2018	initial document