

## Part 232 Compliance Inspection Report Instructions [FORM 232-15I INSTRUCTIONS (9-23-2020)]

DEC routinely reviews all **232-15 Compliance Inspection Reports** for compliance and enforcement purposes. Please read the following instructions for completing the report.

### Before You Begin:

- ! **YOU MUST USE A COPY OF FORM 232-15, POSTED ON THE NYSDEC WEBSITE, TO RECORD AND REPORT THE FINDINGS OF THE COMPLIANCE INSPECTION.**
- ! **INCOMPLETE AND/OR ILLEGIBLE INSPECTION REPORTS WILL BE REJECTED BY DEC REVIEWING ENGINEERS AND RETURNED TO THE REGISTERED COMPLIANCE INSPECTOR FOR RE-SUBMITTAL.**
- ! **Advise the dry-cleaning facility Owner/Manager to have all the information you need, organized and ready, in advance of your scheduled inspection. Needed information includes DEC facility registration records, building information, the previous year's Part 232-15 Inspection Report, all required Part 232 checklists, operation and maintenance logs and files, equipment manuals and specification documents.**
- ! **COMPLETENESS.** Complete all sections of the 232-15 form. ALL fields must contain an entry: mark "n/a" (not applicable) if a question does not apply and "Unknown" if the information is unknown. Write "Unavailable" if the Owner/Manager cannot produce the required information at the time of the inspection. Compliance Inspectors should submit only complete, final inspection reports.
- ! **LEGIBILITY.** All entries MUST be legible. The completed inspection report is an official certified document as submitted to DEC. If the inspector cannot generate a legible report during the inspection, field notes should be taken on a draft 232-15 form and then transcribed using block printing or a typewriter to produce a legible document. Attach additional sheets if more space is needed to report findings and comments.
- ! **CERTIFICATION.** Both the Compliance Inspector and the Registered Compliance Inspectors (RCIs) must certify the inspection report. The Compliance Inspector must certify that all information he/she gathered is true, accurate and complete. The Registered Compliance Inspector must review all the gathered information that was prepared under his/her direct supervision and

certify, to the best of his/her knowledge, that all information is true, accurate and complete. RCI certified reports must be signed by the RCI through their original professional seal affixed on the right side of the Report Certification Section (SECTION J). Three signed copies must be submitted; one to the facility owner for facility records and public review, one to the DEC RAPCE in the DEC region where the facility is located for the compliance status determination and one to the Permitting & Compliance Section for auditing purposes.

### **Specific comments and instructions for filling out Form 232-15.**

All data fields on the form must be completed although not all are discussed below.

### **PART 232 DRY CLEANING COMPLIANCE INSPECTION REPORT ( Page 1):**

**DEC ID.** The DEC ID number can be found at the top of the dry cleaning facility's Air Facility Registration (AFR), Air State Facility (ASF) permit or Air Title V (ATV) permit. All dry cleaning facilities must have a current registration or permit and it must be kept on site.

If the facility owner doesn't have a registration or permit, describe the circumstances in the Inspection Summary in SECTION I. Write "PENDING" above the DEC ID number box if an application has been submitted to DEC. Write "MUST SUBMIT APPLICATION" above the DEC ID number box if the facility owner has not yet submitted a registration or permit application and have them contact the DEC Regional Air Pollution Control Engineer's office for assistance. Additionally, the Small Business Environmental Assistance Program (SBEAP) provides free and confidential assistance to small business at 1-800-780-7227.

**Follow-up 45 day re-inspections.** If a compliance inspection reveals a machine leak or malfunction, the machine must be repaired within the applicable timeframe established in section 232-2.5 and then re-inspected by a compliance inspector no later than 45 days after the machine leak or malfunction was detected. Check the appropriate box to indicate if this is a follow-up 45 day re-inspection.

**Dry Cleaning Facility name.** The legal business (tax) name of the facility. If the business goes by another name, write down both names.

**Location address.** The street address where the facility is located.

**Date facility began operation at this location.** Enter the date the original shop owner first began to operate any perchloroethylene dry cleaning machine at this location.

**Facility type and type of other occupants.** Check the box describing the type of dry cleaning facility: stand-alone, co-located commercial or co-located residential. Also describe the location and types of other building occupants adjacent to the dry cleaner.

**Dry Cleaning Facility owner's name.** Name of the person owning the dry-cleaning business and their telephone number. If owned by a corporation or other organization, enter that name and the name of the contact person.

**Certified Owner/Manager's name.** Record the name of the NYSDEC Certified Owner/Manager and the O/M Certificate number and expiration date.

**Operator Names.** Write down the names of all the employees who operate the dry cleaning machine(s) and indicate if they are certified by the department. Include their names, certificate numbers and certificate expiration date exactly as they appear on their NYSDEC Operator Certificate. All perc dry cleaning machine operators must be certified by the department.

**Compliance inspector's name.** Enter the name of the individual who actually performed the physical inspection: either the RCI or the CI. Write down the compliance inspector's name, telephone number, Owner/Managers Certificate number and expiration date exactly as it appears on the NYSDEC O/M Certificate.

### **FACILITY: BADGE SAMPLING (SECTION A).**

Immediately upon entering all perc dry-cleaning facilities, the Compliance Inspector shall begin passive (badge) sampling. The badge shall be placed just outside the vapor barrier room door (if co-located), or approximately midway between the dry-cleaning machine and the pressing station (if stand-alone), at a height of 3 to 6 feet above the floor level and away from any open windows or outside doors. NYSDOH requires that this measurement be made within the BREATHING ZONE of the facility occupants. Some 232-15 inspection reports have been filed with the reported badge location outside of the 3 to 6 foot height range. **Such reports will be rejected and the RCI will be required to re-inspect the facility.**

**The sample must be collected during the time that the inspection takes place and for a minimum of two hours and two machine loads. The compliance inspector must be present during the entire time the badge sample is collected.**

Samples **MUST** be analyzed at a NYSDOH ELAP certified laboratory using NIOSH Method 1003. There are over 390 Commercial Labs with NYS DOH ELAP certification. They are listed at:

<http://www.wadsworth.org/labcert/elap/comm.html>

**An original copy of the badge sample laboratory analysis MUST be attached to the Part 232 Dry Cleaning Compliance Inspection Report (Form 232-15) that is sent to the NYSDEC Regional Air Pollution Control Engineer. Copies of the laboratory analysis should be attached to the inspection reports that are sent to the facility owner and Permitting & Compliance Section.**

**Badge location:** Note the distance from the badge sampler to the floor; to the VBR or the dry cleaning machine if stand-alone; to the pressing station; and to the nearest open window, door or exhaust fan or duct. The inspector may find that drawing a line sketch on the back of the 232-15 form helpful in recording this required information.

## **FACILITY: GENERAL INFORMATION (SECTION B).**

Record the number of Perc dry cleaning machines and indicate if they all are 3<sup>rd</sup> or 4<sup>th</sup> generation dry cleaning machines. Also report the existence of any COIN-OPERATED Perc dry-cleaning machines at the facility regardless of whether they are claimed to be “in-service” or not.

**Dry cleaning machine removal:** Note on the inspection report any Perc or alternative solvent dry cleaning machine(s) removed from service since the last inspection date along with their removal dates. Machines removed from service must be physically rendered inoperative by disconnecting the utilities (electric, steam, etc.). Upon the termination of operation of any dry-cleaning machine, the facility owner must send a Notice of Dry Cleaning Equipment Shutdown to the respective DEC regional office to the attention of the Regional Air Pollution Control Engineer. The Notice of Dry Cleaning Equipment Shutdown form (Form 232-14) can be found on the NYSDEC website. If a dry cleaning machine has not been removed from service but an Owner/Manager or Operator claims a machine is “unused” or “out-of-service” it still must be listed on the inspection report.

Record the number of alternative solvent dry cleaning machines and include the name of the alternative dry cleaning solvent used at the facility. Only include the total number of alternative solvent dryers, solvent recovery dryers and dry-to-dry, closed loop dry cleaning machines; do not include any washers, extractors, “wet cleaning” machines or liquid carbon dioxide dry cleaning machines. Determine if all dry-to-dry, closed loop dry cleaning machines are equipped with a refrigerated condenser; specifically identifying any machines that are not.

Note the number of perc and alternative solvent dry cleaning machines listed on the NYSDEC registration/permit. If the number of machines at the facility does not equal the number on the registration/permit, the registration/permit needs to be updated. The facility Owner/Manager should then contact the appropriate DEC regional office for assistance.

Record the number of “wet cleaning” machines and liquid carbon dioxide dry-to-dry, closed loop dry-cleaning machines at the facility. Do not include standard washing machines used for shirt laundry.

## **FACILITY: SAMPLING EQUIPMENT (SECTION C).**

The Compliance Inspector may choose how leaks will be **detected**, and once detected, how they will be **quantified**. For example, the inspector may choose to locate leaks with a “beeper” and then to quantify the emissions with a PID.

End-of-cycle Perc drum concentrations from dry cleaning machines must be measured using a portable gas analyzer or colorimetric tube sampling pump.

PIDs are sensitive instruments that require periodic service. The UV Lamp window should be cleaned on a regular basis and PIDs must be calibrated prior to the inspection. Colorimetric tube sampling pumps should be leak tested prior to sampling

the end-of-cycle Perc concentrations.

#### **FACILITY: RECORD KEEPING (SECTION D).**

The Part 232 **Posting Notice** (sign) must be conspicuously displayed and **easily readable** to all who enter the facility.

Ask for and confirm the existence of **equipment manuals**: missing manuals should be replaced by the facility owner/manager. If original manuals are not available from the machine manufacturer, the federal EPA has a “generic” manual which should be ordered and kept on site.

**Checklists, Logs, etc.:** Must be filled out according to the Part 232 regulatory schedule (weekly, monthly, occasionally or every 6 months) and be legible and kept on-site. Records must be completed by certified operators and be maintained on-site for five years. The inspector must confirm that all required logs are currently being kept and must record the **initiation date** specified in the perc usage log on the inspection report. Verify that **no gaps** appear in the record keeping. Record any discrepancies from these requirements in the Inspection Summary in SECTION I.

DEC has been asked by facility owners and inspectors if missing past records should be re-created in anticipation of a compliance inspection. The answer is clearly “NO,” since this would be a falsification of an official State document.

Dry-cleaning facility managers can obtain additional copies of any Part 232 Checklists and Log forms from the DEC website or at no cost by calling any DEC Air Resources program office.

#### **FACILITY: CO-LOCATED LOCATIONS (SECTION E).**

Complete this section for co-located facilities only. All Perc dry cleaning machines must be installed in a Vapor Barrier Room (VBR) at co-located facilities (co-located residential or commercial). Facility files should contain records of vapor barrier construction, including documentation of the use of approved construction materials. Approved alternate vapor barrier materials include epoxy coatings, glass and a structural plastic; the use of chemically compatible sealants (caulks) are important.

**Prior to entering the Vapor Barrier Room**, verify that the exhaust fan is running from outside the room and record its operational status in the report. When the exhaust fan is running, the room will be under negative pressure and perc exposure will be minimized. If the exhaust fan is not running, have the operator turn it on. Partially open the door to measure the Perc air concentration inside the VBR. If the door concentration exceeds 25 ppm, the department recommends that you do not enter the VBR without wearing a NIOSH certified elastomeric half-face or full-face respirator with organic vapor cartridges. If the door concentration exceeds 100 ppm, the department recommends that you do not enter the vapor barrier room until the owner repairs the major leak.

Look carefully for any gaps, cracks or openings in the vapor barrier surfaces. There should be NONE. **Record any observed compromises - cracks, gaps, etc. - in the vapor barrier.**

DEC is especially concerned that the floor be a continuous surface (membrane) and have no cracks, etc. All floor drains in the vapor barrier room **must** be completely sealed; DEC recommends that other drains within the vapor barrier room should be sealed. Record any deviations from the requirements on the form.

Part 232 does not require the installation of vapor barrier material under machines installed before May 15, 1997 at co-located facilities. Nonetheless, the vapor barrier membrane on the floor of these older facilities should be as comprehensive as possible. Any accessible area under these machines must be coated with one of the approved vapor barrier materials. If not accessible, the vapor barrier material should extend up to the base of the machine and be sealed to it. After May 15, 1997, anytime a machine is replaced with a new machine or lifted for maintenance or for any other reason, the vapor barrier surface under the machine must be checked to make sure the floor has a continuous Perc impermeable surface. If not, the floor vapor barrier surface under the machine must be repaired or modified to make the floor impermeable to Perc. Record any observed deviations from these requirements in SECTION I.

**Part 232 REQUIRES that vapor barrier room enclosure doors be CLOSED AT ALL TIMES except when a person is entering or exiting the room. Note confirmation of closed door on inspection form.**

The vapor barrier room exhaust system (General Exhaust Ventilation System) must be completely separate from other facility ventilation systems and be operated at all times when the facility is open for business. Record the locations of the fresh air inlet(s) and outlet vent(s) inside the vapor barrier room. The "fresh air" inlet(s) MUST introduce **outside air** into the vapor barrier; note any discrepancies.

Measure and note the VBR dimensions and calculate and report the volume of the room enclosure. If the facility has been inspected before, much of this information may be available on a previous inspection report. If so, check the information for accuracy and make sure that there are no changes. Record current information on inspection form. Use a velometer or equivalent device for measuring the Vapor Barrier Room exhaust flow rate. Although such measurements should ideally be done in accordance with generally accepted engineering practices, they may be taken at the interior face of the exhaust vents for the purposes of this inspection. Note the measurement instrument. Calculate and record the air exchange rate to confirm it exceeds one air exchange every 5 minutes.

Describe where the Vapor Barrier Room exhaust system vents outside the building in relation to any residential, other co-located facility or other building air intake vents, nearby windows or public access areas.

## **FACILITY: ADDITIONAL INFORMATION (SECTION F).**

**WASTE WATER MANAGEMENT:** Part 232 currently allows the use of treatment systems utilizing physical separation (water separator) and double carbon filtration prior to either heat evaporation, misting (atomizing nozzle) or allowable direct sewer disposal of the carbon-filtered water. These treatment systems require a separator and filtration units to reduce the Perc concentration to less than 20 ppb (parts per billion).

The alternative to on-site treatment is for a facility to collect all the separator water in a drum as a Hazardous Waste and then to ship it to an approved facility using a licensed Hazardous Waste hauler. If this option is used by the facility, check the appropriate box on the inspection report.

Record the manufacturer's name, model name and number of any Wastewater Treatment Units on the Compliance Inspection Report. Use additional sheets if necessary.

**Additional questions:** Perc contaminated lint and fuzz from filters must be disposed of as hazardous waste. Confirm this operational practice. Verify that all solvent containers and containers containing Perc contaminated items are kept covered and sealed. Verify that all parts of the dry cleaning system are closed. Many of the questions in this SECTION require information which should have been previously recorded on the various Part 232 O&M logs: confirm that facility staff answers are consistent with what is written on forms. Look at maintenance logs to ensure they are being kept up-to-date. Repair parts? The repair part inventory may be limited but it should contain replacement parts for the most common repairs (gaskets, filters, etc.). Check for existence of fire control equipment, (fire extinguisher) - is its inspection current?

## **DRY CLEANING EQUIPMENT (SECTION G).**

Complete a separate SECTION G (page 5) for each Perc dry cleaning machine located at the facility. Obtain additional copies of SECTION G if the facility has multiple Perc dry-cleaning machines. Refer to the machine nameplate, manuals, checklists and equipment maintenance log for the information requested on the inspection report. If the machine has been modified or retrofitted, examine work orders, receipts and other available documents to gather information needed to fill out this section. **When the inspection is scheduled, the inspector should remind the facility owner/manager to have these and other necessary documents ready for review at the time of inspection.** If these documents are unavailable, note this on the 232-15 form.

Some dry cleaning machines may have fugitive emissions control systems (internal or external door fans) that are activated upon machine door opening after the drum has ceased rotation and dry cleaning cycle is complete. External door fans reduce perc drum concentrations by drawing drum vapors through an external carbon adsorber and then venting the emissions to the outside air. Internal door fans are non-vented control systems which reduce perc drum concentrations by recirculating drum vapors through the machines internal carbon adsorber and returning the controlled vapors back into the drum. When testing the machine drum of a 4<sup>th</sup> generation dry cleaning machine,

determine if the machine has an activated internal door fan. Internal door fans must be deactivated prior to conducting this test. Where in doubt, have the operator switch off power to the machine after the machine door has been opened. Drum testing is not required for any perc dry cleaning machine that is equipped with an external door fan at a non-major facility: these machines require sampling the external door fan exhaust. NOTE: Fourth 4<sup>th</sup> generation machine drums at major facilities must be tested weekly with both internal and external door fans de-activated.

Refer to the Part 232 O&M logs and the Manufacturer's operational machine manual for information on carbon adsorbers.

## **DRY CLEANING EQUIPMENT TESTING (SECTION H).**

Complete a separate SECTION H (pages 5 & 6) for each Perc dry cleaning machine located at the facility. Record all testing results in the inspection report. Obtain additional copies of SECTION H for multiple Perc dry-cleaning machines or to record more than two test runs for a machine. Testing must be conducted under normal operating conditions and with the machine filled to a minimum of 80% of rated capacity. Under normal operating conditions, the department assumes the machine will be run using a fully automatic program, as recommended by the manufacturer. If any test run is conducted using any manual control, a written explanation must be provided in the Inspection Summary.

**Each of the Leak Check items in this section must be inspected and checked for leaks during that portion of the machine cycle that the component is utilized (i.e., fill piping and pump during fill cycle; air ducts during drying cycle, etc.). If a leak is found, the leak concentration must be measured using EPA Method 21 (Type II: Section 8.3.2) and recorded on the form. Leak and fugitive measurements shall be taken approximately 1 cm from each listed source with the sampling probe moving about one inch per second.**

Section 232-2.5 requires that the **entire dry-cleaning system** be inspected for leaks and not just the specific areas and items listed in SECTION H. Check for leaks using a halogenated hydrocarbon detector ("beeper") and/or Perc gas analyzer (flame ionization detector, photoionization detector, or infrared analyzer). A *vapor leak* is defined as a Perc vapor concentration exceeding 25 parts per million by volume (40 CFR Part 63.321 (subpart M)). Note any leaks from "any other areas" and record the measured concentration on the form. Be sure to check for leaks around the hazardous waste drums and the waste-water treatment unit (if so equipped).

Leaks discovered during a §232-2.11 Compliance Inspection should be repaired immediately if possible. If the leak(s) cannot be repaired during the time of the inspection, **the machine must be repaired and re-inspected no later than 45 days after the leak or malfunction was detected.** It is preferable that the re-inspection be conducted by the same inspector.

Several of the items listed under "PERFORM LEAK CHECK" are not part of the operator's weekly leak check. Each of these additional items **must be physically inspected and an individual Perc measurement must be taken at each location**

**and recorded on the inspection form.** If a particular item does not exist at the facility, indicate “n/a” on the form. Incomplete Compliance Inspection reports will be returned to the RCI and the facility Owner/Manager by DEC.

### **3<sup>rd</sup> and 4<sup>th</sup> Generation Dry Cleaning Machines with External Door Fans.**

Part 232 requires operators to test external door fans and record the results on the Weekly Self-monitoring Checklist for External Door Fans (Part II(a)). External door fans must be installed on all 3<sup>rd</sup> generation dry cleaning machines. Determine the location where the operator normally takes this measurement. The sampling location should be at least 8 duct diameters downstream from the external carbon adsorber and 2 duct diameters upstream from any flow disturbance such as a bend or outlet. For rectangular ducts use an equivalent diameter “D” equal to  $2LW/(L+W)$ . If the operator is sampling from an incorrect location, inform the operator of the proper location and make a note of it in the Inspection Summary (SECTION I).

Measure and record the end-of-cycle maximum Perc concentration from the external door fan exhaust at the proper location using a colorimetric tube sampling pump or a portable gas analyzer (e.g., PID). Sampling should be conducted immediately after opening the machine door and activating the external door fan. If a portable gas analyzer is used, sampling should continue for about a minute to ensure that the maximum concentration is measured. Only one test run is required if the maximum measured Perc concentration doesn’t exceed 20 ppm (Subparagraph 232-2.4(a)(3)(iii)). However, a second load may need to be run, without measurement, to satisfy the two-hour time required for the sampling badge as described in Section A above.

Report the test load, the refrigerated condenser’s high and low pressure readings during the middle of the heated phase of the drying cycle and the condenser’s outlet vapor temperature at the end of the final cool down cycle. Where temperature gauges are installed to demonstrate compliance, the final cool down temperature must be less than 45<sup>0</sup>F. If the dry-cleaning machine uses a built-in temperature gauge, consult the machine manual for range and accuracy specifications.

Measure and record the inward velocity of the door fan at the center of the door opening and record the velocity and measuring instrument.

### **4<sup>th</sup> Generation Dry Cleaning Machines.**

All internal door fans must be deactivated prior to testing 4<sup>th</sup> generation Perc dry cleaning machines not equipped with an external door fan. Conduct this test to determine compliance with the end-of-cycle drum concentration standard in subparagraph 232-2.4(a)(5). For major perc dry cleaning facilities, the test must be conducted on all 4<sup>th</sup> generation dry cleaning machines, with or without an external door fan, and with internal and external door fans de-activated. Although the DEC recommends the use of internal door fans for reducing worker exposure, *they must be deactivated prior to sampling the end-of-cycle drum concentration* for the purpose of determining Part 232 regulatory compliance. Use the following procedure to test a 4<sup>th</sup> generation dry cleaning machine:

1. Before the test load is run, determine if the dry cleaning machine has an active internal door fan system. If so, or in doubt, inform the operator that you want the power to the dry cleaning machine switched off immediately after the machine door partially opened in step 6. If not, steps 5 and 6 may be omitted.

*Internal door fan.* A system, which is activated after completion of the drying cycle and upon machine door opening, that reduces the solvent vapor concentration in the drum by drawing fresh room air into the drum and then passing the air-solvent mixture through an integral carbon adsorber before recirculating the air-solvent mixture back into the drum.

2. Run the dry cleaning test load.

*The test must be conducted under normal operating conditions with a machine load equal to, or greater than, 80% of capacity. Test runs should be conducted using a fully automatic program cycle and without the operator manually controlling any part of the dry cleaning cycle.*

3. Prepare to take the end-of-cycle drum measurement. PID(s) and sampling pumps must be properly configured and/or calibrated.

*PIDs should be configured to save the maximum measured instantaneous perc drum concentration.*

4. Ask the operator to press the door lock release button. May not be required for older machines.

*Pressing the button will release the door lock and turn on any activated internal door fan systems. Internal door fans are an option on many machines. Renzacci calls this option "Air Fresh;" Realstar, the "Air Clean System;" and Union, the "Recuper." Although internal door fans are recommended for reducing worker exposure, they must be deactivated prior to sampling the end-of-cycle drum concentration for the purpose of determining Part 232 regulatory compliance.*

5. Partially open the machine door.
6. Ask the operator to immediately switch off power to the machine.

*Switching off power to the machine will turn off any active internal door fan.*

7. Slowly open the machine door to the fullest extent.

*Opening the door too quickly may create a vacuum or wake effect that will draw perc vapors out of the drum and into your breathing space.*

8. Immediately extend the tip of the PID probe or sampling pump's colorimetric tube towards the rear of the drum and into the vapor space above the clothes. Be careful not to touch the tip of the probe or tube to the clothes as it may invalidate the test.

a. Sampling with a PID. Hold the tip of the probe inside the drum for about 15 seconds to display and save the maximum instantaneous perc concentration. The LCD readout will climb until a maximum concentration is reached and then begin to drop-off. Remove the PID after about 15 seconds and have the operator close the door of the machine.

b. Sampling with a colorimetric tube sampling pump. Hold the tip of the colorimetric tube inside the drum while gripping the base of the pump. For Gastec samplers, pull the handle out fully until it is locked, and then release it and wait until the white flow finish indicator is visible on the back of the handle (about 30 seconds). Use one-half pump stroke with a Gastec sampling pump and colorimetric tube 133HA for assessing compliance (60 to 900 ppm).

c. Sampling with both a PID and colorimetric tube sampling pump. If you have both a PID and sampling pump, try sampling with both devices to verify testing results. Tape both devices together, side-by-side, with painter's tape and align the tips of the probes. Expect the sampling results to be similar but not identical as a PID measures the maximum instantaneous concentration whereas a sampling pump measures a 15-30 second average concentration.

Time and record the duration of the entire dry cleaning cycle in minutes. Additionally, observe and report the refrigerated condenser's high and low pressure readings during the middle of the heated portion of the drying cycle and condenser's outlet vapor temperature at the end of the final cool down cycle. All testing results must be recorded and submitted to DEC. Only one test is required if the measured drum concentration doesn't exceed 300 ppm for machines installed on or after May 15, 1997 and 500 ppm for machines installed before May 15, 1997. However, a second load may need to be run, without measurement, to satisfy the two-hour time required for the sampling badge as described in Section A above.

## **INSPECTION SUMMARY (SECTION I).**

The Registered Compliance Inspector must summarize and record all observed exceptions to Part 232 requirements on this page. **Use additional pages if necessary. Inspectors should write down all pertinent comments regarding what they have observed. IF IN DOUBT -- WRITE IT DOWN.**

**The Compliance Inspectors task is to make impartial and factual observation of the conditions that exist at the facility at the time of the inspection. The RCI must then check and validate the information.** Remember, the RCI does not "flunk" or "violate" a facility. It is the DEC's responsibility to review the reported observations made in the Compliance Inspection report (232-15) and take appropriate enforcement action if necessary and warranted.

## **REPORT CERTIFICATION (SECTION J).**

The DEC requires that both the Compliance Inspector and Registered Compliance Inspector certify the inspection report. The Compliance Inspector must certify that all reported information is true, accurate and complete. Registered Compliance Inspectors

must then review all the gathered information and certify that it was prepared under his/her direct supervision and that he/she believes all information to be true, accurate and complete. The RCI must sign and certify the inspection report as both the Compliance Inspector and Registered Compliance Inspector if he/she conducted the actual inspection. Certified reports must be signed by the RCI through their original professional seal affixed on the right side of the Report Certification Section (SECTION J). Any false statements (6 NYCRR Part 200.3) made to the DEC are punishable as a class A misdemeanor under Section 210.45 of the New York State Penal Law.

Any comments, corrections or suggestions on the content of this document should be directed to the following address:

**New York State Department of Environmental Conservation  
Division of Air Resources  
Bureau of Stationary Sources  
Attn: Part 232 Implementation Group  
625 Broadway  
Albany, New York 12233-3254  
Phone: (518) 402-8403  
FAX: (518) 402-9035**