

DEVELOPMENT AND USE OF COMPLIANCE ASSURANCE SELF-INSPECTION CHECKLISTS

Purpose This Meteorology and Air Quality Group (MAQ) procedure describes the control, development, revision, formatting, and posting to the web of checklists associated with Title V sources developed to assist with regulatory compliance with Title V sources at LANL.

Scope This procedure applies to the development, preparation, control, and posting to the web of checklists as part of the Title V project in MAQ.

In this procedure This procedure addresses the following major topics:

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Hazard Control Plan The hazard evaluation associated with this work is documented in MAQ-Office.

Signatures

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06/21/04

CONTROLLED DOCUMENT

This copy is uncontrolled if no red stamp is present on printed copies. black. Users are responsible for ensuring they work to the latest approved revision.

General information about this procedure

Attachments This procedure has the following attachments:

Number	Attachment Title	No. of pages
1	Template for Self-Inspection Checklist	1
2	Example: Self-Inspection Checklist for TA-52-11 Paper Shredder	1

History of revision This table lists the revision history and effective dates of this procedure.

Revision	Date	Description Of Changes
0	6/16/04	New document.

Who requires training to this procedure? The following personnel require training before implementing this procedure:

- Title V Operating Permit Project Leader
- MAQ personnel who prepare or revise Self-Inspection Checklist.

Training method The training method for this procedure is “**self-study**” (reading) and is documented in accordance with the procedure for training (MAQ-024).

Definitions Specific to this Procedure Self-Inspection Checklist: A form developed to assist with and document regulated air quality activities occurring at LANL associated with the Title V Operating Permit.

References The following documents are referenced in this procedure:

- MAQ-Office, “General Office Safety, Security, and Computer Responsibilities for All Employees”
- MAQ-024, “Personnel Training”

Note Actions specified within this procedure, unless preceded with “should” or “may,” are to be considered mandatory guidance (i.e., “shall”).

Preparing, Developing, and Revising a Self-Inspection Checklist

Uses for the Self-Inspection Checklist

The checklist for each regulated source may be used to document or aide the reporting and regulatory requirements associated with the source. The Self-Inspection Checklist can be a viable operator tool to assist with compliance with the terms and conditions of the permit and to provide information for the Division Quarterly Self-Assessments.

Who may originate action on a Self-Inspection Checklist?

The originator should be the appointed subject matter expert (SME) for the source. The originator may request any of the following:

- a new Self-Inspection Checklist
 - a revision to the the Title V Operating Permit
 - a request for a change to the checklist or Permit from the source operator
 - a revision to any existing checklist
 - the deletion of an existing checklist.
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When is a Self-Inspection Checklist required?

The **Title V Project Leader** determines whether a checklist should be developed for a source, based on the recommendations of the SME for the source. Generally, a self-inspection checklist is required when:

- The Title V Operating Permit or other regulatory requirement requires documentation or limitation of activities such as hours of operation, production quantities, usage, maintenance, etc.
- There is a regulatory requirement to ensure performance of pollution control devices.

Preparing, Developing, and Revising a Self-Inspection Checklist, continued

Preparation, development and revision of a Self-Inspection Checklist

The **Project Leader**, in conjunction with the SME, determines if development/revision is necessary.

The **preparer** develops a comprehensive list of questions using the template (see Attachment 1) as a standard format for the Self-Inspection Checklist (see Attachment 2 for an example). Information that should be considered includes:

- A comprehensive list of questions to ensure information on all reporting requirements for the source are adequately covered.
 - Documentation such as a logbook number and page number(s), file name(s) and/or location, date of inspection, etc., that provide an audit trail.
 - Questions worded in a way that the answer “Yes” means the requirement is satisfied. Example: “If applicable, was MAQ notified of any changes in permitted beryllium operations and was an air quality review performed?”
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Review of the Self-Inspection Checklist

The **preparer**:

- Forwards copies of the draft Self-Inspection Checklist to the affected organization(s) managers. This should include organizations that own the source of emissions.
- Resolves comments of the reviewers. If comment resolution cannot be achieved, work resolution with the project leader.
- After comment resolution, obtains Project Leader’s approval to post the Self-Inspection Checklist on the web.

The **Project Leader**:

- Assigns a qualified reviewer from within the project to review the Self-Inspection Checklist.
- Determines if a reviewer outside MAQ should be assigned and/or involved in the review process.
- Arbitrates comment resolution if necessary.
Note: The project leader may be the reviewer.

The **reviewer**:

- Reviews the draft Self-Inspection Checklist and provides comments.
- Returns comments to the preparer on or before the assignment date.
- Makes appropriate arrangements if the assignment date cannot be met.

Preparing, Developing, and Revising a Self-Inspection Checklist, continued

Control and distribution of the Self-Inspection Checklist

The **Project Leader**:

- Approves checklist for posting to the MAQ web site.
- Informs Web Administrator of the approval of the checklist for posting.

The **Web Administrator**:

- Upon approval by the Project Leader, places the Self-Inspection Checklist into controlled folder and creates/posts the link on the MAQ website.
- Ensures the quality of the information provided to the customer by maintaining Self-Inspection Checklists in a controlled folder with limited access.

The **preparer**:

- Provides final, approved checklist to the Web Administrator.
- Informs end users that the new/revised Self-Inspection Checklist has been developed and of its web site address.

Records resulting from this procedure

Records

The following records generated as a result of this procedure are to be submitted **within two weeks** as records to the records coordinator:

- Self-Inspection Checklist

[Click here to record “self-study” training to this procedure.](#)

TEMPLATE FOR SELF-INSPECTION CHECKLIST

RRES-MAQ, Meteorology & Air Quality		
SELF-INSPECTION CHECKLIST FOR TA-XXX		
(Source) Permit #(#) (location)		This form from MAQ-337
Date this form completed:		
Requirement	(YES/NO)	Comments
Comments:		
Form completed by:		
_____	_____	_____
Signature	Name (print)	Z no. Date

EXAMPLE SELF-INSPECTION CHECKLIST

RRES-MAQ, Meteorology & Air Quality		
SELF-INSPECTION CHECKLIST FOR TA-52-11 PAPER SHREDDER		
		This form from MAQ-337
(Source) Permit #(#) (location)		
Date this form completed:		
Requirement	(YES/NO)	Comments
Is there sufficient documentation, in a log book, to determine the number and size of the boxes that have been shredded?		
Is there sufficient documentation to show that the paper shredder has been maintained according to the manufacturer's recommendations?		
Is there sufficient documentation to show that the pollution control devices have been maintained according to the manufacturer's recommendations?		
Does this source meet all requirements in the Title V application?		
Comments:		
Form completed by:		
Signature	Name (print)	Date