

IERG 2026 Seminar

Air Inspection Program

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OBJECTIVES



Inspection Workflow
(Work Plan
Framework)



Pre-CMR & Records
Request Process



CMR Expectations



Post-Inspection
Follow up

WORK PLAN INSPECTIONS

Foundation
of All
Inspections

Defines
Scope and
Priorities

FCE vs PCE
Structure

INSPECTION LIFECYCLE



PRE-CMR (INITIAL)



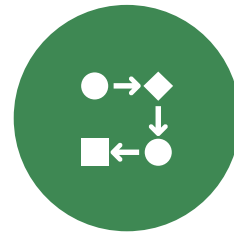
Built From Permits
and Applicable
Requirements



Establishes
Framework of the
Evaluation



Identifies What
Needs to be
Reviewed



Drives Records
Request

RECORDS REQUEST



Sent Prior to Inspection



Allows Facility Response Time



Enables Early Compliance Evaluation



Drives Focused Inspections

DATA FORMAT

Emissions Data Spreadsheet

The screenshot shows an Excel spreadsheet with the following data:

| Date | Process | Operating Hours | Fuel Use (MMBtu) | CO Emissions (tons) | NOx Emissions (tons) | VOC Emissions (tons) |
|------------|--------------|-----------------|------------------|---------------------|----------------------|----------------------|
| 01/05/2024 | Boiler 1 | 16 | 320 | 0.45 | 0.78 | 0.12 |
| 01/12/2024 | Furnace A | 20 | 400 | 0.65 | 1.10 | 0.15 |
| 01/25/2024 | Coating Line | 8 | 150 | 0.63 | 0.34 | 0.10 |
| 01/30/2024 | Boiler 1 | 12 | 250 | 0.34 | 0.60 | 0.09 |
| SUM: | | 56 | 1120 | 1,120 | 2.82 | 0.46 |

Emissions Data PDF

The PDF document displays the following data:

| Date | Process | Process | Fuel Usage (MMBtu) | CO Emissions | NOx Emissions | VOC Emissions |
|------------|--------------|---------|--------------------|--------------|---------------|---------------|
| 01/05/2024 | Boiler 1 | 16 | 320 | 0.45 | 0.78 | 0.12 |
| 01/12/2024 | Furnace A | 20 | 400 | 0.65 | 1.10 | 0.15 |
| 01/16/2024 | Coating Line | 8 | 150 | 0.63 | 0.34 | 0.10 |
| 01/30/2024 | Boiler 1 | 12 | 250 | 0.34 | 0.60 | 0.09 |

COMPLETENESS & RECORDKEEPING

| Supports Efficient Review | Leads to Follow Up |
|----------------------------|----------------------------|
| Clear, Complete Records | Missing or Unclear Entries |
| Transparent Calculations | Unsupported Values |
| “0” Used for Non-Operation | Blank Fields |
| Consistent Documentation | Conflicting Information |

DOCUMENTATION EXPECTATIONS

- ▶ Demonstrates Compliance
 - ▶ Clear Connection to Requirements
 - ▶ Supports Compliance Determination
- ▶ Supports Efficient Review
 - ▶ Well-Organized Documentation
 - ▶ Consistent and Complete Records
- ▶ Leads to Follow-Up
 - ▶ Unclear or Incomplete Information
 - ▶ Not Tied to Requirements
- ▶ CMR Alignment
 - ▶ Documentation Carries Into CMR
 - ▶ Supports Inspection Findings
- ▶ Confidential Information
 - ▶ Marked per 35 Ill. Adm. Code Part 130
 - ▶ Emissions Data is Not CBI

PRE-CMR ANALYSIS



Review Submitted
Data



Identify Compliance
Concerns



Develop Inspection
Focus



Begin
Determinations

ON-SITE INSPECTION



POST-INSPECTION



Complete Evaluations



Draft Violations



Supervisor Review



Finalize Report

CMR STRUCTURE

 General Information

 Permits

 Compliance History

 Evaluations

 Narrative & Findings

CMR PURPOSE



PRIMARY INSPECTION
RECORD



SUPPORTS COMPLIANCE
DETERMINATIONS



USED FOR ENFORCEMENT
SUPPORT

FOLLOW-UP



Violation
Notices



Compliance
Commitments



Timelines



Facility
Expectations

KEY TAKEAWAYS

Preparation Drives Inspection

Pre-CMR Defines Evaluation

Records Request Supports Analysis

On-Site Confirms Findings

Documentation Drives Outcomes



QUESTIONS ?

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