





RSPCB COMPLIANCE INSPECTION STEPS

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**4, Institutional Area, Jhalana Doongri Jaipur-302 004
Ph: 5159600 Fax: 5159697**

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1. Objective of inspection:

- ❖ Rajasthan State Pollution Control Board is a regulatory body and ensures compliance of Environment (Protection) Act, 1986, Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981 and various environmental rules made therein.
- ❖ Purpose of compliance inspections is to verify the compliance status of consent conditions based on evidences viz. Sample collection, photographs, records, log books.
- ❖ The goal of compliance inspections is to educate the stakeholders about environmental laws and motivate the industries /Projects to install or upgrade advance pollution control measures, so that prescribed standards could be achieved.
- ❖ Compliance inspections also help to asses effectiveness of installed pollution control devices.

2. Allocation of inspection through MIS:

- ❖ For ushering in greater transparency and objectivity, Rajasthan State Pollution Control Board has been launched online allocation of inspections to the State Board Officials as per the time frame.

3. Pre-inspection preparation:

- ❖ Inspecting official must be familiar with general inspection procedures and evidence collection techniques to ensure effective inspections.
- ❖ Before conducting inspection preliminary preparation is required:-
 - (1) Collect background information about the industry viz. Address, earlier compliance status or any previous non compliance.
 - (2) Prepare documents and equipment, including appropriate safety equipment. “Notice of Inspection” can be generated online by using MIS.
 - (3) Coordinate schedule with laboratory for sampling of Water & Air samples.
 - (4) Go through the record of the industry, available at HO/RO i.e. latest consent orders, earlier inspection reports, manufacturing process steps, Closure direction & its compliance status.
 - (5) Type of air pollution source and imposed standards should be identified as per available records, so that air monitoring equipments/ chemical solution could be arranged in inspection vehicle.

4. Offsite Surveillance:

- ❖ Compliance inspection must be conducted in working hours except any special situation. Any inspection should not be conducted during non-working hours, without prior permission of the Competent Authority of the State Board.
- ❖ In general before entry into the industry outside activities must be observed. Offsite surveillance always helpful to investigate the zero discharge status of the industry as well as provide an opportunity to the inspecting official to investigate spills, smoke, illegal discharge and illegal dumping of solid waste & hazardous wastes, outside the premises.
- ❖ Inspection official should capture the photograph of such violation and preserve it, as evidence.
- ❖ Offsite surveillance helpful to provide pathway for inspection.

5. Entry & Introduction:

- ❖ Inspecting official shall locate concerning responsible person of the industry and inform about the inspection & its objective.
- ❖ All credentials and notices should be produced properly to the Occupier/ Responsible authorized person.
- ❖ Whenever, there is a difficulty in gaining entry in the industry, inspecting official should tactfully probe the reasons and try to overcome the problem without making any inflammatory discussions.

- ❖ In case industry shall intentionally obstruct the inspection, same shall be recorded in inspection report and initiate punitive action against the unit for non-cooperation.

6. Inspection Procedure:

- ❖ The main part of compliance inspection is its procedures and act of inspecting official during inspection should be impartial & in coherence with the Environmental Acts & Rules.
- ❖ State Board has framed various inspection formats for different type of industrial activities and inspection purposes.
- ❖ A environmental inspection procedure cannot be counted as complete compliance inspection, without assessment of following points:-
 - (1) Operational status of industry (Operative/ Non-operative/Closed). Inspecting official should investigate the reasons of non-operational status of the industrial activities. Documentary evidences viz. Electricity bills, Certified Production figures shall also be collected from the industry during inspection.
 - (2) Raw material.
 - (3) Manufacturing process and identification/tracking of sources of air emissions, effluent generations and hazardous waste generation.
 - (4) Source of fresh water supply and metering arrangements at suitable points.
 - (5) Sources of Water pollution/Effluent generation and its control measures.

- (6) Waste water treatment system (ETP/STP) should be inspected & assessment of operational status & its adequacy is to be evaluated.
- (7) Compliance of Zero discharge status.
- (8) Sources of air pollution and its control measures.
- (9) Air pollution control measures viz. Bag house, Cyclone, Scrubber, Stack height, Venturi Scrubber, ESP should be inspected & assessment of operational status & its adequacy is to be evaluated.
- (10) Energy meters & flow meters should be provided at water pollution control measures & air pollution control measures.
- (11) Management of Hazardous Waste & Solid waste should be verified in terms of adequate storage facility, display board & disposal of hazardous waste/solid waste in accordance to the Rules.

7. Documentation:

- ❖ Inspecting official shall verify all the relevant documents /log books during inspection.
- ❖ Certified copy of the log book/ record shall also be collected from the industry during inspection.
- ❖ Photographs should be captured during inspection, particularly in case of non-compliances.

8. Sampling:

- ❖ Sample of Stack/ Ambient Air/ Fugitive emissions shall be collected in accordance to the standards prescribed in the consent letter.
- ❖ Sample of Treated /Untreated waste water shall be collected.
- ❖ Duly signed notice for intended sample collection should be provided to the unit.
- ❖ Water & Air samples should be deposited at concerning laboratory in prescribed sample deposition format.

9. Communication of shortcomings in writing:

Inspecting official shall inform the industry about non-compliance observed during inspection, in form of “ Site Memo” and advised to submit the reply of site memo within 7 days (supported with documentary /photographic evidences) to the concerning Regional office.

10. Inspection Report

Inspecting official shall prepare the online inspection report by using MIS in prescribed format including non-compliances observed during inspection. Additional information shall be incorporated as remark. Photographic evidences should be attached with the online inspection report and checked carefully.

After approval of competent authority inspection report should be uploaded/submit in MIS by the inspection official.