



Program-Specific Training Requirements are updated periodically. Before starting your training, please check the Inspector Wiki for the most up-to-date training requirements (to access the wiki type <https://inspector.epa.gov> into your browser.)

CLEAN AIR ACT (CAA) - STATIONARY SOURCES – TRAINING REQUIREMENTS FOR CAA STATIONARY SOURCES INSPECTORS

EPA Order 3500.1 establishes minimum and consistent Agency-wide training and development programs for employees conducting, participating in, or assisting with environmental compliance inspections/field investigations. EPA's training program consists of three parts:

1. [Occupational Health and Safety Course](#)
2. Basic Inspector Training (BIT) Curriculum
 - [On-line Basic Inspector Training Course](#) *or*
 - Classroom Training Consistent with On-line BIT Course
3. Program-Specific Curriculum

The Occupational Health and Safety Curriculum consists of mandatory Health & Safety Training specified by the HQ or Regional Safety, Health and Environmental Management Program (SHEMP) manager. The Basic Inspector Curriculum consists of either the on-line BIT course or a BIT classroom training delivered by regional and/or headquarters approved instructors using the basic inspector curriculum student materials and instructor guides as provided by the Office of Compliance. The Program-Specific Curriculum establishes the mandatory and recommended training in legal, programmatic, and technical subjects for each major media program or specific program compliance inspection/field investigation activity. This document sets out the program-specific curriculum for the CAA Stationary Sources Program and required refresher training.

You must complete the Occupational Health & Safety, BIT, and CAA Stationary Sources Program-specific training to become a credentialed Compliance Inspector/Field Investigator in the CAA Stationary Sources Program. Once you have completed both the Occupational Health and Safety Curriculum and the Basic Inspector Curriculum, you may request an optional “Inspector-In-Training” credential. This credential facilitates your ability to participate in field activities, including on-the-job training, in the company of a CAA Stationary Source Lead Compliance Inspector/Field Investigator. The “Inspector-in-Training” credential is valid for one year from the date of issuance.

If you are not yet a CAA Stationary Sources credentialed Compliance Inspector/Field Investigator (for example, if you are a newly hired inspector, a Compliance Inspector/Field Investigator in a program other than the CAA Stationary Sources Program, or a previously credentialed Compliance Inspector/Field Investigator that has allowed your credentials to lapse for greater than a year) and want to become one, you must complete and document that you meet all mandatory requirements for new CAA Stationary Sources Program inspectors in the section below entitled “Requirements for New CAA Stationary Sources Program Inspectors.”

In order to obtain Compliance Inspector/Field Investigator credentials, you and your supervisor are required to document and certify, and submit to your regional or headquarters credentials contact, documentation of completion of the Occupational Health and Safety training, BIT, and CAA Stationary Sources program-specific training. Once you and your supervisor have certified that you have completed all required training and you have obtained your credentials, you are a credentialed Compliance Inspector/Field Investigator and can conduct, participate in, or assist in CAA Stationary Sources inspections. Records of your training, including completed training certification forms and individual training certificates, must be maintained in accordance with EPA Order 3500.1 and relevant inspector training documentation standard operating procedures.



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As a credentialed Compliance Inspector/Field Investigator in the CAA Stationary Sources Program, to maintain your credentials you must annually complete the mandatory refresher requirements for currently credentialed CAA Stationary Sources Program inspectors in the section below entitled “Mandatory Requirements for Currently Credentialed CAA Stationary Sources Program Inspectors.” These mandatory annual training requirements include: the Occupational Health and Safety refresher training; CAA Stationary Sources Program-specific refresher training; and Inspection Skills Refresher Training. During the re-credentialing process, an inspector will need to document that they are up-to-date on all annual refresher training.

These requirements will be updated from time-to-time. Inspectors and supervisors should verify that they have the most recent version of these requirements by checking the Inspector Wiki Site. During the current and future “re-credentialing” processes, inspectors and supervisors must ensure that they have met all of the requirements that applied at the time the inspector obtained their original Compliance Inspector/Field Investigator credentials, in addition to each year’s most recent mandatory refresher training. If an individual has commenced program-specific training to obtain new Compliance Inspector/Field Investigator credentials, and that program-specific training is updated before that person has obtained their credentials, they may choose to complete the training that existed at the time they commenced their program-specific training, or they may start over with the new and most recent program-specific training. The requirements listed below are minimum requirements and a supervisor may, at any time, require additional training as necessary.

Requirements for New CAA Stationary Sources Inspectors

Mandatory Training Courses:

- [CAA 101](#)
- [CAA Confidential Business Information](#) (*State and tribal inspectors with federal CAA inspector credentials cannot be cleared to view CAA CBI.*)
- Opacity Training*:
 - EPA Method 9 Training for visual determination of opacity (aka Smoke School) (lecture and field certification.) Field certification required every six months.
 - EPA Method 22 – No certification required. Read and become familiar with the method.
 - Alt 082 – Use of Digital Camera Opacity Technique for determination of opacity (EPA Method 9 alternative), no certification required. Read and become familiar with the method.

*Only if you conduct opacity reading inspections, you are required to complete one of the three listed emission observation methods.

Mandatory Self-Study

CAA Stationary Sources Inspectors must read and/or familiarize themselves with the following self-study materials. When the requirement says to “read,” the inspector should read and know the material. The inspector will be tested to ensure a minimum knowledge level. When the requirement says to “be familiar,” the inspector should read through the material to gain appropriate familiarity with the scope and organization of the information should they need to access it expeditiously in the future.

Read the following:

- [CAA Stationary Source Compliance Monitoring Strategy \(10/16\)](#)



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- CAA [National Stack Testing Guidance \(04/09\)](#)

Be familiar with the following guidance/reference manuals:

Policy

- [CAA Clean Air Act Civil Penalty Policy \(1991\)](#)
- [Timely and Appropriate Enforcement Response to High Priority Violations](#) (08/14)
- [Guidance on Federally Reportable Violations for CAA Stationary Sources](#) (09/14)
- [Federal Air Rules for Reservations*](#)
*Required only if inspections are conducted on Indian reservations in EPA Region 10.
- [Compliance Guidance for Industrial Process Refrigeration Leak Repair](#) (10/95)

Air Regulations

(Note: For each of the listed CFR readings: To access all of the listed sections, begin by clicking on the link and scroll to the next required reading in the section by using the “Next” link near the top right hand of the page.)

- [40 CFR Sections 50.1](#)-12: National Primary and Secondary Ambient Air Quality Standards
- [40 CFR Sections 51.100](#)-232: Requirements for Preparation, Adoption, and Submittal of Implementation Plans
- [40 CFR Sections 52.01](#)-34: Approval and Promulgation of Implementation Plans-General Provisions
- [40 CFR Sections 60.1](#)-19: Standards of Performance for New Stationary Sources-General Provisions
- [40 CFR Sections 63.1](#)-16: National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions
- [40 CFR Sections 51.166](#) and [52.21](#): Prevention of Significant Deterioration of Air Quality
- [40 CFR Section 51.165](#): Permit Requirements
- [40 CFR Part 82](#): Protection of Stratospheric Ozone

Volatile Organics - VOC's

- Hazardous Organic NESHAP (HON) Inspection Tool ([Volume 1](#) & [Volume 2](#))
- [Process-Based Self-Assessment Tool for the Organic Chemical Industry](#) (EPA 305-B-97-002, 12/97)
- [Inspection Manual: Federal Equipment Leak Regulations for the Chemical Manufacturing Industry](#) (3 Volume Set) (EPA 305-B-98-011, 12/98)
- [Leak Detection and Repair – A Best Practices Guide](#) (EPA-305-D-07-001, 10/07)

Mandatory On-the-Job Training (OJT)

OJT includes inspection preparation procedures, the inspection, and post inspection procedures. You must:

1. Review a minimum of two completed CAA stationary inspection reports. (The new inspector's supervisor can require the review of more than 2 reports, if deemed necessary).
2. Accompany an experienced, credentialed CAA Compliance Inspector/Field Investigator, as determined by the inspector's supervisor, on 2 CAA Stationary Sources inspections.



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An experienced inspector should be an EPA credentialed inspector or state/local inspector with the appropriate level of knowledge and experience in conducting inspections in the CAA program, as determined by the supervisor of the inspector seeking the credential. In determining whether a credentialed Compliance Inspector/Field Investigator is "experienced", the supervisor should consider the number of years and frequency of inspections for that individual. Generally, 2-5 years' experience or 25 documented inspections conducted in the CAA program would be an indication that the person is an experienced, credentialed Compliance Inspector/Field Investigator.

3. Conduct at least 1 CAA Stationary Sources OJT inspection while being observed by an experienced, credentialed CAA Compliance Inspector/Field Investigator, as described above.

Evaluations should be documented, kept on file, and be used by the inspector's supervisor to determine readiness to conduct, participate in, or assist with inspections. An inspector's supervisor may require more OJT inspections, based on the supervisor's assessment of readiness, as appropriate.

Mandatory Requirements for Currently Credentialed CAA Stationary Sources Inspectors

Biannually complete the bulleted item below:

- Visible Emissions (VE) EPA Method 9 Training (8-hour course) Field re-certification required every 6 months. *
*Only if you conduct opacity reading inspections, you are required to complete one of the three listed emission observation methods.

By the end of each calendar year, inspectors must complete: eight (8) modules from the Occupational Health and Safety Course; one program refresher for each program he/she inspects in; and one Inspection Skills Refresher training. Inspectors must:

- Complete eight (8) modules from the Occupational Health and Safety Course including the three (3) mandatory modules (hazard communication, driver safety, and PPE) and five (5) elective modules. Inspectors, in consultation with their, should select five (5) elective modules that reflect the type of field work and anticipated hazards typical of their assignments. Federal EPA employee inspectors can also select an alternate health and safety course as long as it contains the 3 mandatory module topics and is approved in advance by their supervisor and SHEMP manager.

[Occupational Health and Safety Refresher](#) (8 hours annually)

- Complete one of the following CAA Stationary Source program-specific trainings listed below. An inspector may not repeat a course to satisfy this requirement.
 - Complete any untaken course from the list of "Mandatory Training Courses or Mandatory Self-study for New CAA Stationary Source Inspectors."
 - [Greenhouse Gas Reporting Rule](#)
 - [Boilers 101](#)
 - Complete an [Air Pollution Training Institute \(APTI\)](#) or [California Air Resource Board \(CARB\)](#) course. APTI or CARB courses can be either classroom or on-line and must



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be relevant and topical to stationary source compliance and approved by the inspector's supervisor.

- [EPA Residential Wood Heater Inspector Training](#)
- [Fundamentals of Title VI Regulations](#) (Stratospheric Ozone Protection Primer)
- The inspector, in consultation with the supervisor, may select other CAA Stationary Source courses to meet the annual requirement.

(New CAA Stationary Source training courses will be added to the Inspector Wiki [CAA Program-Specific Resources](#) page as they become available.)

- Complete one refresher training course from the Inspector Wiki listed under the section entitled "[Inspection Skills Refresher Training](#)." This refresher training includes topics such as "Note Taking," "Interviewing Techniques," and "Being a Witness." To satisfy this annual requirement, an inspector may not repeat an Inspection Skill Refresher Training Course until all have been completed. Upon completion of all of the listed courses, the inspector and supervisor may select other similar inspector refresher training to meet this annual requirement or repeat a course from the list of "Inspection Skills Refresher Training" courses.
- Continue to be familiar with the guidance/reference manuals listed in the mandatory Self-Study and the Recommended Reference Materials Sections.
- Become familiar with new regulations and policies as they are issued.