



## **COGCC STANDARD OPERATING PRACTICES (SOP)**

### **ALTERNATE MEANS OF INSPECTION**

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#### **Background**

##### *Purpose of this Document:*

The purpose of this standard operating practice (SOP) is to establish guidelines for when Alternate Means of Inspection (AMI) may be accepted to approve corrective actions completed to resolve findings identified on a Field Inspection Report (FIR).

##### *Introduction:*

The current process only allows for findings to be closed when an inspector verifies completion of the corrective actions via an on location re-inspection. In certain instances, it's inefficient for an inspector to return to a location to verify corrective actions related to the **specific** situations outlined below. This guidance document outlines when an AMI may be accepted to close corrective actions, saving state resources. AMI may NOT be used when corrective actions are related to environmental impacts to air, water, soil, or biological resources, public health, safety and welfare; including the environment and wildlife resources.

# ALTERNATE MEANS OF INSPECTION SOP

## Overview of the Process

An AMI may be used at the inspector's discretion when the corrective action is related to any of the following:

- Signs.
- Tank and equipment painting.
- Unused Equipment.
- Certain stormwater management controls that are not subjective such as putting stakes on the correct side of the silt fence or armoring sediment traps.
- Weeds and trash.
- Installation of general secondary containment.
- Upon approval of a variance request.
- Upon submission of required documentation, such as a Form 5A.

The following is a list of acceptable supporting documentation that may allow an inspector to close the corrective action via an AMI.

- Date and time stamped photos taken from a similar location and perspective as the photo attached to the FIR with a description of actions taken to address the finding.
- Video taken of the location.
- A PDF copy of the approved variance request.
- A document number for a submitted document.

### Important Point:

The decision to close the corrective action via an AMI is at the discretion of the COGCC inspector.

### Process Steps:

- 1) Operator receives FIR with photos and findings.
- 2) Operator completes required corrective actions.
- 3) Operator submits the FIR Resolution Form stating corrective actions have been completed and includes a description of what was done and supporting documentation as required.
- 4) COGCC inspector reviews the FIR Resolution Form along with supporting documentation and makes a determination on whether an AMI is acceptable.
  - a. If acceptable, COGCC inspector accepts AMI, provides comments in the FIR Resolution Form, and closes corrective action if supporting documentation supports that action.
  - b. If not acceptable, COGCC inspector re-inspects location for CA closure.

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### Document Change Log:

Change Date	Description of Changes
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