



# Development of a Targeted Inspection Program & Policy

Community Equity, Health, and Justice Committee

March 12, 2025

Dennis Quach

Air Quality Specialist

Compliance & Enforcement Division

# Presentation Outline

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- Strategic Plan Framework
- Targeted Inspection Program and Policy: Goals and Objectives
- Overview of Targeted Inspection Program and Policy
- Compliance Inspection Background
- General Inspection Program Priorities
  - Routine Inspections by Source Type
- Enhanced Inspection Priorities in Overburdened Communities (*launch in Assembly Bill (AB) 617 communities*)
  - Analyze Compliance Data to Target Inspections
  - Community Engagement and Partnership
- Additional Strategies Associated with Policy Changes
- Next Steps

# Strategic Plan Framework

**MISSION** The Air District improves air quality to protect public health, reduce historical and current environmental inequities, and mitigate climate change and its impacts.

**CORE VALUES**



**5-YEAR VISION** Over the next 5 years, the Air District will transform its workforce, operations, community engagement, and programs to improve air quality, increase public trust, and demonstrate leadership in equity-centered environmental stewardship.

**Environmental Justice Priorities**

**5-YEAR GOALS**



**Strategy 1.6:** New Enforcement Policy

**Strategy 4.5:** Improve Compliance Investigations

# Targeted Inspection Program and Policy: Goals & Objectives

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- Align with the Air District Strategic Plan to provide **transparency** into how routine compliance work is prioritized across the nine Bay Area counties and with a key focus, on overburdened communities, starting with AB 617 communities
- Improve inspection program by incorporating **routine data review and analysis** to identify sites/facilities in AB 617 communities that require additional enforcement efforts
- Integrate internal and external information and **utilize community knowledge and experiences** to pinpoint compliance issues
- Direct staffing resources **more efficiently and effectively** to target non-compliance and repeat violators, and resolve community concerns in AB 617 areas

# Overview of Targeted Inspection Program & Policy



## General Inspection Program Priorities (*Air District-wide*)

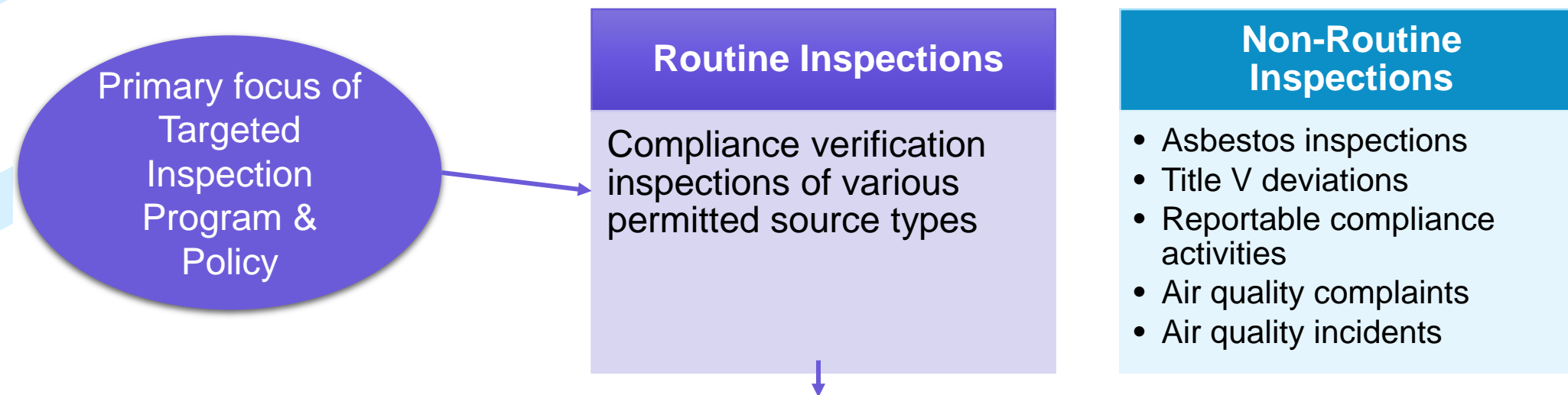
- Update inspection frequencies across the nine counties based on various source types, facilities, and operations
  - Title V facilities
  - Sites/facilities with elevated health risk



## AB 617 Priority Areas

- Prioritizes and identifies community concerns
- Incorporates information-driven compliance strategies to target non-compliance

# Compliance Inspection Types



A **routine inspection** typically includes the following activities:

- Review of Air District permit and regulations that apply
- Onsite inspection of equipment, operations, abatement, and controls, including general housekeeping
- Records review (e.g., usage/throughput logs, emissions testing, monitoring, maintenance, etc.)
- Documenting inspection findings in a compliance report (determination of compliance or Notice of Violation)

# Routine Inspections by Source Types

Fixed Inspection Frequencies	
Title V & Synthetic Minor Facilities	1.5 years
Facilities with Elevated Health Risks	1.5 years
Industrial Sources and Operations (non-Title V/Synthetic Minor Facilities)	
<ul style="list-style-type: none"> <li>Landfills and Organic Material Handling Operations</li> <li>Tanks, Terminals, and Bulk Plants</li> <li>Metal Shredding and Recycling Operations</li> <li>Aggregate, Cement, and Asphalt Plants</li> </ul>	2 years
<ul style="list-style-type: none"> <li>Surface Coating and Prep, Solvent, Adhesive and Resin Operations</li> <li>Wastewater Treatment Operations</li> <li>Chrome Plating Operations</li> <li>Combustion Sources</li> <li>Gasoline Dispensing Facilities (Retail)</li> </ul>	3 years
<ul style="list-style-type: none"> <li>Auto Body Coating Operations</li> <li>Printing Operations</li> <li>Soil Groundwater Remediation / Soil Vapor Extraction</li> <li>Food &amp; Agricultural Processes</li> <li>Dry Cleaners</li> </ul>	4 years
<ul style="list-style-type: none"> <li>Gasoline Dispensing Facilities (Non-Retail)</li> </ul>	5 years

Permitted Sites and Facilities

## Title V & Synthetic Minor Facilities

- **Major Facility (Title V):** A facility with the potential to emit 100 tons/yr of Criteria Air Pollutants (CAP) or 10 tons/yr of Hazardous Air Pollutant (HAP)
- **Synthetic Minor:** A facility that emits or has the potential to emit at or above 80% of the Title V threshold
- Federal Environmental Protection Agency (EPA) Compliance Monitoring Strategy (CMS) recommends the following inspection frequency
  - **Title V:** **Minimum** once every **2 fiscal years**
  - **Synthetic Minor:** **Minimum** once every **5 fiscal years**

# Routine Inspections by Source Types (cont.)

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Permitted Sites and Facilities

## Facilities with Elevated Health Risks

- Focus compliance efforts on facilities that have been identified with elevated health risks
  - Utilize prioritization scores to guide inspection priorities
  - Prioritization scores are based on the quantity of toxic air contaminants (TACs), the relative toxicity of the TACs emitted, and the proximity of the facility to possible receptors
  - Prioritization scores are updated annually



# Routine Inspections by Source Types (cont.)

Fixed Inspection Frequencies	
Title V & Synthetic Minor Facilities	1.5 years
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Compliance priorities are based on the type of site, facility, and sources of operation.

- Source categories are listed based on current Air District priorities
- Inspection frequencies can vary based on staffing resources available, types of pollutants emitted, and known causes for potential compliance concerns.
- Inspection frequencies of source categories may be adjusted or augmented as Air District priorities change

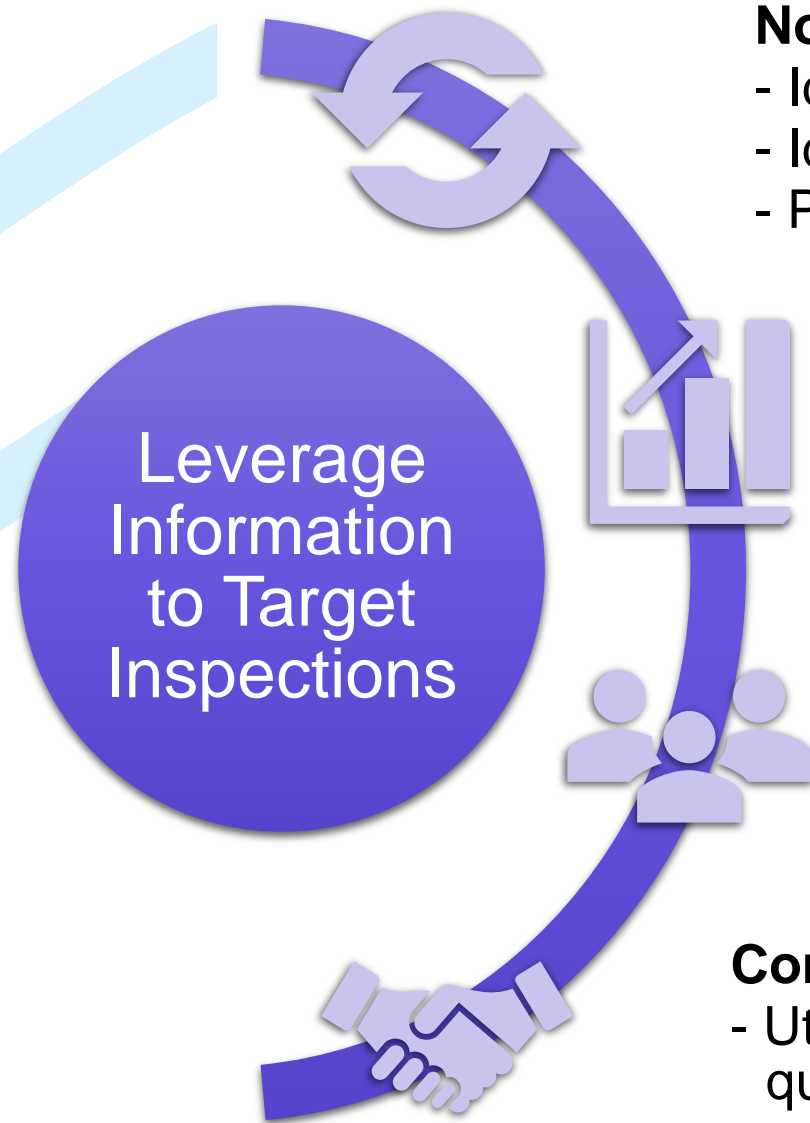
# Enhanced Inspection Priorities in Overburdened Communities



## Methodology in Information-Driven Compliance Strategies

- Utilize **community knowledge and understanding** of local air quality issues to better address compliance concerns
- Review and **analyze** the last three years of **compliance data** such as Notice of Violation (NOV), Air Quality Complaint, inspection history data
- **Identify non-compliance trends** for inspections and additional actions
  - Allocate staffing resources towards areas or sites/facilities that have patterns of non-compliance for further investigation/inspection

# Analyze Compliance Data to Target Inspections



## **Notice of Violation (NOV) Data**

- Identify sites/facilities with reoccurring violations
- Identify reoccurring non-compliance issues at the same sources/operations
- Prioritize additional inspections/investigations

## **Air Quality Complaint Data**

- Identify hotspots, patterns and reoccurrences of emissions
- Prioritize area patrols and inspections

## **Collaborative Identification**

- Enhance internal collaboration and align priorities across divisions
- Coordinate with external partners and local regulators

## **Community Engagement and Partnership**

- Utilize community knowledge and understanding of local air quality issues to target compliance concerns

# Community Engagement and Partnership

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Collaborate with Environmental Justice Division to solicit community knowledge and experiences to target air quality concerns

- Identify community partners
- Develop tools for the community to interact with the Air District to collect data on air quality issues (e.g. Air Pollution Log)
- Establish scope, protocol, timeline, and resource commitment, and set expectations



# Additional Strategies Associated with Policy Changes

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- Expand staff coverage *outside of business hours*
- Develop a “Whistleblower” Tip Line
- Utilize data to support work across divisions (e.g., prioritize and inform emissions monitoring and other data analyses)
- Continue to update Targeted Inspection Program & Policy goals and methodologies
- Increase inspection transparency by providing compliance updates on the website and improving data accessibility

# Next Steps

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- **Starting March 2025** - Pilot elements of the program in AB 617 communities, starting with Bayview Hunters Point
- **May 2025** - Present policy concepts to the Board of Directors
- **June - August 2025** - Complete draft policy and enhance existing compliance tracking tool
- **October 2025** - Release draft policy for community review and input
- **December 2025** - Finalize program and policy
- **January – March 2026** - Conduct staff training and implement new policy
- Review and provide **annual updates** to the Targeted Inspection Program

# Questions / Feedback

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**For more information:**  
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# Diversity, Equity, and Inclusion (DEI) Action Plan

Community Equity, Health, and Justice Committee

Wednesday, March 12, 2025

Tim Williams, Director

Nunu Phengphanh, Supervising Staff Specialist  
Office of Diversity, Equity, and Inclusion



# About the Office of Diversity, Equity, and Inclusion

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- Established in 2017
- Maintains equitable, welcoming, and inclusive environment
- Designs and implements DEI initiatives and data-informed strategies that transform workforce culture and operations
- Builds cultural awareness, supports professional development, and facilitates employee engagement events



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# DEI Action Plan: Purpose and Scope

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## Purpose

- Alignment with 2024-2029 Strategic Plan
  - Strategy 3.1 – A Diverse Workforce
  - Strategy 3.2 – Be Welcoming and Inclusive
- Internal Capacity-Building
  - Inclusion Training
  - Leadership Development
- Program and Policy Development

## Scope

- Internal Focus

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# September 2024-February 2025

# DEI Program Updates

# Heritage Celebrations and Cultural Events



Latin American Heritage Month is a vibrant and meaningful period where we recognize the rich tapestry of American culture.

Celebrating Latin American Heritage Month is an opportunity to honor the traditions, customs, and community members who have shaped our diverse environment. By celebrating Latin American Heritage Month, we recognize the significant impact of Latin American culture and inspire all employees to embrace our District's diversity.



Air District proudly serves Lunar New Year. The Lunar New Year festival is typically celebrated in Asian countries, beginning on the first new moon of the lunar calendar and ending on the first full moon, 15 days later.

Diversity@ba



Black communities have fought for environmental justice. From environmental racism to a Black leaders and organizing movement to ensure that we live in a healthy environment. Icons like the "Father of Environmentalism" have shown Black communities disproportionately affected by pollution and climate change. We must continue to address these issues.



# Professional Development Webinars

## Elevating the Latine Community (Oct 7)

- An interactive session exploring how leaders and co-workers can actively and intentionally challenge outdated and harmful stereotypes and societal norms so our community can thrive equitably and inclusively.

## Leveling Up Your Career & Brand (Oct 10)

- A professional development workshop specifically designed to address the unique challenges faced by the Latin American/Latine community in professional development and career advancement.



# Workplace Allyship Program

- Launched Air District Allyship Program in Nov 2024
- Aligns with strategic plan efforts to foster cohesion and inclusion
- 76% of participants so far rated sessions as excellent
  - 24% rated as good
- 98% rated as very effective or effective



Graphics courtesy of Lean In.

# Air District Mentorship Program

- Launched 3rd cohort in Jan 2025, with 60 participants
- Aligns with strategic plan commitment 3.6.1 (Develop an expanded mentoring program)
- Highlights from two cohorts:
  - **96%** reported gaining perspectives and knowledge
  - **80%** report gaining personal satisfaction
  - **76%** rated the program as "Very successful"



# Employee Resource Group Empowerment

## **CLIMA: Comunidad Latina para Impacto y Medio Ambiente**

- For Latine/Latin American-identified employees and allies

## **The CULTURE**

- For Black/African American-identified employees and allies







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# Purpose and Scope

# Strategic Plan Alignment

# Strategy 3.1: A Diverse Workforce

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- 3.1.1** Establish recruitment, hiring, retention, and advancement policies and practices that promote diversity and inclusion and remove any structural biases, including consideration of an expanded internship program.
- 3.1.2** Create development programs tailored to employees from diverse backgrounds.
- 3.1.3** Establish and grow employee support groups.
- 3.1.4** Regularly assess recruitment, retention, and promotion rates for under-represented employees, especially in leadership positions.
- 3.1.5** Gather employee feedback and adjust as needed.

# Strategy 3.2: Be Welcoming and Inclusive

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## 3.2.1

Redouble efforts to consider diversity, equity, and inclusion in our work, including internal and external decision-making, policies, procedures, regulations, funding initiatives, public outreach, planning, and hiring practices.

## 3.2.2

Conduct annual diversity and unconscious bias training for all levels of the organization, with a focus on those making hiring and promotional decisions.

# DEI Action Plan Overview

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1. Establish an Environmental Justice Scholarship and Internship/Fellowship Program
2. Implement a Supplier Diversity Initiative
3. Refine our DEI Trainings and Learning Experience
4. Launch an Employee Development Program
5. Integrate Diversity Awareness in Hiring Process
6. Build an Employee Resource Group (ERG) Empowerment Program
7. Develop a Pathway to Permanency Design
8. Integrate Equity into Decision Making



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# Environmental Justice (EJ) Scholarship & Internship/Fellowship Programs (Strategy 3.1.1)

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## 1. Establish an Environmental Justice Scholarship and Internship/Fellowship Program

### Scholarship

- Entering and undergraduate students from the Bay Area
- Goal to achieve 50% participation from students from overburdened communities
- Funds to cover a portion of educational and living expenses, starting in Fall 2026 academic year

### Internship/Fellowship

- Undergraduates, graduate students or early-career professionals
- Hands-on experience with the Air District and receive competitive salaries, professional development, and mentorship opportunities
- Current existing Internship Program will add a diversity component by 2026

# Supplier Diversity (Strategy 3.2.1)

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## 2. Implement a Supplier Diversity Initiative Program

- Proactive process to create a supplier base that reflects diverse communities in which we work
- To launch once new procurement software in place
- Development of Supplier Diversity guidelines, outreach, and engagement by Summer 2026

# DEI Learning Program (Strategy 3.2.2)

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- ### 3. Refine Internal DEI Learning Program
- Learning content to cover topics such as: Implicit Bias, Microaggression and Allyship, Equity 101, and Intersectionality
  - Establish ongoing training schedule and require manager participation
  - Offer at least six DEI learning opportunities in 2025

# Employee Development Program (Strategy 3.1.2)



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## 4. Launch an Employee Development Program

- Support professional growth and retention of employees from diverse backgrounds and strengthen leadership pipeline
- Begin offering leadership development by Summer 2025



# Diversity Awareness (Strategy 3.1.1)

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- ## 5. Integrate Diversity Awareness into our Hiring Process
- Develop interactive dashboards that offer insights into team demographics for hiring managers
  - Provide hiring manager training on unconscious bias, attracting diverse talent
  - Partner with Human Resources Office to integrate DEI into recruitment efforts

# Employee Resource Groups (Strategy 3.1.3)



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## 6. Build an Employee Resource Group (ERG) Empowerment Program

- Establish stronger partnerships with ERGs to harness their collective strength, including launching two new groups by end of 2025
- Actively engage ERGs on key DEI projects and align DEI efforts with ERG insights and existing initiatives
- Provide additional resources to ERGs, including logistical support, opportunities for dialogue, and leadership opportunities to support career growth and development

# Pathway to Permanency (Strategy 3.1.1)

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## 7. Develop a Pathway to Permanency Program

- Creating clear, accessible pathways for temporary employees to secure permanent positions
- Offer targeted support initiatives (mentorship opportunities, interview skills, and career counseling)

# Equity Integration in Decisions (Strategy 3.2.1)



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## 8. Integrate Equity into Decision Making

- Incorporate equity considerations into board actions
- Introduce a standardized equity section in the board memo template, requiring content creators to assess and articulate the equity implications of the proposed actions

# Adjusted DEI Action Plan

Actions	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026
EJ Scholarship and Fellowship/Internship Program						
Supplier Diversity Initiative						
Internal DEI Learning Program						
Employee Development Program						
Diversity Awareness in Hiring Program						
Employee Resource Group (ERG) Empowerment Program						
Pathway to Permanency Program						
Equity Integrated into Decision Making						

# Questions?

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**For more information:**

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