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**Category:** 49 – Recordkeeping / Reporting

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR, NOISE AND RADIATION

January 27, 1984

MEMORANDUM

STATE AIR PROGRAMS BRANCH

**SUBJECT:** Violations of Recordkeeping Provisions in Approved  
SIPs

**FROM:** Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards

**TO:** Air and Waste Management Division Directors  
Regions II, IV, VI-VIII, and X

Air Management Division Director  
Regions I, III, V, and IX

Evolving out of the recent VOC workgroup meeting was the problem of VOC sources not keeping adequate records to show compliance as required by approved SIP regulations. This is of particular concern, especially where the only practical means of determining compliance is by use of this information which is gathered and kept by the source, and maybe compounded by new compliance approaches such as special and temporal bubbles. Region V has specifically addressed this issue in a recent memo to us (copy attached).

I fully endorse the approach that Region V presents in addressing this problem and would urge you to follow their lead.

Should you have any comments, please call John Rasnic (382-2826).

Edward E. Reich

Attachments

Letter From: Larry Kertcher, Chief; Air Compliance Branch  
To: John Rasnic; Stationary Source Compliance

Division

Date: December 12, 1983  
Subject: Violations of Recordkeeping Provisions by VOC

cc: Air Program Branch Chiefs, Regions IX  
Air Compliance Branch Chiefs, Regions II, V, VII, and IX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

Date: December 12, 1983

Subject: Violations of Recordkeeping Provisions by VOC Sources  
with Approved SIP revisions

From: Larry Kertcher, Chief  
Air Compliance Branch

To: John Rasnic  
Stationary Source Compliance Division

Compliance inspections at several VOC sources in Region V which have approved SIP revisions have revealed that these sources are not complying with their recordkeeping and monitoring requirements. Production data is being recorded on an intermittent basis or over long time periods. Under these conditions compliance can only be determined for "selected" days or "averaged" days regardless of the limit specified in the revision.

An enforcement problem thus arises which allows a source to violate its revised SIP limit but avoid detection because of poor recordkeeping. A source can simply exclude production data on days when violations occur or wait several weeks and record the data in a generalized total from which specific violations could not be determined. In either event, enforcement is precluded.

Region V believes that accurate recordkeeping is an essential part of any compliance demonstration. It is important that this provision be strictly enforced so that regulated sources do not take their compliance responsibilities lightly. If inspection of a VOC source reveals inadequate recordkeeping the compliance demonstration will be deemed incomplete. The source will be informed of the deficiencies and requested to remedy them. If the source fails to correct its recordkeeping by the next compliance inspection, Region V will issue a Notice of Violation.