

**SANTA BARBARA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
**POLICIES AND PROCEDURES**

Policy No.	<u>6100.044.2016</u> Div Pol Yr	Draft	<u>      </u>
Supersedes No.	<u>6100.044.1994</u> Div Pol Yr	Final	<u>  x  </u>
Date:	<u>August 25, 2016</u>	Pages	<u>  2  </u>
Topic:	<u>Recordkeeping Consistency Pertaining to Rules/Policies/Permits</u>		
Distribution:	<u>Engineering Division Staff</u>		

**ISSUE**

New or revised APCD rules, policies or permit streamlining goals may be inconsistent with specific recordkeeping requirements found on existing permits.

**POLICY**

To achieve recordkeeping consistency and equitability among permitted sources affected by a new or modified rule, a policy change or streamlining goal, the APCD shall notify affected individual permit holders of the appropriate recordkeeping requirements.

**PROCEDURE**

The following procedure shall be followed to ensure consistent and equitable recordkeeping requirements among permit holders:

- 1) The author of a proposed rule or policy that affects recordkeeping shall determine what source types are affected and shall notify the Engineering and Compliance Divisions;
- 2) The District shall identify all affected permit holders;
- 3) Upon rule or policy adoption, Engineering and Compliance Division staff shall examine each affected permit and determine whether the recordkeeping permit condition(s) needs to be modified. The engineer needs to ensure that the source operates consistent with the permit engineering analysis (BACT or other control requirements may require additional recordkeeping).

---

Policies and Procedures Memoranda are intended to provide agency staff, applicants and the public guidance relative to standardized APCD procedures. These policies and procedures shall not be interpreted in conflict with APCD Rules and Regulations or administrative policies, and may be modified or updated periodically without advance notice.

- 4) If recordkeeping changes are needed, the affected permitted sources shall be notified, in writing, by the District. This notice shall specify the appropriate recordkeeping requirements and the effective date of these requirements.;
- 5) A copy of the notification shall be inserted into the appropriate permit files by District support staff;
- 6) Inspectors shall review permit files prior to inspection of a source to ascertain which recordkeeping requirements are applicable; and
- 7) Permit engineers shall modify the permit recordkeeping conditions during the affected source's next permit reevaluation.