

Compliance and Enforcement Division June 30, 2006 Compliance Advisory

This Advisory is provided to inform you about activities of the District which may affect your operation. It is intended to assist you in your efforts to achieve and maintain compliance with applicable air pollution rules and regulations.

ATTENTION: OWNERS AND OPERATORS OF AIR POLLUTION SOURCES

SUBJECT: REPORTABLE COMPLIANCE ACTIVITIES

A Reportable Compliance Activity (RCA) is a new term that the District will use in processing six distinct reporting categories required by various regulations of the Bay Area Air Quality Management District ("District"). The District will no longer use the term "Episode" in the processing of reporting for the following six categories:

- Excess emissions indicated by a continuous emission monitor (CEM)
- Area concentration excesses indicated by a ground level monitor (GLM)
- Parametric monitor excursions
- Pressure relief device (PRD) releases
- Inoperative BAAQMD-required monitors
- Requests for breakdown relief

There are no changes in the procedures that occur when you report a RCA, which are as follow:

- A unique RCA ID# is phoned back to you for each applicable RCA reported.
- A District Inspector will visit your facility to investigate the reported event and get copies of any chart/monitor data that describe the RCA, where applicable.
- District staff will evaluate the chart/monitor data, as well as any required additional written submittals related to the event. Following this evaluation, a recommendation for various enforcement options or breakdown relief (if applicable) is made.

A **new service** has been added that will provide notification by U.S. mail following the disposition of an RCA, where no enforcement action is recommended.

The following **new resources** are provided to assist you to achieve and maintain compliance:

- > A new notification form to report multiple RCA occurring within the same time period,
- ➤ A timeline showing when different RCA types are required to be reported,
- Frequently Asked Questions (FAQ) regarding RCA have been updated based on input received during Industry Compliance Schools. It now includes a clarification of what "operating day" means in terms of required reporting. The FAQ document will be updated on an ongoing basis as needed, so please check our website for revised versions.

For further assistance, please call the District at the following numbers:

- For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.
- For specific questions regarding RCA, contact your assigned inspector at (415) 749-4979 or Michael Krone at (415) 749-4779 or mkrone@baaqmd.gov.

Kelly J. Wee Director of Enforcement