

Question 13.2

Topic: Recordkeeping

Question: The recordkeeping requirements at § 72.9(f)(1) state that records (including all emission monitoring data) must be kept on site at the source for a period of five years from the date the document is created. The recordkeeping requirements at § 75.57(a) state that records required by Part 75 (CEM data) must be kept for three years. Should we keep CEM records on site for five years or for three years?

Answer: Since § 72.9(f)(1) begins with the qualifying statement "Unless otherwise provided. . .". The record retention requirements in § 75.57(a) supersede those in § 72.9(f)(1). Therefore, a retention period of three years is adequate for the types of records specified in § 75.57(a).

References: § 72.9(f)(1), § 75.57(a)

History: First published in Original March 1993 Policy Manual; revised in October 1999 Revised Manual