

# Enforcement Issues: The States' Perspective

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# Topics

- Facility Expectations
- Permit Requirements
- Submissions of Inventories and Permit Renewals
- Reporting and Record keeping
- Operation and Maintenance
- Communication
- State Specific Issues

# Facility Expectations

- READ YOUR PERMIT
  - Communication with permit writer
  - Ensure understanding/implementation of each condition with operations staff
  - Establish clear expectations/responsibilities
  - Develop management program
  - Evaluate compliance routinely
  - Environmental Management System

# Permit Requirements

- READ your permit
- Communicate with permit writer
- Ensure conditions are appropriate/achievable
- Understand what is expected
- Review conditions routinely
- Comply with your permit

# Emission Inventories

- Know date inventories are due
  - TV facilities
    - SCDHEC – Inventories due by March 30
    - NCDAQ – Inventories due by June 30
  - Non-TV facilities
    - NCDAQ – Inventories due with permit renewal
- Accuracy is vital

# Permit Renewals

- Permit renewals must be submitted for all facilities
- TV facilities
  - SCDHEC – Renewal due 6 months prior to expiration
  - NCDAQ – Renewal due 9 months prior to expiration
  - Loss of application shield if renewal not received by due date
- Non TV facilities
  - SCDHEC - Renewal due 60 days prior to expiration
  - NCDAQ – Renewal due 90 days prior to expiration

# Reporting and Record Keeping

- Reporting and record keeping violations are the most common violations at facilities!!
- Report due dates are in the permit
  - No excuse for being late
  - Read your permit!

# Quick Tip for Reporting

- Set up reminder files or “tickler” files to avoid missing reporting deadlines
- Send reports via certified mail
  - Protect yourself if NCDAQ, SCDHEC, or EPA loses report (it happens!)

# Record Keeping

- Read your permit!
- Understand all record keeping requirements
  - record keeping is key to determining compliance
- Keep organized and understandable files
- Train back up employees in the event of vacation, illness, etc.



# Operation and Maintenance

- Proper O&M is a permit requirement
- Do not ignore problems
- Provide good documentation of corrective actions in records



# Communication – Internal

- Communicate permit requirements to your employees
  - Share ownership of compliance (empowerment)
  - Back up when key employees are out
    - Record keeping doesn't stop for vacations, sick leave, etc.
    - Inspectors show up when you least expect it
  - Loss of environmental personnel due to cut backs has been a recent issue
    - Missed reports and records because no one else on site understands the permit

# Communication – External

- Notify state agency when you find violations/deviations
  - Notification may be required by permit
  - Self-reporting policy – applicable in some situations
  - NCDAQ/SCDHEC can work with you to return to compliance



# NCDAQ Contacts

- Asheville Regional Office  
Mike Parkin  
(828) 296-4500
- Fayetteville Regional Office  
Robert Hayden  
(910) 433-3300
- Mooresville Regional Office  
Bruce Ingle  
(704) 663-1699
- Raleigh Regional Office  
Steve Hall  
(919) 791-4200
- Washington Regional Office  
Robert Bright  
(252) 946-6481
- Wilmington Regional Office  
Brad Newland  
(910) 796-7215
- Winston-Salem Regional Office  
Brent Rockett  
(336) 771-5000

# NC Local Programs

- Western North Carolina Regional Air Quality Agency (Buncombe County)  
Ashley Featherstone  
(828) 250-6777
- Mecklenburg County Air Quality  
Jason Rayfield  
(704) 336-5430
- Forsyth County Environmental Affairs Department  
Jeff Ebbitt  
(336) 703-2440

# SCDHEC Contacts

- REGION 1

Anderson EQC Counties: Anderson, Oconee

– Stephanie Smith-Strack (864) 260-5569

Greenwood EQC Counties: Abbeville, Edgefield, Greenwood, Laurens, McCormick, Saluda

– Mark Harvley (864) 223-0333

- REGION 2

Greenville EQC Counties: Greenville, Pickens

– Bill Williamson (864) 241-1090

Spartanburg EQC Counties: Cherokee, Spartanburg, Union

– Johnny Hall (864) 596-3800

- REGION 3

Lancaster EQC Counties: Chester, Lancaster, York

– Steve Moseley (803) 285-7461

Columbia EQC Counties: Fairfield, Lexington, Newberry, Richland

– Ben Buchanan (803) 896-0620

# SCDHEC Contacts (continued)

- REGION 4

Florence EQC Counties: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro

– Keith Lane (843) 661-4825

Sumter EQC Counties: Clarendon, Kershaw, Lee, Sumter

– Regie Watt (803) 778-6548

- REGION 5

Aiken EQC Counties: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg

– Tabatha Corley (803) 641-7670

# SCDHEC Contacts (continued)

- REGION 6

Myrtle Beach EQC Counties: Georgetown, Horry, Williamsburg  
– Matt Maxwell (843) 238-4378

- REGION 7

Charleston EQC Counties: Berkeley, Charleston, Dorchester  
– Whit Hoover (843) 953-0150

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- REGION 8

Beaufort EQC Counties: Beaufort, Colleton, Hampton, Jasper  
– Shane Johnson (843) 846-1030

# South Carolina - Specific Issues

- Stack Testing
  - Follow protocol
  - Provide all process data
  - Timeliness

## Exemptions

new requirements for determination and record management

# Speaker Contact Information

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