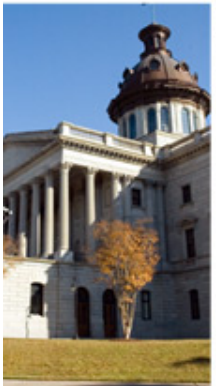




# Getting to a Draft Permit in South Carolina

Diane Humphries  
Coastal Plains Permitting Section  
Manager  
Bureau of Air Quality

CAPCA Fall Conference 2019





# Applications should be . . .

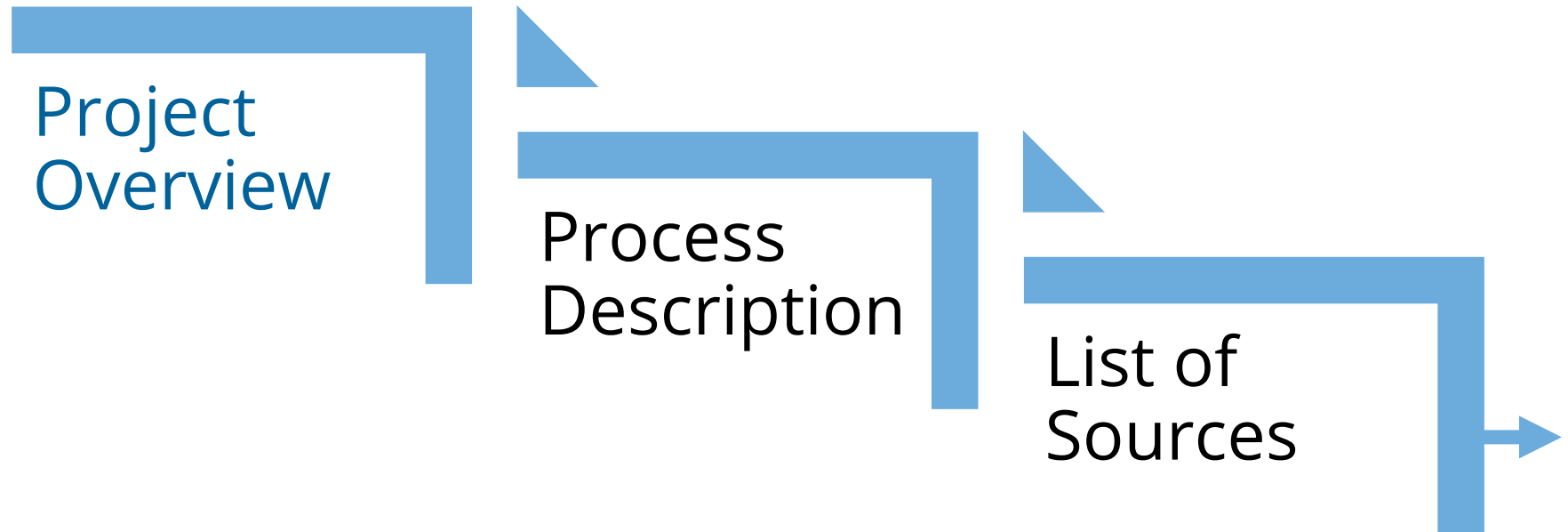
- Clear
- Concise
- Consistent
- Organized
- Accurate
- Complete



# What Can You Do?

- Read and follow the form's instructions
- Read the content of the regulation, not just the regulation's title
- Re-read the regulations – they may have been revised
- Read the completed application thoroughly before submitting

# Consistency is Important



# Consistency is Important





# What Can You Do?

- Confirm that the source emissions and modeled emissions match
- Check that the equipment and control devices on the application are correct
- Provide complete and accurate process descriptions
- Include Process Flow Diagrams and other drawings



# Exempt Equipment?

- Review equipment as it relates to a process. If it is part of permitted process, it will be permitted equipment.
- Air Permitting Exemption List is updated periodically.
- Note that the Title V Insignificant Activities List is different from the Air Permitting Exemption List



# What Can You Do?

- Respond to requests for additional information promptly
- If specific information has been asked for during a past project, it will likely be asked for with a new project.

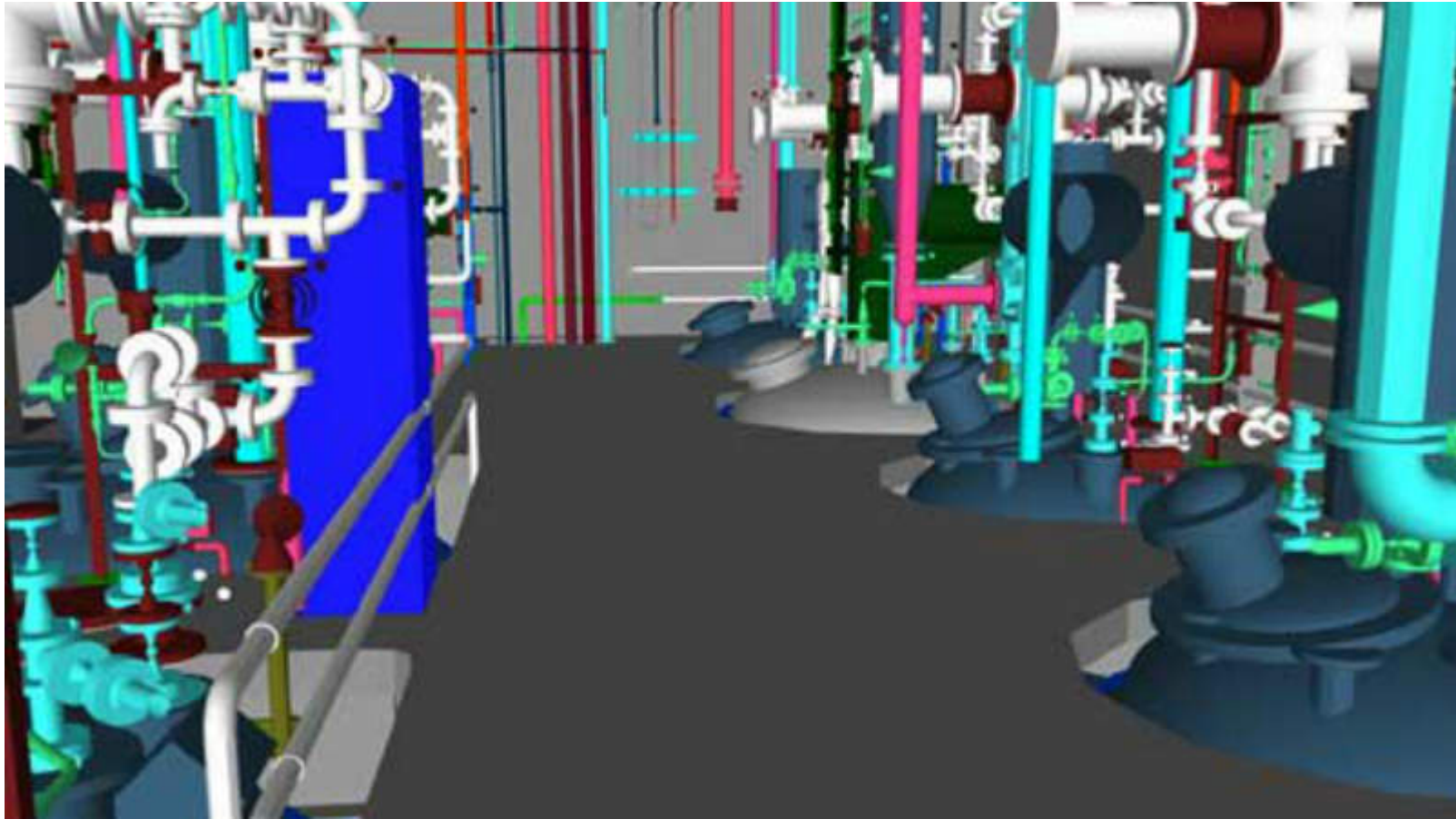




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## Facility Visits





# What to Include

- Federal Tax Identification Number
- SIC and NAICS codes (primary and others)
- Two (2) Public Copies
- One (1) Confidential Copy (if applicable)
- Original Signatures – at least one copy must have original signatures of both owner/operator and Professional engineer (when required)



# What to Include - Emissions

- Potential Emissions
- Sample Calculations
- Emission Factor Details
- SDS
- CAS numbers



# Potential to Emit

- What it is not
  - Potential calculated based on business plans or past actuals
- What it is
  - Theoretical quantity of each air pollutant a source can physically emit and/or based on federally enforceable limits
  - Based on maximum capacity of the equipment



# What to Include

- Co-location applicability determination if needed (<https://www.scdhec.gov/sites/default/files/docs/Environment/docs/Guidance%20for%20CollocationSingle%20Source%20Determinations.pdf>)
- Reference Documents
- Source Test Data (include date tested if from SC)
  - Sister Facility Data (out-of-state/country): Send the full report (Must be in English)



# What to Include

- Complete, Current Regulatory Review
  - Why is the facility subject
  - Limits you are subject to
  - How compliance will be demonstrated
  - Address all applicable sections of the regulation
- Also address regulations that could “reasonably apply”



# What to Include

- How will the facility demonstrate that the control device is operating correctly
- Previously received monitoring alternative, special approvals, case-by-case determinations



## Standard 5.2

- Read the current version of the regulation to determine if applicable
  - If not applicable, explain why not
- If applicable, include
  - What is the emission limit?
  - What other requirements are applicable?
  - How will compliance be demonstrated?





# Helpful to Get Electronically

- Emissions Spreadsheet in Excel
- Permit Shield Form in Word

This is in addition to the required hard copies.



# Construction Permits

- If applying for the expedited program
  - Applications of very high quality are expected
  - Send the application to OCRM if required
  - Don't pay unless accepted into the expedited program
  - May require a pre-application meeting



# Operating Permit Renewal

- Include all changes since last operating permit
  - Equipment lists, control devices
  - Emissions
  - Regulations
  - Review the completed draft application
- Submit on time



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# Draft Permit Review





# Registration Permits

- Auto Body Refinishing
- Cotton Ginning Operations
- Crematory Operations
- Fuel Combustion Operations
- Sawmill Operation
- Surface Finishing
- Temporary Crushing/Screening
- Wood Working Operations



# General Permits

- Asphalt
- Concrete
- Nonmetallic Mineral
- Sawmill
- Surface Finishing
- Textile
- Fuel Combustion
- Petroleum Distribution



# What's Next

- General Title V's
  - Boats
  - Landfills
- Updated forms



# Air Permitting Structure

## Four Permit Sections

1. Piedmont Permitting Section
2. Coastal Plains Section
3. Sandhills Section
4. General Permitting Section





## Contact Us



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