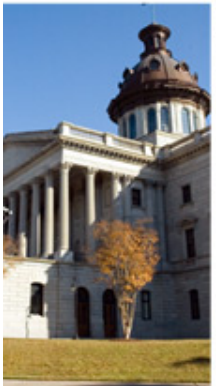




South Carolina Update

Rhonda B. Thompson, P.E., Chief
Bureau of Air Quality

CAPCA Spring Conference
April 12, 2018





Presentation Overview

- Management Team Update
- NAAQS Updates (Ozone, PM_{2.5}, SO₂)
- State Regulation Updates
- Modeling Guidelines Revisions
- Permitting/Enforcement/Compliance Updates & Reminders
- EPA's "Once In, Always In" Policy Rescission



South Carolina Department of Health and Environmental Control
Healthy People. **Healthy Communities.**

Latest Management Hire



South Carolina Department of Health and Environmental Control
Healthy People. Healthy Communities.



Diane Humphries, Manager of Coastal Plains and Power Section



South Carolina Department of Health and Environmental Control
Healthy People. **Healthy Communities.**

NAAQS Updates

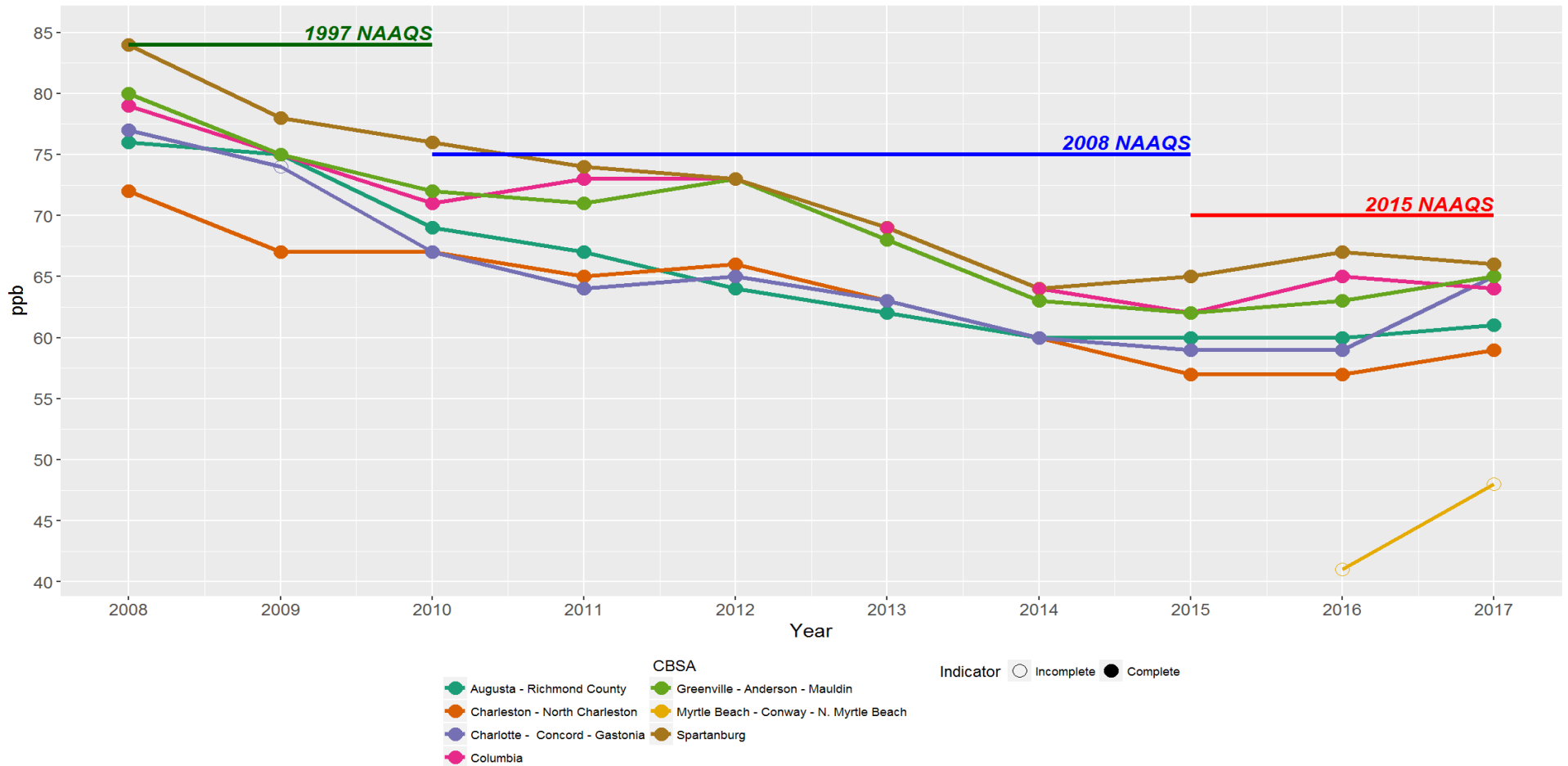


Ozone NAAQS

- 2015 Ozone Standard: 70 ppb
- All SC monitors attaining the standard
 - Highest reading monitor - 66 ppb (North Spartanburg)
 - Most other monitors at 60 ppb or less
- EPA designated **ALL** of South Carolina as “attainment/unclassifiable” on 11/6/2017



2008 - 2017 South Carolina Ozone Design Values by Highest Monitor in the CBSA



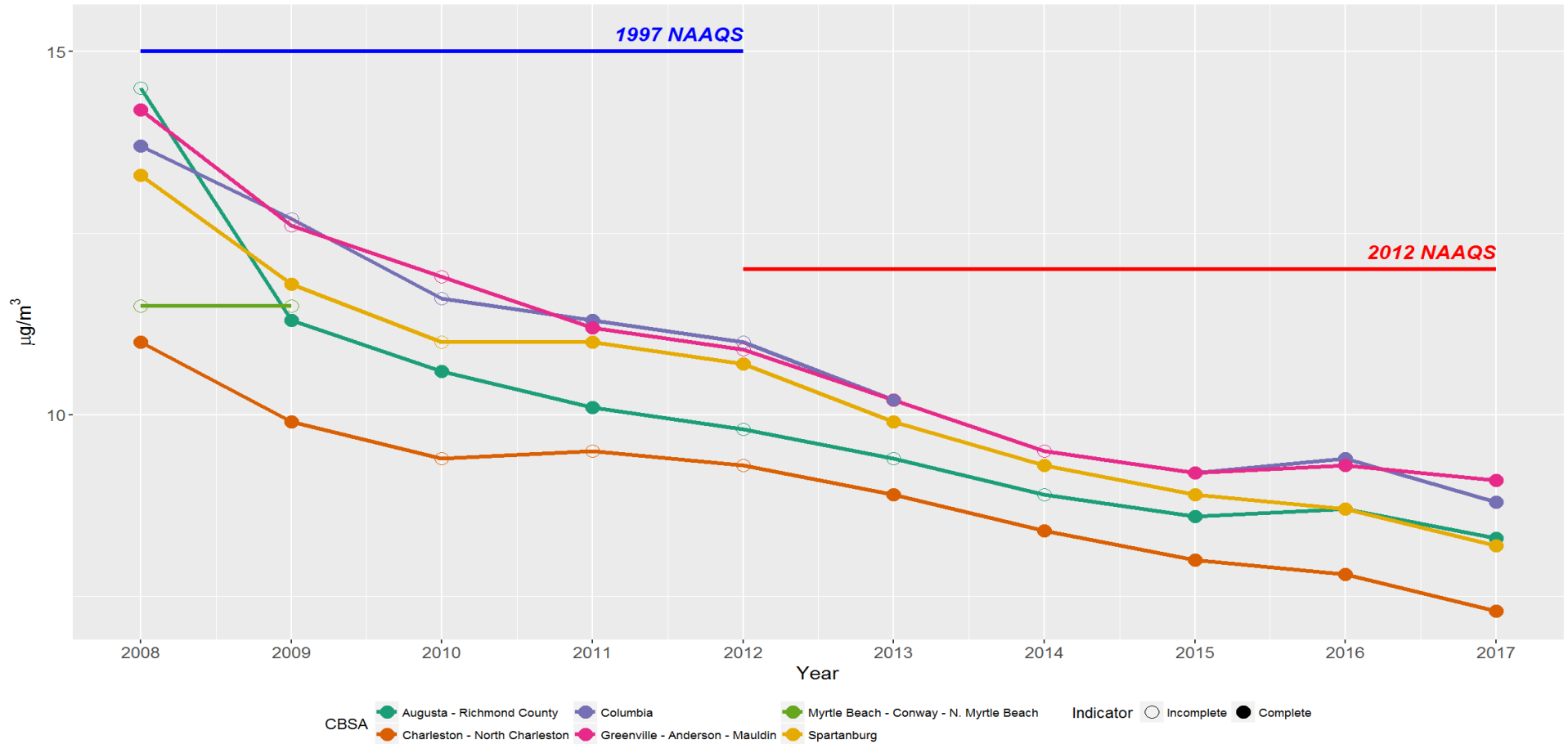


PM_{2.5} NAAQS

- PM_{2.5} Standards:
 - Annual – 12 µg/m³
 - Daily – 35 µg/m³
- All SC monitors attaining the standards
- Highest reading SC monitors
 - Annual – 9.4 µg/m³ (Irmo)
 - Daily – 23 µg/m³ (Greenville)

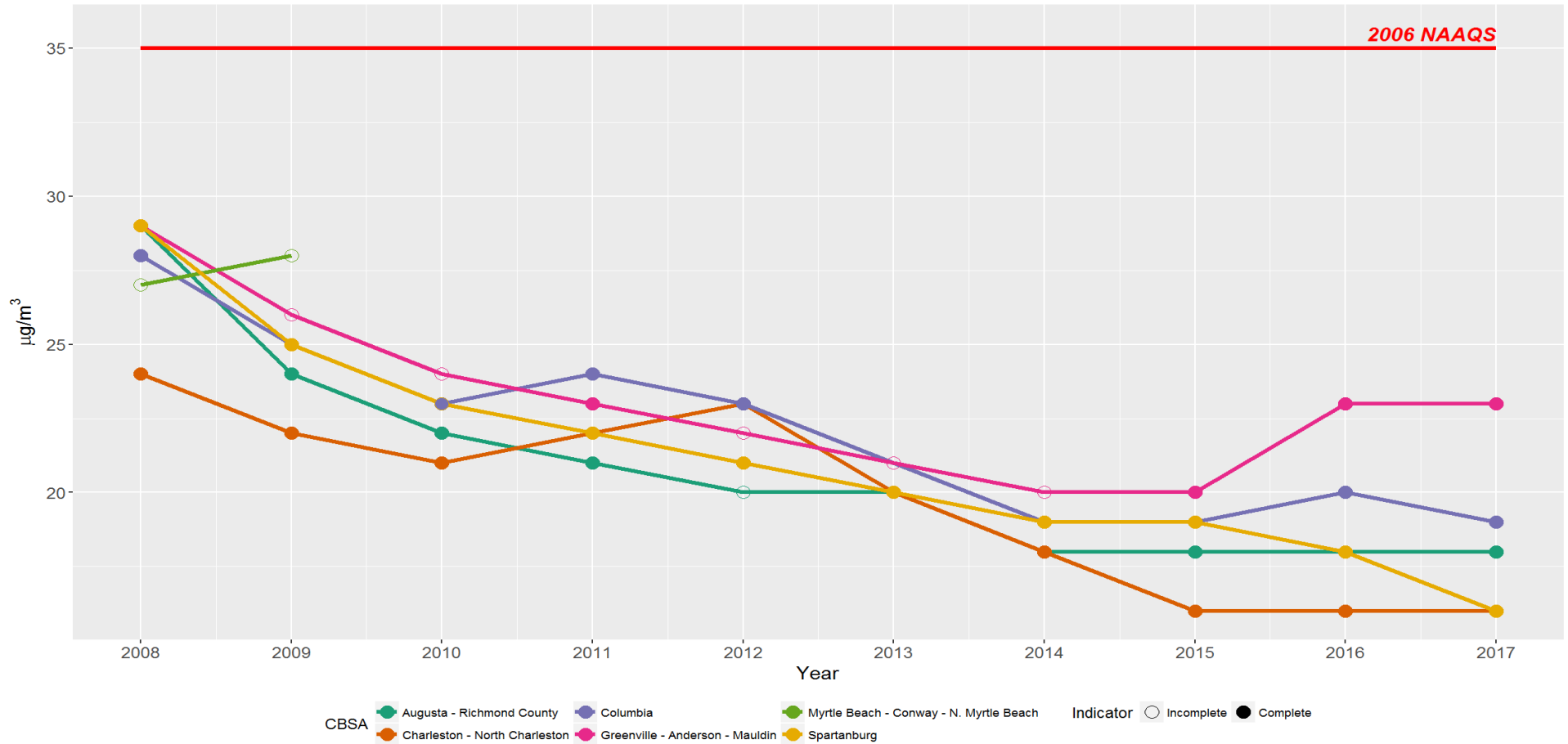


2008 - 2017 South Carolina PM_{2.5} Annual Design Values by Highest Monitor in the CBSA





2008 - 2017 South Carolina PM_{2.5} Daily Design Values by Highest Monitor in the CBSA



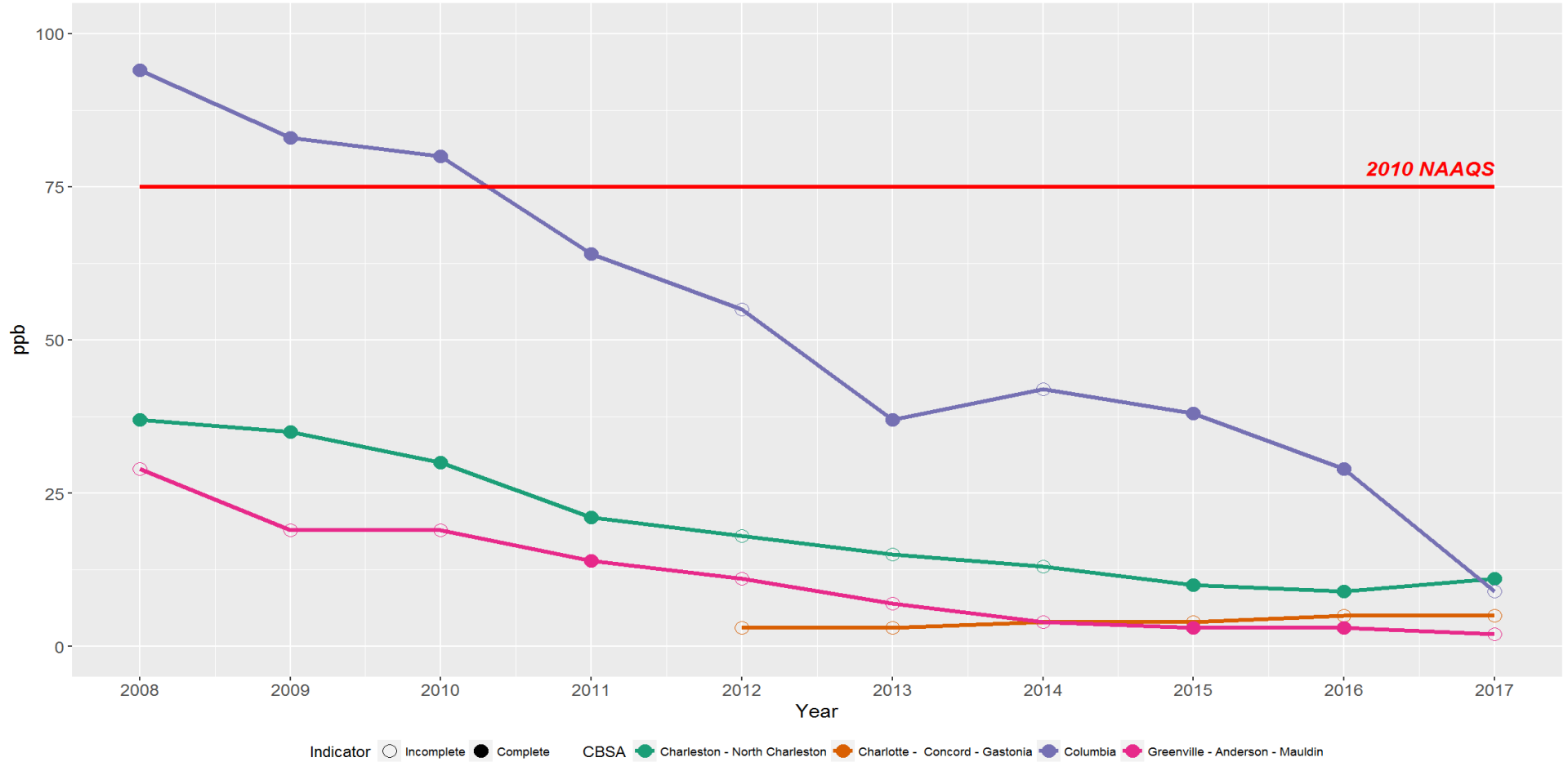


SO₂ NAAQS

- 2010 SO₂ Standard: 75 ppb
- All SC monitors attaining the standard
- Highest reading SC monitor: 29 µg/m³ (Irmo)
- EPA designated **ALL** of South Carolina as “attainment/unclassifiable” on 12/20/2017



2008 - 2017 South Carolina SO₂ 1-Hour Design Values by Highest Monitor in the CBSA





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Regulatory Updates



2017 End Of Year Revisions

- Notice of Drafting published in *State Register* on March 23, 2018
 - Comment period closes April 23, 2018
- Present proposed regulations to Agency Board in June 2018
 - 30-day public comment period if approved
 - Public hearing/final approval in September 2018
- No legislative review required



2017 End of Year Revisions

- Incorporating changes to federal New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) by reference
 - January 1, 2017 – December 31, 2017
- Changes to Chemical Accident Prevention Provisions and Title V Operating Permit Program
 - Corrections, clarifications, consistency with federal regulations
- Repealing Nitrogen Oxide (NO_x) and Sulfur Dioxide (SO₂) Budget Trading Program
 - Cross-State Air Pollution Rule (CSAPR) adopted on August 25, 2017



Air Dispersion Modeling Guidelines

- Last major revision in 2001
 - Complete rewrite of guidelines
- Will be seeking stakeholder input
- Hope to publish in *State Register* for public comment by early summer



Modeling Guideline Changes

- Incorporates guidance previously issued as addendums (Standard 2, 7, and trace toxic exemptions and deferrals)
- Includes AERMOD, EPA's Appendix W changes
- Clarifies when screening vs. refined modeling may be used
- Adds PSD modeling guidance
- Adds Hydrogen Fluoride standard and de minimis level, list of common polycyclic organic matter (POM)s and guidance
- Appendices now includes tabular guides on concentration ranks and met files



Permitting Updates

- Newest General and Registration Permits
 - Non-metallic Mineral Processing Plants
 - Surface Finishing Operations
- New General TV Permit (under development)
 - Boat Manufacturing
- General State and Conditional Major Permits approaching renewal
 - Asphalt Plants (expires June 30, 2018)



General and Registration Permit Information

- <http://www.scdhec.gov/Environment/AirQuality/OperatingPermits/General/>
- <http://www.scdhec.gov/Environment/AirQuality/RegistrationPermits/>



Enforcement By the Numbers

- 2017 Enforcement Actions
 - Notices of Violation – 317*
 - Total Orders - 44
 - Consent Orders - 40
 - Administrative Orders - 4
 - Assessed Civil Penalties - \$522,825

*using more compliance assistance, taking more informal actions when appropriate; delays in actions due to backlog of cases (staff shortages)



Enforcement Order Breakdown

- Total Orders: 44
 - Stationary Sources - 25
 - Asbestos - 10
 - Open Burning - 5
 - Risk Management Program (112(r)) - 4



Compliance Assistance Reporting Reminders

- Ensure reports are complete, and include:
 - Facility's permit number
 - Permit condition number
 - Permit reporting period
 - Essential data needed to determine compliance
 - 12-month rolling sums, fuel oil certifications, etc.
- Contact permit writer or regional inspector with questions



Compliance Assistance Inspection Reminders

- Be familiar with all permit requirements
- Keep required logs/documentation on site
 - Examples: visual inspections, throughput, on site implementation logs (OSIL), etc.
- Contact permit writer or regional inspector with questions



Compliance Assistance Source Evaluation Reminders

- Ensure test notifications and reports are complete and accurate
 - Often missing required operational and parametric monitoring data
 - Not following QA/QC procedures
- Contact Source Evaluation staff for assistance



Emissions Inventory Compliance Tools

- Emissions Inventory YouTube clips
 - <https://www.youtube.com/user/scdhec/playlists>
 - See SLEIS Air Emissions Inventory Collection Tool
- Emissions Inventory webpage
 - <http://www.scdhec.gov/Environment/AirQuality/ComplianceandReporting/EmissionsInventory/>
- Dedicated mailbox for emissions inventory support
 - ei_submittals@dhec.sc.gov



EPA's "Once In, Always In" Policy

- EPA's May 1995 Memo titled *"Potential to Emit for MACT Standards – Guidance on Timing Issues"* – aka *"Once In, Always In" policy*
 - After compliance date, facilities must continue to comply with MACT standard, even if no longer a major source of HAPs
- EPA rescinded and replaced the memo on 11/25/2017
 - Allows facilities to be reclassified as "area sources" at any time



EPA's "Once In, Always In" Policy

- DHEC planning to implement new policy
 - Facilities with MACT placeholder language in permit (minor modification to TV permit)
 - Facilities with specific MACT conditions in permit (case-by-case determination)
- Several environmental groups have filed a petition challenging the rescission
 - If public notice required (TV significant modification, taking HAP limit, etc), expect public comments, possible permit appeal
 - States receiving FOI requests for HAP inventory data, lists of affected sources



Volkswagen Environmental Mitigation Trust

- SC Department of Insurance (DOI) released the first draft of the Beneficiary Mitigation Plan (BMP) on April 10th
 - 45 day-comment period (comments due 5/25/18)
- Public Meeting set for May 1 @ 1pm
 - Location: SC Bar Conference Center, Columbia
 - RSPV by April 27, 2018
- SC allotted \$33,895,291.39 for listed mitigation projects
- Draft plan and more information at: vwsettlement.sc.gov



Contact Us

Rhonda B. Thompson, P.E.
Bureau Chief

thompsrb@dhec.sc.gov
(803) 898-4391



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