



SC DEPARTMENT *of*
**ENVIRONMENTAL
SERVICES**

Administratively Complete Permit Application

October 23, 2025



Agenda

- Proviso 55.26
 - Energy Security Act
 - Application Framework
 - Preapplication Meeting
 - Permit Application Check List
 - Project Scope
 - Common Permit Application Pitfalls
 - Agency Resources
-



Proviso 55.26

- Included in State FY2025-2026 Budget (Act H.4025).
- Directs agency to make a decision within 90 calendar days of receiving a complete application.
- Due date can be extended by mutual agreement.
- More comprehensive completeness reviews.
- Implemented with a 10 calendar day period to make a completeness determination.

The South Carolina Energy Security Act

- The South Carolina Energy Security Act signed by Governor Henry McMaster on May 12th 2025, (Act H.3309)
- "Energy infrastructure project" (EIP) means the construction, placement, authorization, or removal of energy infrastructure including, but not limited to, electric transmission and generation assets, natural gas transmission assets, and all associated or appurtenant infrastructure and activities, including communications and distribution infrastructure.
- EIP projects are to be given "expedited review"

The South Carolina Energy Security Act

- This Act directs SCDES to review and issue a decision on an Energy Infrastructure Project application within 6 months of receiving a complete application.
- Within 30 days of receipt of an application, the agency must determine whether the application is complete.
- The applicant and the agency may, in a written “mutual agreement,” extend the permit review period.
- All EIPs require a pre-application meeting, where milestones will be established.

Permitting Timelines

Proviso 55.26		
Application Determination	Application Review Period	Determination/ Permit Received
Complete	10 Days	90 Day*
Incomplete	10 Days from date of the revised application submission	90 Days from the date of the revised application submission
South Carolina Energy Security Act		
Application Determination	Application Review Period	Determination/ Permit Received
Complete	30 Days	6 Months*
Incomplete	30 Days from date of the revised application submission	6 Months from the date of the revised application submission

*or an alternative timeline established via Mutual Agreement

Application Framework

- Facility/Project information
- Equipment/Control Devices
- Emissions
- Modeling as Needed
- Regulatory Applicability
 - State
 - Federal
- Contacts
- Signatures/Certification

Ask Questions

If you're not sure about something let us know. We're here to help you succeed!



Pre-Application Meeting

Types of applications with mandatory pre-application meetings

- PSD
- 112(g)
- Synthetic Minor
- Projects with significant public interest
- Energy Infrastructure Projects



Pre-App Meeting Attendance

Who is expected to attend:

- Permitting Contact
- Consultant(s) including a modeler if modeling was completed.

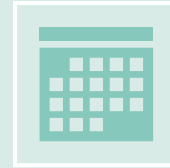
Preapplication meetings can be completed virtually on Microsoft Teams, in person at 2600 Bull St., or a hybrid of both options if needed.

If a project is simple, we may elect to have a conference call.

Pre-App Meeting Objectives



Identify milestones specific to the individual application/site



Discuss alternative timeline



Discuss emission calculation methods, applicable regulatory standards and compliance methods, etc.



Discuss modeling requirements

Air Permit Application Checklist



S.C. Department of Environmental Services Air Permit Application Checklist

Purpose

This checklist is to assist applicants and consultants in submitting an air permitting construction permit application. The following information is expected to be provided to the agency for an application to be deemed complete.

This list is extensive, but there exist too many scenarios for it to be exhaustive. The facility and consultant will need to use experience to appropriately address their project's details. Contact the Bureau of Air Quality's Air Permitting Division or Air Modeling Section with any questions. Visit <https://des.sc.gov/programs/bureau-air-quality/air-quality-permits/baq-permitting-contacts-industry-sectors> for permitting contacts by industrial sector. For modeling questions, contact Modeling Section Manager, at 803-898-4074.

Important Notes

Confidential Information

Confidential information should not be attached to or included in the ePermitting submission. Confidential information should be mailed to Air Permitting Division, 2600 Bull Street, Columbia, SC 29201.

Certifier Agreements

Facility representatives and consultants signing (certifying) the application must have ePermitting accounts and a certifier agreement with wet ink signature on file prior to certifying the application. The Bureau will not add a consultant or additional users to a site. The facility representative's (ePermitting administrator) must invite any additional users.

ePermitting

For the login portal, a copy of the certifier agreement form, or troubleshooting tips for SCDES ePermitting, visit: <https://des.sc.gov/permits-regulations/permit-central/epermitting>

Air Permitting - Construction Submission

(Information for Air Modeling - Emission Point Information starts on Page 10)

This checklist will assist applicants and consultants in submitting an air permitting construction permit application.

This checklist is a tool to help during the application process; however, all projects are unique and may require information not covered. Review the ePermitting application thoroughly.

Application sections match Checklist Section

Emissions



Emissions Calculations

- Uncontrolled emissions: Maximum emission rate at full design capacity without consideration of control devices or emission limitations.
- Controlled emissions: Maximum emission rate at full design capacity taking into consideration control devices.
- Potential to Emit (PTE): The maximum capacity of a source to emit a regulated pollutant under its physical and operational design; optionally considering federally enforceable limits.

Quick Emissions Checks



Do back of the envelope calculations validate your emissions?



Do your results match your algorithm?



Check units



Have you included exempt equipment in facility-wide emissions if required?



All sources are accounted for & the appropriate number of times.

Emissions Spreadsheets

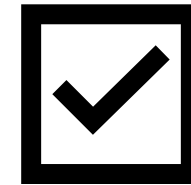
- SCDES is asking that a copy of the emissions calculation spreadsheet/s be provided in .xlsx format, and unlocked, with applications to allow staff to verify calculations and troubleshoot errors.
- All emission factors and conversions and a justification of their use must be provided.
- Confidential Information: Is not to be submitted via ePermitting at this time.

Regulatory Review

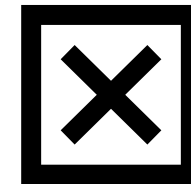


Regulatory Review

For each potentially applicable regulation, explain how the source will comply with the regulation. Include the existing or proposed methods for monitoring, recordkeeping, and reporting.



If the regulation is not applicable, but superficially appears that it could apply, address the reason the regulation is not applicable providing a detailed justification.



Regulatory Review

Permitting Checklist South Carolina Air Regulations

Example:

Std No. 4 requests applicants subject to Section VIII provide:

- Maximum Process rate
- State if Acid Mist is present
- Explanation of the process weight rate determination.

Guidance for specific regulations:

- For Standard 1, review Fuel Burning Operation definition in SC Regulation 61-62.1.
- For Standard 3, identify the source categories to which the equipment is subject.
- For Standard 4, if the source is subject to Section VIII, specify the maximum process rate, if acid mist is present, and how the process weight rate was determined.
- For Standard 5.2, if manufacturer's certifications/guarantees will be used for compliance, note that in the explanation. If these documents have already been obtained, include them in the emission's additional information documents. If they are not included, the Department may require their submittal prior to startup or a stack test to verify compliance.
- For Standard 7, the applicability procedures for PSD are complex and the facility should consult the regulation for specific requirements and definitions to assist in determining applicability. The application should include at a minimum:
 - Any applicability tests with basis and supporting documentation:
 - Actual-to-projected-actual applicability test for projects that only involve existing emissions units:
 - Actual-to-potential test for projects that only involve construction of a new emissions unit(s).
 - Hybrid test for projects that involve multiple types of emissions units.

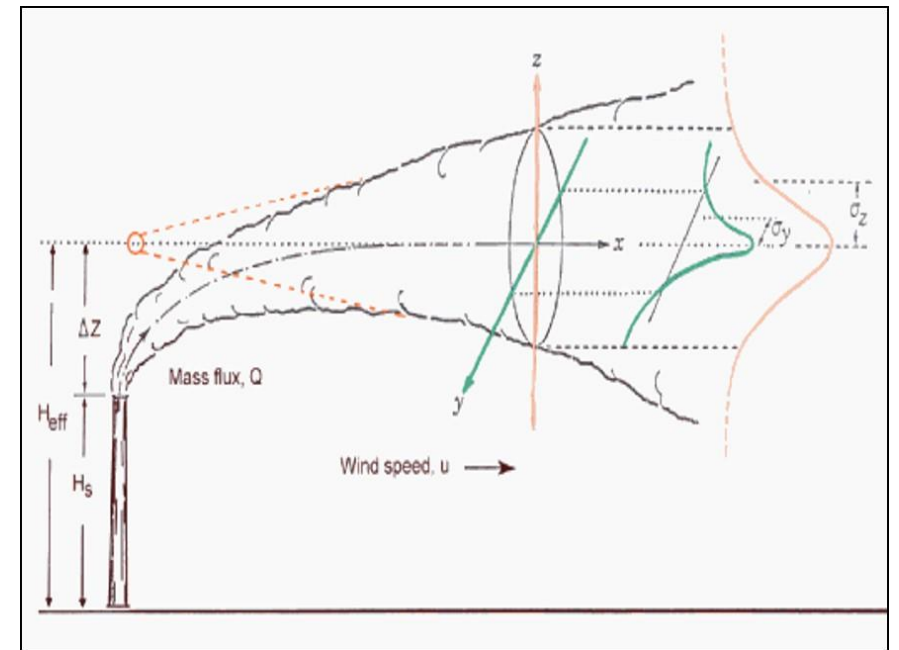
Modeling



Modeling for Existing Facilities

Existing Facilities may request a copy of their current modeling summary if they do not have one.

This can be done without going through the FOIA process.



Modeling Application Procedure

If procedures are not applied as prescribed in the modeling guidelines, the applicant must coordinate this with Air Modeling personnel and acceptably justify the approach taken. Any questions can be directed to the Bureau of Air Quality modeling manager.



South Carolina **Modeling Guidelines** **for** **Air Quality Permits**

October 2018
(Revised 1/9/2025)

Modeling Application Needs

- A pollutant-by-pollutant table with emission rates and emission point IDs
- A table with Emission point IDs, locations, and dispersion characteristic parameters
- Complete discussion of any assumptions made to revise the worst-case maximum allowable short-term emission rates (as permitted) for modeling analyses
- Input and output files for all model runs (including but not limited to AERMAP, BPIP-Prime, AERMOD) need to be provided in the ePermitting submission.

Common Application Pitfalls



Pitfall # 1

Pitfall : Submitting incomplete or non-verifiable calculations

Ladder: Provide calculation details including emission factors with sources, numerical values with labeled units, unit conversions, and substitutions.

Your emissions calculations must be representative and verified before a permit can be issued. All emission factor sources must be cited and any information not readily available must be provided.

Pitfall # 2

Pitfall : Providing generic regulatory applicability statements.

Ladder: Provide a justification for why the Regulation is Applicable/Not-Applicable to the specific project.

Read each regulation carefully and document findings. If using precedence to bolster your argument, provide a copy or link to your sources.



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Get in touch

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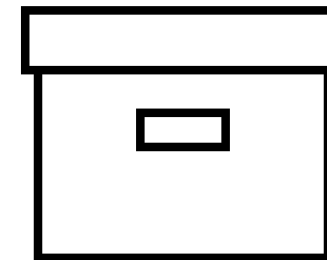
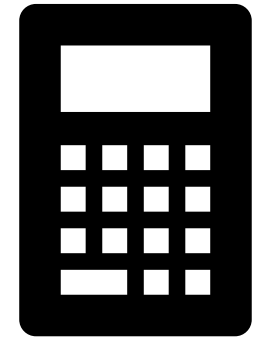
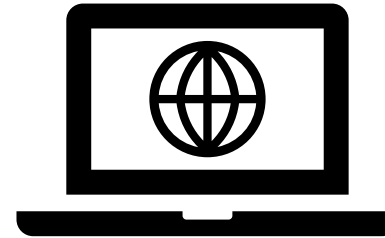
@SouthCarolinaDES



Agency Resources

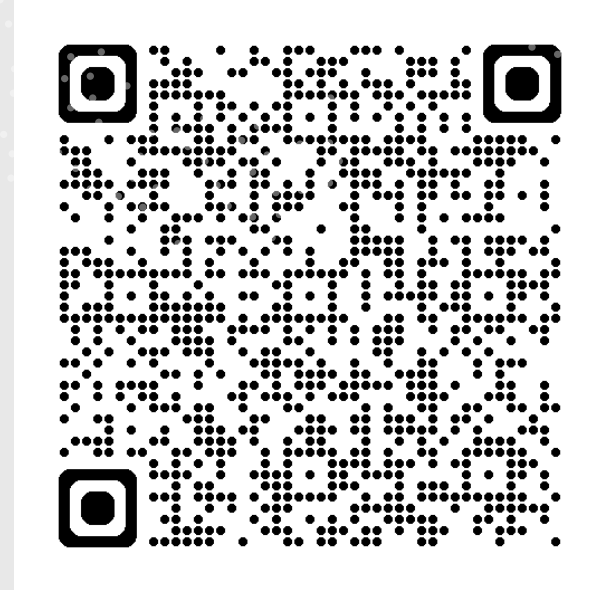
SCDES BAQ provides resources to aid in Applications.

- SCDES Air Permitting Guidance Webpage
- Emission Calculators for General/Registration Permits
- Modeling Guidelines
- Air Permit Application Checklist



Links

- South Carolina Department of Environmental Services Bureau of Air Quality Guidance and Emission Calculators for Air Permits
 - <https://des.sc.gov/airpermitguidance>



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Links

- South Carolina Department of Environmental Services Bureau of Air Quality
 - <https://des.sc.gov/programs/bureau-air-quality>
- Air Permit Application Checklist
 - <https://des.sc.gov/sites/des/files/Documents/BAQ/Permitting%20Guidance/Air%20Permit%20Application%20Checklist.pdf>
- ePermitting
 - <https://epermitting.des.sc.gov>
- ePermitting Training
 - <https://des.sc.gov/permits-regulations/permit-central/epermitting-training>



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Modeling Links

- Air Quality Modeling Guidelines
 - https://des.sc.gov/sites/des/files/Documents/BAQ/Modeling/SCModelingGuidelines_2025.pdf
- Other Information Guidance
 - <https://des.sc.gov/programs/bureau-air-quality/air-dispersion-modeling-overview>
- Air Dispersion Modeling Data
 - <https://des.sc.gov/programs/bureau-air-quality/air-dispersion-modeling-overview/air-dispersion-modeling-data>
- EPA Guidance on Developing Background Concentrations for Use in Modeling Demonstrations
 - <https://epa.gov/system/files/documents/2023-10/draft-guidance-on-developing-background-concentrations-for-use-in-modeling-demonstrations.pdf>



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Contacts:

BAQ Permitting: Contacts for Industry Sectors

- <https://des.sc.gov/programs/bureau-air-quality/air-quality-permits/baq-permitting-contacts-industry-sectors>

Modeling Section Manager - Gregory Quina

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