



## MEMORANDUM

**DATE:** July 27, 2016 (Revision 1)  
**TO:** BAQ Engineering Services  
**FROM:** Christopher D. Hardee, P.E., Manager, Sandhills and Pulp & Paper Section  
**THROUGH:** Elizabeth Basil, Director, Engineering Services Division  
**RE:** Approved List of Pre-Construction Activities Prior to Receiving a PSD Permit

---

The purpose of this guidance is to provide instructions to facilities that inquire about the types of activities that can be undertaken prior to receiving a PSD construction permit.

### Revision

In addition to the items listed in the original guidance below, the following items also do not constitute "begin actual construction" and are allowed to be conducted prior to receiving a PSD construction permit:

1. Planning\*
2. Engineering and design
3. Geotechnical investigation

\*Planning does not include entering into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification that cannot be cancelled or modified without substantial loss. Such a contract would be considered beginning actual construction.

### Original Guidance

"Begin actual construction" is defined in SC Regulation 61.62.5, Standard No. 7 as meaning, in general, initiation of physical on-site construction activities on an emissions unit which are of a permanent nature. Such activities include, but are not limited to, installation of building supports and foundations, laying underground pipework and construction of permanent storage structures. With respect to a change in method of operations, this term refers to those on-site activities other than preparatory activities which mark the initiation of the change.

The following list of requested activities was submitted by a facility seeking concurrence that these activities do not constitute “begin actual construction” and are allowed to be conducted prior to receiving a PSD construction permit:

1. Location of a temporary construction office on-site.
2. Installation of a well and septic tank for the construction office.
3. Temporary power for the site. (from power line)
4. Site drainage including ditches and culverts.
5. Gravel (ROC) roads.
6. Clearing, grubbing and grading of the site.
7. Soil only excavations.
8. Temporary dewatering activities associated with the excavations.
9. On site storage of equipment and materials.

Both EPA Region 4 and the Bureau of Air Quality agree that items on the above list do not constitute “begin actual construction” and may be conducted prior to receiving a PSD construction permit. Approval by the Bureau of Air Quality to perform items on the above list does not preclude the need for a facility to obtain any necessary permitting approvals from the Bureau of Water associated with land disturbance.

<b>RECORD OF REVISIONS</b>	
<b>Date</b>	<b>Description of Change</b>
August 16, 2006	Original Guidance
July 27, 2016	Revision to include planning, engineering and design, and geotechnical investigation.