



MEMORANDUM

DATE: March 25, 2016

TO: **Engineering Service Division**

FROM: Steve McCaslin, Piedmont Section Manager

THROUGH: Liz Basil, Director of Engineering Service Division

SUBJECT: **Relocation of equipment, control device(s) or entire facilities**

In accordance with SC Regulation 61-62.1 Section (II)(B)(6), a facility may request an exemption from the requirement to obtain a construction permit for modifications to existing equipment, including the reconstruction, relocation, and replacement of existing equipment. This memo is to provide guidance to staff and facilities in making the determination of when to allow equipment/facility relocation without a construction permit.

The intent of this guidance is to help streamline the permitting process eliminating the requirement to obtain a construction permit for a previously permitted source, where no new applicable requirements are triggered due to the relocation of the equipment/facility. Therefore, this guidance will not apply to any equipment/facility that does not currently have the proper air permit or for relocation of equipment/facility that has outstanding compliance issues. This guidance strictly applies to the relocation of existing equipment at a permitted source and does not apply to modifications or reconstruction to existing equipment, or installation of a new unit. This guidance does not apply if the equipment being relocated is sold/transferred to a new owner or operator.

Facilities meeting any one of the following criteria must obtain a construction permit prior to relocating:

- 1. The facility is major for PSD or holds a PSD permit**
- 2. Relocation will trigger a new applicable requirement**
- 3. Facility will relocate to an area classified as non-attainment**
- 4. Facility will relocate some equipment from one permitted location to another permitted location. This can impact the potential to emit (PTE) from the location receiving the additional equipment and will require a case by case review. The permitted location receiving the equipment must apply for the construction permit or request a case by case exemption.**

March 25, 2016

Relocation of equipment, control device(s) or entire facilities

Page 2 of 4

For the following scenarios, a facility will not be required to obtain a construction permit for relocating existing equipment.

Scenario 1: Equipment is relocated within the same building or site, site includes co-located facilities.

The facility must maintain an onsite implementation log (OSIL) consisting of the following information, at a minimum:

- 1) A complete description of the existing equipment being relocated, including a description of the new location.
- 2) Dates the equipment was/were removed from current location and the date the equipment began operating in the new location.
- 3) The facility must address compliance with applicable ambient air quality standards with the relocation request. No equipment should be operated at the new location until the compliance justification has been approved. If there will be no increases in emissions since the facility last compliance demonstration, emission point parameters will remain the same, the distances to the closest boundary at the new location will be no closer, and all current standards have been addressed in the existing compliance demonstration, the Bureau may allow the use of the existing compliance demonstration as sufficient for the relocation. If you are unsure if your relocation would require a revised compliance demonstration, please contact the Manager of the Air Modeling Section to discuss your proposed changes. Once the compliance justification has been submitted you may proceed with the relocation at your own risk, prior to the justification being approved. Please submit a Facility Information Form (DHEC form D- 2566) and Emission Point Information Form (DHEC form D-2573) for the new location of the equipment so that the Bureau can maintain an accurate modeling inventory.
- 4) A regulatory review to demonstrate the project is not a CAA Title I modification, nor subject to SC Regulation 61-62.5, Standards No. 7 and No. 7.1.

Scenario 2: Some or all equipment is relocated to a new site location.

The facility must maintain an onsite implementation log (OSIL) for the current and new site with all the information required for scenario 1 and make the following notifications and requests to the Department. Facility Relocation Application form D-0662 should be used to request this exemption:

- 1) Facilities that have a Title V operating, conditional major operating, or synthetic minor construction permit must undergo a public notice for the new location prior to making the relocation. The facility may contact the Bureau of Air Quality for a case by

March 25, 2016

Relocation of equipment, control device(s) or entire facilities

Page 3 of 4

case determination on the requirement to public notice the relocation. If circumstances warrant, the public notice will be waived. The Bureau will consider any comments received during the public notice and either approve or disapprove the relocation.

- 2) The facility must address compliance with applicable ambient air quality standards with the relocation request. No equipment should be operated at the new site until the compliance justification has been approved. If there will be no increases in emissions since the facility last compliance demonstration, emission point parameters will remain the same, the distances to the closest boundary at the new location will be no closer, and all current standards have been addressed in the existing compliance demonstration, the Bureau may allow the use of the existing compliance demonstration as sufficient for the relocation.

When relocating equipment care should be taken to ensure the same equipment is not permitted on two different air permits simultaneously. The facility should request in writing that the equipment on the permit for the old location be voided on the effective date of the equipment added to the permit for the new location. These notifications should occur within 15 days of the relocation. The facility must continue to adhere to the permit terms and condition of the existing permit until the operating permit for the new location has been issued.

March 25, 2016

Relocation of equipment, control device(s) or entire facilities

Page 4 of 4

Record of Revisions	
DATE	Description of Change
May 2, 2013	Original Memorandum
January 14, 2014	Scenario 1 was changed to state a site could include co-located facilities.
February 17, 2016	Update regulatory cites, form name changes, clarify public notice requirement, and update the ambient air compliance language.
March 25, 2016	Scenario 1 and 2 were updated.