



# Environmental Assistance Conference

November 2019

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# Air Permitting Division Update

- Permit Application/Notification Forms
  - Reviewing what information is requested
  - Streamlining, where possible
  - Review process has started with construction application forms
  - Next will be Title V forms, followed by State Operating/Condition Major forms

# Air Permitting Division Update

- Guidance Document Updates
  - Exemption List (publication in State Register, Nov. 2019)
  - Fumigation Permitting Guidance, updated August 31, 2019

# Air Permitting Division Update

- TV Backlog
  - Priority behind construction applications
  - State operating backlog will be next



# Opportunities To Improve Applications To Decrease Permit Drafting Time

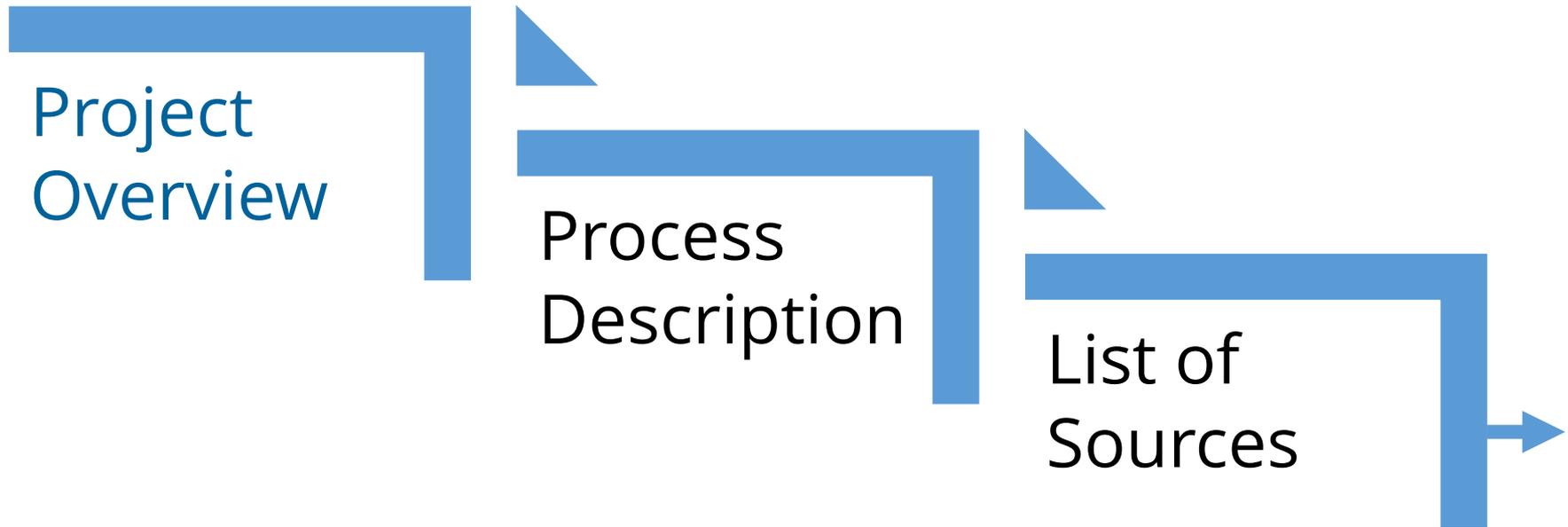
# Applications should be . . .

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

# What Can You Do?

- Read and follow the forms' instructions
- Read the content of the regulation, not just the 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?

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

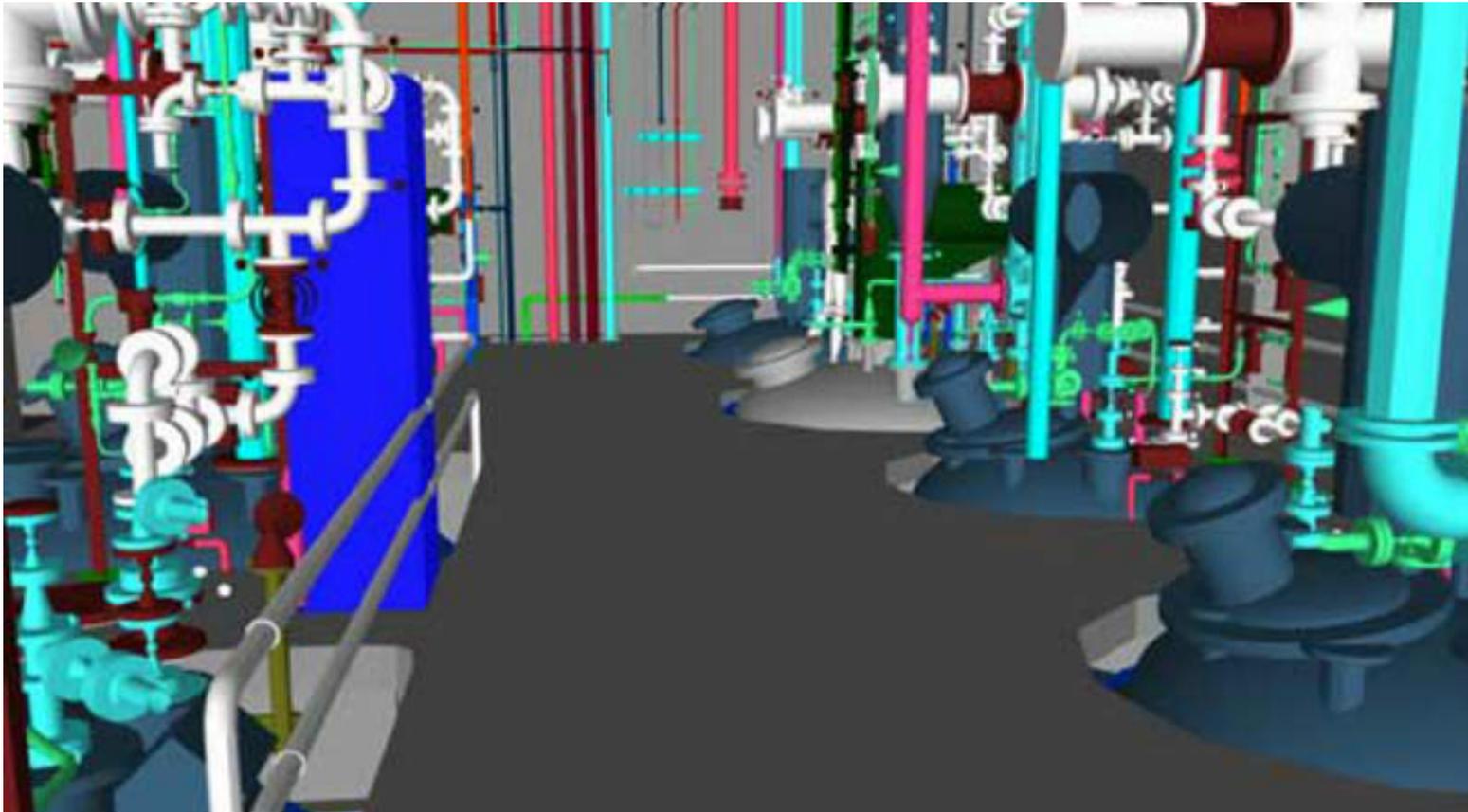
# Exempt Equipment?

- 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.

# Facility Visits



# What to Include – General Info

- 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, original signatures
  - Owner/operator
  - Professional engineer (when required)

# What to Include - Emissions

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

# Potential to Emit

- What it is not
  - Potential calculated based on business plans, no. of employees, 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 - Miscellaneous

- Co-location applicability determination if needed  
(<https://www.scdhec.gov/sites/default/files/docs/Environment/docs/Guidance>)
- Reference Documents
- Source Test Data
  - Include date tested if from SC
  - If Sister Facility Data (out-of-state/country), send the full report (Must be in English)

# What to Include – Control Devices

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

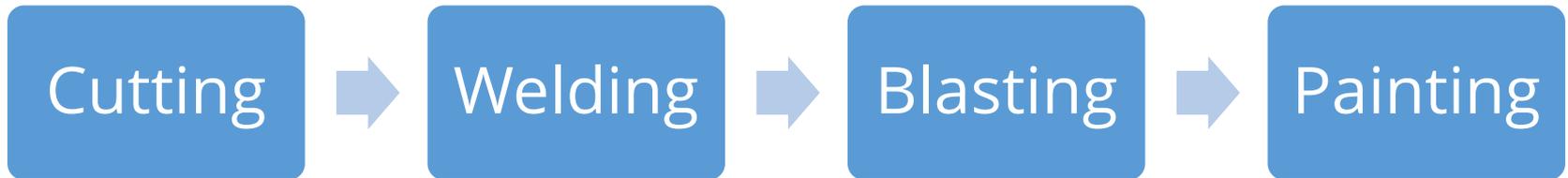
# What to Include – Reg Review

- 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”

# Process Weight Rate

- Standard 4 process weight rate (PWR)
  - Provide in tons/hour
  - Explain how developed
  - Group processes in series (flow diagrams/narrative helps)
- Guidance document
  - <https://www.scdhec.gov/sites/default/files/docs/Environment/docs/permitting/STD4guidance.pdf>

# Std. 4 – Grouping Processes



Application Says:

Process	Max PWR
Cutting	15
Welding	15
Blasting	15
Painting	15

Std. 4 Says:

Process	Max PWR
Cutting/ Welding/ Blasting/ Painting	15

## Standard 5.2

- Read current version of the regulation to determine if applicable
  - If not applicable, explain in detail 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
- Word version of process description, etc.
- Permit Shield Form in Word

Note: These are 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

# 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

# General Permits - What's Next

- General Title V's
  - Boats
  - Landfills

# Air Permitting Division Structure

## Four Permit Sections

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



## Contact Us



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