



STATEMENT OF BASIS
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 BAQ Engineering Services Division

Company Name:	Corley Construction, LLC	Permit Writer:	Diana Zakrzewski, PE
Permit Number:	1900-0286-CA	Date:	August 16, 2017

DATE APPLICATION RECEIVED: 2/21/2017

FACILITY/ PROJECT DESCRIPTION

Corley Construction is proposing to construct an air curtain incinerator which will be permitted to burn untreated wood waste, untreated clean lumber and yard waste. The facility will be installing a McPherson Systems M40E refractory lined air curtain incinerator with a rated capacity of 20 tons per hour. An electric motor will be used to drive the fan for the air curtain.

SOURCE TEST REQUIREMENTS

Method 9 for opacity is required on an annual basis as required by 40 CFR 60, Subpart CCCC and SC Regulation 61-62.60 Subpart CCCC.

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS / FACILITY WIDE EMISSIONS					
ID	Pollutant	lb/hr	TPY @ 8760	TPY w/ PSD limit	Method for Estimating Emissions
01 (ACI)	PM	260	1139	249	13 lb/ton emission factor (AP-42/FIRE)
	PM ₁₀	98.8	433	95	4.94 lb/ton emission factor (AP-42/FIRE)
	PM _{2.5}	98.8	433	95	4.94 lb/ton emission factor (AP-42/FIRE)
	NO _x	80	350	77	4.0 lb/ton emission factor (AP-42/FIRE)
	SO ₂	2	9	2	0.1 lb/ton emission factor (AP-42/FIRE)
	CO	52	228	50	2.6 lb/ton emission factor
	VOC	22	96	21	1.1 lb/ton emission factor

Emission factors have been reviewed and approved.

REGULATORY APPLICABILITY REVIEW	
Regulation	Comments/Periodic Monitoring Requirements
Section II.E- Synthetic Minor	A limit of 38,325 TPY has been added to this construction permit as a federally enforceable limit for the facility to keep the PTE of the facility below the 250 TPY (for PM, PM10/2.5, and NOx).
Standard No. 1	No sources subject to this regulation (all operations direct fired).
Standard No. 3 (state only)	The air curtain incinerator is subject to this regulation. Applicable requirements include: operator training, ash handling, opacity limitations, etc.
Standard No. 4	Not subject for permitted source. PM and Opacity covered under Std. 3 for ACI.
Standard No. 5	Not applicable to this source based on type and PTE of VOCs.
Standard No. 5.2	The air curtain incinerator is exempt from this regulation.
Standard No. 7	A limit of 38,325 tons per year has been added to this construction permit as a federally enforceable limit for the facility to keep the PTE of the facility below the 250 TPY (for PM, PM10/2.5, and NOx) major source threshold.
61-62.6	Fugitive emissions shall be kept to a minimum.



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REGULATORY APPLICABILITY REVIEW	
Regulation	Comments/Periodic Monitoring Requirements
40 CFR 60 and 61-62.60	The air curtain is subject to Subpart A and CCCC (Commercial and Industrial Solid Waste Incinerators) as an air curtain incinerator. The regulation includes limits on the opacity and operations. This unit is permitted to combust yard waste, land clearing waste and untreated wood waste.
40 CFR 61 and 61-62.61	No sources subject.
40 CFR 63 and 61-62.63	No sources subject
61-62.68	This facility does not have chemicals above applicable thresholds.
40 CFR 64	This facility will be a Title V source; however there are no pieces of control equipment used.

AMBIENT AIR STANDARDS REVIEW	
Regulation	Comments/Periodic Monitoring Requirements
Standard No. 2	Modeling (4/3/2017) showed compliance with no permit limits.
Standard No. 8 (state only)	Exempt based on the combustion of clean wood

PUBLIC NOTICE

This construction permit will undergo a 30-day public notice period to establish synthetic minor limits in accordance with SC Regulation 61-62.1, Section II.N. The comment period was open from May 2, 2017 to May 31, 2017 and was placed on the BAQ website during that time period. Comments were received during the comment period.

Per comments, the following conditions were added to the permit:

C.7	<p>Equipment ID: Incinerator</p> <p>The unit is limited to operating during daylight hours and in addition, the loading of the unit is not allowed after 5 pm. The owner/operator must record the actual operating hours daily including the times operated and when the last waste was loaded into the unit. Reports of the recorded hours of operation shall be submitted semiannually.</p> <p>The owner/operator shall notify the Midlands Regional EQC Office prior to the startup of the air curtain incinerator on each calendar day that the unit is in operation. In lieu of the daily notification, the owner/operator may contact the Midlands Regional EQC Office with a weekly schedule for the operation of the unit. If the weekly schedule changes during the week, the owner/operator shall contact the Regional EQC Office with updated information prior to daily incineration. Incineration in the unit shall not commence until region personnel have been contacted by FAX, telephone or email. This notification shall be within the same calendar day as the operation on the unit.</p> <p>The facility may request this condition to be modified or removed in the future should the</p>
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	Department deem modification or removal to be warranted.
C.8	<p>Equipment ID: Incinerator</p> <p>The unit is prohibited from operating the unit during a "South Carolina Forestry Commission Burn Notice". These burn notices can be found at the following web address: https://www.state.sc.us/forest/scnotifs.htm.</p>

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.