



Bureau of Air Quality Construction Application Forms Q&A

Several questions/comments were received regarding clarifications on all the new forms and associated instructions.

The forms and associated instructions were revised to clarify what information was being requested.

General Questions:

1. What are the major differences between the old forms and the new forms?

The old forms included Part I, which provided general facility and company information as well as project specific information such as emissions and a regulatory review. Multiple Part II forms were available for different types of construction. The Part II forms included equipment and control device specific information. Based on input from industry representatives and consultants as well as internal personnel, the needs for construction permit application forms were evaluated with the ultimate goal of speeding up the technical review process. Following are the new forms:

- Form D-2566 - Facility Information
- Form D-2567 – Equipment / Processes
- Form D-2568 – Control Devices (This form was merged with Form D-2567 and is no longer an approved form)
- Form D-2569 – Emissions
- Form D-2570 – Regulatory Review
- Form D-2571 - Application Revision Request
- Form D-2572 – Start of Construction Notification
- Form D-2574 – Operating Permit Request

2. Will there be a specific form for notifying of a control device operating range (within 180 days of startup) or should it still be submitted in letter form?

There is now an operating range form (Form D-0304) and instructions available on the web page that should be utilized for this.

Form 2566, Facility Information:

1. When will we be able to submit electronic applications?

Electronic application submittal is a priority. The Agency has been making progress in e-permitting and will continue to do so. We don't have a specific timeframe at this time.

2. Why is there no longer a Responsible Official (R.O.) requirement?

The phrase Responsible Official was removed from the forms as it has a specific definition from Title V regulations; however, there is no regulatory requirement that a R.O. sign a construction permit form. An R.O. will still be required to sign TV modification forms to incorporate a construction permit.

3. Is an original signature required on one of the public copies? If so, why?

For legal reasons, an original ink signature is required as proof of the original submittal.

4. How do we know if there are community concerns? Is there a website for that?

The Department is asking if the facility is aware of community concerns. If you are a consultant filling out the forms, please ask the facility if they are aware of community concerns.

5. How do we determine if a facility is co-located?

Refer to “[Guidance for Collocation/Single Source Determination](#)” for assistance with determinations.

6. Why is there no longer a table for P.E. information?

Professional Engineer Information Table of the form contains fields for entering a professional engineer’s information.

Form 2567, Equipment / Processes:

1. Can we still do like-for-like replacement without a construction permit?

The new forms do not supersede existing like-for-like replacement guidance, operational flexibility conditions, or construction permit exemptions.

Guidance regarding like-for-like replacement of equipment and control device(s) at Non-Prevention of Significant Deterioration (PSD) sources can be found at

http://www.scdhec.gov/Environment/docs/permitting/NonPSD_Like_for_Like_Replacement.pdf

Guidance regarding like-for-like replacement of equipment and control device(s) at Prevention of Significant Deterioration (PSD) Major Sources

http://www.scdhec.gov/Environment/docs/permitting/PSD-Major_Like_for_Like_Replacement.pdf

2. How do we handle the replacement of a piece of equipment with an identical piece of equipment?

Assuming that the replacement does not meet the like-for-like replacement criteria or operational flexibility exemptions, there should be two entries, an entry checked “Remove” for the piece of

equipment being removed, and a new entry checked “Add” for the equipment that is being constructed.

3. If we are modifying equipment, can we reference current permit clauses?

If an existing permit condition contains information relevant to an item on the form, you may reference it.

Form 2570, Regulatory Review:

1. For “List the specific limitations and/or requirements that apply”, can we just reference the specific regulations or sections rather than writing it out?

The Department understands that regulations can be extensive. In this case, it is acceptable to list the specific sections of the regulation that are applicable. However, when pertinent, list the specific limitations and/or applicable requirements.

Form 2571, Application Revision Request:

1. When should this form be used?

This form should be used when a facility wishes to revise an issued construction permit prior to it being rolled into the operating permit. If during the process of application review, information needs to be resubmitted, the permit writer will direct the facility whether or not to use the revision request form or just update the application.

Form 2572, Start of Construction Notification:

1. Do we have to submit cover letters with this form or can the form stand alone?

The form can stand alone. All of the information that is required is listed on the form.

2. Do we have to turn this in for each equipment ID? What if there are hundreds of IDs?

If there are hundreds of IDs, it is acceptable to list the process ID, versus listing each piece of equipment. For complex projects, discuss with the permit writer.

3. If we have a large project that will be completed in different phases and take years to complete, how do we submit this form? Are we required to let DHEC know that the project will be constructed in phases and what the expected durations will be?

The form can be completed as each phase is constructed. If this is a large project, it is acceptable to list the processes, instead of all of the equipment. If the facility knows the project will be completed in phases that information should be included in the original construction permit application.

4. Does testing of equipment count as start-up? If so, do we submit start of construction and start-up notifications at the same time?

Various definitions for startup exist, depending on the regulation(s) to which the equipment is subject. For example, 40CFR60.2 defines startup as setting in operation of an affected facility for any purpose, whereas 40CFR63.2 defines startup as the setting in operation of an affected source or portion of an affected source for any purpose. The Start of Construction Form (2572) will need to be submitted to the Department within 30 days after construction was commenced for the equipment. Form 2574 (Operating Permit Request), will need to be submitted to the Department within 15 days after the actual date of startup. If both events (construction and start-up) occur within the same time frame, then these forms can be submitted simultaneously.

Form 2574, Operating Permit Request:

1. General – Request for an operating permit is made by the ‘permittee’. If the engineer is certifying construction with this form, then it most likely could not be considered a request for an operating permit. Sometimes, construction is completed a few months prior to initial start-up. Also, sometimes Initial Start-Up occurs prior to the Completion of Construction. With no definitions of “Initial Start-Up”, “Operation”, or “Completion of Construction” there is no established relationship/connection between the terms “Initial Start-Up” and “Completion of Construction”. The form should have a check-box or some other method to identify the purpose of its use when submitted, as it appears to have multiple reasons for submission.

The Department acknowledges that there may be various scenarios that can occur with completion of construction and initial start-up of sources. The Department requests that the facility provides additional documentation if further explanation is needed to clarify information in the form.

2. Do we have to submit cover letters with this form or can the form stand alone?

The form can stand alone. All of the information that is required is listed on the form.

3. Do we have to turn this in for each equipment ID? What if there are hundreds of IDs?

If there are hundreds of IDs, it is acceptable to list the process, versus listing each piece of equipment. For complex projects, discuss with the permit writer.

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6. The following language is contained in one of my client's construction permits: "The owner/operator shall submit written notification to the Director of Engineering Services and the Regional Air Section Manager of the actual date of initial startup of each new or altered source, postmarked within 15 days after such date." Our question is...in what form should that notification be. Is it through submittal of Form 2574 or just a letter to DHEC indicating the EP and the start-up date? I would assume that all start-ups need to include a certification of construction...correct?

We encourage the facility to use DHEC Form 2574. The regulation requires a written notice, and the form was created to provide a streamlined approach for the notifications with respect to the certification of construction, start up and operation. If the facility chooses to provide the information in the form of a letter, we ask that it contain all of the information requested on the form.

Form 2573, Emission Point Information:

1. Do you want Table L data (Emission Rates) sorted by pollutant or emission point?

Please group the Table L data by emission point.

2. Can you clarify in the instructions which tables have to be filled out? Currently, it sounds like we have to fill out more than one table when we only modeled one source.

The instructions for each table have been edited to indicate to include parameters for those sources that were modeled.

3. Does the Department have a preference on whether a facility uses (i.e. AERSCREEN or SCREEN3)?

Both models, when properly applied; provide sufficiently conservative results to be used as screening models. However, most facilities will find using SCREEN3 to be the simplest choice. Note that AERSCREEN is required for any PSD screening.