



MEMORANDUM

DATE: December 3, 2014

TO: **Engineering Service Division**

FROM: Veronica Barringer, Coastal Plains and Power Section Manager

THROUGH: Liz Basil, Director of Engineering Service Division

SUBJECT: **Guidance for Voluntary Control Devices**

Statutory Authority: S.C. Code Section 48-1-10 et seq.

In accordance with South Carolina Regulation 61-62.1, Definitions and General Requirements, Section (II)(A)(1)(b) allows the South Carolina Department of Health and Environmental Control (Department) to grant permission to proceed with minor alterations or additions without issuance of a permit when the Department determines that the alteration or addition will not increase the quantity or alter the character of the source's emissions.

The Department has provided guidance for staff in making the determination of when the installation of a "voluntary" control device (VCD) will be allowed without a construction permit.

A facility will not be required to obtain a construction permit for the installation of a "voluntary" control device in the following requirements/conditions are met:

1. The installation of a VCD does not supersede all otherwise applicable state and federal requirements and standards. For example, 40 CFR 63 must be met.
2. The facility must be able to show that the uncontrolled emission rates demonstrate compliance with modeling requirements for S.C. Regulation 61-62.5, Standard 2, Standard 7 and/or Standard 8.
3. The construction/operating permit will not require monitoring for the VCD per S.C. Regulation 61-62.1, Section II.A and B. However, a construction permit and/or operating permit with monitoring may be required for the associated emission unit. The VCD will be identified on the facility's operating permit (in the emission unit description) for the process which is associated with the VCD, for tracking purposes.
4. The facility shall submit a request to the Department to have their operating permit modified prior to the installation of the VCD. Title V facilities must submit a permit modification form.
5. If the facility is a Title V source, opacity monitoring of the emission unit associated with the VCD may still be required as per SC Regulation 61-62.70.6(a)(3).

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6. The facility will be required to maintain the hours of operation of the VCD if it is to be utilized for such purpose as calculating actual emissions for the determination of fees, etc.
7. The VCD may lose its "tax-exempt status." The Department of Revenue will make this determination. However, the Department may be consulted regarding the determination.
8. The VCD will require future permitting as a modification to include monitoring if the controlled emissions are to be utilized for PSD and/or LAER netting purposes.

If a control device is already permitted, the facility can request to have it be a VCD. The requirements of 1-8 must be met. The permit engineer should carefully review the permit to determine if all requirements can be met and make adjustments to any monitoring and record keeping as necessary.

Record of Revisions	
DATE	Description of Change
August 10, 1998	Original Memorandum
April 2002	
September 18, 2012	
December 3, 2014	