



South Carolina Department of Health and Environmental Control

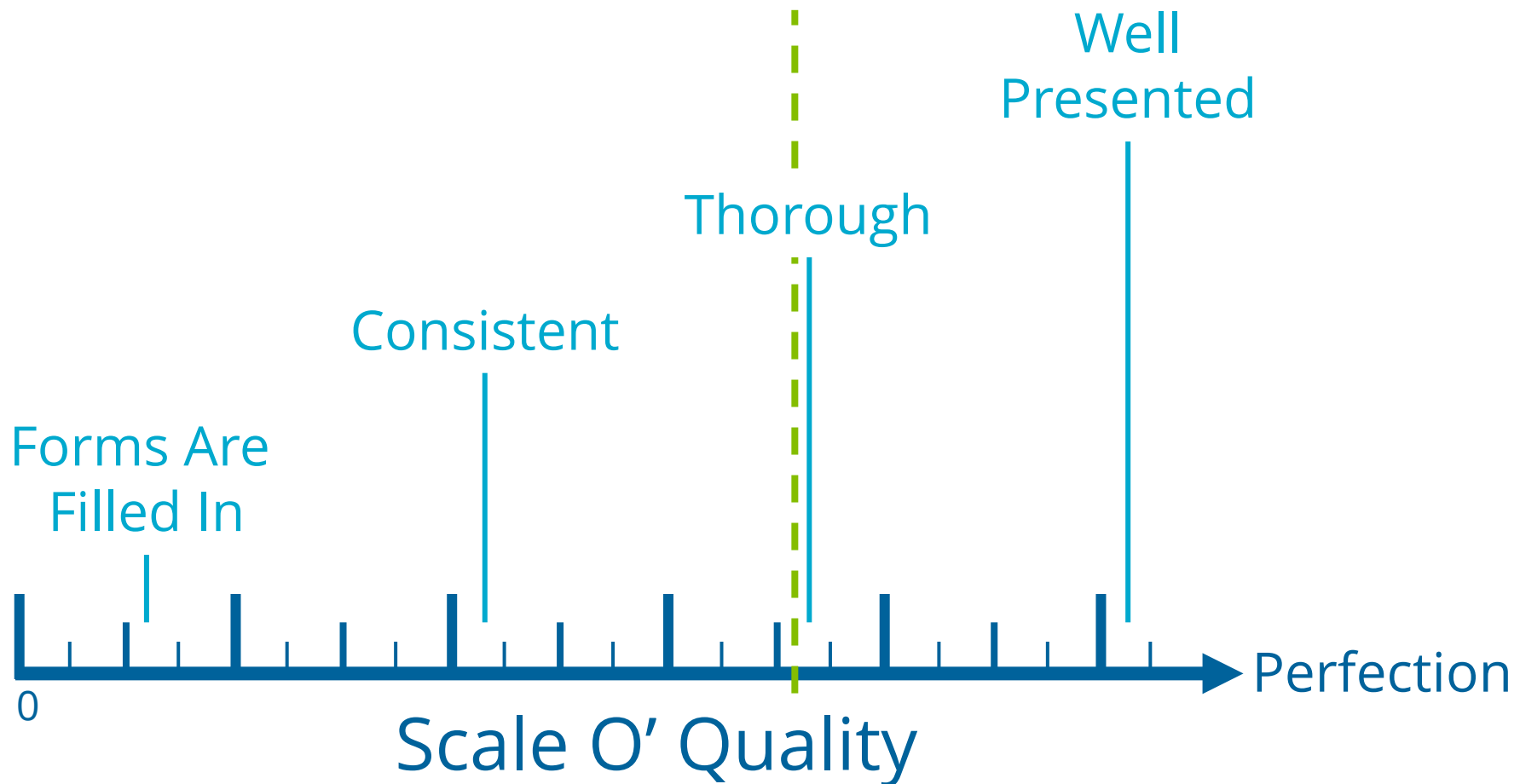
Help Us Help You

Part 1

2018 Environmental Assistance Conference

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We Don't Need Perfection



Consistency is Important



Consistency is Important



Current Prevalent Errors

- Inconsistencies (see previous)
 - Narrative, Form, Throughputs, etc.
- Reading a regulation's title, and not the content
 - Especially, when it gets you out of another reg
- Calculating "potential" based on:
 - Business plans
 - Past actuals other than highest

Current Prevalent Errors

- Std. 4 - Not grouping processes that are in series
 - Needs to be supported by flow diagrams/ narrative
- Not explaining how your Std. 4 PWR was developed
- Not re-reading the regulations (they change); e.g., Std. 5.2

Current Prevalent Errors

- Exemptions:

Dryers & kilns ≠ Boilers & space heaters

Std. 4 - Grouping Processes



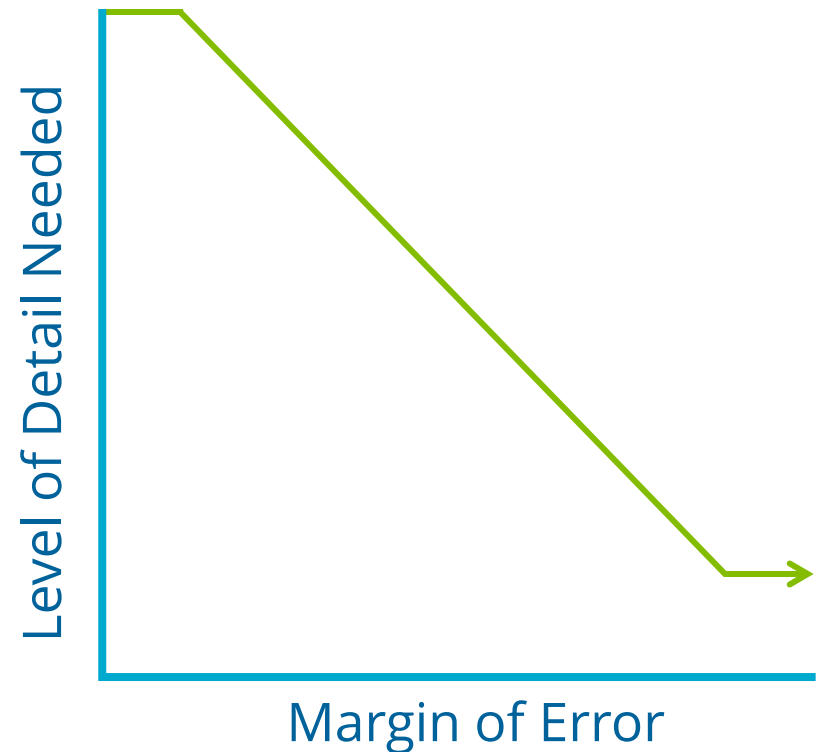
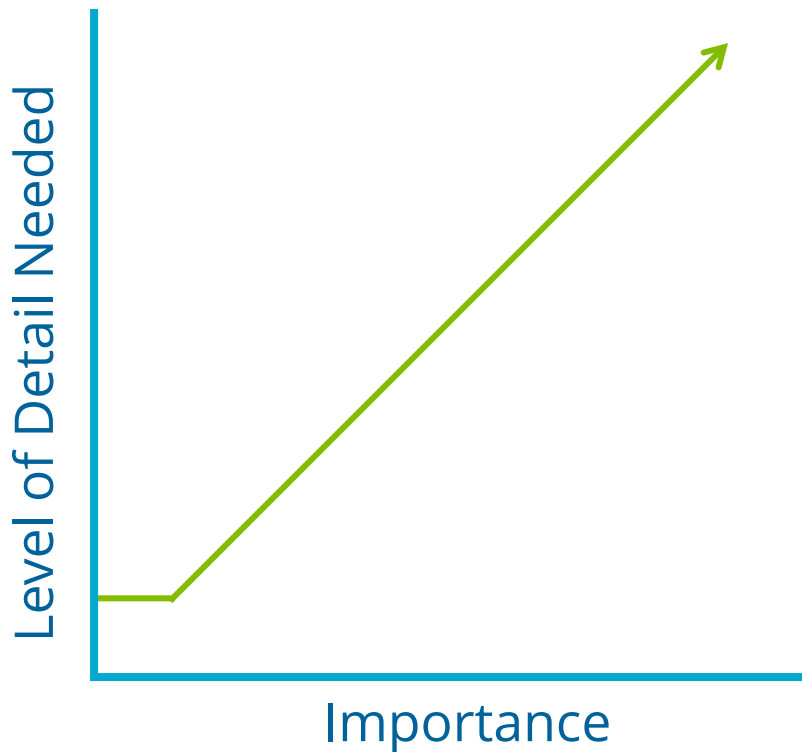
Application Says:

Process	Max PWR
Cutting	15
Welding	15
Blasting	15
Painting	15

Std. 4 Says:

Process	Max PWR
Cutting/Welding/Blasting/Painting	15

Rules of Thumb - Level of Detail



Rules of Thumb - Sources

- Reference Documents: If not on page 1 of google results, send a copy with the application
- Sister Facility Data (out-of-state/country):
Send the full report
 - Must be in English

Application Content Tips

- Tell/remind us if you:
 - Previous received monitoring alternatives, special approvals, or case-by-case determinations
 - Are updating emissions for other unaffected sources
- Std. 1, 4, & 5.2 - Show how you will comply with resultant limits
- Use Confidential markings appropriately
- Send excel spreadsheet with the application

Tips for Correcting Issues

- We don't list every instance of a problem pattern, you need to check the whole application
- "Addressing" a regulation is not the same as being subject
 - Could "reasonably apply"
 - Use the ADI; tell us what you find

Golden Rule

- Read your draft permit



CONTACT US

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