



South Carolina Department of Health and Environmental Control

Help Us Help You

Part 2

2018 Environmental Assistance Conference

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BAQ, Technical Management Section

Current Number of Facilities in Operation in SC

- Title V – 276
- Conditional Major – 538
- Minor – 685

Number of Violations Cited in 2017

- Title V Sources – 42
- Conditional Major Sources – 71
- Minor Sources & Unpermitted – 100

One of the most important things you can do to promote compliance at your facility is to thoroughly read all permits you receive!

Air Quality Permits

- Permit language and conditions can change from draft to issuance
- If you have a concern about your permit or permit draft call your permit writer with questions as soon as you can after receiving it
- Once the permit is effective you are responsible for compliance with all permit conditions

Air Quality Permit Issues (cont'd)

- Permit Flexibility Condition & OSIL
 - The facility may undertake minor alterations without a construction permit, or without revising or reopening the operating permit unless otherwise specified by any State or Federal requirement. These minor alterations must meet the criteria and procedures as prescribed in this condition.
 - As part of this permit flexibility procedure, the facility shall keep an on-site implementation log (OSIL) (written or electronic), to document all changes made under the procedure. The OSIL will be kept with the facility's air permit and made available for inspection. The OSIL shall provide detailed information supporting the changes made under this procedure.

Air Quality Permit Issues (cont'd)

- Permit Flexibility Condition & OSIL (cont'd)
 - In addition to the record keeping and reporting requirements in the flexibility condition (E.1), at the end of every calendar year but no later than January 31, the permit holder shall review their facility's equipment, processes, and materials to determine if: a) there have been any changes allowed by the flexibility condition that have not been documented; b) all required documentation is present for previous recorded changes; and c) if there have been any changes made that are not allowed by the flexibility condition.

Air Quality Permit Issues (cont'd)

- Permit Flexibility Condition & OSIL (cont'd)
 - This condition allows certain specified changes without construction permits being needed
 - Log must be kept of all changes
 - Annual Review of Facility Operations and OSIL due by January 30th and it must be documented in your log to show that the review was done

Air Quality Permit Issues (cont'd)

- RICE MACT and Boiler MACT
 - Even if not listed specifically in your permit, if you have affected sources, you are subject and must be in compliance
 - RICE MACT – Neshia Wright – (803) 898-0844
 - Boiler MACT – Zachary Carfley – (803) 898-1782

Air Quality Permit Issues (cont'd)

- Calibration Condition
 - The owner/operator shall inspect, calibrate, adjust, and maintain continuous monitoring systems, monitoring devices, and gauges in accordance with manufacturer's specifications or good engineering practices. The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.

Air Quality Permit Issues (cont'd)

- Calibration Condition (cont'd)
 - The point of the condition is to ensure devices being used for compliance monitoring purposes are accurate and providing quality data
 - Instances of readings being outside of the approved range need to have corrective actions taken and documented
 - Some facilities are choosing just to replace gauges, probes, thermocouples, etc. instead of calibrating them which is acceptable if done on some routine frequency

Inspection Issues

- Make sure all personnel responsible for compliance with your air permit have actually read the permit and are aware of all requirements
- Having just one person knowledgeable about and responsible for compliance with your permit is a recipe for disaster

Inspection Issues (cont'd)

- Air inspections are unannounced in SC and training multiple people on the air inspection process is recommended
- Records need to be available at all times
 - Someone being on vacation isn't a valid excuse for records not being accessible
- If your permit says maintain records on-site, they need to be on-site in some form

Inspection Issues (cont'd)

- Typically 12 month rolling sums are required to be calculated monthly
- During an inspection you will be asked for up-to-date sums, which may or may not coincide with your reporting submittal frequency
- Keeping these sums calculated monthly will speed up the inspection process

Inspection Issues (cont'd)

- Boiler Start-up/Shut-down logs should document the actual time of mechanical start up of your boiler, to the time the boiler is mechanically off
- If an opacity issue occurs during the start-up or shut-down portion of your process you may be able to use this data as a mitigating factor for excess opacity events

Inspection Issues (cont'd)

- Logs that document compliance with monitoring conditions should be complete
 - All days should be accounted for if the monitoring frequency is specified as daily
 - If frequency specified in permit says daily during source operation then log should either show a reading or something to indicate source was not operating
 - Logs should not have blanks or skips in them
 - Logs should be legible and should indicate the time period of the readings

Reporting Issues

- Timeliness
 - Reports must be postmarked no later than
 - 30 days after the end of reporting period for periodic reports
 - 45 days after end of reporting period for Title V ACC
 - MACT reporting submittal timeframes may be subpart specific
- Completeness
 - Submit all required data in the correct format, including units
 - Reports should contain your facility's permit number and the condition number(s) being reported on

Reporting Issues (cont'd)

- Reports should contain the correct amount of data needed to determine compliance for 12 month rolling sums
 - Monthly reports – 12 months of data
 - Quarterly reports – 14 months of data
 - Semiannual reports – 17 months of data
 - Annual reports – 23 months of data

Reporting Issues (cont'd)

- Title V Annual Compliance Certifications
 - Activities to certify
 - Certify with all activities that are taking place on-site that have not been incorporated into the Title V Permit.
 - 502(b)(10) requests
 - Minor modifications
 - Significant modifications
 - Construction permits
 - If start-up notification has been submitted to BAQ during the reporting period, include construction permit conditions.

Reporting Issues (cont'd)

- Title V Annual Compliance Certifications (cont'd)
 - “Not applicable” (N/A) is not acceptable for conditions that are not informational.
 - Record Review
 - “Record Review” is acceptable for some conditions, but not for most.

Reporting Issues (cont'd)

- Record Review (cont'd)
 - Record Review is not acceptable when:
 - Tune-ups are required – date of most recent tune up
 - Source testing is required – date and status of the source test performed
 - Algorithm is required – date the algorithm was submitted

Reporting Issues (cont'd)

- Record Review (cont'd)
 - Operational ranges are required – date the ranges were submitted
 - Submittal dates of periodic reports are required – dates the reports were submitted during the reporting period
 - Process rate limits are applicable – indicate you have been operating at/below the limit
 - Maintenance checks are required – state frequency of and dates maintenance was performed

Reporting Issues (cont'd)

- Record Review (cont'd)
 - Visual inspections are required – state frequency and dates the inspections were performed
 - Placeholder language in the permit for MACT Subparts
 - Initial Notification and Notice of Compliance Status is required
 - Give a brief explanation of how the facility is complying with the MACT

Compliance Management Division

- Division Director – Keith Frost (803) 898-4115
 - Technical Management Section
 - Manager – Dawn Jordan – (803) 898-4075
 - Source Evaluation Section
 - Manager – Michael Shroup – (803) 898-4051
 - Enforcement Section
 - Manager – Currently Vacant
 - Asbestos Section
 - Manager – Marc McKenna – (803) 898-4270

CONTACT US

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Stay Connected
