



South Carolina Department of Health and Environmental Control

On-Site Implementation Logs (OSIL)

2018 Environmental Assistance Conference

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On-site Implementation Log

- 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.

On-site Implementation Log

- Permit Flexibility Condition & OSIL, cont'd
 - 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.

On-site Implementation Log

- What is an OSIL?

It is a written log of why you considered the change to be allowed under the flexibility of the permit.

The condition in the permit steps you through what the activity does not and cannot do. Your log is your proof for meeting each of the criteria.

- Why use an OSIL?

You can implement changes faster than submitting an exemption or construction permit.

Flexibility Permit Condition (F1)

- Permit Condition F1 provides a list of 9 criteria that the activity must meet. For example, “The activity will not result in emissions that will exceed any limit in this permit.” If it does, you must do a construction permit.
- There is guidance about modeling in Section II of the permit condition.
- Recordkeeping is in Section III – what does an OSIL have to have in it.

Section IV of Permit Condition F1 and Permit Condition F2 Reporting

Annually - No later than January 31st

Review the site to determine if all changes were record in OSIL. If you find any, add them!

Record your review in the OSIL including any additions or changes made.

Every 5 years submit OSIL to the Director of Air Permitting for review.

Is there an OSIL form I use?

- Yes and No
 - DHEC has a form you can use, **BUT**
 - You can create your own

DHEC Form 0722

There is also a page of instructions with the form

Don't forget emissions!



A. Facility Information	
Facility Name: [REDACTED]	SC Air Permit Number (8-digits only): [REDACTED] - [REDACTED]
Operating Permit Type: <input type="checkbox"/> State Operating <input type="checkbox"/> Conditional Major	
Date Activity Occurred: [REDACTED]	

B. Permit Flexibility Criteria
Utilizing the flexibility condition found in your permit, exempt sources and existing permitted sources may undertake activities that meet the flexibility criteria. The activities shall be allowed, without a construction permit, or without revising or reopening the operating permit unless otherwise specified by any State or Federal requirement. The owner/operator may be subject to possible enforcement if changes are found to be inconsistent with the permit flexibility condition found in your most recently issued permit.

C. Implementation Details
Provide a brief description of the activity being undertaken and how it meets the criteria listed as part of your permit flexibility condition. [REDACTED]
Will the activity affect the identification numbers for equipment, operating permit units, and stacks as listed in the most recently issued permit? <input type="checkbox"/> YES <input type="checkbox"/> NO
If yes, please provide an explanation. [REDACTED]
Provide a demonstration that the activity does not trigger any new regulations, standards or requirement. [REDACTED]
Provide a demonstration that the activity does not result in a change in any existing permit term, condition or limit; and does not result in a need for a new permit term, condition, or limit. [REDACTED]
Provide emissions calculations for all regulated air pollutants resulting from the activity and a demonstration that when added to the existing emissions all permit limits will be met. This should include the increase and the facility-wide emissions totals from the activity. [REDACTED]

Resources for the OSIL

Permitting exemptions

<https://www.scdhec.gov/sites/default/files/Library/Regulations/R.61-62.1.pdf#page=13>

Bureau of Air Quality Permitting Exemption List (December 2016)

<https://scdhec.gov/sites/default/files/docs/Environment/docs/NewExemptions.pdf>

Simplifying the Air Permitting Process

<https://www.scdhec.gov/sites/default/files/Library/CR-010877.pdf>

CONTACT US

BAQ Office – 803-898-4123

**Ask for your Permit Writer or for the
Permit Writer on Call**

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