

# AREA SOURCE PROGRAM IN SOUTH CAROLINA

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# National Urban Air Toxics Strategy

- **Urban Air Toxics Strategy – 112(k) of Clean Air Act Amendments (CAAA)**
- **Applies to area sources (non-major Hazardous Air Pollutants (HAP) sources) and mobile sources**
- **Identify 30 HAP that are the greatest threat (33 were identified)**
- **Identify source categories accounting for 90% of those HAP emissions**
- **Achieve a 75% reduction in cancer attributable to stationary sources**

# Area Source Program

- **112(k) of CAAA**
- **70 area source categories requiring regulations**
- **Standards can be Maximum Achievable Control Technology (MACT) or “GACT”**
  - **Generally Available Control Technology**
  - **less stringent than MACT**
  - **can be work practices**

# Area Sources in SC

- **Estimated permitted sources universe – 2008**
  - Total permitted affected sources: 1871
  - Title V (not major for HAP): 120
  - Conditional major: 434
  - State Minor: 1317
- **Estimated permitted sources universe – 2011**
  - Total permitted affected sources: 1628
  - Title V (not major for HAP): 80
  - Conditional major: 401
  - State Minor: 1147

# Area Sources in SC

- **Non-permitted sources: Unknown or best guess**
  - **Dry Cleaners (~300)**
  - **Gas stations (4000)**
  - **Auto body shops (1000)**
  - **Sources with generators, boilers and heating equipment (unknown)**

# Area Source Strategy

- **Three types of area sources in SC**
  - **Type “1”**: **Affected sources are currently permitted facilities**
    - Ex – wood preserving, hospitals
  - **Type “2”**: **Generally un-permitted industrial source specific categories**
    - Ex – dry cleaners, autobody shops
  - **Type “3”**: **General Categories**
    - Impact both permitted and un-permitted
    - Ex – generators

# Area Source Strategy Cont...

- **Type “1” source categories**
  - **Business as usual**
    - Fold requirements into operating permit
    - Inspect on usual schedule, depending on permit status
  - **Outreach Packages**
    - Send to facilities, includes a letter, regulation, timeline, fact sheet, EPA brochures, contact information
  - **Fees**
    - Assess current category
    - May create new tonnage categories

# Area Source Strategy Cont...

- **Type “2” source categories**
  - **Identify the number of possible sources**
  - **Registration Permits**
  - **Environmental Results Program (ERP)**
    - **Autobody Shops**
    - **Compliance Assistance**
    - **Self Certification**
    - **Performance Measurement**
  - **Combination of ERP/Registration**
  - **Annual fees unlikely at this time**

# Area Source Strategy Cont...

- **Type “3” source categories**
- **Outreach focus**
  - **Website**
    - **EPA links and documents**
  - **Fliers from regional offices**
    - **Hand out during inspections**

# Workgroup

- **Air Toxics**
- **Permitting**
- **Emissions Inventory**
- **Small Business**
- **Regional inspectors**
- **Enforcement**

# Permitting

- **Exemptions**
- **Registration permits**
- **General conditional major permits**

# Registration Permits

- **South Carolina Air Pollution Control Regulation 61-62.1, Section II(I)**
  - **Legislative action**
- **Specific stationary source groups**
- **Uncontrolled potential to emit (PTE)**
  - **< 10 tons per year (tpy) of any single HAP**
  - **< 25 tpy of any combination of HAPs**
- **< 100 tpy of volatile organic compounds (VOC)**

# Registration Permits, cont.

- **Must contain standard permit conditions required in SC DHEC R 61-62.1 Section II(J)(1)**
- **SC DHEC R 61-62.1 Section II(J)(2) allows special conditions to be added**
- **Plain language permit that will be easy to follow**
  - **Potential formats include checklists and/or certificates**
  - **Outline specific conditions and requirements of the area source regulations**

# Fuel Combustion Permits

- **Registration**
- **General Conditional Major**
  - Available for facilities that only have boilers, emergency and/or non-emergency generators, fuel storage tanks, ethylene oxide sterilizers (hospitals)
- **Worked with Permitting Division to include specific items in accordance with Area Source Boiler Rule, Hospital Sterilizer Rule, and RICE MACT**

# Implementation

- **Type “1” category – Conditions added to facility operating permit**
  - **Electric Arc Furnaces (Subpart 5Y)**
  - **Iron and Steel Foundries (Subpart 5Z)**
  - **Wood Preserving (Subpart 6Q)**
  - **Miscellaneous Surface Coating (Subpart 6H)**
  - **Plating and Polishing (Subpart 6W)**
  - **Metal Fabrication (Subpart 6X)**
  - **Hospital Sterilizers (Subpart 5W)**
  - **Gasoline Distribution (Subpart 6B)**

# Implementation

- **Type “3” category**
  - **Conditions added to operating permits for applicable facilities**
  - **Known exempt facilities**
    - **Tracked in database using old permit number or a tracking number assigned to un-permitted facilities**
  - **Plating and Polishing (Subpart 6W)**
  - **Metal Fabrication (Subpart 6X)**
  - **Gasoline Distribution (Subpart 6B)**
  - **Boilers (Subpart 6J)**

# Boilers

- **Compiled list of all permitted sources**
  - **Narrowed field by eliminating sources without boilers (i.e., crematories, quarries, asphalts, concrete batch, cotton gins)**
  - **Wrote outreach letter**
    - **Joint letter for major and area source rules**
    - **Did not mail when the EPA stayed the major source rule and issued a notice of reconsideration**

# Implementation

- **Type “2” category**
  - **Dry Cleaning (Subpart M)**
  - **Gasoline Distribution (Subpart 6C)**
  - **Paint Stripping and Miscellaneous Surface Coating – Auto Body Shops (Subpart 6H)**
  - **Metal Fabrication (Subpart 6X)**

# **Subpart M, Dry Cleaning Facilities**

- **Revised standards in residual risk assessment**
- **Notification of Compliance Status (NOCS) was due on July 28, 2008**
- **Memo in plain language**
  - **Handed out at trade show with NOCS**
  - **Low return**
- **Considered for registration permit**
  - **Resource issue**

# **Subpart CCCCCC, Gasoline Distribution: Gasoline Dispensing Facilities (GDF)**

- **Formed relationship with UST program**
  - **Strong UST program in South Carolina**
  - **Used their mailing list for outreach**
  - **Liaison between trade groups and Air for meetings**
  - **Included information in quarterly newsletters for tank owners**
- **Resource issues**

# **Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations**

- **New outreach approach**
  - **Online yellow pages**
  - **Postcard mailing**
  - **Compiled database per county**
  - **Windshield campaign with regional offices**
  - **Based mailing list off results**
- **Brochure**
  - **Based on EPA version**

# **Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations**

- **Paint vendors/representatives contacted us**
  - **They offered to host meetings**
  - **Events held around the state at night**
    - **Allowed shops to attend after work hours**
    - **High attendance at most meetings**
  - **Continued relationship with vendors/ reps**
    - **Provides them with a contact person**

# **Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations**

- **Registration permit**
  - **Certificate format**
    - **General applicability and requirements listed**
  - **Self-certification and workbook**
    - **Regulation in checklist format**
      - **Workbook provides additional information**
    - **Submit annually**
      - **Provides shops with an opportunity to do self-inspections**
      - **Can be used for Annual Notification of Changes Report**
      - **Eases stress on state resources**



South Carolina Department of Health  
and Environmental Control

**Office of Environmental Quality Control  
Bureau of Air Quality  
Registration Permit for Auto Body Refinishing Shops**

<full\_company\_name\_proper>  
<business\_address>  
<business\_citystzip>  
**Permit Number: <permit\_number>**

Pursuant to the provisions of the Pollution Control Act, Section 48-1-50(5) and 48-1-110 (a), 1976 Code of Laws of South Carolina and the South Carolina Air Quality Control Regulation 61- 62.1, Section II(I), the above mentioned sources are hereby granted permission to discharge air contaminants into the ambient air. This permit is subject to all conditions and operating limitations contained herein. This permit is subject to and conditioned upon the terms, limitations, standards, and schedules contained in or specified on the attached pages of this permit.

**GENERAL APPLICABILITY**

In accordance with this registration permit, an auto body refinishing shop may operate under the conditions contained in this permit if the business performs any of the following activities: Spray-applied coatings of motor vehicles and/or mobile equipment for the purposes of finishing or refinishing, or chemical stripping with products that contain methylene chloride (MeCl) to remove dried paint.

**REQUIREMENTS**

1. The permittee shall follow all work practice standards listed in 40 CFR 63, Subpart HHHHHH.
2. The permittee shall submit the Self-Certification Form by March 01 of each year, and if applicable, the Return-to-Compliance Plans for Auto Body Shops on a DHEC approved form.
3. The permittee shall maintain the Self-Certification Checklist for Auto Body Shops on site for a period of at least five (5) years from the date generated and shall make the checklist available to a Department representative upon request

## CONDITIONS

1. This shop is subject to the provisions of 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subpart A, General Provisions, and Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Existing affected sources shall comply with the applicable provisions by the compliance date specified in Subpart HHHHHH, National Emission Standards For Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
2. This permit expressly incorporates all of the provisions of SC DHEC Regulation 61-62.1, Section II(J).
3. In accordance with SC Regulation 61-62.1, Section II, certain equipment is exempt from obtaining a construction permit.
4. Any permittee who plans to construct, alter, or add to a source of air contaminants, including the installation of any device for the control of air contaminant discharges must notify the Department.
5. This permit may be reopened by the Department for cause or to include any new standard or regulation which becomes applicable to a source during the life of the permit.
6. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:
  - a. Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
  - c. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - d. As authorized by the Clean Air Act and/or the SC Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
7. In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.

OR

- In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began on or before December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 40%.
8. In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section VIII - Other Manufacturing, particulate matter emissions shall be limited to the rate specified by use of the following equations: for process weight rates less than or equal to 30 tons per hour ( $E = 4.10P^{0.67}$ ) and for process weight rates greater than 30 tons per hour ( $E = 55.0P^{0.11} - 40$ ) where E = the allowable emission rate in pounds per hour and P = process weight rate in tons per hour.

# Who to Call

- **General Air Toxics Questions**
  - Heinz Kaiser, Manager: 803-898-4089
- **Area Source Questions**
  - Mary Peyton Wall: 803-898-4064
    - Chemical categories, autobody shops, gasoline dispensing facilities, boilers
  - Connie Turner: 803-898-0341
    - Metals, gasoline distribution, hospital sterilizers, chrome plating

**Questions?**