

January 15, 2002

CONTACT
PLANT NAME
STREET
CITY, STATE ZIP

Re: 2001 Point Source Emission Inventory

South Carolina Regulation 62.1, Section III requires major facilities to provide emission inventory data every two years. This requirement does not preclude additional reporting requirements contained in your operating permit. The completed reports are due by March 31 of even numbered calendar years. Data reported are used to calculate emissions during the previous odd number calendar year (i.e., 1997, 1999, 2001, etc.). However, you may not receive this package by January 1, 2002. Therefore, the Department will consider the required information due 90 days after the date of this letter. The information collected will be used by the Department for reporting required emissions data to the Environmental Protection Agency (EPA), for policy and regulatory decisions, and for calculating annual permit fees mandated by state and federal laws. Failure to provide the required information by the deadline may result in enforcement action.

A review of available data indicates that your facility can emit air pollutants at levels that require reporting operation rates and other information from which air pollution emission estimates can be made. Emission inventories are required by regulation from major facilities that have the potential to emit 100 tons per year (TPY) of any one of the following air pollutants: particulates, sulfur oxides, nitrogen oxides, volatile organic compounds, or carbon monoxide. Inventories are also required from major sources of Hazardous Air Pollutants (HAPs). Major sources of HAPs are those that have the potential to emit 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Potential emissions are air emissions from all sources in a facility assuming no controls and operating 8760 hours per year at capacity.

Procedure Changes from the 1999 Inventory

For the 1997 and 1999 inventory cycles, we attempted to implement electronic data reporting (EDR) using Satellite *i*-STEPS emission inventory software. The rationale for EDR was and remains good. However, the Bureau of Air Quality is a part of the Department's Office of Environmental Quality Control (EQC) and EQC has committed to development of a consolidated Environmental Facilities Information System (EFIS) database. All Bureau databases, including *i*-STEPS, are being migrated into EFIS. This is a massive undertaking that has taken years to implement. Electronic data reporting is very powerful when the data collection tool matches the data receiving tool but it can be counter-productive when they do not. To further complicate matters, a great number of Title V and Conditional Major permits have been issued in the past year. Since your emission inventory must be developed in terms of each Emission Unit Equipment ID, and Insignificant Activity ID identified on your permit, any emission inventory data we currently have in *i*-STEPS for your facility must be dis- and re-aggregated in terms of your new permit. For these reasons, we will not send Satellite *i*-STEPS disks out for the 2001 inventory.

With this letter we have included a completed 2001 Point Source Data Report Facility General Information page for your facility and a 2001 Document Certification form. For your convenience, we have placed the entire Point Source Data Report on the Bureau's web page at <http://www.scdhec.net/baq/>. Click on the Air Quality icon and then click on the Emissions Inventory link. You should then select the 2001 Emission Inventory Point Source Data Report in either PDF or the MS Word format to save to your computer. If you use the Word document format, you will be able to link your report to activity data records you might keep in Excel spreadsheets or Access databases. If you do not have Internet access, we can mail the Point Source Data Report form to you either as hard copy or on a floppy disk in Word or WordPerfect format. On the other hand, if you have been using Satellite *i*-STEPS to keep your emission inventory records, you may still wish to send your inventory to us in that format. However, using Satellite *i*-STEPS will increase opportunities for processing errors. If there have been no changes at your facility beyond increased or decreased activity rates, you may use a finalized Detailed Emission Inventory Report. If you do not have copy of the finalized Detailed Emission Inventory Report that we sent to you after completing our review of your last emission inventory, please call us and we will fax a copy to you. If you choose this option, you should strike out the 1999 Annual Operating Rates and replace them with 2001 Annual Operating Rates. Returning an updated Detailed Emission Inventory Report with a corrected Facility General and a signed Document Certification form will be considered a complete submittal. Your report should be sent to the address given on Page 4 of the 2001 SOUTH CAROLINA EMISSION INVENTORY POINT SOURCE DATA REPORT.

Workshops

PSDR workshops will be held in Peebles Auditorium of the Sims/Aycock Building, 2600 Bull Street, Columbia, SC on Monday, February 11th and Wednesday, February 20th from 10:00 AM until 1:00 PM. If you would like to attend the training sessions or if you have questions about completion of the form, please call Bob Betterton at (803) 898-4292. Thank you for your assistance with this effort.

Other reporting requirements and information not addressed by the 2001 emission inventory:

Please be reminded that if you hold a Part 70 (Title V) Air Quality Operating Permit you are required to submit an Annual Certification of Compliance (TVACC) each year. The TVACC requires each TV permit holder to certify its compliance status with respect to each term and condition of the permit during the previous year. The TVACC is required within forty-five (45) days of the end of each year, based upon the anniversary of your permit issuance date. Also, please be reminded that a copy of the TVACC must be sent to the Environmental Protection Agency in Atlanta, Georgia, annually. Should you have any questions concerning the TVACC, please contact Dawn Jordan at (803) 898-4075.

If your site/facility stores or uses 10,000 pounds or more of any material requiring a Material Safety Data Sheet (MSDS) [or exceeds the threshold planning quantity for an extremely hazardous substance] at any one time, SARA Title III, EPCRA Tier2 requires you to report it to DHEC, your county local emergency planning committee (LEPC), and local fire department annually by March 1. Contact Michael Branton at (803) 898-3849 should you have any questions.

Sincerely,



Bob Betterton, Manager
Emissions Inventory Section
Emissions, Modeling and Support Division