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Concrete Batch Plant Workshop

May 5, 2026





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Office of Compliance Assistance (OCA)

May 5, 2026

New Office of Compliance Assistance (OCA)

- OCA takes a proactive, supportive approach to helping the regulated community understand and meet environmental requirements
 - Technical experts who offer clear guidance, practical tools, and sector-specific resources that reduce compliance issues by preventing and reducing violations
 - Provide straightforward explanations of regulations, permitting obligations, and reporting requirements
 - Offer assistance through trainings, workshops, guidance materials, outreach, and one-on-one support
 - Mission is to ensure regulated entities understand their responsibilities and feel confident and well-equipped to comply
-



Current Projects

- Compliance Calendar
- Developing agenda for 1st Compliance Assistance Workshop in early 2027
- Communication with local chambers and industry groups
- Working with the Bureau of Coastal Management to develop educational brochures
- Private Well educational material
- Compliance Assistance Request Form: Gives customers the ability to submit their compliance-related needs.



Regulated Community Compliance Assistance Feedback Survey





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Office of Compliance Assistance | South Carolina Department of Environmental Services



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Concrete Plants: Updates to General Air Permit

May 5, 2026

Agenda

- Combined permits
 - Removed conditions
 - Operating ranges
 - On-site recordkeeping
 - Fugitive dust control plan
 - On-Site Implementation Log (OSIL)
 - Relocations and Single Source
 - Statement of Basis update
-



Combined Permits

- General Construction Permit
 - Grant permission to construct facilities that have similar proposed operations
- General Operating Permit
 - Cover facilities that have similar operations after they have constructed under the general construction permit and begin operating

CONCRETE PLANT INFORMATION						
Type of Plant	Make and Model of Plant	Capacity (yd ³ /hr)	Installation Date	Conditional Major Limit (yes/no)	Reports Required (yes/no)	Storage Only (yes/no)
Truck Mix Central Mix Pugmill Volumetric Batching						

Conditions Removed

- Temporary Crushing and Screening Operations (TCSO) requirements
 - No longer covered under this general permit
 - Must be permitted under the Registration Permit for TCSO, regardless of equipment ownership or operator
- Fuel Usage and Fuel Burning Provisions
 - Addressed on a case-by-case basis through facility-specific permit attachments



Operating Ranges

- New sources: submitted within 180 days of startup
- Existing sources: submitted within 180 days of coverage under the new general operating permit

Operating Ranges in ePermitting

Air - Operating Ranges ⓘ
Submission HQM-Z09N-6NYXZ Revision 1 Form Version 3.2

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SAVE PROGRESS

Permit Information
Operating Ranges Information 1
Signatory Authority
Review
Signing

PREVIOUS SECTION
Permit Information

Operating Ranges Information

1 Operating Ranges Information CLEAR DUPLICATE

* Action
 Modify Existing Ranges
 Add Ranges

Control Device

Control Device ID *

Control Device Type *

Applicable Regulation/Standard/Permit Condition *

Control Device Ranges

Operating Ranges in ePermitting

Air - Operating Ranges ⓘ
Submission HQM-Z09N-6NYXZ Revision 1 Form Version 3.2

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Permit Information
Operating Ranges Information 1
Signatory Authority
Review
Signing

POLLUTANTS(S) CONTROLLED (CRITERIA/OTHER)	POLLUTANT(S) CONTROLLED (TAPS/HAPS)	PARAMETERS MONITORED	TYPE OF MONITORING SYSTEM	OPERATING RANGE
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

ADD ROW

Fullscreen

Method of Range Determination *

Method of Range Determination Supporting Documentation
Please be aware that files exceeding 500 MB in size are not allowed

Drop files here to upload
OR
CHOOSE FILE

Comment

DUPLICATE OPERATING RANGES INFORMATION

ADD NEW OPERATING RANGES INFORMATION

Recordkeeping and Reporting

Frequency of Record	Type of Record
Daily	<ul style="list-style-type: none">• Concrete production (yd³/hr)• Pressure drop• Silo inspections
Weekly	Visual inspection of truck/mixer loadout
Monthly	<ul style="list-style-type: none">• Monthly production total• Twelve-month rolling sum of production
As Needed	Replacement of pressure drop gauge

Recordkeeping and Reporting

- If the plant is not in production, all associated records shall note such
- Conditional major sources are required to submit annual reports of the monthly production and twelve-month rolling sum, calculated for each month in the reporting period, in cubic yards
 - All other records shall be maintained on-site in written or electronic logs

Fugitive Dust Control Plan

- Purpose: new requirement for all plants to control fugitive emissions
 - This plan was added with this proposed permit in response to dust concerns.
- For new and existing sources, the fugitive dust plan shall be:
 - Developed and submitted within 90 days of operation/coverage under new permit
 - Implemented within 30 days of approval
- Submitted via ePermitting schedule “Air – Fugitive Dust Plan”



Fugitive Dust Control Plan

- At a minimum, the plan must address:
 - Water truck operations
 - Sprinkler system operations
 - Material stockpiling procedures
 - Containment of material spills from process equipment and trucks
 - Access road speed limits
 - Excessive opacity
 - Alternative dust control methods, if applicable



Fugitive Dust Control Plan

- Alternative control methods include but not limited to:
 - Approved chemical dust suppressant
 - Conveyor covers
 - Storage pile enclosures
 - Street sweeping
 - Wheel wash stations
 - Windbreaks and fencing



On-Site Implementation Log (OSIL)

The facility may undertake minor alterations without a construction permit, or without revising or reopening the operating permit, including:

- Installation and/or replacement of control devices (binvents, baghouses, and dust collectors)
- Installation and/or replacement of storage silos
- Any activity on the BAQ published permitting exemption list

On-Site Implementation Log (OSIL)

Record keeping:

- Description
- Manufacturer specification
- Date activity occurred
- Revised equipment list
- List of exempt sources


Reporting:

- Submitted every 5 years
- If no activities conducted, documentation shall be submitted stating such

OSIL in ePermitting


Air - On-Site Implementation Log for Concrete (OSIL)  
Submission HQM-Z08G-BPW05 Revision 1 Form Version 1.0

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 SAVE PROGRESS

Permit Information and On-Site Implementation Log (OSIL) 

Site Name
*

Air Permit Number
*

Reporting Period 

START DATE OF REPORTING PERIOD END DATE OF REPORTING PERIOD
* *

* Do you have confidential information or data to submit?
 Yes
 No

Were any activities conducted that fall under the permit flexibility condition in your permit?
*
 Yes
 No

Single Source

- Two or more plants operating at the same site and are considered a single source, shall record and report annually:
 - Monthly concrete production (yd³)
 - Twelve-month rolling sum (yd³)
- Maintained **in addition** to individual plant records

Relocations

- Notification of relocation no more than **10 days after** relocation completed
- If modeling is required at the new location, a demonstration shall be submitted **30 days before** the relocation is completed

Statement of Basis

Based on the type of plant and equipment, the facility's SOB will include a list of the applicable regulations in the general permit.

Type of Plant (Select One)	Applicable Conditions in General Permit Section B (Delete Not Applicable, Always Applicable in Bold)
Central Mix Volume Mix Truck Mix Pug Mill Block Plant In Storage	B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, B.9, B.10, B.11, B.12, B.13, B.14, B.15



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Concrete Plants: Inspection Form Completeness

May 5, 2026

Concrete Plant Reporting Tool

- The tools are available at the following address:

[BAQ_ConcreteRecordKeepingTool.docx](#)

- 12 Month Rolling Sum tool:

[Concrete_12_Month_Rolling_Sum_Calculator](#)



Concrete Batch Plant Record Keeping

Directions:

For your convenience, this log may be used to capture concrete plant record keeping requirements. Please review your permit for any additional site-specific requirements that may apply. SCDES is not liable for errors or omissions. Filter maintenance and weekly visual inspection truck/mixer load-out tables are found on page 3 of this document. The daily pressure drop reading should be taken when the batch plant is in operation and making concrete. The visual inspection(s) of the silos should be taken when the silo is being loaded.

Operating ranges should be submitted for approval via ePermitting within 180 days of startup (for existing sources, within 180 days of the date coverage is granted under the general operating permit for concrete plants). The operating ranges can also be updated via ePermitting, as needed under the "Air - Operating Ranges" schedule.

During source operation, each silo control device shall be visually inspected for leaks or abnormal visible emissions during the load-out. If leaks or abnormal visible emissions are present, loading shall immediately cease until corrective action has been taken. The owner or operator shall record the results of each inspection along with any corrective action taken. If no truck/mixer load-out occurred during the week, the log shall indicate such. These records shall be maintained on site in written or electronic logs.

Concrete Plant Compliance Records

Month:	Year:	Permit Number:	Operational Ranges:	Plant Name:
--------	-------	----------------	---------------------	-------------

Date	Initials	Operating?		Daily Yards Produced	Daily Pressure Drop Readings	Visual Inspection (observed leaks/visible emissions)						Corrective Actions / Comments, if applicable
						Silo 1		Silo 2		Silo 3		
1		Y	N			Y	N	Y	N	Y	N	
2		Y	N			Y	N	Y	N	Y	N	
3		Y	N			Y	N	Y	N	Y	N	
4		Y	N			Y	N	Y	N	Y	N	
5		Y	N			Y	N	Y	N	Y	N	
6		Y	N			Y	N	Y	N	Y	N	
7		Y	N			Y	N	Y	N	Y	N	
8		Y	N			Y	N	Y	N	Y	N	
9		Y	N			Y	N	Y	N	Y	N	
10		Y	N			Y	N	Y	N	Y	N	
11		Y	N			Y	N	Y	N	Y	N	
12		Y	N			Y	N	Y	N	Y	N	
13		Y	N			Y	N	Y	N	Y	N	
14		Y	N			Y	N	Y	N	Y	N	
15		Y	N			Y	N	Y	N	Y	N	
16		Y	N			Y	N	Y	N	Y	N	
17		Y	N			Y	N	Y	N	Y	N	
18		Y	N			Y	N	Y	N	Y	N	
19		Y	N			Y	N	Y	N	Y	N	
20		Y	N			Y	N	Y	N	Y	N	
21		Y	N			Y	N	Y	N	Y	N	
22		Y	N			Y	N	Y	N	Y	N	
23		Y	N			Y	N	Y	N	Y	N	
24		Y	N			Y	N	Y	N	Y	N	
25		Y	N			Y	N	Y	N	Y	N	
26		Y	N			Y	N	Y	N	Y	N	
27		Y	N			Y	N	Y	N	Y	N	
28		Y	N			Y	N	Y	N	Y	N	
29		Y	N			Y	N	Y	N	Y	N	
30		Y	N			Y	N	Y	N	Y	N	
31		Y	N			Y	N	Y	N	Y	N	

Concrete Plant Compliance Records

Month:	Year:	Permit Number:	Operational Ranges:	Plant Name:
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Weekly Visual Inspection Truck/Mixer Loadout

Date	Truck/Mixer Load-Out Observed Leaks/Visible Emissions		Corrective Actions / Comments, if applicable
	Y	N	
	Y	N	
	Y	N	
	Y	N	
	Y	N	

Filter Maintenance Record

Date	Time	Changes / Repairs Made

Gauge Inspection and Replacement

Date	Time	Inspection / Replacement Made

Inspection Checklist Completeness

- There must be an entry for each day of the month, including days when the plant is not operating. An entry of Not in Operation is sufficient for days the plant is down.
- Checking Yes or No on a form is for noting whether or not visible emissions were observed, not for just noting that an inspection was performed.
- If Yes is selected for visible emissions, then there should be corrective action noted.

Inspection Checklist Completeness

- The baghouse Operating Range should be noted on each form.
- For each instance when a pressure drop reading is out of range, corrective action must be documented.
- Baghouse/Filter maintenance – Dates that filter maintenance is conducted must be documented. This includes bag and filter replacement.
- Magnehelic gauges – Maintenance/replacement/calibration of gauges needs to be documented.

Inspection Completeness

- An entry for each weekly Truck/Mixer loadout needs to be included along with any necessary corrective action. Any week when there is no production should be noted.
- A copy of the most up to date Dust Control Plan must be available for review. Documentation of the annual reviews (due by January 31 of each year) must be maintained. Water truck and sprinkler inspection records must be up to date and available for review.
- A copy of the On-Site Implementation Log (OSIL) and a list of any exempt sources must be available for review, along with a copy of the Operating Permit.



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Industrial Stormwater and Concrete Manufacturing Facilities

May 5, 2026

Agenda

- Regulatory History
 - Industrial Stormwater Overview
 - Industrial Stormwater General Permit Requirements
 - Sector-Specific Requirements
-



Regulatory History - From the EPA to South Carolina

- The Environmental Protection Agency (EPA) was formed in 1970
- Clean Water Act of 1972 – Established the NPDES (National Pollution Discharge Elimination System) Permit Program
- Clean Water Act Amendments of 1977 – Added the framework for stormwater permitting if it carries oil, sediment, or toxic chemicals into navigable waters
- Water Quality Act of 1987 - Added Stormwater Permitting Requirements to NPDES
- South Carolina becomes Stormwater Permitting Authority from EPA in 1991
- First Industrial Stormwater General Permit (IGP) issued in October 1992

What is Industrial Stormwater?

“The discharge from any conveyance that is used for collecting and conveying stormwater and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.” – 40 CFR

122.26(b)(14)

SIC Codes & The IGP

- SIC Codes requiring coverage are codified by Federal Law (40 CFR 122.26) and implemented into State Law SC R.61-9.122.26
- SIC Code(s) determine what Sector/Subsector(s) a facility will fall under in the IGP
- 8E. Sector E - Glass, Clay, Cement, Concrete, and Gypsum Products, Subsector E2 - Concrete and Gypsum Product Manufacturers
 - 3271 – Concrete Block and Brick
 - 3272 – Concrete Products except Block and Brick
 - 3273 – Ready-mix concrete

Obtaining IGP Coverage

- Identify applicable Standard Industrial Codes (SIC)
- Prepare SWPPP
- Prepare Notice of Intent (NOI) in ePermitting – Form D 2611
- Setup Signature Authority (Becoming a Certifier)
- Submit NOI and Pay First Annual Invoice

General Permit Requirements



Stormwater Pollution Prevention Plan (SWPPP) Requirements

- The SWPPP is the "living" onsite document used to meet the requirements of the IGP
- The Department provides an Industrial SWPPP Template on our website for public use
- All records are to be retained no less than three years after coverage has ended

Create a SWPPP

A Stormwater Pollution Prevention Plan (SWPPP) must be developed prior to applying for permit coverage and placing an industrial facility into service. This SWPPP acts as a living document which can be updated to match facility conditions and serves as a guideline for maintaining compliance with the IGP, State, and Federal regulations. Each SWPPP must include the following information:

- Stormwater Pollution Prevention Team
- Site Description
- Summary of Potential Pollutants Sources
- Sampling Data
- Description of Control Measures
- Schedules and Procedures (including employee training, inspection schedules, and sampling schedules)

[Industrial Stormwater SWPPP Template](#)



Common Sources of Pollutants

- Material Handling & Storage Areas: Such as sand, gravel, clay, cement, fly ash, kiln dust, and gypsum
- Concrete Mixing and Processing
- Casting, Forming, and Curing Areas
- Vehicle & Equipment Fueling, Washing, and Maintenance Areas
 - The discharge of vehicle and equipment wash water is not authorized by this permit (2.1.2.1)
- Waste & Scrap Material Areas



Stormwater Sampling

- All Samples must be collected within the first 30 minutes of initial discharge from a measurable storm event or as soon as practicable with documentation
- Impaired Waters Monitoring
 - 303(d) Listed Impairment, not within TMDL - once per year at each outfall
 - EPA Approved TMDL - not less than four times per 12-month period
- Quarterly Benchmark Monitoring
- Annual Effluent Limit Guidelines (ELGs) – Cement Manufacturing Storage Piles

SC Water Quality Tool



- <https://gis.des.sc.gov/stormwater/>
- First "Locate" site, then select "Water Info"
- Use to help determine receiving waterbody and impaired waters information

Notice of Intent (NOI) Application

Stormwater Application Information

General Information

If location is incorrect, clear **X** and use below to locate site.

Lat Long **X**

MS4 Designation **Info**

Within SC Coastal Critical Area **Info**

Watershed Name **Info**

Watershed Boundary Dataset(WBD) **Info**
10-Digit Hydrologic Unit Code

Select the nearest **STREAM** in the watershed for name and classification. Water classification is **PROVISIONAL** information.
Use to select stream.
The information can be cleared by selecting **X**

Waterbody Name **X**

Water Classification **Info**

To measure distance, select unit of measure (Feet, Yards, or Miles), click on , hold left mouse button down and draw a line from site to stream.

Distance to Nearest Waterbody **Feet** **Yards** **Miles**

Follow the stream until it connects with another stream or reservoir.
Click on the downstream waterbody for name.
Stream selection instructions listed above.

Nearest Downstream Waterbody **X**

Water Quality Information

Total Maximum Daily Load Approved Sites and Watersheds

Report

Layers

- Monitoring Stations >
- TMDL Stations
- Streams >
- Watersheds
- Coastal Critical Area
- MS4 Designation
- TMDL Watersheds
- Location Searched
- Location Accepted

Stormwater Inspections - Routine

Routine Facility Inspections

- Performed at least quarterly
- While facility is in operation
- 1/year during storm event
- Important Items to Note: Unidentified discharges, BMPs needing maintenance/repair, BMP failures, Noncompliance incidents, Additional needed BMPs



Stormwater Inspections - Visual

Quarterly Visual Assessments

- Collect a stormwater sample from each outfall
- First 30 minutes of discharge from storm event, or document as practicable and at least 72 hours after last discharge
- Important Items to Note: color, odor, clarity, solids, oil foam, sheen, and potential probable pollutant source



Stormwater Inspections - Annual

Annual Comprehensive Inspection

- All industrial areas & pollutant sources, BMP effectiveness, evidence of pollutant discharges, condition of all outfalls and drainage areas
- Document
 - All observations, any noncompliance, and any required SWPPP revisions
 - Verification that the facility reviewed the most recent 303(d) & TMDL lists
 - Statement, signed and certified in accordance with SC Reg. 61-9. Section 122.22, provided in Appendix B of the IGP

Corrective Actions

- Corrective Actions are triggered when certain conditions occur
 - Examples include benchmark or impaired waters exceedance, BMP/control measure failure, sector-specific measures
- These conditions are not inherently permit violations
- Corrective Actions Steps
 - Immediate Actions – Immediate, Reasonable, Temporary Stabilization
 - Subsequent Actions - Permanent fixes within 14 days or as scheduled
 - Corrective Action Report – Document, Document, Document!

Inactive and Unstaffed Sites

- What is Inactive and Unstaffed?
 - Facility has no active industrial operations and is not staffed (no routine employees onsite)
 - All industrial materials and equipment onsite are fully sheltered with no stormwater exposure
- Certification signed by an authorized representative confirming inactive/unstaffed status maintained in SWPPP
- If you are not qualified for this exception at the time you are permitted, but qualify later, then you must notify the Department of this change before you cease monitoring under the permit.

Inactive and Unstaffed Exemptions

- An Inactive and Unstaffed Site is exempt from the following permit requirements:
 - Routine facility inspections and quarterly visual assessments
 - Benchmark and impaired-waters monitoring
- This does not exempt you from any other permit requirements
- Status must be updated if: site becomes active or staffed, any industrial materials become exposed, or if any industrial activity resumes

Sector Specific Requirements for Sector E



Good Housekeeping Measures

Section 8.E.2

- Prevent or minimize the discharge of spilled cement, aggregate (including sand or gravel), kiln dust, fly ash, settled dust, or other significant material in stormwater
- Prevent the exposure of fine granular solids (e.g. cement, fly ash, kiln dust, etc.) to stormwater, where practicable, by storing these materials in enclosed silos, hoppers, buildings, or under other covering
- Sweeping regularly, at least once a week, or using other equivalent measures to minimize the presence of these materials

Additional SWPPP Requirements

8.E.3.1 Drainage Area Site Map. (See also Part 5.1.2) Document in the SWPPP the locations of the following, as applicable: bag house or other dust control device; recycle/sedimentation pond, clarifier, or other device used for the treatment of process wastewater; and the areas that drain to the treatment device.

8.E.3.2 Certification. (See also Part 5.1.3.4) For facilities producing ready-mix concrete, concrete block, brick, or similar products, include in the non-stormwater discharge certification a description of measures that ensure that process waste waters resulting from washing trucks, mixers, transport buckets, forms, or other equipment are discharged in accordance with NPDES waste water permit requirements or are recycled.

Sector-Specific Benchmarks

Section 8.E.4

- Required quarterly, for your first 4 full quarters of permit coverage
- Also required in the four quarters of your fourth year of permit coverage (i.e., your 13th-16th quarters), unless the first quarter of your fourth year of coverage occurs on or after the expiration date of this permit

Subsector E2. Concrete and Gypsum Product Manufacturers (SIC 3271-3275)	Total Suspended Solids (TSS)	100 mg/L
	pH	6.0 - 9.0 s.u.

Useful Links

- Industrial Homepage: <https://des.sc.gov/programs/bureau-water/stormwater/industrial-stormwater>
- ePermitting Home: <https://epermitting.des.sc.gov/ext/ncore/external/home>
- ePermitting Training: <https://des.sc.gov/permits-regulations/permit-central/epermitting-training>
- OSHA SIC Code Manual: <https://www.osha.gov/data/sic-manual>
- EPA Industrial Stormwater Fact Sheets: <https://www.epa.gov/npdes/industrial-stormwater-fact-sheet-series>



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