



**STATEMENT OF BASIS**  
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 BAQ Air Permitting Division

<b>General Operating Permit</b>	Concrete Plants	<b>Permit Writer:</b> Madeline Florek, Nick Hoehn, and Kaleb Snider	<b>Date:</b> April 1, 2026
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**CHANGES SINCE LAST ISSUANCE**

**General Permit:**

The following general updates are being made to this permit (see details outlined in Sections and Conditions Update Tables):

- Update template and conditions to latest versions
- Updated the applicability section.
  - Removed language for fuel combustion sources. A facility can still be granted coverage under this permit if these sources are used. Since most Concrete Plants do not have fuel combustion sources that require a permit, sources that require a permit will be listed on the facility attachments along with the applicable requirements for that site only.
- Removed Temporary Crushing and Screening Operations (TCSO) Section E and F
  - To avoid confusion, all TCSO will be required to be covered under the Registration Permit for Temporary Crushing and Screening Operations regardless of who owns or operates the equipment. No action will be required for facilities that currently have TCSO sources listed on facility specific attachments. The attachments will be updated to remove these sources, coverage will be granted under the Registration permit, and a permit number will be assigned to these operations.
- Removed Fuel Usage and Fuel Burning Section G
  - No action will be required for facilities that have these operations. If a facility has a permitted source that is subject, the facilities attachment will be modified to include the requirements applicable to that site. This will include requirements for 6J, if applicable.
- Combined the following sections into a new section called "Limitations, Monitoring, and Reporting"
  - General Plant Conditions
  - Plant Conditions
  - Plant Relocation

<b>Sections Updated</b>	
<b>Current Permit's Sections</b>	<b>Revised Permit's Sections</b>
A. Applicability	A. Applicability
B. General Plant Conditions	B. Limitations, Monitoring, and Reporting
C. Plant Conditions	B. Limitations, Monitoring, and Reporting
D. Plant Relocation	B. Limitations, Monitoring, and Reporting
E. Temporary Crushing and Screening Operations	Removed from General Permit
F. Crushing and Screening Operations	Removed from General Permit
G. Fuel Usage and Fuel Burning	Removed from General Permit
H. NESHAP Periodic Reporting Schedule Summary	Removed from General Permit
I. NESHAP – Conditions	C. NESHAP (40 CFR 61 and 40 CFR 63)
J. Permit Flexibility	D. Permit Flexibility
K. Ambient Air Standards Requirements	G. Ambient Air Standards
L. Periodic Reporting Schedule	Removed for General Permit
M. Reporting Conditions	F. General Record Keeping and Reporting
N. General Conditions	E. General Facility Wide



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Sections Updated	
Current Permit's Sections	Revised Permit's Sections
O. Permit Renewal, Modification, Expiration and Transfer of Ownership	E. General Facility Wide (except Transfer of Ownership is under F. General Record Keeping and Reporting (F.5))

Conditions Updated		
Current Permit Number	Revision Permit Number	Changes
A.1	A.1	Removed "boiler(s) and/or other fuel combustion device(s) rated less than 30.0 million BTU/hr, temporary and portable crushing and screening equipment for nonmetallic minerals" and items 2, 3, and 4.
---	A.2	Added to applicability section stating all temporary crushing and screening operations (TCSO) must be covered under the Registration Permit for TCSO.
B.1	F.1	Updated template language. Added an additional requirement for record retention during transfers of ownership/operation.
B.2	B.9	Updated template language
B.3	B.10	Updated template language
C.1	B.1	Revised to clarify condition: <ul style="list-style-type: none"> <li>• Split condition</li> <li>• Updated concrete production from monthly records to daily</li> <li>• Shall indicate any dates when no concrete production occurred</li> </ul>
	B.2	
--	B.3	Added single source requirements.
C.2	B.4	No Changes
C.3	B.5	Updated to keep records on site.
C.4	B.6	Updated to keep records on site. Added clarification that the control device should be operated per manufacturer specifications.
C.5	B.7	Updated to keep records of pressure drop on site and to indicate days when the plant is not in operation. Added clarification that the gauge should be operated per manufacturer specifications. Added additional recordkeeping requirement for when gauge is replaced.
---	B.8	Added. For new sources, facilities will have 180 days from startup to submit the operating ranges. For existing sources, facilities will have 180 days from the date coverage is granted under this permit to submit the operating ranges.
C.6	B.11	Updated to keep records on site and records must include date and time of the inspection.
C.7	B.12	No Changes
C.8	B.13	No Changes
C.9	B.14	Updated to establish fugitive dust control plan within 90 days of this revision or coverage granted under this permit. Maintained on-site with minimum requirements outlined in this condition.
C.10		
D.1	B.15	Revised and combined into one condition.



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Conditions Updated		
Current Permit Number	Revision Permit Number	Changes
D.2		
I.1	C.1	Updated template language
I.2	C.2	Updated template language
I.3	C.3	Updated template language
I.4	---	Removed from General Permit
J.1	D.1	A list of exempt sources must be maintained on-site and the list will be submitted with every On-Site Implementation Log (OSIL).
---	D.2	Added provisions for the OSIL to be submitted every five (5) calendar years.
	D.3	
	D.4	
	D.5	
N.4	---	Removed from General Permit (addressed under B.13)
---	E.11	Added to address renewal
---	E.12	Added to address renewal

**Permit Attachment:**

The Concrete Plant Information and Silos tables were updated to include a column for the installation date. The Control Device table was updated to include columns for the installation date and if the control device has a pressure gauge. These changes have already been implemented.

**Statement of Basis:**

The template document for the Statement of Basis will include the following table. 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>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</b>

**PUBLIC NOTICE**

This permit has undergone a 30-day public notice period in accordance with SC Regulation 61-62.1, Section II(N). The comment period was originally open from September 23, 2025 to October 22, 2025 and the draft permit was placed on the BAQ website during that time period. Comments were received and requests for a public meeting.



Table with 2 columns: Permit Type (General Operating Permit) and Facility (Concrete Plants) on the left; Permit Writer (Madeline Florek, Nick Hoehn, and Kaleb Snider) and Date (April 1, 2026) on the right.

The comment extension was open from January 23, 2026 to March 3, 2026 and the draft permit was placed on the BAQ website during that time period. Comments were received at the public hearing.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

RESPONSE TO COMMENTS ON DRAFT

CRMCA Environmental Committee via email on 7/10/25:

This draft permit requires for a general permit that an annual report must be submitted for any issues of a control device along with the corrective action and if there are not any issues still submit a report. There is also a requirement -B.6- that states we must submit documentation supporting operational ranges for the gauges. All of this documentation can be reviewed by the inspector when they are on-site and not needed to be provided in an annual report. This is a 12 month rolling average away from a Conditional Major Permit. These requirements add an unnecessary burden to the site operators.

Additionally, general conditional permits should not require us to list onsite exemptions every time we submit a report, for the same reason above. They can see that list during an onsite visit or a brief review of our SCDES online profile.

The Bureau of Air Quality (BAQ) has determined that the sites subject to the facility-wide conditional major limits shall submit annual concrete production records. All other concrete plants will not be required to submit annual concrete records.

No other reports regarding control device maintenance, truck/mixer loadouts or silo visual inspections, corrective actions, or pressure gauge exceedances will be required annually. However, the Department still requires these documents to be kept on site for all concrete plants.

The On-Site Implementation Log (OSIL), the Fugitive Dust Control Plan, and Operating Ranges are NOT required to be submitted annually.

- The BAQ requires a submission of the OSIL every 5-years. If no exempt activities take place at the Concrete Plant after 5 years, the Concrete Plant will still need submit the OSIL but clarify that "no changes/ additions" occurred. Installing a new mixer, loadout, or concrete plant is not an exempt activity and would require a construction permit instead.
• The Fugitive Dust Control Plan will just need one (1) initial submission that is due within 90 days of the date of coverage under this general permit. No annual reporting is required from this plan. However, revisions will need to be made no later than January 31 each year and kept on-site. If no changes occur the owner or operating shall clarify in the records of revision that "no changes/ additions" occurred.
• Operating Ranges will just need one (1) initial submission that is due in 180 days of startup or 180 days of the ate coverage is granted under this permit, whichever comes first. No annual reporting from is required from operating ranges. However, updates to the operating ranges require an additional submission and approval from the BAQ.