



PROJECT MEMORANDUM

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To: SCDES

Cc:

From: Heather Ponce *Heather Ponce*
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Subject: Manning Quarry Regulatory Discussion

REGULATORY DISCUSSION

- **Regulation 61-62.1 Section II(E) Synthetic Minor Construction Permits**
The facility will be in compliance with the enforceable limits set forth by this standard with the proposed emission sources and control devices.
- **Regulations 61-62.5 Standard No. 1 - Emissions from Fuel Burning Operations**
There are no fuel burning operations at the subject facility.
- **Regulation 61-62.5 Standard No. 2 Ambient Air Quality Standards**
The modeling demonstration shows that the facility will be in compliance with Standard No. 2 for criteria pollutants emitted.
- **Regulation 61-62.5 Standard No. 3 - Waste Combustion and Reduction (State Only)**
This facility will not have any sources that burn anything other than virgin fuels for any purpose.
- **Regulation 61-62.5, Standard 3.1 - Medical Waste Incineration (State Only)**
This facility will not incinerate medical waste.
- **Regulation 61-62.5 Standard No. 4 Emissions from Process Industries**
This facility will be subject to specific sections of this regulation. The quarry will have non-enclosed operations and crushing operations.

As presented in the emissions calculations, the facility will be in compliance with the particulate matter limits set forth by this standard.

- **Regulation 61-62.5 Standard No. 5 Volatile Organic Compounds**

This facility will not have any sources of volatile organic compound emissions.

- **Regulation 61-62.5 Standard No. 5.2 Nitrogen Oxides Lowest Achievable Emission Rate**

There are no fuel burning operations at the subject facility.

- **Regulation 61-62.5 Standard No. 7 Prevention of Significant Deterioration**

This regulation defines two (2) categories of major stationary sources for PSD applicability. These categories are potential emissions of 100 tpy of PSD pollutants for 28 specific industry types and potential emissions of 250 tpy of PSD pollutants for all other industry types. This facility is not specified as one of the 28 specific industry types and is in the other industry type category. PSD applicability is pollutant specific and is based on the potential to emit considering federally enforceable air pollution controls and/or federally enforceable operating conditions (i.e. emission limits, production limits etc.) This facility will emit PM₁₀ which is a PSD pollutant. This facility's uncontrolled PM₁₀ emissions will be greater than 250 tpy. This facility will use wet suppression to control PM₁₀ emissions to less than 250 tpy. The facility requests that the control devices be federally enforceable with issuance of this permit. Because the federally enforceable potential to emit of PM₁₀ emissions is less than 250 tpy, this regulation does not apply.

The facility will be located in Richland County, which has a Minor Source Baseline Date for PM₁₀ of 05/20/1981 and a Minor Source Baseline Date for PM_{2.5} of 06/12/2023. Where the minor source baseline date has been set for a pollutant, any increase in emissions from a new or modified emission source must comply with the Standard 7 increment(s) for that pollutant and the facility must submit an analysis that demonstrates emissions increases caused by the facility will not cause an increase in pollutant concentration above the Standard 7 increment(s). SCDES' "Guidance Concerning Prevention of Significant Deterioration (PSD) Ambient Air Increments" document available on SCDES' website updated April 15, 2019 states that; SCDES will no longer require that facilities include an air quality analysis for PSD increments in permit applications for those pollutants that do not trigger PSD permit action. Since the facility does not trigger PSD permit action, a Standard 7 increment modeling analysis has not been submitted.

- **Regulation 61-62.5 Standard No. 7.1 Nonattainment New Source Review**

The facility is not located in a non-attainment area, so this standard does not apply.

- **Regulation 61-62.5, Standard 8 - Toxic Air Pollutants (TAPs) (State Only)**

No Standard 8 pollutants requiring a compliance demonstration will be emitted.

- **Regulations 61-62.6 - Control of Fugitive Particulate Matter**

The facility will not be located in a non-attainment area. Due to the fugitives generated from the stockpiles, this facility will be subject to specific sections of this regulation.

- **Regulation 61-62.68 (40CFR68) - Chemical Accident Prevention Provisions: 112(r)**

This facility does not store or use chemicals subject to this regulation above the threshold quantities required to trigger applicability.

- **Regulation 61-62.70 - TITLE V Operating Permit Program**

Any source that has the potential to emit greater than 250 tpy of criteria pollutants, single HAP emissions greater than 10 tpy or total HAP emissions greater than 25 tpy is required to have a Title V permit. This facility has the potential to emit more than 250 tpy of PM and PM₁₀, which are criteria pollutants. Heidelberg requests facility-wide federally enforceable emissions limitation of less than 250 tpy for PM and PM₁₀ emissions to be classified as a Conditional Major facility and remove itself from applicability to this regulation.

- **40CFR60 - Standards of Performance for New Stationary Sources (NSPS)**

New Source Performance Standards (NSPS) require new, modified, or reconstructed sources to control emissions to the level achievable by the best-demonstrated technology as specified in the applicable provisions. Moreover, any source subject to a NSPS is also subject to the general provisions of Subpart A, except as otherwise specified.

NSPS Subpart A provides general provisions referenced by other NSPS Subparts. The proposed equipment at Heidelberg is subject to NSPS Subpart OOO which reference Subpart A. Subpart A provides requirements for notifications, performance testing, recordkeeping, monitoring, and control requirements for referencing subparts as applicable.

- **40 CFR Part 60 subpart OOO**

Sources which commenced construction, reconstruction, or modification after August 31, 1983 are subject to all applicable requirements of Federal New Source Performance Standards (NSPS) 40 CFR 60, Subpart OOO. The requirements for inspections, testing, reporting, monitoring, etc. listed in 40 CFR 60 Subparts A and OOO for the new crushers, screens, conveyors, feeders, and bins will be completed and reported as specified.