



SC DEPARTMENT *of*
**ENVIRONMENTAL
SERVICES**

What's New for Asbestos?

Nov. 3, 2025





SC DEPARTMENT *of*
**ENVIRONMENTAL
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Asbestos Compliance Assistance Toolkit

Environmental Assistance Conference, November 2025

Agenda

- What is asbestos?
 - Where does it hide in a structure?
 - Health effects
- Permitting and licensure
 - When is a structure regulated?
 - Application timelines
- Common compliance issues



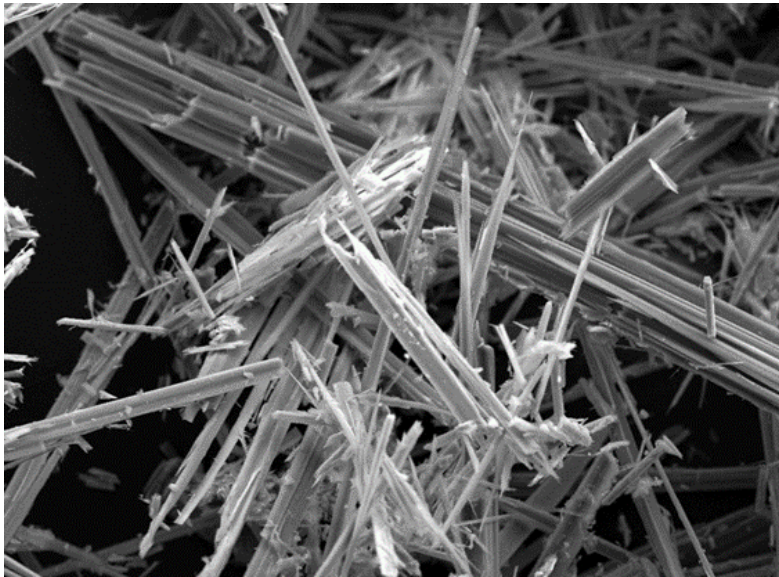
What is asbestos ?

- Fibrous mineral, naturally occurring
 - Strong and flexible
 - Heat resistant

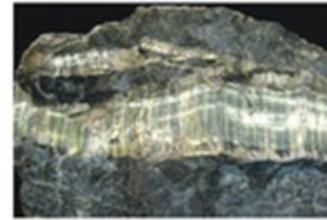


Six mineral types are defined by EPA as “asbestos”

Anthophyllite fiber
under magnification



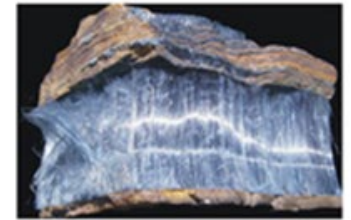
Serpentine and amphibole class of minerals



Chrysotile



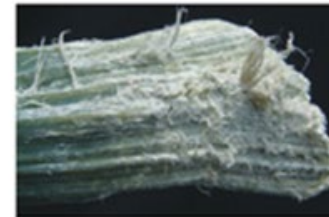
Amosite



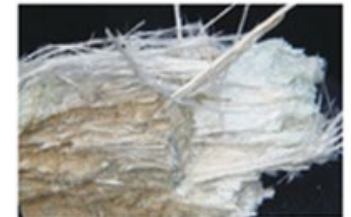
Crocidolite



Tremolite



Actinolite



Anthophyllite

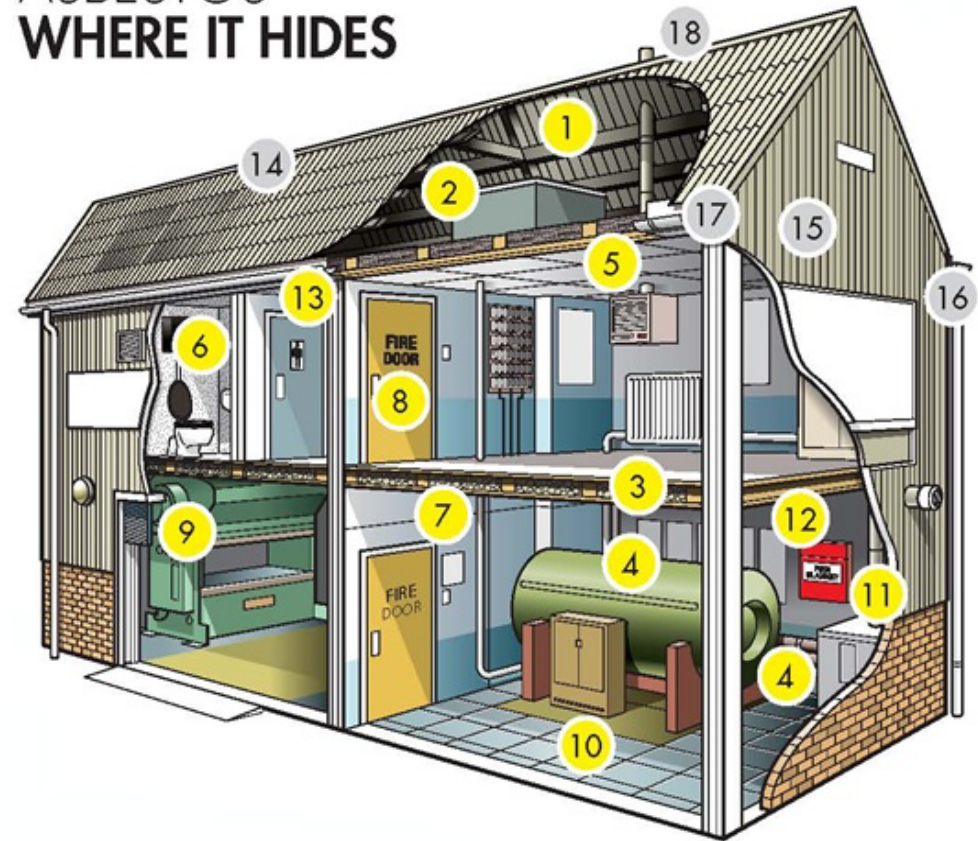
Asbestos Containing Materials



Where is asbestos in my structure?

1. Fireproofing
2. Cement water tank
3. Fill Insulation
4. Boiler insulation
5. Ceiling tiles
6. Sink coating
7. Sheetrock/joint compound
8. Fire doors
9. Gaskets

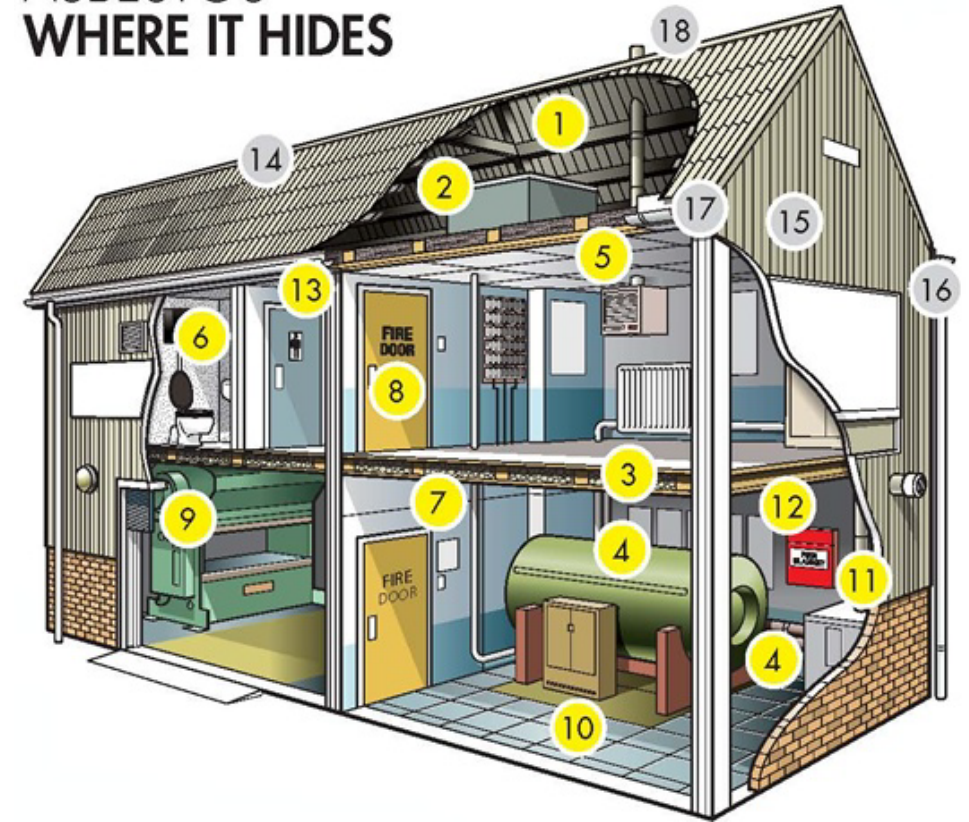
ASBESTOS
WHERE IT HIDES



Where is asbestos in my structure?

- 10. Floor tile
- 11. Pipe insulation
- 12. Window caulking
- 13. Textured wall coating
- 14. Shingles
- 15. Siding
- 16. Roof mastic
- 17. Roof felt
- 18. Roof flashing

ASBESTOS
WHERE IT HIDES



What other materials?

- Friction materials
 - Brakepads
- Textile and cloth products
- Spackling, patching, and taping compounds
- Laboratory hoods and tabletops



Decorations... but make them asbestos

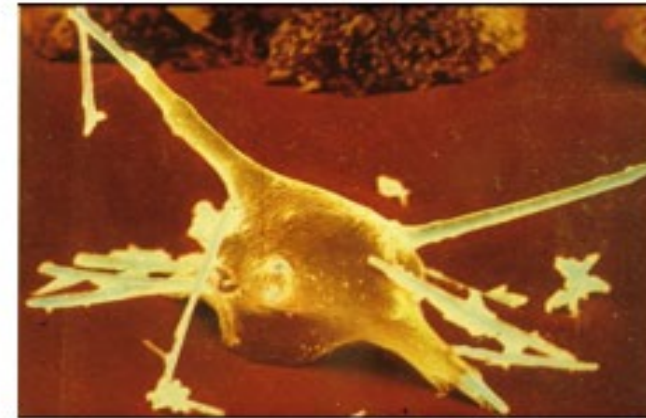
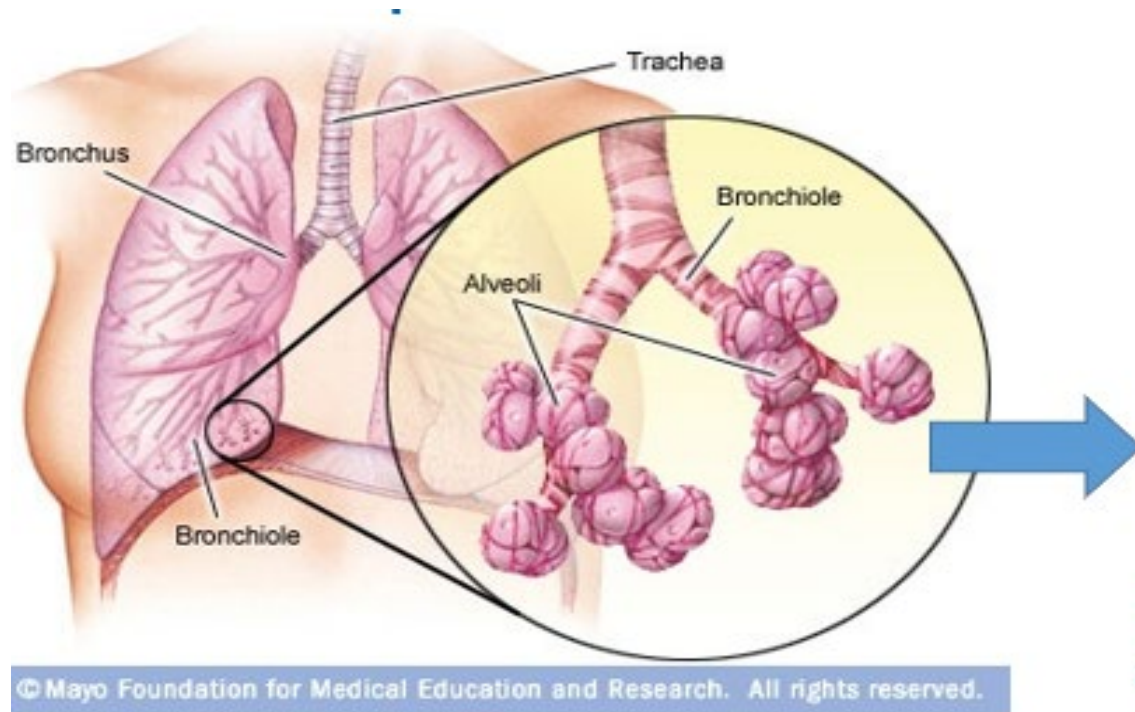
1939 Wizard of Oz poppy field scene: 100% Chrysotile asbestos snow



Health Risks



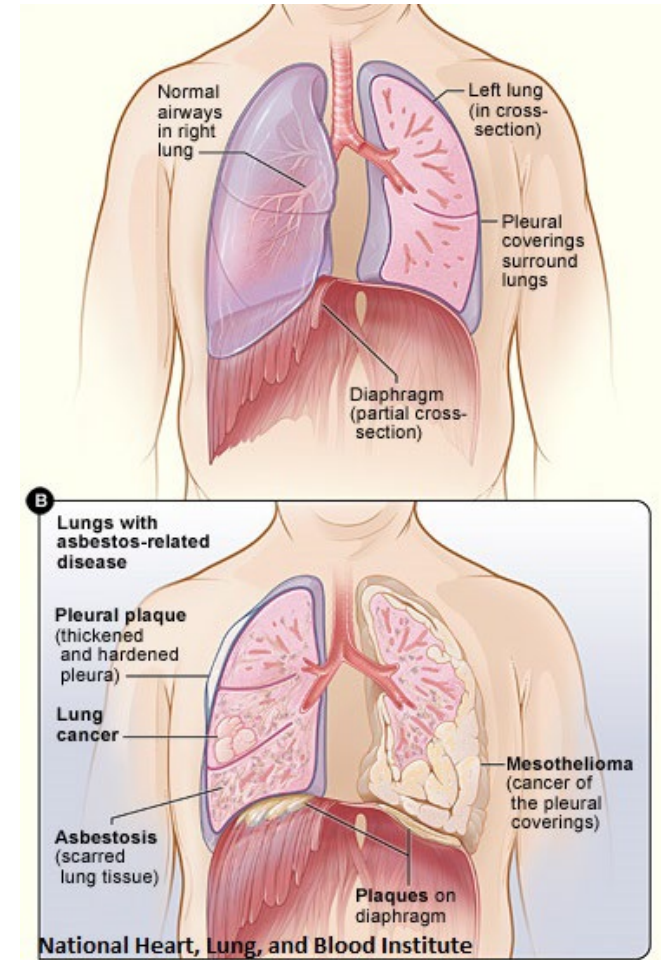
What happens when you are exposed to asbestos fibers?



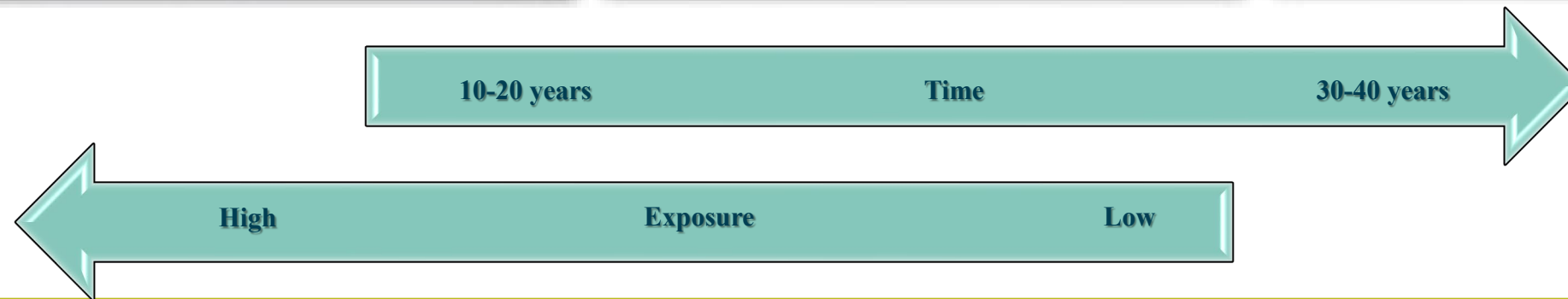
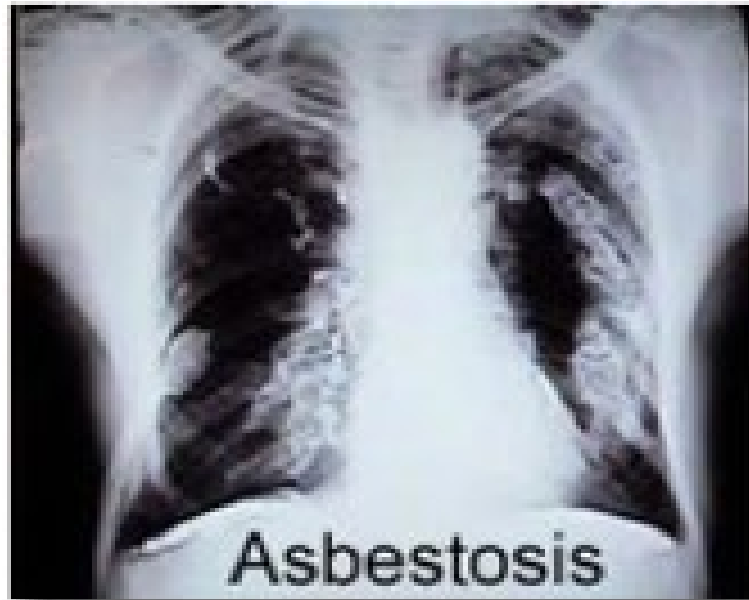
Macrophage trying to "digest" asbestos fiber

Asbestos-related Diseases

1. Asbestosis
 - Scarring of lung tissue
 - Reduces lung capacity
2. Mesothelioma
 - Tumor of the tissue that lines the lungs, stomach, heart, and other organs
3. Lung Cancer
 - Smoking causes “synergistic effect”



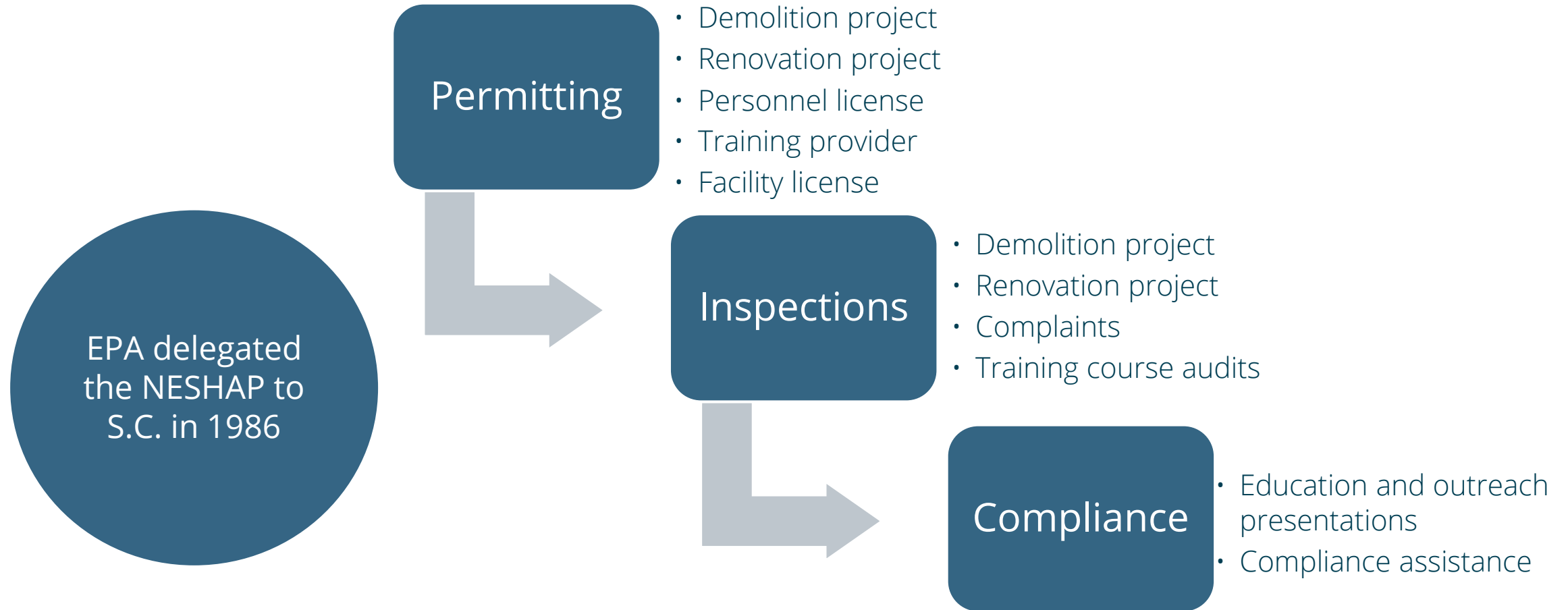
Asbestos-related Diseases



Asbestos Permitting and Licensing in S.C.

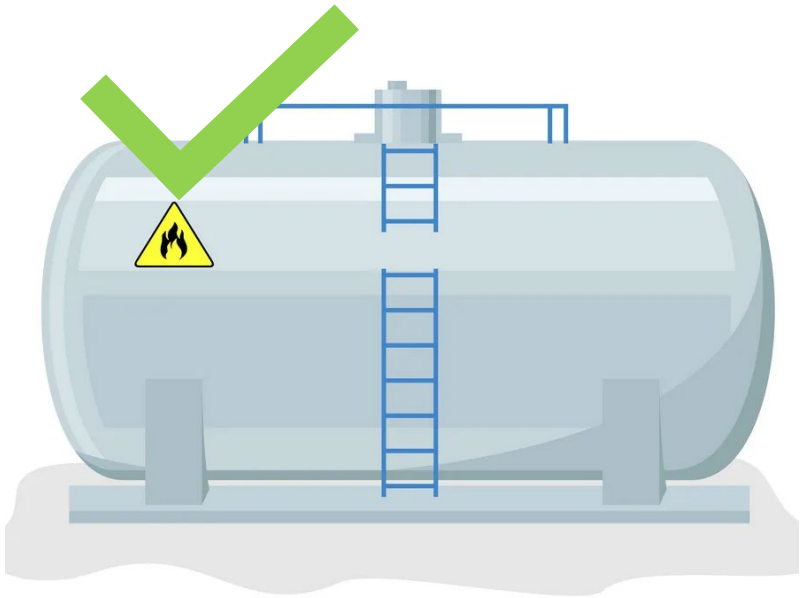


What we do in South Carolina...



What is regulated?

- Everything is regulated (billboards, docks, gas station canopies, above ground storage tanks, bridges, etc.)
- Except for what qualifies for **residential exemption**.



Residential exemption doesn't apply when...

- Greater than 4 units under one roof
- Abatement being performed by a licensed asbestos abatement contractor
- More than one dwelling unit being demolished within a city block with same owner/operator
- Commercial development aka a larger project
- Urban renewal, blight projects (includes flood/natural disaster cleanups)
- Road widening project
- Fire training project

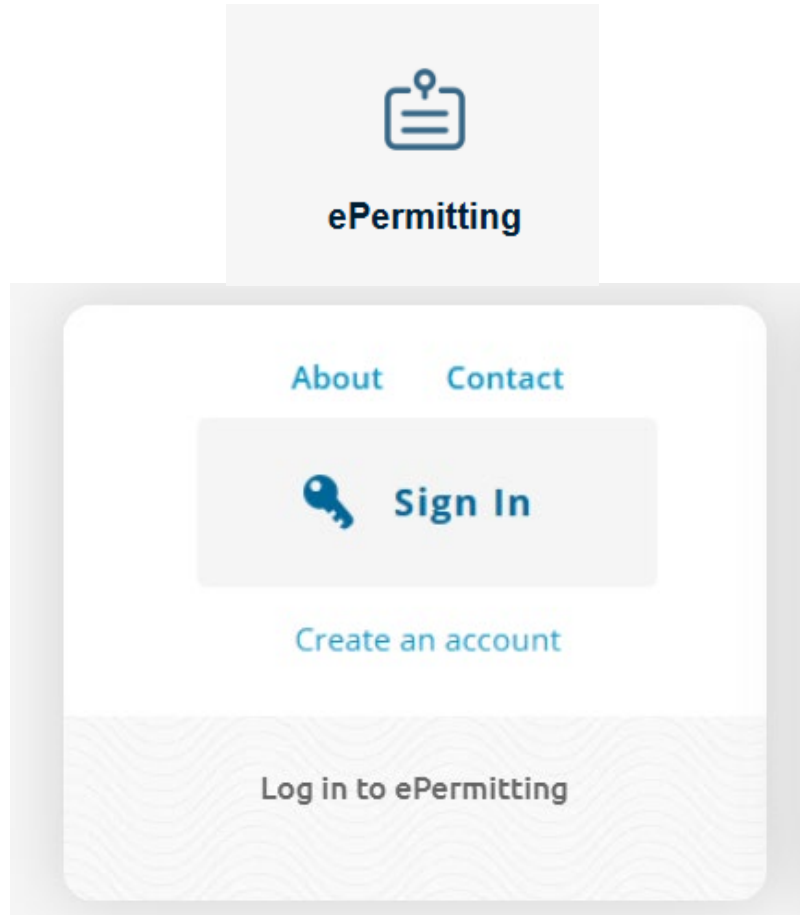
If the structure is not exempt, when is it regulated?

- Prior to any *renovation or demolition activity* of regulated structure or facility component
- There is **no** regulation that requires asbestos in good condition to be removed.
Why?
 - If material is intact, has not disturbed, the potential for exposure is negligible
- Types of activities that trigger the federal and state requirements
 - Demolition (total , partial, re-location, or fire training)
 - Renovation (“cosmetic work or interior demo” removing something)

Asbestos Permitting and Licensing in S.C.



Application timelines



Project Type	Minimum Required Notification Period
DEMOLITION	10 Working* Days
NESHAP Removal (> or = 160 SF, 260 LF, or 35 CF)	10 Working Days
SMALL Removal (> 25 SF but < 160 SF, 260 LF, or 35 CF)	4 Working Days
MINOR Removal (< or = 25 SF)	2 Working Days
Non-Friable NESHAP-Sized Removal (non-friable > or = 160 SF, 260 LF, or 35 CF)	4 Working Days
	*Includes holidays that fall on a weekday

How does asbestos use ePermitting?

Types of sites

Site (structure/building site), Person (site), or Organization (company or facility site)

1. Your Project Permit: Each structure/building will need a separate application AND each application needs a separate site
2. Your Supervisor License: Located on your Person Site
 - Starts with prefix ASB or SA, at least one is required for a valid CO license
3. Your Contractor License: Located on your company's Organization site
 - Permits/Licenses start with prefix ASB or CO
 - Renewed annually along with Supervisor License (Exp dates will be different!)

HINT: if you already were issued a “permit or license” number, you may need an invite to your site

How does asbestos use ePermitting?

Types of sites

[< BACK](#)

Permit Change Forms

Jennifer Lynn Boryk

▼

Filter

Showing 5 of 5

Asbestos - Abatement License Application (Contractor) - Renewal

Site Name: Jennifer Lynn Boryk
Permit Number: SA-02525 v8.0
Form Description: This application is for a renewal of the Contractor Abatement License issued to an Organization (not an individual).
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application (Individual) - Renewal

Site Name: Jennifer Lynn Boryk
Permit Number: SA-02525 v8.0
Form Description: This is an application to renew an Abatement License. Do not use for Contractor Licenses.
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application - Replace License

Site Name: Jennifer Lynn Boryk
Permit Number: SA-02525 v8.0
Form Description: Request a Replacement Abatement Personnel License ID Card (Do not use for Project Licenses)
Program Area: Air - Asbestos

Begin

Asbestos - Application Form for Group License - Renewal

Site Name: Jennifer Lynn Boryk
Permit Number: SA-02525 v8.0
Form Description: Application Form for Group License - Renewal
Program Area: Air - Asbestos

Begin

- Home
- Dashboard
- Site Details
- Start a New Form
- Submissions
- Permits
- Financials
- Documents
- Authorized Users

Asbestos - Abatement License Application (Individual) - New
Form Description: This is the application for a new Abatement License to be issued to an individual person.
Program Area: Air - Asbestos

Begin

Asbestos - Application for Instructor Approval
Form Description: Application for Instructor Approval
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application (Contractor) - Renewal
Form Description: This application is for a renewal of the Contractor Abatement License issued to an Organization (not an individual).
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application (Individual) - Renewal
Form Description: This is an application to renew an Abatement License. Do not use for Contractor Licenses.
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application - Replace License
Form Description: Request a Replacement Abatement Personnel License ID Card (Do not use for Project Licenses)
Program Area: Air - Asbestos

Begin

Asbestos - Project Application - Demolition with Asbestos in Place License New
Form Description: This application is used to notify regulated demolition projects with asbestos in place
Program Area: Air - Asbestos

Begin

Asbestos - Temporary Storage Containment Area License Application - New
Form Description: This form is an application for a new Temporary Storage Containment Area License.
Program Area: Air - Asbestos

Begin

Select Site

Select a context for your submission from the following options. Or, select Create New Site to begin a submission for an entirely new site.

Select Site

- Create New Site -

New Site Name

Continue

Cancel

Application types

Types of new applications

- Filter the applications for “asbestos”
 - 9 types of New forms
- It tries to guess the form you need based on your site type
- If you don't see the right one, click *I'm Not Sure or Show ALL*

The forms below are filtered for only those that apply to Sites.

Show All Forms

- **HINT:** The individual application contains ALL asbestos disciplines, i.e. supervisor, inspector, worker, etc. to select

Apply for a New Permit, License, or Entrance into a Program

asbestos x

Showing 9 of 98

Asbestos - Abatement License Application (Contractor) - New

Form Description: This is the application for a Contractor Abatement License to be issued to an Organization (not an individual).
Program Area: Air - Asbestos

Begin

Asbestos - Abatement License Application (Individual) - New

Form Description: This is the application for a new Abatement License to be issued to an individual person.
Program Area: Air - Asbestos

Begin

Asbestos - Application for Instructor Approval

Form Description: Application for Instructor Approval
Program Area: Air - Asbestos

Begin

Asbestos - Application for Training Course Approval - New

Form Description: This is the application for new Training Course approval for a company.
Program Area: Air - Asbestos

Begin

Asbestos - Application Form for Group License - New

Form Description: Application Form for Asbestos Group License
Program Area: Air - Asbestos

Begin

Asbestos - Project Application - Abatement License New

Form Description: This application is used to notify renovation/abatement projects.
Program Area: Air - Asbestos

Begin

Asbestos - Project Application - Demolition License New

Form Description: This application is used to notify regulated demolition projects.
Program Area: Air - Asbestos

Begin

Asbestos - Project Application - Demolition with Asbestos in Place License New

Form Description: This application is used to notify regulated demolition projects with asbestos in place
Program Area: Air - Asbestos

Begin

Asbestos - Temporary Storage Containment Area License Application - New

Form Description: This form is an application for a new Temporary Storage Containment Area License.
Program Area: Air - Asbestos

Begin

Renewal types, a.k.a Permit change

Types of renewal/revision applications

- We use renewal/revision, and the system categorizes these types of forms PERMIT CHANGES
- There are 14 types of renewal applications and can be accessed from Dashboard or Start a new form, option 2
- Pay attention to the SITE NAME and PERMIT NUMBER to make sure you are beginning the correct one
- *HINT:* Use the filter with your permit number to quickly find what you are looking for

Permit Change Forms

Filter

Showing 2 of 2

Asbestos - Project Application - Demolition License Revision

Site Name: Jennifer Boryk Test Site

Permit Number: ASD-000112 v1.0

Form Description: This application is used to revise regulated demolition projects or add or remove a hold on a permit.

Program Area: Air - Asbestos

Begin

Asbestos - Project License Cancellation

Site Name: Jennifer Boryk Test Site

Permit Number: ASD-000112 v1.0

Form Description: This form is used for submitting a request to cancel an existing Asbestos project license.

Program Area: Air - Asbestos

Begin

Schedules or reporting obligations

Types of schedule applications

- Two ways to access these 5 types of forms
- Start a New Form -> REPORTING
- Dashboard -> find in 'as needed' or 'priority' tabs
- Pay attention to the SITE NAME and PERMIT NUMBER to make sure you are beginning the correct one
- *HINT*: Use the filter with your permit number to quickly find what you are looking for and BEGIN

Start New Form

What kind of form are you looking for?

I want to start a new application

Forms used to apply for a New Permit, License, or Entrance into a Program



I want to renew, modify or terminate an existing permit, license or registration

Forms used to reissue, modify, transfer or terminate a permit



I have a reporting obligation to fulfill

Reporting forms relating to current permits and active compliance actions



I want to make a service request

Forms used to make a service request



I want to file a complaint, or report

Forms to file a general complaint or to report

I'm not sure

Search all available forms

waste shipment

Showing 341 of 901

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: CAROLINA GAS TRANSMISSION LLC

Permit Number: ASR-003772 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: Abbeville County Schools - Washington Street Storage Building

Permit Number: ASD-001104 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: GAFFNEY BOARD OF PUBLIC WORKS

Permit Number: ASR-001671 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: Billy Jeffers Building

Permit Number: ASR-002574 v2.0

Program Area: Air - Asbestos

Not Started

Begin

Group or facility license reporting

- License will be found under Permits menu
 - Prefix of "FO", "GR", or "ASB"
- Must report asbestos project waste
 - Use these reports to generate disposal permits
- Quarterly reporting deadlines: 2025 example
 - Due 1/30/2025 → 4th Quarter 2024 (Oct-Dec)
 - Due 4/30/2025 → 1st Quarter 2025 (Jan-Mar)
 - Due 7/30/2025 → 2nd Quarter 2025 (Apr-Jun)
 - Due 10/30/2025 → 3rd Quarter 2025 (Oct-Dec)

Start New Form

What kind of form are you looking for?

I want to start a new application

Forms used to apply for a New Permit, License, or Entrance into a Program



I want to renew, modify or terminate an existing permit, license or registration

Forms used to reissue, modify, transfer or terminate a permit



I have a reporting obligation to fulfill

Reporting forms relating to current permits and active compliance actions



I want to make a service request

Forms used to make a service request



I want to file a complaint, or

Forms to file a general complaint or

I'm not sure

Search all available forms

waste shipment

Showing 341 of 901

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: CAROLINA GAS TRANSMISSION LLC

Permit Number: ASR-003772 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: Abbeville County Schools - Washington Street Storage Building

Permit Number: ASD-001104 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: GAFFNEY BOARD OF PUBLIC WORKS

Permit Number: ASR-001671 v1.0

Program Area: Air - Asbestos

Not Started

Begin

Asbestos - Waste Shipment Record - Asbestos - Waste Shipment Record

Site Name: Billy Jeffers Building

Permit Number: ASR-002574 v2.0

Program Area: Air - Asbestos

Not Started

Begin

Compliance Issues



Incomplete license applications

Different types of applications *may* require supporting documentation and *not* submitting them initially could cause *delays in your project timeline*

- Copies instead of original certifications
- Missing last 4 of Social Security Number on certificate
- Made money order or check out to “DHEC” instead of “SCDES”
- Wearing a hat in passport-style photo
- First time being licensed in S.C., need to see all your past certificates

Incomplete project applications

Different types of applications *may* require supporting documentation and *not* submitting them initially could cause *delays in your project timeline*

- Asbestos Building Inspection Report aka Survey
 - Don't submit only lab sample results or limited pages... total report will be required
 - Required for variance projects, *all* demolitions, and when your inspector requests to see it
- Asbestos Project Design aka Specifications
 - ACM regulated projects greater than 3000 SF, 1500 LF, and 656 CF of RACM
 - May be required after found violations on site, or when your inspector requests one

HINT: Waste Shipment Records/Air Monitoring close out docs are submitted after your permit end date

License fraud



Compliance assistance

- ePermitting help with applications and other reports
 - Screen share
 - Phone/email tools
 - [ePermitting | South Carolina Department of Environmental Services](#)
- Site visits with consultants to assist on complicated clean-ups
- Incomplete or missing paperwork
 - Demo without a permit

Asbestos Section Contacts

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Get in touch

Asbestos Section//

des.sc.gov/Asbestos

803-898-4289 (main line)

des.sc.gov



South Carolina Department of
Environmental Services



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NESHAP Compliance and Reporting

Zachary Carfley

Manager, Air Toxics Section

November 3, 2025



Air Toxics Section

Air Toxics oversees the federal regulatory requirements for two programs within the Clean Air Act:

- Reduction of hazardous air pollutant emissions from stationary sources (NESHAP/MACT)
- Accidental chemical release prevention from stationary sources (RMP, 112(r), or Part 68)

Delegated Authority by EPA to run these programs in South Carolina



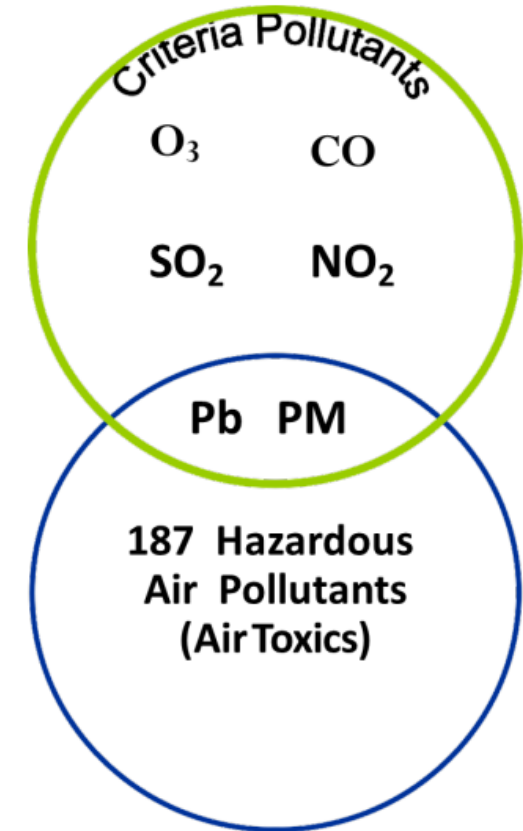
Air Toxics: Duties

- Conduct Research on Regulations
 - Review Reports and Notifications
 - Assist Regional Inspectors
 - Review TVACC NESHAP Conditions
 - Review State Air Permit Conditions
 - Routine RMP Inspections
 - RMP Release Investigations
-



What are Hazardous Air Pollutants?

- Commonly referred to as HAPs
- EPA currently lists **188** chemicals as HAPs
- Regulated by NESHAPs
 - National Emission Standards for Hazardous Air Pollutants
 - 40 CFR Part 61- Pollutant (20ish)
 - Risk Based
 - 40 CFR Part 63 – Technology (130+)
 - Phase 1- Technology Based
 - Phase 2- Residual Risk Review



National Emission Standards for HAPs

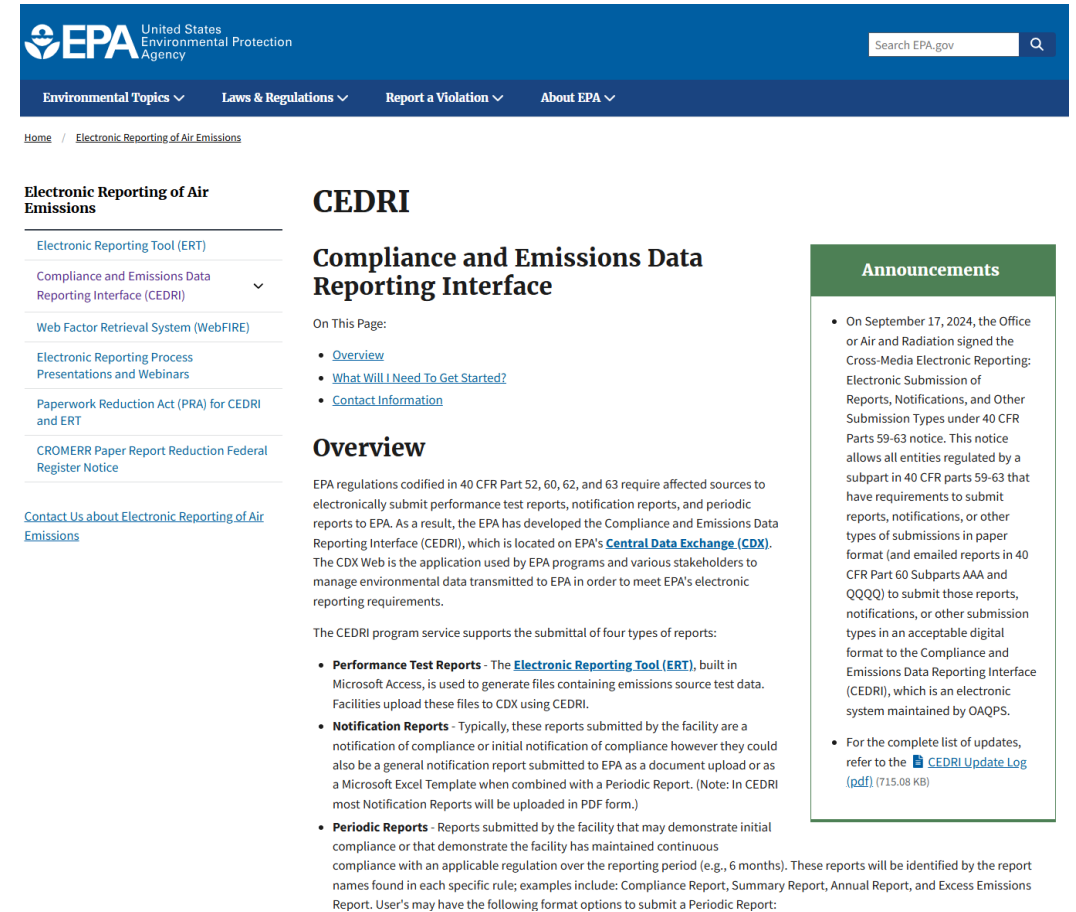
- Who is subject?
 - Stationary source that meets applicability
 - Major Source (10tpy any single or 25tpy of any combined HAP)
 - Area Source
 - Could apply to industrial sector or common emitting equipment
- What is required? It depends....
 - Documentation
 - Add on control devices
 - Performance testing
 - Compliant materials
 - Work practice standards

Common Compliance Issues

- Maintaining copies of Initial Notification and Notification of Compliance Status
- Updating NOCS to accurately reflect current operations and compliance strategy
- Maintaining Compliance Certifications as required by certain rules (Area Source Boilers)
- Boiler MACT tune-ups inconsistent with rule definition. (Before and After Air Measurements)
- Submitting notifications within required time frame
- Performing source testing within required time frame

Electronic Reporting

- Electronic reporting is being added as rules are revisited
- Must be submitted via Compliance and Emissions Data Reporting Interface (CEDRI) through the EPA's Central Data Exchange (CDX)
- Can apply to Initial Notifications, Notifications of Compliance Status, Periodic Compliance Reports, and Performance Test Reports
- Information submitted is made public
- Do not include CBI



The screenshot shows the EPA's CEDRI (Compliance and Emissions Data Reporting Interface) website. The header features the EPA logo and navigation links: Environmental Topics, Laws & Regulations, Report a Violation, and About EPA. A search bar is located in the top right. The main content area is titled "Electronic Reporting of Air Emissions" and includes a sidebar with links to the Electronic Reporting Tool (ERT), Compliance and Emissions Data Reporting Interface (CEDRI), Web Factor Retrieval System (WebFIRE), Electronic Reporting Process Presentations and Webinars, Paperwork Reduction Act (PRA) for CEDRI and ERT, and CROMERR Paper Report Reduction Federal Register Notice. The main content area has a section for "CEDRI Compliance and Emissions Data Reporting Interface" with a "On This Page:" section listing links to Overview, What Will I Need To Get Started?, and Contact Information. Below this is an "Overview" section explaining that EPA regulations require affected sources to electronically submit performance test reports, notification reports, and periodic reports to EPA. It also mentions the CDX Web application. The "Announcements" sidebar on the right contains two items: one about the September 17, 2024, signed Cross-Media Electronic Reporting: Electronic Submission of Reports, Notifications, and Other Submission Types under 40 CFR Parts 59-63 notice, and another about the complete list of updates, referring to the CEDRI Update Log (pdf) (715.08 KB).

EPA United States Environmental Protection Agency

Search EPA.gov

Environmental Topics ▾ Laws & Regulations ▾ Report a Violation ▾ About EPA ▾

Home / [Electronic Reporting of Air Emissions](#)

Electronic Reporting of Air Emissions

- [Electronic Reporting Tool \(ERT\)](#)
- [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#) ▾
- [Web Factor Retrieval System \(WebFIRE\)](#)
- [Electronic Reporting Process Presentations and Webinars](#)
- [Paperwork Reduction Act \(PRA\) for CEDRI and ERT](#)
- [CROMERR Paper Report Reduction Federal Register Notice](#)

[Contact Us about Electronic Reporting of Air Emissions](#)

CEDRI

Compliance and Emissions Data Reporting Interface

On This Page:

- [Overview](#)
- [What Will I Need To Get Started?](#)
- [Contact Information](#)

Overview

EPA regulations codified in 40 CFR Part 52, 60, 62, and 63 require affected sources to electronically submit performance test reports, notification reports, and periodic reports to EPA. As a result, the EPA has developed the Compliance and Emissions Data Reporting Interface (CEDRI), which is located on EPA's [Central Data Exchange \(CDX\)](#). The CDX Web is the application used by EPA programs and various stakeholders to manage environmental data transmitted to EPA in order to meet EPA's electronic reporting requirements.

The CEDRI program service supports the submittal of four types of reports:

- Performance Test Reports** - The [Electronic Reporting Tool \(ERT\)](#), built in Microsoft Access, is used to generate files containing emissions source test data. Facilities upload these files to CDX using CEDRI.
- Notification Reports** - Typically, these reports submitted by the facility are a notification of compliance or initial notification of compliance however they could also be a general notification report submitted to EPA as a document upload or as a Microsoft Excel Template when combined with a Periodic Report. (Note: In CEDRI most Notification Reports will be uploaded in PDF form.)
- Periodic Reports** - Reports submitted by the facility that may demonstrate initial compliance or that demonstrate the facility has maintained continuous compliance with an applicable regulation over the reporting period (e.g., 6 months). These reports will be identified by the report names found in each specific rule; examples include: Compliance Report, Summary Report, Annual Report, and Excess Emissions Report. User's may have the following format options to submit a Periodic Report:

Announcements

- On September 17, 2024, the Office of Air and Radiation signed the Cross-Media Electronic Reporting: Electronic Submission of Reports, Notifications, and Other Submission Types under 40 CFR Parts 59-63 notice. This notice allows all entities regulated by a subpart in 40 CFR parts 59-63 that have requirements to submit reports, notifications, or other types of submissions in paper format (and emailed reports in 40 CFR Part 60 Subparts AAA and QQQQ) to submit those reports, notifications, or other submission types in an acceptable digital format to the Compliance and Emissions Data Reporting Interface (CEDRI), which is an electronic system maintained by OAQPS.
- For the complete list of updates, refer to the [CEDRI Update Log \(pdf\)](#) (715.08 KB)

CEDRI Reporting

Requires rule specific templates to minimize potential of reporting errors.

Automatically pushes reports to public WebFIRE portal. Do not include CBI.

Important to remember it's an EPA system. SC DES staff only review submissions.

If you have issues with registration or submitting, please contact CEDRI or CDX Help Desk.

63.9(k) outlines procedure for claiming a system outage if necessary.

Air Toxics still asks that you fulfill the reporting schedule in ePermitting.

ePermitting

Some difficulties in how the system handles interactions between permits and "schedules"

Air Toxics "schedules" *should* exist for facilities to submit required NESHAP/MACT reports.

Includes regularly scheduled periodic compliance reports and as-needed submissions.

Air Toxics submissions have the option to select "Submitted in CEDRI" to fulfil requirement.

We may request a re-submission or clarification. Can be handled within the ePermitting system.

SC DES runs the system. **Please reach out to us if you have issues of any kind.**

Takeaways

- Compliance questions? Contact us!
- ePermitting questions? Contact us!
- CDX/CEDRI issues? Contact EPA!
- Know your permit and applicable subparts
- Stay informed of any changes to regulations
- We are here to help!



Questions?





SC DEPARTMENT *of*
**ENVIRONMENTAL
SERVICES**

Get in touch

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Environmental Services



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@SouthCarolinaDES



South Carolina Department of
Environmental Services



@SC_EnvServices