

Permit Application Completeness

November 3, 2025



Agenda

- Permitting Timelines
- Completing an Application
 - Emissions
 - Regulatory Review
 - Modeling
- ePermitting

Proviso 55.26

- Included in State FY2025-2026 Budget (Act H.4025).
- Directs agency to make a decision within 90 calendar days of receiving a <u>complete application</u>.
- Due date can be extended by mutual agreement.
- More comprehensive completeness reviews.
- Implemented with a 10 calendar day period to make a completeness determination.

The South Carolina Energy Security Act

- The South Carolina Energy Security Act signed by Gov. Henry McMaster on May 12, 2025 (Act H.3309)
- Energy infrastructure projects (EIP) are to be given "expedited review"
- Within 30 days of receipt of an application, the agency must determine whether the application is complete.
- This Act directs SCDES to review and issue a decision on EIP application within 6 months of receiving a complete application.
- The applicant and the agency may, in a written "mutual agreement," extend the permit review period.
- All EIPs require a pre-application meeting, where milestones will be established.

Permitting Timelines

Proviso 55.26			
Application Determination	• •	Determination/ Permit Received	
Complete	10 Days	90 Day*	
Incomplete	10 Days from date of the revised application submission	90 Days from the date of the revised application submission	

South Carolina Energy Security Act			
Application Determination	Application Review Period	Determination/ Permit Received	
Complete	30 Days	6 Months*	
Incomplete	30 Days from date of the revised application submission	6 Months from the date of the revised application submission	

*or an alternative timeline established via Mutual Agreement

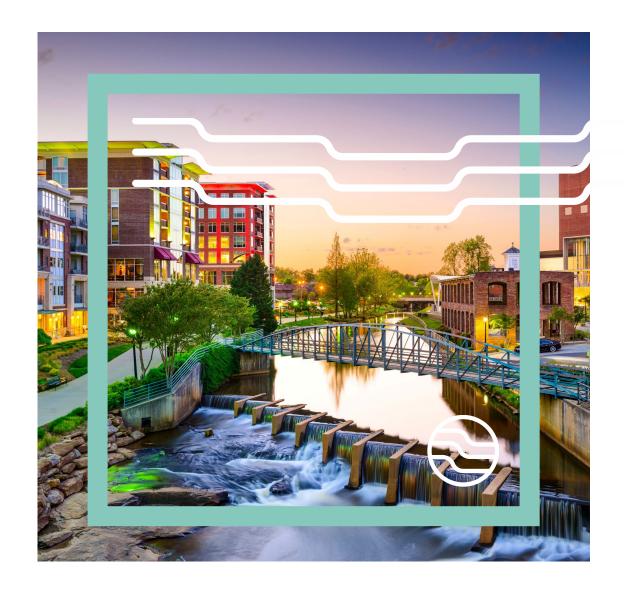
Completing an Application



Pre-Application Meeting

Types of applications with mandatory pre-application meetings

- PSD
- 112(g)
- Synthetic Minor
- Projects with significant public interest
- Energy Infrastructure Projects



Pre-App Meeting Attendance

Who is expected to attend:

- Permitting contact
- Consultant(s) including a modeler if modeling was completed

Preapplication meetings can be completed virtually on Microsoft Teams, in person at 2600 Bull St., or a hybrid of both options if needed.

If a project is simple, we may elect to have a conference call.

Pre-App Meeting Objectives



Identify milestones specific to the individual application/site



Discuss alternative timeline



Discuss emission calculation methods, applicable regulatory standards and compliance methods, etc.



Discuss modeling requirements





This checklist will assist applicants and consultants in submitting an air permitting construction permit application.

This checklist is a tool to help during the application process; however, all projects are unique and may require information not covered. Review the ePermitting application thoroughly.

Application sections match Checklist Section

S.C. Department of Environmental Services Air Permit Application Checklist

Purpose

This checklist is to assist applicants and consultants in submitting an air permitting construction permit application. The following information is expected to be provided to the agency for an application to be deemed complete.

This list is extensive, but there exist too many scenarios for it to be exhaustive. The facility and consultant will need to use experience to appropriately address their project's details. Contact the Bureau of Air Quality's Air Permitting Division or Air Modeling Section with any questions. Visit https://des.sc.gov/programs/bureau-air-quality/air-quality-permits/baq-permitting-contacts-industry-sectors for permitting contacts by industrial sector. For modeling questions, contact Modeling Section

Important Notes

Confidential Information

Confidential information should not be attached to or included in the ePermitting submission. Confidential information should be mailed to Air Permitting Division, 2600 Bull Street, Columbia, SC 29201.

Certifier Agreements

Facility representatives and consultants signing (certifying) the application must have ePermitting accounts and a certifier agreement with wet ink signature on file prior to certifying the application. The Bureau will not add a consultant or additional users to a site. The facility representative's (ePermitting administrator) must invite any additional users.

ePermitting

For the login portal, a copy of the certifier agreement form, or troubleshooting tips for SCDES ePermitting, visit: https://des.sc.gov/permits-regulations/permit-central/epermitting

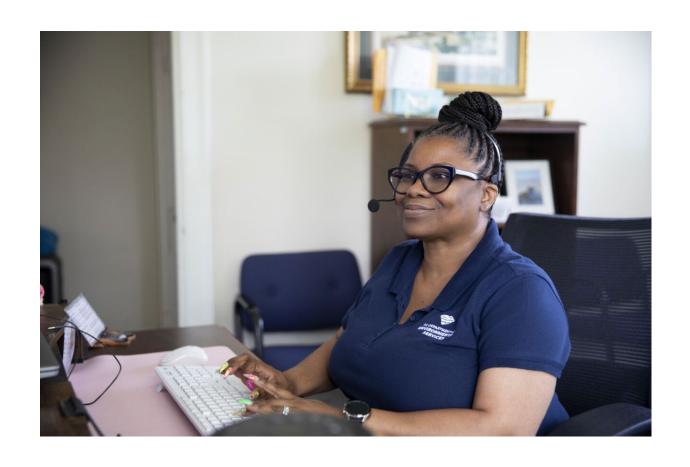
Air Permitting - Construction Submission

(Information for Air Modeling - Emission Point Information starts on Page 10)

Ask Questions

If you're not sure about something let us know.

We're here to help you succeed!



Emissions



Emissions Calculations

- Uncontrolled emissions: Maximum emission rate at full design capacity without consideration of control devices or emission limitations.
- Controlled emissions: Maximum emission rate at full design capacity taking into consideration control devices.
- Potential to Emit (PTE): The maximum capacity of a source to emit a regulated pollutant under its physical and operational design; optionally considering federally enforceable limits.

Emissions Spreadsheets

- SCDES is asking that a copy of the emissions calculation spreadsheet/s be provided in .xlsx format, and unlocked, with applications to allow staff to verify calculations and troubleshoot errors.
- All emission factors and conversions and a justification of their use must be provided.
- Confidential Information: Is not to be submitted via ePermitting at this time.

Emissions Tip

- Provide calculation details including emission factors with sources, numerical values with labeled units, unit conversions, and substitutions.
- Your emissions calculations must be representative and verified before a
 permit can be issued. All emission factor sources must be cited and any
 information not readily available must be provided.

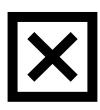
Regulatory Review



Regulatory Review

- For each potentially applicable regulation, explain how the source will comply with the regulation.
 Include the existing or proposed methods for monitoring, recordkeeping, and reporting.
- If the regulation is not applicable, but superficially appears that it could apply, address the reason the regulation is not applicable providing a detailed justification.





Reg Review Tip

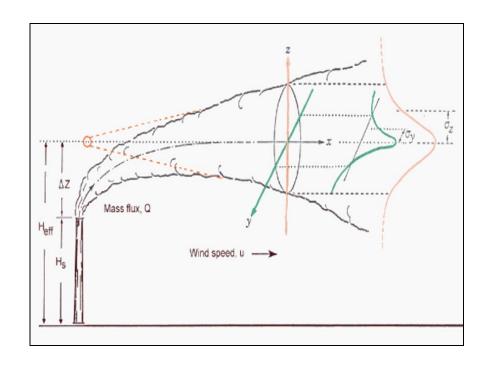
- Provide a justification for why the Regulation is Applicable/Not-Applicable to the specific project.
- Read each regulation carefully and document findings. If using precedence to bolster your argument, provide a copy or link to your sources.

Modeling



Modeling for Existing Facilities

- Existing Facilities may request a copy of their current modeling summary if they do not have one.
- This can be done without going through the FOIA process.



Modeling Application Procedure

If procedures are not applied as prescribed in the modeling guidelines, the applicant must coordinate this with Air Modeling personnel and acceptably justify the approach taken.

Any questions can be directed to the Bureau of Air Quality modeling manager.



South Carolina

Modeling Guidelines

for

Air Quality Permits

October 2018 (Revised 1/9/2025)

Modeling Application Needs

- A pollutant-by-pollutant table with emission rates and emission point IDs
- A table with Emission point IDs, locations, and dispersion characteristic parameters
- Complete discussion of any assumptions made to revise the worst-case maximum allowable short-term emission rates (as permitted) for modeling analyses
- Input and output files for all model runs (including but not limited to AERMAP, BPIP-Prime, AERMOD) need to be provided in the ePermitting submission.

ePermitting

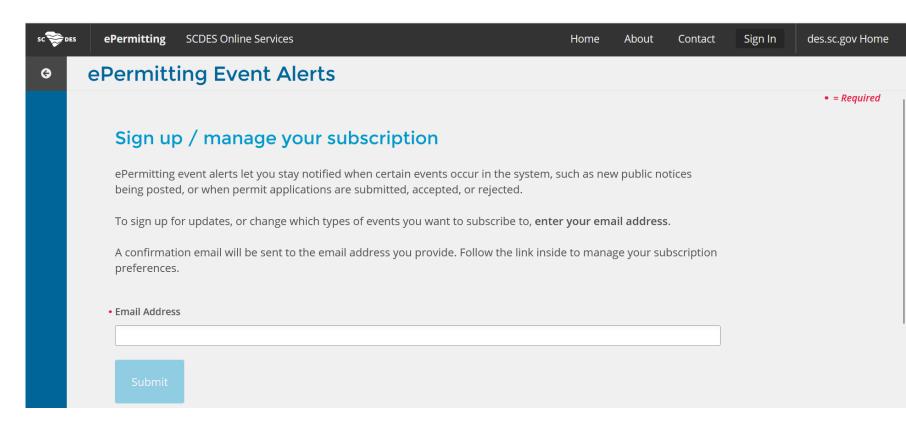


Authorized Users

- Roles in ePermitting provide different capabilities:
 - Viewer Can view site information but can't make any changes.
 - Limited Editor Can fill out forms and reports but cannot edit drafts initiated by others.
 - Editor Can fill out forms/reports as well as make edits to drafts created by them and others.
 - Administrator In addition to the capabilities listed for Editor, can edit site information, invite other users to join the site, inactivate users, and request certifier permissions for users.
- All requests for adding an authorized user should be sent to baq_epermitting@des.sc.gov
- We will not invite a consultant to be an authorized user, the facility must send them the invitation.
 - A consultant should not be the only administrator at a facility.
- Certifier Agreement form must be sent in for Signing Authority.

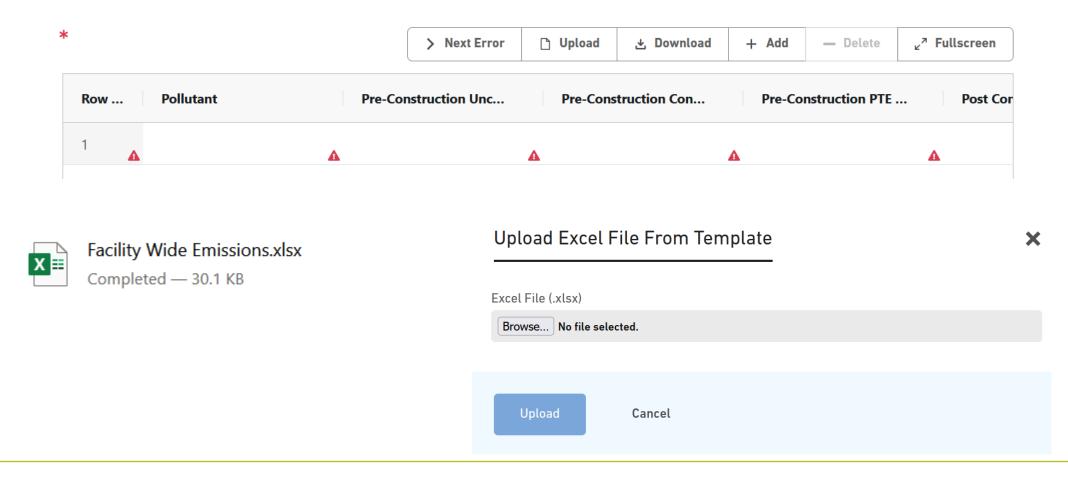
Sign-Up for Notifications

- Public notices going into effect
- Permits issued/denied
- Applications received



https://epermitting.des.sc.gov/ext/ncore/external/subscriptions/signup

Uploading Tables in Application



Start of Operation and Construction Certification

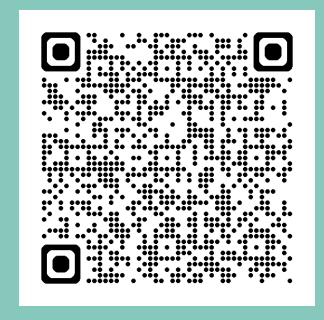
Current Operating Permit Status	Form Needed
Existing Non-Title V	Air Permitting – Operating Permit Modification*
Existing Title V	Air Permitting – Title V Modification*
New Operating Permit	Air Permitting – Operating Permit*
New Title V	Schedule: Air Permitting – Start of Operating and Certification of Construction

*these forms include start of operation and construction certification

Source Tests

- Source Evaluation has streamlined a new submission form for the submittal of stack testing related documents.
- This new form type will allow for the submission of individual compliance forms, which can be deemed "Approved" after submission.
- This differs from our previous form in the ability to indicate status of individual compliance activities before the finalization of the stack test.
- Each testing event will be submitted as a single "Air Source Test Submission" package.

Air Permitting Guidance





Get in touch

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des.sc.gov











Links

- South Carolina Department of Environmental Services Bureau of Air Quality
 - https://des.sc.gov/programs/bureau-air-quality
- Air Permit Application Checklist
 - https://des.sc.gov/sites/des/files/Documents/BAQ/Permitting%20Guidance/Air%20Permit%20Application% 20Checklist.pdf
- ePermitting
 - https://epermitting.des.sc.gov
- ePermitting Training
 - https://des.sc.gov/permits-regulations/permit-central/epermitting-training



Modeling Links

- Air Quality Modeling Guidelines
 - https://des.sc.gov/sites/des/files/Documents/BAQ/Modeling/SCModelingGuidelines_2025.pdf
- Other Information Guidance
 - https://des.sc.gov/programs/bureau-air-quality/air-dispersion-modeling-overview
- Air Dispersion Modeling Data
 - https://des.sc.gov/programs/bureau-air-quality/air-dispersion-modeling-overview/air-dispersion-modeling-data
- EPA Guidance on Developing Background Concentrations for Use in Modeling Demonstrations
 - https://epa.gov/system/files/documents/2023-10/draft-guidance-on-developing-background-concentrations-for-use-in-modeling-demonstrations.pdf



Contacts:

BAQ Permitting: Contacts for Industry Sectors

• https://des.sc.gov/programs/bureau-air-quality/air-quality-permits/baq-permitting-contacts-industry-sectors

Modeling Section Manager - Gregory Quina

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