



MEMORANDUM

DATE: February 26, 2016

TO: **Engineering Service Division**

FROM: Alyson Hayes, General Permit and Support Section Manager

THROUGH: Liz Basil, Director of Engineering Service Division

SUBJECT: **Relocation of Asphalt Plants**

In accordance with SC Regulation 61-62.1, Section II.B.6, a facility may request an exemption from the requirement to obtain a construction permit for modifications to existing equipment, including the reconstruction, relocation, and replacement of existing equipment. This memo is to provide guidance to staff and facilities in making the determination of when to allow facility relocation for asphalt plants covered under the General Conditional Major for Asphalt Plants without a construction permit.

The intent of this guidance is to help streamline the permitting process eliminating the requirement to obtain a construction permit for a previously permitted source, where no new applicable requirements are triggered due to the relocation of the equipment/facility. Therefore, this guidance will not apply to any equipment/facility that is not currently covered under the General Conditional Major for Asphalt Plants or for relocation of equipment / facility that has outstanding compliance issues. This guidance strictly applies to the relocation of existing equipment at a permitted source and does not apply to modifications or reconstruction to existing equipment, or installation of a new unit.

All equipment is relocated to a new site location within the state of SC.

The facility must make the following notifications and requests to the Department:

- 1) DHEC Forms D-0662 (Facility Relocation Application) and D-2573 (Emission Point Information Form) should be submitted to indicate the new facility location and provide a complete list/description of the existing equipment being relocated.
- 2) Updated emission calculations if there have been any changes since renewal.
- 3) The facility must address compliance with applicable ambient air quality standards with the relocation request. No equipment should be operated at the new site until the compliance justification has been approved. If there will be no increases

in emissions since the facility last compliance demonstration, emission point parameters will remain the same, the distances to the closest boundary at the new location will be no closer, and all current standards have been addressed in the existing compliance demonstration, the Bureau may allow the use of the existing compliance demonstration as sufficient for the relocation.

4) For facilities covered under the General Conditional Major for Asphalt Plants, public notice will generally not be required prior to approval of the relocation. The Department may determine a notice is appropriate, such as when a facility is moving into a non-attainment area of the state or moving into an area that has had significant community interest in asphalt plants. If public notice is required, the Bureau will consider any comments received and either approve or disapprove the relocation. This determination was based on the draft permit being published as a general permit in the State Register and multiple newspapers throughout the state and subsequently issued as the General Conditional Major Asphalt Plant Permit. The permit contains federally enforceable limits so that emissions stay below Title V operating permit thresholds. Facilities requesting to be permitted under this permit may request coverage and be issued coverage with no further notice (SC R 61-62.1 Section IIG.7.e).

5) The facility should request in writing that the location on the permit be updated within 15 days of the relocation. This request can be made in a letter or by using DHEC Form D- 2959 (Facility Information Update). The facility must continue to adhere to the permit terms and conditions of the General Conditional Major for Asphalt Plants at all times when in operation.

Record of Revisions	
DATE	Description of Change
February 26, 2016	ORIGINAL MEMORANDUM.