

AREA SOURCE PROGRAM STRATEGY (SC)

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**States ERP Consortium National
Meeting
Reno, NV**



Delegation

- **SC has automatic delegation of all Section 111 and 112 programs, including area sources, through Title V (TV) Program approval**
 - **Does this mean we have to implement 112(k)? Can we partially implement the program (i.e. implement standards that impact permitted sources)? Do we need to modify TV delegation?**
 - **Can we say “NO” to 105 Grant commitments related to area sources? Will EPA take away grant money?**

Area Sources in SC

- **Includes Title V (not major for HAP), Conditional Major (CM), Minor, Exempted & Non-permitted sources**
- **Estimated permitted sources universe: 1871**
- **120 TV (TV Sources not major for HAP)**
- **434 CM**
- **1317 State Minor**

Area Sources in SC

- **Non-permitted sources: Unknown or best guess**
 - **Dry Cleaners (~300)**
 - **Gas stations (4000)**
 - **Auto body shops (1100)**
 - **Sources with generators, boilers and heating equipment (unknown)**

Area Sources Workgroup

- **Subcommittee of Air Toxics Workgroup**
- **Air Toxics, Small Business Environmental Assistance Program (SBEAP), Engineering, Compliance, Regions, Emissions Inventory**
- **Registration permits**
 - **Unpermitted facilities**
 - **Environmental Results Program**
- **Fee collection**

Area Source Strategy

- **Three types of area sources**
- **Type “1” Standards affecting currently permitted facilities**
 - Ex- wood preserving
- **Type “2” Generally un-permitted industrial source specific categories**
 - Ex- dry cleaners, auto body shops
- **Type “3” General Categories**
 - Impact both permitted and un-permitted
 - Ex- generators

Area Source Strategy Cont...

- **Type “1” Standards affecting currently permitted facilities**
- **Business as usual**
 - Fold requirements into operating permit
 - Inspect on usual schedule, depending on permit status
- **Outreach Packages**
 - Sent to facilities, includes a letter, regulation, timeline, fact sheet, EPA brochures, contact information
- **Fees**
 - Assess current category
 - May create new tonnage categories

Area Source Strategy Cont...

- **Type “2” Generally un-permitted industrial source specific categories**
- **Identify the number of possible sources**
- **Registration Permits**
 - SC R. 61-62.1 Section II “I”
 - Fold requirements into operating permit
 - Inspect on usual schedule, depending on permit status
- **Environmental Results Program (ERP)**
 - Compliance Assistance
 - Self Certification
 - Performance Measurement
- **Hybrid ERP/Registration**
- **Annual Fees**

Area Source Strategy Cont...

- **Type “3” General Categories**
- **Outreach focus**
 - **Website**
 - **Fliers from regional offices**

“Small” Area Source Challenges

- **“Small” = Unpermitted**
- **Identifying the sources State-wide**
- **Special outreach – lots of training, workshops, site visits**
- **Areas impacted: Permitting, Modeling, SBEAP, Emissions Inventory, Regions, Air Toxics, Enforcement, Source Evaluation, Technical Management**

Permitting “Small” Area Sources

- Do these sources need to be permitted?
- Some sources have already been exempted (ex-generators) – can we take back an exemption?
 - Streamlined regulation may allow for this
- Registration permits over traditional permitting?
- Area source requirements will need to be added to existing permits
 - do we wait 10 yrs until OP renewal?
- If registration permits are required for “Small” area sources, resources needed to develop and implement the permits
- Compliance with the regulations
 - Existing Permits – regularly inspected
 - ERP – Autobody shops (maybe other categories?)
 - Self-certifications for other registration permits

Permitting and Fees

- **Fees for registration permits**
 - **Current Fees: \$41.96 per ton (actual emissions)**
 - **Most area sources emit < 3 tons/year**
 - **Emissions based on industry averages**
 - **New area source categories**
 - **Use stakeholder process to get industry averages of existing sources within category**

To Implement or Not To Implement

- Do we want to do this?
- Permitted area sources vs. non-permitted area source
- What are expectations for identifying the “small” facilities, conducting outreach, and inspections?
- Where to find the funding? What resources are needed?
- What help can we expect from EPA?