AREA SOURCE PROGRAM STRATEGY (SC)

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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. 61-62.1Section 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?