

S.C. Department of Environmental Services

Air Permit Construction Pre-Application Meeting Checklist

Purpose

This checklist will assist applicants and consultants in preparation for an air permitting pre-application meeting. The more project information that is known and available during the pre-application meeting, the more effective the feedback can be. The following information is expected to be on hand and discussed with the agency during a pre-application meeting.

Contact the Bureau of Air Quality's Permitting Division or Air Modeling Section with any modeling related questions. Visit [BAQ Permitting: Contacts for Industry Sectors | SCDES](#) for permitting contacts by industrial sector. For modeling questions, contact the Modeling Section manager at 803-898-4074.

Important Notes

What is a Pre-Application Meeting

A Pre-Application meeting is a meeting that takes place before you formally submit your application but after you have a draft application or have a firm understanding of your project's expected equipment, emissions, and regulatory applicability. The meeting is your chance to present your project and get constructive feedback from SCDES air permitting staff to help your submittal be complete and easier to process quickly.

Encouraged and Required Pre-Application Meetings

For the permit types specified below, a pre-application meeting is mandatory for an application to be deemed complete.

- Prevention of Significant Deterioration
- Case-by-Case MACT (112g)
- Projects that may have public interest
- Energy Infrastructure Projects
- Synthetic Minor
- As requested by the Bureau of Air Quality

Applicants are encouraged to have a pre-application meeting for all air construction permitting projects.

Method

Pre-application meetings can be conducted remotely, in-person, or a hybrid.

Scalability

A pre-application meeting can scale with the complexity of a project. For example, for a project with little complexity, not all the information in this checklist may be needed and a short conference call may be enough. Please contact your air permitting industrial sector contact for advice on the scale for your specific project.

Adequacy

A project presented with uncertainty to the degree that little or no constructive feedback is possible, may in rare cases, be determined to not be an adequate pre-application meeting. In such cases, where a pre-application meeting is mandatory, another meeting will be required prior to submission. The Department will provide feedback on what information is needed to have an adequate subsequent meeting.

Minimum Attendance

- A facility representative that has knowledge of their existing and/or proposed processes.
- Consultant(s), or others, that are conducting the emissions and regulatory analysis.
- Consultant(s), or others, that are conducting the ambient air quality compliance analysis, if required.
NOTE: This includes compliance demonstrations other than a model (e.g., demonstration through other information).

Facility Overview

- Proposed location(s)
- SIC/NAICS Codes
- Site history (i.e., new or existing operation)
- Brief overview of current facility operations, if applicable
- Brief overview of proposed facility operations

Project Description

- Description of the facility's proposed new or altered processes. Include how the new or altered sources affect the existing operation (e.g., removal of bottlenecks, increase of capacity), if applicable.
- Description and capacity of proposed equipment to be added, removed, or modified.
- Description and destruction/removal efficiency of proposed control devices to be added, removed, or modified.
- Process flow diagram / production process layout of all new or altered sources, showing the flow of materials and intermediate and final products.

Emissions

- Emission calculation methodologies and emission factor sources.
- Net emissions change of uncontrolled, controlled, and potential to emit totals.

- If existing, the pre-construction and post-construction emissions totals.
- Projected emission estimates of uncontrolled, controlled, and potential to emit

Applicable Air Regulations

- If the project will be taking any form of avoidance limits and how compliance will be demonstrated.
- For each state and federal air pollution regulations:
 - o For each applicable regulation, which limits or requirements apply and how compliance will be demonstrated.
 - o For each non-applicable regulation, that superficially appears that it could be applicable, why it is not applicable.
 - o Reference the Application Checklist for Regulation Lists ([AirPermitApplicationChecklist.pdf](#))

Modeling

- SC Standard No. 2 (Ambient Air Quality Standards), how compliance will be demonstrated, including the following:
 - o Applicable modeling exemptions (and/or proposed requests for modeling deferrals).
 - o "Other Information" analyses and discussion of the suggested approach.
 - o Screening (SCREEN3) and refined (AERMOD) air dispersion modeling methods applied, including discussion of selected monitor background data, meteorological data, source types, dispersive characteristics, nearby structures affecting downwash, nearby terrain features (for SCREEN3 application), and the use of regulatory default model settings (or why defaults may not be selected, such as the use of non-default in-stack NO₂/NO_x ratios, if applicable).
- For SC Standard No. 8 (Toxic Air Pollutants Standards), how compliance will be demonstrated, including the following:
 - o Applicable modeling exemptions (and/or proposed requests for deferrals).
 - o Pollutants less than applicable facility-wide de minimis (lb/day) thresholds.
 - o Screening (SCREEN3) and refined (AERMOD) air dispersion modeling methods applied, including discussion of meteorological data, source types, dispersive characteristics, nearby structures affecting downwash, and nearby terrain features (for SCREEN3 application).

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- Prevention of Significant Deterioration modeling compliance discussion (if applicable):
 - Modeling protocol submittal.
 - Applicable off-site county emissions inventory data requests and cumulative impact model inclusions.
 - Air dispersion modeling analyses to demonstrate compliance with Class II significant impact levels, cumulative impact NAAQS, increments, and additional impacts as required.
 - Class I modeling and Federal Land Manager (FLM) communication.
 - Inclusion of secondary formation impacts for ozone and PM_{2.5} analyses.

Proposed Timeline

- If the project will be an Energy Infrastructure Project (EIP). ([SC Energy Security Act | SCDES](#))
- The facility's planned start of construction date and/or date that permit is required for "beginning actual construction" under state and federal air regulations.
- If there is any known public interest in the project.
- If any community engagement regarding the project has been undertaken or is planned.

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RECORD OF REVISIONS	
Date	Description of Changes
04-30-2026	Initial checklist