

Question and Answer: Operating Ranges & Parameter Readings for Air Pollution Control Devices

This document has been created to assist facilities with understanding operating ranges and parameter readings for air quality pollution control devices. Note that all monitor parameter readings of the control device must be recorded while the process and control device are in operation. All records required to demonstrate compliance under your permit shall be maintained on site for a period of at least five (5) years from the date the record was generated and shall be made available to a Department representative upon request. Some requirements may also include submission of the records via ePermitting.

All gauges shall be readily accessible for verification by operating personnel and the South Carolina Department of Environmental Services (SCDES) personnel (i.e., on ground level or easily accessible roof level).

This guidance document is intended to assist with understanding the requirements of your permit. While we make every effort to encompass as much information as possible, permit contents may vary. Please review your permit for any additional site-specific requirements that may apply. SCDES is not liable for errors or omissions.

1. Question: What are operating ranges, and why are they important?

Answer: Operating ranges are ranges that are established to ensure that the control device is operating as intended. The range includes a minimum and/or maximum value within which a reading indicates the control device is operating correctly. These ranges can be established by using source test data, vendor certification, manufacturer's specifications, good engineering practices, operational history and visual inspections.

2. Question: Why is it important to maintain the gauge on my control device?

Answer: If a gauge is not providing accurate readings, a facility may miss potential problems with the control device. Therefore, it's the responsibility of each facility to document what is being done to ensure that the gauge for each control device is operating as intended. Air quality permits for facilities with control devices require owners or operators to regularly inspect, calibrate, adjust, and maintain all continuous monitoring systems and gauges according to manufacturer's specifications or good engineering practices.

3. Question: How do I establish/update operating ranges?

Answer: A facility can establish operating ranges using source test data, vendor certification, manufacturer's specifications, good engineering practices, operational history and visual inspections. In some instances, a facility may be required to update the operating ranges. This can be due to Department requests, source test requirements, or process changes at the facility.

4. Question: How do I submit operating ranges in ePermitting?

Answer:

- Log into your ePermitting account.
- Locate the "Air – Operating Ranges" form.
- Fill out the form, attach required documents, and click submit. The form will be routed to the BAQ permitting staff for review and approval.

Facilities can refer to the ePermitting guidance documents at des.sc.gov/ePermittingTrainingAir for instructions on how to complete and submit the operating ranges form.

- 5. Question: My facility recently underwent changes in our production process and/or products, which resulted in the need to re-establish our operating ranges. How do we document this?**

Answer: The facility should refer to the permit to determine if there is a time frame requirement for re-establishing the operating range. Depending upon the permit type, the supporting documentation for the re-established operating ranges will either need to be kept on site or submitted via ePermitting.

As a reminder, the facility must evaluate whether a construction permit or permit modification is required for the change.

- 6. Question: My parameter reading is outside of the established range. What should I do?**

Answer: Each occurrence of parameter readings outside of the established operating range—including the date and time, cause, and corrective action taken—shall be recorded and kept on site.

As required by your permit, reports of these occurrences may need to be submitted during the established permit reporting period. If there were no occurrences during the reporting period, documentation shall be submitted stating such.

Exceedances of an operating range are not considered violations of an emission limit in the permit unless the exceedance is accompanied by other information demonstrating that a violation of an emission limit has occurred.

If a facility determines that re-establishment of the operating ranges is needed, refer to Question 3.

7. Question: Why do I need to document and keep records of my operating range?

Answer: Permitting requirements are based on state and federal air quality regulations, which have been established to be protective of public health and environment, including the sensitive and vulnerable population. Maintaining required documentation of the operating ranges, as well as the parameter readings, helps a facility maintain compliance with their permit requirements.