Simplifying the Air Permitting Process

On-Site Implementation Log (OSIL)

BUREAU OF AIR QUALITY
Air Permitting Division

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Disclaimer

This booklet is produced by the South Carolina Department of Environmental Services (SCDES) - Bureau of Air Quality. The intent of this booklet is to provide a basic overview of the process to determine if a source is eligible for a construction permit exemption. This booklet is not a substitute for applicable Federal and South Carolina laws and regulations.

South Carolina Air Pollution Control Requirements and Standards are contained in SC Regulation 61-62.

Introduction

An On-Site Implementation Log (OSIL) is a document kept at the facility, used to keep a record of all minor alterations made at the facility as allowed under their operating permit's flexibility conditions without having to obtain a construction permit. These changes must meet the requirements of the permit conditions. As part of the requirements established in the permit flexibility conditions, a facility is required to keep the OSIL (written or electronic) with the facility's Air Permit and it must be made available during inspections. OSIL entries shall provide detailed information supporting the changes made under this procedure. The OSIL is required to periodically be submitted to the Department, per the permit conditions, or anytime the OSIL is requested by the Department.

What is Allowed?

A facility may undertake minor alterations without a construction permit, or without revising or reopening the operating permit unless otherwise specified by any State or Federal requirement. These minor alterations must meet the criteria and procedures as prescribed in the permit's flexibility conditions. This flexibility only covers exempt sources and existing permitted sources. The owner or operator may be subject to possible enforcement if the activity is found to be inconsistent with the permit flexibility conditions.

What are some activity criteria for changes that can be included in an On-Site Implementation Log?

- Will not exceed any existing limit in the operating permit.
- Will not result in a change or addition of a permit term, condition, or limit.
- Does not result in an emissions change that would potentially make the facility subject to the Title V operating permit program.
- Does not trigger S.C. Regulation 61-62.5, Standards No. 7 (PSD) and No. 7.1 (NSR) or synthetic minor permitting requirements.
- Does not trigger applicability of a new regulation or regulatory requirement.
- If an activity is subject to 40 CFR Part 60, 61 or 63, it cannot be included in the OSIL and will require a construction permit. Except:
  - New/existing exempt sources under S.C. Regulation 61-62.1, Section II(B)(2) or the Bureau of Air Quality-published permitting Exemption List.
- Does not affect compliance with S.C. Regulations 61-62.5 Standards

No. 2 (Ambient Air Quality Standards), No. 7 (PSD) and No. 8 (Toxic Air Pollutants).

- Any activity exempted in S.C. Regulation 61-62.1, Section II(B)(2) or the Bureau of Air Quality published permitting exemption list except if subject to a federal standard.
- Changes that impact an ambient air standards demonstration (such as air dispersion modeling), but are otherwise allowed under the permit flexibility condition, shall be allowed provided:
  - Updated air dispersion modeling or other information demonstration is conducted prior to the source operating under the new operating scenario. A copy of these results for the new operating scenario are kept on site and available for inspection. The air dispersion model used must be Department approved.
  - The facility must submit a written request to modify the demonstration within three (3) business days of operating under the new operating scenario. The demonstration shall include a description of the scenario, emission rates, modeling results, modeling files and a completed modeling information form and any other pertinent information relevant to the demonstration. This request shall be submitted to the Department.

Recordkeeping

What is recorded in an On-Site Implementation Log?

- An OSIL should at a minimum include:
- A brief description of the activity and how it meets Permit Flexibility Criteria for Existing and Exempt Sources.
- Include impacted equipment identification numbers, operating permit identification unit, and stack identification.
- The date the activity occurred.
- A demonstration that the activity did not trigger any new regulations, standards or requirements.
- A demonstration that the activity did not result in a change in any existing permit term, condition or limit; and did not result in a need for a new permit term, condition or limit.
- Calculations for:
  - The change in emissions of all regulated air pollutants from the alteration itself and
  - Revised facility-wide emission totals after the alteration (demonstrating that when added to the existing emissions, all permit limits will be met)

» Emergency Generators:
  - Document date installed/initial start-up.
  - Applicable NSPS & NESHAP Subparts with which the sources must comply.
  - Rated capacity of the engine
  - If the rated capacity of the engine is greater than 150 kilowatts (kW) and is designated for emergency use only, operation is limited to 500 hours per year or less. Document the method with which you will record the actual hours of use such as a non-resettable hour meter.

Annual Facility Review

At the end of every calendar year but no later than January 31, the owner or operator shall review the facility's equipment, processes, and materials and complete an Annual Facility Review. The review should address:

» Note any equipment removed for site.

» Any changes allowed by the flexibility condition that were not previously documented.

» That all required documentation is present for previously recorded changes.

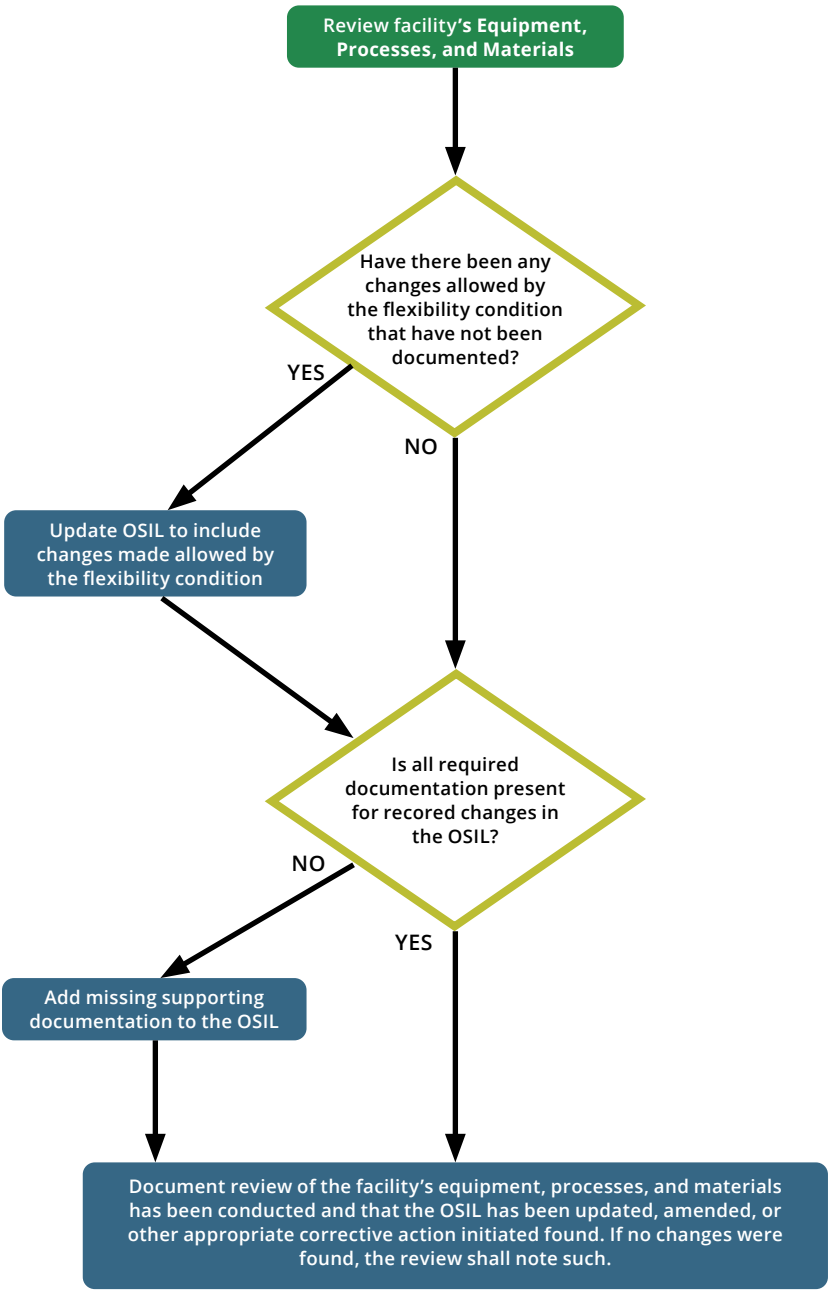
» If there have been any changes made that are not allowed by the flexibility condition. Initiate the appropriate corrective action.

Ex. An Annual Review for the year 2024 will cover changes made January 1st, 2024, to December 31st, 2024. The Annual Review should then be completed no later than January 31st of 2025.

The Annual Review is not intended to replace keeping the OSIL updated as changes are made for the OSIL could be requested by the Department for review at any time. The owner or operator shall document that this review of the facility's equipment, processes, and materials has been conducted and that the OSIL has been updated or amended, or other appropriate corrective action initiated. If no changes were found, the review shall note such.

The Annual Review does not need to be submitted to the Department each year. However, the five annual reviews completed during the OSIL reporting period should be submitted every 5 years with the OSIL.

Annual Facility Review Flowchart



Reporting

The reports of activities conducted under the permit flexibility condition shall be submitted every five (5) years for most facilities. To verify submission frequency for an individual permit, check the frequency listed in the permit flexibility condition of the operating permit. The due date for the Periodic OSIL Submittal schedule can be found in ePermitting. If no activities were conducted under the permit flexibility condition during the reporting period, the owner or operator shall submit documentation stating such along with an up-to-date exempt sources list. The OSIL should be submitted via the facility's ePermitting portal and is listed as a schedule.

Each OSIL submission shall include a complete list of exempt sources at the facility and the citation of the applicable exemption criteria. An OSIL template and a spreadsheet for tracking exempt sources are included in the Appendix.

Note: Depending on the date a permit is issued, the OSIL may not line up with the calendar year. If this is the case, the 5-year OSIL report is due 31 days from the end of the OSIL interval (e.g., with a Permit Effective date of July 1, 2024, the OSIL Period runs from July 1, 2024, to June 30, 2029, and the OSIL is due July 31, 2029).

Summary

The BAQ has developed a streamlined approach allowing facilities the flexibility to perform various activities if they meet certain criteria, regulations and ambient air quality standards. If you have questions or would like to make suggestions, please contact the BAQ at 803-898-4123 and ask to speak with an Air Permitting manager.

Appendix – Useful Links

S.C. Department of Environmental Services

- Regional Contacts
- Air Dispersion Modeling
- Emissions Inventory
- Permitting, Exemption and Compliance Tools
- Exempt Source Template
- Bureau of Air Quality Permitting Exemption List
- OSIL Template

External Links

- EPA Technology Transfer Network AP-42 Emission Factors
- Federal Register

Scan the QR Code for additional training information regarding **Air Quality Permit Applicants.**

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CR-010877 04/25