

**RTR Phase II Group 2:
South Carolina's Review
and Updates**

SC's Emissions Inventory Process

- Facilities submit actual CAP and HAP emissions at process level
- Staff reviews emissions/ calculations per approved methodologies
- Staff make changes as needed
- Inventory is sent back to facility for approval of staff's review/ changes

Pros and Cons of SC's Inventory Process

■ Pros

- Multiple chances to collaborate with facility
- Consistency across inventory years and facility categories
 - Inventories assigned to staff based on SIC codes
 - Examples: utilities, pulp and paper, chemical plants
- Staff provide supplemental sheet detailing assumptions and calculations

■ Cons

- Intense and time consuming

Review of RTR Phase II Group 2

- RTR was based on 02 NEI, but SC had newer inventories for covered facilities
- Determined which facilities had closed or were no longer major sources of HAPs
- For facilities that were still subject, provided complete facility inventory in NIF format
 - Stacks, control devices, emissions, etc.

South Carolina Details ...

- Had facilities covered in 6 of the 22 categories
 - aerospace, ship building, print publishing, pharmaceutical, wool and mineral products, and polymer and resins (PET)
- ~ 70 facilities
- 8 facilities had permanently closed
- 21 facilities no longer considered major sources of HAPs

Issues and Concerns

- Not enough time or staff resources for in-depth review
 - More of a “data exchange,” and not a “data review”
- Facilities had changed names
 - *was* International Mill ... *now* Stein Inc #1
 - *was* Metal Trades ... *now* Protected Vehicles
 - *was* Voridian ... *now* Carolina Eastman
 - *was* Wheelabrator Cast Products ... *now* ISPC
Castalloy Inc Walterboro

Issues and Concerns (*continued*)

- Facilities with same name, but different locations
 - Irix Pharmaceuticals – Greenville or Florence???
- Complaints from facilities to upper management
 - “Why is older data being used when newer data has been submitted and QA’ed by the staff?”
- State had no emissions data for 1 facility
 - State provided potential emissions based on TV permit application

Suggestions for Improvements

- State does not track facilities by NEI ID – EPA should provide state identifier in addition to NEI ID
- Allow more time for review across the RTR categories
- Is using the 2002 NEI the best approach, given that newer data is likely available?

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