

Forwarding E-Mail

DHEC continues to work with federal, state and local partners as it investigates COVID-19 cases in South Carolina. While our top priority remains protecting the public during this national and state emergency, Environmental Affairs staff have also been focused on actions we can take to assist our business partners during this unprecedented time of impact and uncertainty. Attached you will find the details of a new "Regulatory Compliance Assistance" process which includes an email account to receive requests for regulatory relief consideration due to the COVID-19 pandemic.

Requests should be directed to environmentalcompliance@dhec.sc.gov. A staff member with the appropriate program area will follow up with you no later than the end of the next business day.

We believe there are many benefits to this approach. The common email address will allow us to track each request to ensure that you receive a timely and consistent response. It will also allow us to more readily identify trends and common issues where it may be appropriate to provide broad relief. We also want to continue to have direct and frequent communication and will be scheduling webinars soon to share information on requests, trends and areas where we can provide broad relief.

We have already identified some items in the Air and Water Programs where we can offer broad relief now. For the Air Program, the due date for Emissions Inventories will be extended from March 31, 2020, to April 30, 2020; an additional 30 days will be allowed to submit On-Site Implementation Logs (OSIL) which are due on or before April 30, 2020, and extensions have been provided for asbestos personnel licenses that expire before April 29, 2020. For the Wastewater Program, the due date for permit required testing and reports that fall within the next 30 day can be extended to April 30, 2020, and the deadline to submit DMRs to ePermitting is extended from April 2020, to May, 31, 2020, and permittees may submit by paper or by using the ePermitting option.

In closing, communication, both direct and frequent, will be key for us as we work together facing operational and workforce disruptions and challenges that we would have never anticipated. Please know that the Environmental Affairs team is here to assist you. Stay safe and healthy. Talk soon.....#SCStrong

Respectfully,
Myra

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Compliance Assistance for Regulatory Relief During the COVID-19 Pandemic
Office of Environmental Affairs
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The Department is aware that the onset of the COVID-19 pandemic is presenting challenges to our normal ways of living and working. Regulated entities may be experiencing impacts to normal operations such as reductions in workforce and/or inaccessibility to outside, supporting contractors, consultants, deliveries and supplies.

The Department understands these are unprecedented circumstances. Regulated entities should remain diligent in taking safe best efforts to maintain compliance. However, in the event that non-compliance is unavoidable **directly due to impact from COVID-19 and/or related legal restrictions (federal/state/local declarations or orders)**, the Department is prepared to address such issues. The Office of Environmental Affairs (EA) will evaluate each non-compliance situation, or other request for relief, on a timely and consistent basis using:

- Permit flexibility
- Compliance discretion

An electronic mailbox has been set up to receive requests for regulatory relief consideration due to the COVID-19 event:

environmentalcompliance@dhec.sc.gov

This mailbox is monitored throughout the day; messages will be routed to the proper regulatory program area for action. Messages will be responded to no later than one (1) business day. The Department will coordinate with delegating Federal agencies, as needed.

A message to the Department regarding specific requests for regulatory relief must include the following minimum information:

- Facility/entity identifying and descriptive information (*e.g.*, location, permit number, etc.) or identification of representative association and extent of request [*i.e.*, for one (1) entity or one (1) or several sectors]
- Contact information for authorized representative
- Situation or issue for which submittal is made
- Has situation or issue occurred or is anticipated it will occur
- Anticipated needed duration for relief
- Regulatory analysis including rule and/or permit provision citation for which relief is being sought

To ensure a timely response from the Department, the message must be clear, concise and complete.

Regulated entities must maintain records that adequately document activities related to a non-compliance event or issue, including documentation of the entity's best efforts to comply. For example, entities should inform the Department of staffing or compliance plans that depart from regulatory requirements and update the Department should those plans change due to the COVID-19 pandemic.

The mailbox cited above can also be used for general inquiries regarding regulatory relief and potential non-compliance issues during the COVID-19 pandemic. Such inquiries will also be responded to within one (1) business day when at all possible.