

Bureau of Air Quality State Construction Permit

International Paper - Georgetown Mill 700 Kaminski Street Georgetown, South Carolina 29440 Georgetown County

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5), 48-1-100(A), and 48-1-110(a), the 1976 Code of Laws of South Carolina, as amended, and South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on June 22, 2022, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: 1140-0002-DK

Issue Date: November 17, 2022

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Steve McCaslin, P. E., Director Air Permitting Division Bureau of Air Quality

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RECORD OF REVISIONS

Date	Description of Changes

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PROJECT DESCRIPTION

Permission is hereby granted to remove the two baghouses associated with the two ash silos that are part of the Ash Handling and Loading System, EU ID 01, equipment ID ASHH, control device IDs Ash Baghouse. The two ash handling systems (ASHH) will now be insignificant activities based on the uncontrolled emissions.

Particulate emissions generated by the combustion of solid fuels in the two Power Boilers (equipment IDs PB01 and PB02) are controlled by cyclones and electrostatic precipitators (ESPs). The collected particulates (fly ash) are managed by the Ash Handling and Loading System (ASHH) and sent to two ash silos, one for each power boiler. The ash is mechanically conveyed from the boilers' cyclones and ESPs via the ash handling system to the ash storage silos. Each silo is equipped with a baghouse to control particulate matter emissions.

Both baghouses were originally installed prior to 1985 but have since been replaced. The baghouse on the No. 1 Power Boiler ash handling system was replaced in May 2021 and the baghouse on No. 2 Power Boiler's ash handling system was replaced in March 2022. Since replacement, the mill has been experiencing some operational and safety issues with the continued operation of the baghouses. International Paper - Georgetown has installed variable speed drives on the induced draft fans as an interim, short-term mitigating measure.

To allow the facility to physically remove the equipment prior to the TV OP being renewed, this permit will be public noticed to be procedurally equivalent to S.C. Regulation 61-62.70.7 and S.C. Regulation 61-62.70.8; as to allow incorporation as an administrative permit amendment to the Title V Operating Permit per S.C. Regulation 61-62.70.7(d)(1)(v).

EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
	Existing – Ash Handling and Loading System:		
ASHH	Conveyors (153,147 tons ash/yr); Hoppers; Feeders;	Ash Baghouses	ASHHEP
	Storage Silos		

CONTROL DEVICES

Control Device ID	Control Device Description	Pollutant(s) Controlled
Ash Baghouses	Remove – Ash System Baghouses (2)	PM, PM ₁₀ , PM _{2.5}

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LIMITATIONS, MONITORING, AND REPORTING

Condition Number	Conditions	
	Emission Unit ID: 01	
	Equipment ID: ASHH	
1	Control Device ID: Ash Baghouses – to be removed	
	The owner or operator is permitted to remove the two baghouses associated with the two ash silos that are part of the Ash Handling and Loading System.	
2	(S.C. Regulation 61-62.6) Fugitive particulate matter (PM) emissions from material handling, process equipment, or storage piles will be minimized to the extent practicable in a manner with good air pollution control practices. Fugitive emissions from dust buildup will be controlled by proper housekeeping and/or wet suppression.	
3	Facility Wide The owner or operator shall continue to operate under all applicable requirements, including emission limits and standards, testing, monitoring, record keeping, and reporting under the existing Title V Operating Permit (1140-0002) and any unincorporated construction permits that are not changed or contravened by this construction permit.	

GENERAL FACILITY WIDE

Condition Number	Conditions	
1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.	
2	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II(L), the owner or operator may document an emergency situation through properly signed, contemporaneous operating logs, and other relevant evidence that verify: 1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency; 2. The permitted source was at the time the emergency occurred being properly operated; 3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and 4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II(J)(1)(c)(i) through (J)(1)(c)(viii). The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective	

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GENERAL FACILITY WIDE

Condition Number	Conditions	
	actions taken. This provision is in addition to any emergency or upset provision contained in any applicable requirement. (S.C. Regulation 61-62.1, Section II(O)) Upon presentation of credentials and other documents as may	
3	 be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following: Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. 	
4	(S.C. Regulation 61-62.1, Section II(J)(1)(a)) No applicable law, regulation, or standard will be contravened.	
5	(S.C. Regulation 61-62.1, Section II(J)(1)(e)) Any owner or operator who constructs or operates a source or modification not in accordance with the application submitted pursuant to this regulation or with the terms of any approval to construct, or who commences construction after the effective date of these regulations without applying for and receiving approval hereunder, shall be subject to enforcement action.	

GENERAL RECORD KEEPING AND REPORTING

Condition Number	Conditions
1	(S.C. Regulation 61-62.1, Section II(J)(1)(g)) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this 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.
2	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
3	All reports and notifications required under this permit shall be submitted to the person indicated in

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GENERAL RECORD KEEPING AND REPORTING

Condition Number	Conditions	
	the specific condition at the following address: 2600 Bull Street Columbia, SC 29201 The contact information for the local Environmental Affairs Regional office can be found at: http://www.scdhec.gov	
4	(S.C. Regulation 61-62.1, Section II(A)(3)) The owner/operator shall submit written notification to the Director of Air Permitting of the date construction is commenced, postmarked within thirty (30) days after such date.	
5	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.	
6	 (S.C. Regulation 61-62.1, Section II(J)(1)(c)) For sources not required to have continuous emission monitors, any malfunction of air pollution control equipment or system, process upset, or other equipment failure which results in discharges of air contaminants lasting for one (1) hour or more and which are greater than those discharges described for normal operation in the permit application, shall be reported to the Department within twenty-four (24) hours after the beginning of the occurrence and a written report shall be submitted to the Department within thirty (30) days. The written report shall include, at a minimum, the following: 1. The identity of the stack and/or emission point where the excess emissions occurred; 2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions; 3. The time and duration of excess emissions; 4. The identity of the equipment causing the excess emissions; 5. The nature and cause of such excess emissions; 6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction; 7. The steps taken to limit the excess emissions; and, 8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions. The initial twenty-four (24) hour notification should be made to the Department's local Environmental Affairs Regional office. 	
	The written report should be sent to the Manager of the Technical Management Section, Bureau of Air Quality and the local Environmental Affairs Regional office.	

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REPORTING SCHEDULES

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source)	Report Due Date
	January-March	April 30
Quarterly	April-June	July 30
Quarterly	July-September	October 30
	October-December	January 30
	January-June	July 30
Semiannual	April-September	October 30
Semiamuai	July-December	January 30
	October-March	April 30
	January-December	January 30
Annual	April-March	April 30
Annual	July-June	July 30
	October-September	October 30

Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.

PERMIT EXPIRATION AND EXTENSION

Condition Number	Conditions	
	(S.C. Regulation 61-62.1, Section II(A)(4) and (5) and S.C. Regulation 61-62.1, Section II(J)(1)(f)) Approval to construct shall become invalid if construction: a. is not commenced within 18 months after receipt of such approval; b. is discontinued for a period of 18 months or more; or c. is not completed within a reasonable time as deemed by the Department.	
1	The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.	
	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within eighteen (18) months of the projected and approved commencement date.	

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PERMIT TO OPERATE

Condition Number	Conditions
1	(S.C. Regulation 61-62.1 Section II(F)(2) When a Department issued construction permit includes only emission limits, monitoring, reporting, and/or other requirements that do not establish engineering or construction specifications for the project, the owner or operator may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
2	(S.C. Regulation 61-62.1, Section II(F)(1)) The owner or operator shall submit written notification to the Department of the actual date of initial startup of each new or altered source, postmarked within fifteen (15) days after such date. Any source that is required to obtain an air quality construction permit issued by the Department must obtain an operating permit when the new or altered source is placed into operation and shall comply with the requirements of this section.
3	(S.C. Regulation 61-62.1, Section II(F)(4)(a)) For sources covered by an effective Title V operating permit, the modification request required by Regulation 61-62.70 shall serve as the request to operate for the purposes of S.C. Regulation 61-62.1, Section II(F). The request should be made using the appropriate Title V modification form.