Department Decision

Air Construction Permit No. 1900-0238-CA

Whitaker Container Service, Inc.
Wessinger Road (near the intersection of Fairfield Road and Wessinger Road)
Columbia, SC 29203

March 22, 2007

In accordance with the provisions of the amended appeal process for DHEC decisions in 2006 Act No. 387, Section 44-1-60(D), and the 1976 Code of Laws of South Carolina, as amended, a Department Decision has been made to issue Air Quality Construction Permit No. 1900-0238-CA to the above-named permittee. Applicable air quality regulations did not require public notification or a public comment period for this permit. However, due to past citizen concerns in the area, this permit was placed on public notice and open for public comment from November 14, 2006, through December 14, 2006. Adverse public comments were received by DHEC during this comment period. A joint public hearing was held by DHEC's Bureau of Air Quality and Bureau of Land and Waste Management on February 7, 2007, to receive oral comments on their respective draft permits. The formal comment period was subsequently extended through February 14, 2007. Additionally, informal public meetings were held on November 15, 2006, December 20, 2006, and March 15, 2007, in response to citizen concerns regarding this facility. Adverse public comments were received by DHEC at the public hearing and at all of the public meetings. Comments received during the formal comment period have been addressed in DHEC's Response Summary, to be mailed with this Department Decision. DHEC's decision to issue this permit has been made after consideration and a complete review of the following: the permit application, applicable air quality regulations, comments and concerns raised during the public hearing and public meetings, all other comments received within the required time frame, and all other pertinent information.

The Bureau of Air Quality does hereby certify that; a) the issued permit (Attachment A) meets the requirements of all applicable air regulations; b) a summary of the project, permit, and applicable regulations has been outlined in the Engineering Calculation Sheets (Attachment B); and c) the responses to issues raised and comments made by concerned citizens regarding this permit have been addressed and summarized in DHEC's Response Summary, to be mailed with this Department Decision. DHEC's Response Summary and this Department Decision (including attachments) will be included in DHEC's administrative record for this permit decision.

Rhonda B. Thompson, P.E., Director
Engineering Services Division
Bureau of Air Quality
March 22, 2007

Whitaker Container Service, Inc.
P.O. Box 112
State Park, South Carolina 29147

ATTENTION: David Whitaker

Dear Mr. Whitaker:

Your permit application has been reviewed by our technical staff. Enclosed is Construction Permit No. 1900-0238-CA. Please note the conditions on this permit by reading it carefully. Pursuant to the South Carolina Administrative Procedures Act, this permit decision may be appealed in accordance with applicable state law. Please see the enclosed Notice of Appeal Procedure, effective July 1, 2006, for guidelines on appeal submittals.

In addition to this permit to construct, a permit to operate is required in accordance with the Air Pollution Control Regulations and Standards for the State of South Carolina. The regulations require a written request to obtain an operating permit be submitted to this Department no later than fifteen (15) days prior to placing the new, increased, or altered source in operation.

Please examine this new permit carefully for errors or omissions and notify the appropriate staff member, Veronica Barringer, at (803) 898-4127, or by e-mail at: barrinv@dhec.sc.gov, promptly, if any are discovered.

Sincerely,

Rhonda B. Thompson, P.E., Director
Engineering Services Division
Bureau of Air Quality

RBT:EAVB:pe

Enclosure

cc: Lisa Clark, Region 3, Columbia EQC Office
S2 Engineering & Consulting, LLC
Permit File: 1900-0238
Main File: 1900-0238
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
BUREAU OF AIR QUALITY
NSPS CONSTRUCTION PERMIT

Whitaker Container Service, Inc.
Wessinger Road near the intersection of Fairfield Road and Wessinger Road
Columbia, South Carolina 29203

Permission is hereby granted to install an air curtain incinerator (ACI) for the incineration of clean lumber and yard waste with a maximum operating capacity of 96 tons per day (TPD).

The unit shall also be equipped with an electric powered blower, which shall be in operation at all times when the unit is operating.

In order to meet Standard 7, Class II modeling, the ACI shall be limited to processing 34.68 tons per day.


NOTWITHSTANDING ANY OF THE CONDITIONS LISTED BELOW, NO APPLICABLE LAW, REGULATION, OR STANDARD MAY BE VIOLATED.

CONDITIONS

1. All official correspondence, plans, permit application forms, and written statements are an integral part of this permit.

2. THE DIRECTOR OF THE ENGINEERING SERVICES DIVISION MUST BE NOTIFIED IN WRITING OF THE DATE CONSTRUCTION BEGAN POSTMARKED NO LATER THAN 30 DAYS AFTER SUCH DATE, AND THE ACTUAL DATE OF STARTUP POSTMARKED WITHIN 15 DAYS AFTER SUCH DATE OF EACH PERMITTED FACILITY.

3. This construction permit shall expire one year from date issued. This permit may be extended one year upon approval by the Bureau following the written request from the permittee. This request must be made prior to the permit expiration.

4. An expired construction permit may be reactivated within one year of the expiration only upon approval by the Bureau following the written request of the permittee. This request shall address all laws, regulations, and standards applicable at the time of request for reactivation.

PERMIT NUMBER: 1900-0238-CA
DATE OF ISSUE: March 22, 2007
FACILITY SIC/NAICS CODES: 4953/562219
This is pursuant to the provisions of Section 48-1-110, 1976 Code of Laws of South Carolina, as amended, and the South Carolina Air Quality Control Regulation 61-62.1, Section II and the Code of Federal Regulations, Title 40, Part 60, Subpart A.

I. STANDARD CONDITIONS

A. This permit expressly incorporates all the provisions of South Carolina Department of Health and Environmental Control Regulation 61-62.1, Section II, Paragraph C and the Code of Federal Regulations, Title 40, Part 60, Subpart A.

II. SPECIAL CONDITIONS

A. EMISSION LIMITATIONS

Air pollutant emissions shall not exceed the following:

<table>
<thead>
<tr>
<th>ID</th>
<th>Pollutant/Standard</th>
<th>Limit</th>
<th>Reference Method</th>
<th>Regulation</th>
<th>State Only</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>Opacity</td>
<td>10%</td>
<td>Method 9</td>
<td>40 CFR 60.1445</td>
<td>No</td>
</tr>
<tr>
<td>CA</td>
<td>Opacity</td>
<td>20%</td>
<td>Method 9</td>
<td>SC Regulation 61-62.5, Standard 3</td>
<td>Yes</td>
</tr>
</tbody>
</table>

The emission limitations listed for each emission unit are based on operation at permitted capacity. Operation at less than permitted capacity must meet emission limits specified in the applicable regulations based on that operating rate. All test methods must be the most recent revisions that are published in the Code of Federal Regulations, in accordance with the requirements of SC Regulation 61-62.1, Section IV, Source Test.

B. CONTINUOUS MONITORING REQUIREMENTS

<table>
<thead>
<tr>
<th>ID</th>
<th>Pollutant</th>
<th>Averaging Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable

C. SOURCE TEST SCHEDULE

<table>
<thead>
<tr>
<th>ID</th>
<th>Pollutant</th>
<th>Frequency</th>
<th>Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>Opacity</td>
<td>Initially within first 60 days; then every 12 months</td>
<td>9</td>
</tr>
</tbody>
</table>

D. ADDITIONAL CONDITIONS

<table>
<thead>
<tr>
<th>Condition Number</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>The permittee shall pay fees in accordance with SC Regulation 61-30, SC Environmental Protection Fees.</td>
</tr>
<tr>
<td>Condition Number</td>
<td>Conditions</td>
</tr>
<tr>
<td>------------------</td>
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</tr>
<tr>
<td>2.</td>
<td>In accordance with SC Regulation 61-62.1 Section II(C)(3), for all sources not required to have continuous emissions monitors, in the event of 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 hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the local Environmental Quality Control (EQC) Regional office within twenty-four (24) hours after the beginning of the occurrence. The permittee shall also submit a written report within thirty (30) days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality (BAQ). The report shall contain as a minimum, the following: the identity of the emission unit and associated equipment where excess emissions occurred, the magnitude of excess emissions, the time and duration of excess emissions, the steps taken to remedy the malfunction and to prevent a recurrence, documentation that control equipment and processes were at all times maintained and operated, to the maximum extent practicable, in a manner that was consistent with good practice for minimizing emissions. Such a report shall in no way serve to excuse, otherwise justify, or in any manner affect any potential liability or enforcement action resulting from the occurrence.</td>
</tr>
<tr>
<td>3.</td>
<td>Air dispersion modeling (or other method) has demonstrated that this facility’s operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in the air dispersion modeling may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment A of this permit. Higher emission rates may be administratively incorporated into Attachment A of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded.</td>
</tr>
<tr>
<td>4.</td>
<td>The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment A, not to exceed the pollutant limitations of this construction permit. Should the facility wish to increase the emission rates listed in Attachment A, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified in this permit condition. This is a State Only enforceable requirement.</td>
</tr>
<tr>
<td>5.</td>
<td>This air curtain incinerator is limited to 7.14 lb PM10/hr and a 34.68 TPD charge rate, in order to comply with SC Regulation 61-62.5, Standard No. 7, Class II Increments. Any increase in allowable emission rate must be approved by the Bureau of Air Quality and may require re-modeling to demonstrate compliance with the above listed standard(s).</td>
</tr>
<tr>
<td>6.</td>
<td>In addition, the owner/operator shall accurately measure the amount of waste (i.e. by use of a scale or hydraulic strain gauge) and record the actual waste charge rate daily. Reports of the calculated values shall be submitted on a semiannual basis.</td>
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<tr>
<td></td>
<td>These conditions shall not supersede any State or Federal requirements such as National Emission Standards for Hazardous Air Pollutants, unless these conditions would impose a more restrictive limit.</td>
</tr>
<tr>
<td></td>
<td>This construction permit was reviewed and issued based on the permit application submitted by the owner/operator. The owner/operator shall obtain any Bureau authorization required under South Carolina Regulation 61-62.1, Section II(A)(1) prior to making modifications not covered under this construction permit.</td>
</tr>
<tr>
<td>Condition Number</td>
<td>Conditions</td>
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<td>7.</td>
<td>The owner/operator of this facility must submit a written request to obtain an operating permit to the Director of Engineering Services Division at least fifteen (15) days prior to placing this source into operation. After submittal of this request the facility may operate this source in accordance with the terms and conditions contained in this permit, until such time as the Bureau of Air Quality incorporates this source into the facility’s operating permit.</td>
</tr>
<tr>
<td>8.</td>
<td>Unless elsewhere specified within this permit, 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 generated and shall be made available to a Department representative upon request.</td>
</tr>
</tbody>
</table>
This air curtain incinerator is subject to SC Regulation 61-62.5, Standard 3 Waste Combustion and Reduction as an air curtain incinerator. |
| 10.              | In accordance with SC Regulation 61-62.5, Standard 3, the Opacity shall not exceed 20%, except that an opacity level of up to 35% is permitted during startup periods during the first 30 minutes of operation of the unit. |
| 11.              | As specified in SC Regulation 61-62.5, Standard No. 3, Section IX all incinerator operators shall be trained based on criteria contained in SC Regulation 61-62.5, Standard No. 3, Section IX (C) as to proper operating practices and procedures of the incinerator. The content of the above referenced training program, in addition to a list of trained personnel, shall be submitted to the Director of Engineering Services, no later than thirty (30) days after the start up of the incinerator. The incinerator shall not be operated without a trained operator on site, who has a certificate verifying satisfactory completion of the approved training program. |
| 12.              | As specified in SC Regulation 61-62.5, Standard No. 3, Section IX(C), an incinerator operating training program should include but not be limited to:  
1. A summary of the applicable standards under this Standard;  
2. A description of basic combustion theory applicable to an incinerator;  
3. Procedures for receiving, handling, and feeding waste as appropriate;  
4. Incinerator startup, shutdown, and malfunction procedures;  
5. Procedures for maintaining proper combustion air supply levels;  
6. Procedures for operating the incinerator within the standards established under this Standard;  
7. Procedures for responding to periodic upset or off-specification conditions;  
8. Procedures for minimizing particulate matter carryover;  
9. Procedures for handling ash;  
10. Procedures for monitoring incinerator emissions; and  
11. Reporting and recordkeeping procedures. |
<table>
<thead>
<tr>
<th>Condition Number</th>
<th>Conditions</th>
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<tbody>
<tr>
<td></td>
<td>In accordance with SC Regulation 61-62.5, Standard 3, Section III(G), the unit shall meet the following requirements:</td>
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<tr>
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<td>1. Refractory lined pits shall be required;</td>
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<td>2. Onsite storage of debris to be incinerated shall be kept to a minimum. Material to be incinerated shall be incinerated within one week of storage unless otherwise approved by the Department.</td>
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<tr>
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<td>3. An operation and maintenance program shall be developed and adhered to at all times to ensure the proper operation of this facility;</td>
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<td>4. Good operation practices shall be exercised to minimize emissions from incineration. This shall include the wetting of ash prior to removal from the incinerator;</td>
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<tr>
<td></td>
<td>5. Winds during the time of burning or ash removal must be away from any area in which the ambient air may be significantly affected by the smoke or ash from this operation if that area contains a public roadway or a residential, commercial, or industrial site;</td>
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<tr>
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<td>6. All ash shall be stored in compliance with the requirements of the South Carolina Solid Waste Management Regulations, 25A SC Code Ann. R.61-107.12;</td>
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<td>7. No burning shall take place if the air curtain is not operating properly or at its design air flow;</td>
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<td>8. The air curtain shall be used at all times that the pit contains burning permitted material except during start-up to get the fire ignited;</td>
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<td>9. The incinerator shall be located so as to maximize the distance to business and residential areas and shall be located at least 500 feet from any business or residence located on adjacent properties;</td>
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<tr>
<td></td>
<td>10. Access roads and loader work areas shall be maintained in such a manner so as to minimize fugitive emissions. This shall include the use of water sprays, dust controlling chemicals (but not volatile organic compounds) or other Department approved dust suppression systems;</td>
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<tr>
<td></td>
<td>11. Stacking rakes or similar devices shall be utilized on loader equipment when loaders are used to charge the pit in order to minimize dirt on the material to be burned; and</td>
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<tr>
<td></td>
<td>12. Any change in location of the incinerator must have prior written approval from the Department.</td>
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</tbody>
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**SC Regulation 61-62.6, Control of Fugitive Particulate Matter**

In accordance with SC Regulation 61-62.6, Section III, emissions of fugitive particulate matter shall be controlled to the maximum extent possible. Access roads and loader work areas shall be maintained in such a manner so as to minimize fugitive emissions. This shall include the use of water sprays, dust controlling chemicals (but not volatile organic compounds or oil treatment) or other Department approved dust suppression systems such that fugitive particulate emission sources are controlled to the maximum extent possible. In accordance with SC Reg. 61-62.5, Standard 4, Section X, all non-enclosed operations shall be conducted in such a manner that a minimum of particulate matter becomes airborne. In no case shall established ambient air quality standards be exceeded at or beyond the property line, and emissions of fugitive particulate matter shall be controlled in such a manner and to the degree that it does not create an undesirable level of air pollution.

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**40 CFR 60 Subpart A (General Provisions) and Subpart AAAA (Standards Of Performance For Small Municipal Waste Combustion Units For Which Construction Is Commenced After August 30, 1999 Or For Which Modification Or Reconstruction Is Commenced After June 6, 2001)**
<table>
<thead>
<tr>
<th>Condition Number</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>15.</td>
<td>New Source Performance Standard (NSPS 40 CFR 60), Subpart A, General Conditions and Subpart AAAA, Standards Of Performance For Small Municipal Waste Combustion Units For Which Construction Is Commenced After August 30, 1999 Or For Which Modification Or Reconstruction Is Commenced After June 6, 2001, applies to the air curtain incinerator. The permittee shall comply with all applicable parts of Subparts A and AAAA.</td>
</tr>
<tr>
<td>16.</td>
<td>Air curtain incinerators which burn only yard waste, clean lumber and wood waste, are only subject to the requirements of 40 CFR 60 Subpart AAAA listed in 40 CFR §60.1435 through 60.1455.</td>
</tr>
<tr>
<td>17.</td>
<td>In accordance with 40 CFR §60.1445, within 60 days after the air curtain incinerator reaches the maximum load level at which it will operate, but no later than 180 days after its initial startup, the owner or operator shall meet the following two limits: The opacity limit is 10 percent (6-minute average) and the opacity limit is 35 percent (6-minute average) during the startup period that is within the first 30 minutes of operation. Except during malfunctions, the requirements of this subpart apply at all times. Each malfunction must not exceed 3 hours. In accordance with 40 CFR §60.1450, the facility shall use Method 9 to determine compliance with the opacity limitation. The facility shall conduct an initial test for opacity as specified in 40 CFR §60.8 within the first 180 days of operation, and following the date that the initial performance test is completed, the owner or operator of the air curtain incinerator shall conduct a performance test for opacity on an annual basis (no more than 12 calendar months following the previous performance test).</td>
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<tr>
<td></td>
<td>In accordance with 40 CFR §60.1455, the owner or operator shall maintain records of results of the initial opacity performance test and subsequent performance tests onsite. Annual performance tests shall be submitted by February 1 of the year following the year of the performance test unless otherwise approved by the Department. In accordance with 40 CFR 60.8(d) the owner or operator of an affected facility shall provide the Department at least 30 days prior notice of any performance test to allow the Department the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Department as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Department by mutual agreement.</td>
</tr>
<tr>
<td>18.</td>
<td>The permittee shall perform a visual inspection on a daily basis or whenever operated whichever is less frequent. Visual Inspection means a qualitative observation of opacity during daylight hours where the inspector records results in a log, noting color, duration, density (heavy or light), cause and corrective action taken for any abnormal emissions. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water. Logs shall be kept to record all visual inspections, including cause and corrective action taken for any abnormal emissions and visual inspections from date of recording. The owner/operator shall submit semiannual reports.</td>
</tr>
<tr>
<td>19.</td>
<td>As defined in SC Regulation 61-62.1, Section I, and SC Regulation 61-62.5, Standard 3, this air curtain incinerator shall only burn clean wood or yard waste (excluding plastic bags). This includes untreated wood or untreated wood products including clean untreated lumber, tree stumps (whole or chipped), and tree limbs (whole or chipped) and grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs that are generated by residential, commercial/retail, institutional, and/or industrial sources as part of maintenance activities associated with yards or other private or public lands. This air curtain incinerator is prohibited from incinerating any other material, not specified above.</td>
</tr>
<tr>
<td>Condition Number</td>
<td>Conditions</td>
</tr>
<tr>
<td>------------------</td>
<td>------------</td>
</tr>
<tr>
<td>20.</td>
<td>This construction will make this facility a major source with respect to Title V regulations. As per SC Regulation 61-62.7(a)(1)(i), the facility will be required to submit a complete Title V Operating Permit application within 12 months of commencing operation of any or all of the source listed in this permit.</td>
</tr>
<tr>
<td>21.</td>
<td>Unless elsewhere specified within this permit, all reports required under this permit including all recorded parameters and calculated values shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality, at the address listed below, postmarked no later than thirty (30) calendar days after the end of the reporting period.</td>
</tr>
</tbody>
</table>

SC DHEC - BAQ  
Technical Management Section  
2600 Bull Street  
Columbia, SC 29201

Rhonda B. Thompson, P.E., Director  
Engineering Services Division  
Bureau of Air Quality
## AMBIENT AIR QUALITY STANDARDS - STANDARD 2

<table>
<thead>
<tr>
<th>STACK</th>
<th>Modeled Emission Rates (lbs/hr)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Curtain Incinerator</td>
<td>TSP 72</td>
<td>PM$_{10}$ 7.14</td>
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</tbody>
</table>

## CLASS II PREVENTION OF SIGNIFICANT DETERIORATION - STANDARD 7

<table>
<thead>
<tr>
<th>STACK</th>
<th>Modeled Emission Rates (lbs/hr)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Curtain Incinerator</td>
<td>PM$_{10}$ 7.14</td>
<td>SO$_2$ 0.63</td>
</tr>
</tbody>
</table>
Notice of Appeal Procedure

The following procedures are in effect beginning July 1, 2006, pursuant to 2006 Act No. 387:

1. This decision of the S.C. Department of Health and Environmental Control (Department) becomes the final agency decision 15 days after notice of the decision has been mailed to the applicant or respondent, unless a written request for final review is filed with the Department by the applicant, permittee, licensee, or affected person.

2. An applicant, permittee, licensee, or affected person who wishes to appeal this decision must file a written request for final review with the Clerk of the Board at the following address or by facsimile at 803-898-3393.

   Clerk of the Board  
   SC DHEC  
   2600 Bull Street  
   Columbia, SC  29201

3. The request for final review should include the following:
   a. the grounds on which the Department's decision is challenged and the specific changes sought in the decision
   b. a statement of any significant issues or factors the Board should consider in deciding how to handle the matter
   c. a copy of the Department's decision or action under review

4. In order to be timely, a request for final review must be received by the Clerk of the Board within 15 days after notice of the decision has been mailed to the applicant or respondent. If the 15th day occurs on a weekend or State holiday, the request is due to be received by the Clerk of the Board on the next working day. The request for final review must be received by the Clerk of the Board by 5:00 p.m. on the date it is due.

5. If a timely request for final review is filed with the Clerk of the Board, the Clerk will provide additional information regarding procedures.

6. The Board of Health and Environmental Control has 60 days from the date of receipt of a request for final review to conduct a final review conference. The conference may be conducted by the Board, its designee, or a committee of three members of the Board appointed by the chair.

7. If a final review conference is not conducted within 60 days, the Department decision becomes the final agency decision, and a party may request a contested case hearing before the Administrative Law Court within 30 days after the deadline for the final review conference.

The above information is provided as a courtesy; parties are responsible for complying with all applicable legal requirements.
DATE APPLICATION RECEIVED: April 14, 2006
DATE OF LAST INSPECTION: New facility.
PHYSICAL LOCATION: Wessinger Road near the intersection of Fairfield Road and Wessinger Road - Columbia
SIC/NAICS CODE(s): 4953/562219

PROJECT DESCRIPTION
Whitaker is requesting permission to install a 96 TPD air curtain incinerator, which will be used to incinerate untreated wood waste, clean untreated lumber, and yard waste. The facility will not be allowed to burn painted/treated wood products, construction debris such as dry wall, insulation, and all other building material.

The facility operates as a batch process, where it is loaded during the first few hours of operation and then continues burning for the remainder of the day. As such it takes 24-hours to complete one batch. The controlled PM10 emission rate for the ACI is calculated to be 19.76 lb/hr, as per the emission rates below. However, the facility can not pass modeling for the Standard 7, 24-hour standard for PM10 at this rate (19.76 lb/hr). As such modeling was back-calculated, in order to find the PM10 emissions rate at which the facility could pass the 24-hour standard. This PM10 emission rate is 7.14 lb/hr. A new charge rate was calculated based on the 7.14 lb/hr emission rate (see below). The facility will be required to weigh the material being added to the ACI and keep associate records.

The facility is also required to obtain a TV operating permit, in accordance with SC Regulation 70.3 (a)(2) and (b), and Section 111/129(e) of the CAA.

SOURCE DESCRIPTION

<table>
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<tr>
<th>CP ID</th>
<th>Equipment ID</th>
<th>Equipment Description</th>
<th>Installation Date</th>
<th>Stack ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>ACI</td>
<td>96 TPD Air Curtain Incinerator, for the incineration of untreated wood waste, clean untreated lumber, and yard waste only</td>
<td>Future</td>
<td>Fugitive</td>
</tr>
</tbody>
</table>

EMISSIONS

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr</th>
<th>TPY@ 8760 hours</th>
<th>Method for Estimating Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>52</td>
<td>227.76</td>
<td>*AP-42, Chapter 2, Table 2.1-12; emission factor of 13 lb/ton</td>
</tr>
<tr>
<td>PM10</td>
<td>19.76</td>
<td>86.55</td>
<td>1. SCC Codes (fire factor) 5-03-001-06 and 5-01-005-10; emission factor of 4.94 lb/ton</td>
</tr>
<tr>
<td>SO2</td>
<td>0.4</td>
<td>1.75</td>
<td>*AP-42, Chapter 2, Table 2.1-12; emission factor of 0.1 lb/ton</td>
</tr>
<tr>
<td>NOx</td>
<td>16</td>
<td>70.08</td>
<td>*AP-42, Chapter 2, Table 2.1-12; emission factor of 4.0 lb/ton</td>
</tr>
<tr>
<td>CO</td>
<td>--</td>
<td>--</td>
<td>The factor in both AP-42 and the SC Fire Code are none existent.</td>
</tr>
<tr>
<td>VOC's</td>
<td>--</td>
<td>--</td>
<td>The factor in both AP-42 and the SC Fire Code are none existent.</td>
</tr>
</tbody>
</table>

* Factors are as follows: 13.0 lb/ton for PM, 4.94 for PM10, 0.1 lb/ton for SO2, and 4.0 lb/ton for NOx. The factor used for PM10 is given in the SC Fire emission factor. The AP-42 factors are the same as the SC Fire emission factors for all the Pollutants. Note: Factors for VOC's and CO are not available and are not considered in the emission calculations.

FACILITY WIDE EMISSIONS

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Uncontrolled Emissions</th>
<th>Controlled Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>lb/hr</td>
<td>TPY@ 8760 hours</td>
</tr>
<tr>
<td>PM</td>
<td>52</td>
<td>227.76</td>
</tr>
<tr>
<td>PM10</td>
<td>19.76</td>
<td>86.55</td>
</tr>
<tr>
<td>SO2</td>
<td>0.4</td>
<td>1.75</td>
</tr>
<tr>
<td>NOx</td>
<td>16</td>
<td>70.08</td>
</tr>
</tbody>
</table>

CORRELATION BETWEEN MODELED PM/PM10 EMISSION RATE AND TPH INPUT
The facility can pass the Standard 7, 24-hour standard for PM10 at 7.14 lb/hr. Below is the calculation for a new maximum daily limit on the air curtain incinerator. The facility can not exceed this limit for any 24-hour period of operation. Records will be required to be kept to verify this charge rate.
New TPD limit (Charge Rate):
7.14 lb/hr (modeled rate) / 19.76 lb/hr (emission rate) = Charge Rate TPD / 96 TPD (capacity of unit)
Charge Rate = 34.68 TPD

REGULATIONS

SC Regulations 61-62.5, Standard 1 - Emissions from Fuel Burning Operations
Not Applicable This facility has no fuel burning sources. The air curtain incinerator and electric blower are not considered indirect fired sources and therefore not subject to this Standard.

SC Regulations 61-62.5, Standard 2 - Ambient Air Quality Standards (AAQS), and SC Regulations 61-62.5, Standard 7, Section II - Prevention of Significant Deterioration (PSD), Ambient Air Limits (Richland County)(PSD Class II Increment Emission Rate)
Applicable Modeling was performed using AERMOD. The facility can pass the Standard 7, 24-hour standard for PM/PM10 at 7.14 lb/hr, as per modeling summary dated October 27, 2006.

SC Regulations 61-62.5, Standard 3 - Waste Combustion and Reduction (State Only)
Applicable The air curtain incinerator is used to incinerate natural wood waste and is subject to this standard as defined in Sections I Part A and Section II Part G. This standard sets a 20% opacity limits for the air curtain incinerator except during startup periods were a 35% opacity level is allowed for the first 30 minutes of the operation of the unit. Operator training will be required.

SC Regulations 61-62.5, Standard 4 - Emissions from Process Industries
Not Applicable For the incinerator, Std 4 uses the process weight to determine PM emissions limitations. Per SC Regulation 62.1, Process Weight is defined as “The total weight of all materials introduced into a source operation, including air and water where these materials become an integral part of the product, and solids used as fuels but excluding liquids and gases used solely as fuels.” Since the air curtain incinerator does not have a product then Std 4 will not apply (SC Guidance dated 1999). Also in Std 3 for air curtain incinerators, the PM emission limit is listed as “No established limit”, this limit was placed in the regulation to preclude air curtains from being subject to Std 4.

SC Regulations 61-62.5, Standard 5.2 - Control Of Oxides Of Nitrogen (NOx)
Not Applicable Source falls under one of the seventeen exemptions from this standard: facility is an air curtain incinerator.

SC Regulations 61-62.5, Standard 7 - Prevention of Significant Deterioration (PSD)
Not Applicable The facility’s FTE for PM is less than 250 TPY.

SC Regulation 61-62.70 - TITLE V Operating Permit Program
Applicable Even though the potential emission rates are below the 100 TPY threshold, the facility will still be required to obtain a TV operating permit, in accordance with SC Regulation 70.3 (a)(2) and (b), and Section 111/129(e) of the CAA.

40 CFR 60 - Standards of Performance for New Stationary Sources (NSPS)
Applicable Since the ACI (air curtain incinerator) will burn yard waste, clean lumber and wood waste; is not taking a 11 ton per day limit on the yard waste burned; got a maximum capacity of 96 TPD; planning to be constructed in 2006, it is subject to NSPS Subpart AAAA.

Note that Std 3 only allows ACIs to burn clean lumber, wood waste and yard waste; therefore the allowance for the ACI to only be partially subject to the NSPS requirements as allowed by the regulation is always true for correctly permitted ACIs.

SUMMARY AND CONCLUSIONS
It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.
October 08, 2008

David Whitaker
WHITAKER CONTAINER SERVICE INC
PO BOX 112
STATE PARK, SC 29147

803-699-1783

Re: Report of Department Inspection/Investigation

Dear David Whitaker:

A representative of the South Carolina Department of Health and Environmental Control (SC DHEC), Bureau of Air Quality (BAQ), conducted an inspection of your facility on July 31, 2008. Enclosed is a copy of the inspector’s report. Your facility’s overall compliance status may be different from that indicated in this report, which pertains only to those observations made by the inspector at the time of the inspection. Questions regarding the report should be directed to the inspector listed in the report header.

Compliance with State and Federal air quality regulations, and with air quality permit(s) issued to your facility is your responsibility. We encourage you to read your permit(s) carefully to ensure you understand all terms, conditions, and requirements. You may also wish to review your permit periodically and monitor your status on a routine basis. Questions about permitting issues should be directed to personnel in the BAQ Engineering Services Division at (803) 898-4123. Questions about reporting issues should be directed to personnel in the BAQ Technical Management Section at (803) 898-4123.

We would also like to remind you that a pollution prevention/waste minimization program can reduce material lost to waste streams in all media. The Center for Waste Minimization is a free, non-regulatory arm of DHEC whose goal is to help you reduce wastes and waste management expenses. For information on how to receive a free, confidential, non-regulatory waste assessment, call the Center at (803) 896-8986.

Sincerely,

Dawn M. Jordan
Technical Management Section
Air Compliance Management Division

cc: Bob Burgess, Center for Waste Minimization
Compliance File 1900-0238
Source (Project): Whitaker Container Service Inc  
Source No: 1900-0238  
Mailing Address: 7429 Fairfield Rd  
Columbia SC 29203  
Source Address: 7429 Fairfield Rd  
Columbia SC 29203  
County: Richland

Date/Time: July 31, 2008 @ 0825  
Type: Construction Permit  
Owner/Operator: David Whitaker  
Person Contacted: David Whitaker  
Source Telephone: 803-699-1783  
Code: MA09F  
Inspector: Clark, Lisa

On the above date, I meet with Mr. Whitaker at the site located at Wessinger Road near the intersection of Fairfield Road and Wessinger Road. During this inspection, I observed the foundation formed and rebar installed but no concrete poured. Mr. Whitaker stated he has been delayed by Richland County Zoning to determine if this site is considered a “construction” or “equipment” project. Mr. Whitaker said the unit was assembled (offsite) waiting for the ok to proceed with delivery.

Mr. Whitaker will update the Department as construction progresses.
November 05, 2009

Whitaker Container Service, Inc.
WHITAKER CONTAINER SERVICE INC
PO BOX 112
STATE PARK, SC  29147

803-699-1783

Re:  Report of Department Inspection/Investigation

Dear Whitaker Container Service, Inc.:

A representative of the South Carolina Department of Health and Environmental Control (SC DHEC), Bureau of Air Quality (BAQ), conducted an inspection of your facility on October 15, 2009. Enclosed is a copy of the inspector's report. Your facility's overall compliance status may be different from that indicated in this report, which pertains only to those observations made by the inspector at the time of the inspection. Questions regarding the report should be directed to the inspector listed in the report header.

We encourage you to read your permit(s) carefully to ensure you understand all terms, conditions, and requirements. You may also wish to review your permit periodically and monitor your status on a routine basis. Questions about permitting issues should be directed to personnel in the BAQ Engineering Services Division at (803) 898-4123. Questions about reporting issues should be directed to personnel in the BAQ Technical Management Section at (803) 898-4123.

The results of the inspection indicate that your facility may be operating in contravention of your permit. A copy of the inspection report is being forwarded to the Air Enforcement Section for review. Prompt action to address any deficiencies noted in the inspection report would be appreciated. Any questions regarding enforcement concerns should be directed to Mr. Randy Stewart, Air Enforcement Section Manager, at (803) 898-4112.

Sincerely,

Dawn M. Jordan
Technical Management Section
Air Compliance Management Division

cc:  Compliance File  1900-0238-CA
Whitaker Container Service, Inc. was granted permission under to install an air curtain incinerator (ACI) for the incineration of clean lumber and yard waste with a maximum operating capacity of 96 tons per day (TPD). The primary operations are identified by NAICS Code 562219-Other Nonhazardous Waste Treatment and Disposal. An air compliance inspection was performed at this facility on the above date to determine compliance with their Construction Permit. Construction permit 1900-0238-CA was issued March 22, 2007. Following are the inspection results:

II. Special Conditions, D. Additional Conditions

1-This condition is informational in nature.
2-This condition is informational in nature.
3-This condition is informational in nature.
4-The facility representative indicated a scale was used to measure the amount of waste. Daily waste charge records were provided for August 21 and 25, 2009, which showed 37.12 tons and 81.10 tons had been incinerated, respectively. The facility representative indicated that there were additional daily waste charge records, but was unable to locate them at the time of the inspection. The air curtain incinerator is limited to a 34.68 TPD charge rate. Records for August 21 and 25, 2009 indicated the charge rate limit had been exceeded.
5-This condition is informational in nature.
6-This condition is informational in nature.
7-A written request to obtain an operating permit was submitted to the Director of Engineering Services Division on September 14, 2009 and is currently under review.

8-This condition is informational in nature.

9-This condition is informational in nature.

10-The air curtain incinerator was not in operation at the time of the inspection and therefore no visible emissions were observed.

11-An operator training program and a list of trained personnel had not been submitted to the Director of Engineering Services at the time of the inspection.

12-This condition is informational in nature.

13-This condition is informational in nature.

14-No fugitive particulate matter emissions were observed at the time of the inspection.

15-This condition is informational in nature.

16-This condition is informational in nature.

17-An initial opacity performance test had not been conducted at the time of the inspection. The Engineering Services Division is reviewing the initial opacity performance test schedule to determine whether or not this permit condition had been violated at the time of the inspection.

18-Records of visual inspections were not available at the time of the inspection.

19-At the time of the inspection there was construction and demolition debris stored on site. The facility representative indicated the material was separated and that only the clean wood would be burned. The Department is reviewing whether or not this permit condition was violated.

20-This condition is informational in nature.

21-This condition is informational in nature.

Conclusion

The facility was found to be in violation of permit conditions II.D.4, II.D.11, and II.D.18. This matter is being referred to the BAQ Enforcement Section for review and resolution. The BAQ Engineering Services Division is reviewing whether or not any additional permit violations have occurred.
LETTER OF TRANSMITTAL

TO SCDHEC
Region 3 EQC-Columbia
P.O. Box 156 State Park, SC 29147

DATE 1/7/10     JOB NO. 019-09
ATTN: Benjamin Buchanan
RE: Air Quality Report

WE ARE SENDING YOU:
☒ Attached ☐ Under separate cover via
☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications
☐ Copy of letter ☐ Change Order ☐ File Copy Data

COPIES DATE NO. DESCRIPTION
1 1/7/10 1 Independent Follow-Up Report

THOSE ARE TRANSMITTED as checked below:
☐ For Approval ☐ Approved at Submitted ☐ Resubmit copies for approval
☒ For your use ☐ Approved as noted ☐ Submit copies for distribution
☐ As requested ☐ Returned for corrections ☐ Return Corrected prints
☐ For review and comment ☐ ☐ Printed returned after loan to us
☐ For bids due ☐

REMARKS:

COPY TO:

SIGNED: Andrew R. Tolleson, PE
Principal-In-Charge

If enclosures are not as noted, kindly notify us at once.
SCDHEC  
Region 3 EQC-Columbia  
P.O. Box 156, State Park, SC 29147

Attn: Benjamin Buchanan  
Environmental Health Manager

Re: Independent Follow-Up Report  
Open Burning Investigation Report  
WCS, Inc. / Wessinger Road Property  
Richland County, SC  
TTLC: C-019-09

Dear Mr. Buchanan:

I am providing a copy of my field inspection and investigation into Open Burning operations at the referenced facility. I found the Wessinger Road facility operated by Whitaker Container Services, Inc. to be in compliance with burning regulation ordinances as published by the County, however, the issue of a fugitive re-ignition occurred on this date. My inspection and interview on this date concur with your observations of burn pile content. On inspection and interview we determine that the burning operation was a result of unintentional and spontaneous re-ignition in an isolated area of the designated burn pile. Our findings indicate that a waste hauler erroneously dumped a single load of land clearing debris that contained fugitive demolition debris. This occurred on or about 12/9/2009 or 12/10/2009, and was not made part of an active burn. Instead, the mixed materials were consolidated and an effort to remove the demolition components was afforded. Over the course of the week prior to this incident, WCS, Inc. did not engage in active burning. It appears prior burn(s) may not have been properly extinguished. A smoldering hot spot remained and served as the source of an unintentional spontaneous ignition of untreated lumber remnant debris that was part of the cover soil. It was this material that re-ignited and resulted in smoke emissions. Given these circumstances that we believe to be a reasonable explanation of fact, we request your consideration that no intentional violation occurred. At closure to my inspection(s) the operations Manager was overseeing full extinguish of source ignition and measures were put in place with staff to ensure proper segregation of demolition debris and improved management of leveling and fire suppression on a daily basis. If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Andrew R. Tolleson, ME, PE, PGISS  
President & Principal Engineer

Tolleson Limited Company  
136 Stonemark Lane; Suite 110  
Columbia, South Carolina 29210  
(803) 783-9001 FAX (803) 783-9210  
www.tollesonltd.com

CIVIL ENGINEERING  
ENVIRONMENTAL PERMITTING  
GEOTECHNICAL SERVICES

(via email & fax)
Field Inspection Report

THE FOLLOWING WAS NOTED

Engineer, Andrew Tolleson, PE arrived at WCS / Wessinger Road site (12/16/09) following request (12/16/09) by Operator (WCS, Inc.). The Tolleson Limited Company was requested to perform a site inspection and assessment of field operations for purpose of evaluation of alleged Open Burn activities that had been documented by SCDHEC / EQC. Request for inspection was related to Owner's immediate commitment to access and respond to possible unintentional burn violation. I arrived on site immediately following SCDHEC/EQC inspection by Ben Buchanin, although Mr. Buchanin had completed inspection he was not present in my inspection. Upon my inspection and interview with WCS Operations Manager, Michael Green, the following was determined. 1. Designated Open Burn area is located on south slope of property and was inspected. Area was level graded with containment berms along southern, western and portion of northern perimeter. Obvious burn pile yard debris was stockpiled 100+ feet from burn trench was noted and this area is designated for yard debris burn only. No burning of yard debris was occurring at time of my engineer inspection. I noticed mixed clearing / demolition waste was graded level with some evidence of over roughly 1/3 segment of burn trench. 2. Furthermore, smoldering of demolition debris type was observed, but not ignited to open flame. Fugitive smoke was visible from the level graded mixed debris area. WCS had dispatched manpower to extinguish source of ignition following ordinance protocol in association with results of SCDHEC / EQC inspection this date. 3. Conclusion, this appears to be a circumstance of unintentional (fugitive) re-ignitions of C&D debris. Source of ignition thought to be improperly extinguished yard debris that had been partially covered and remained smoldering. The fugitive re-ignition of non-yard debris was unintentional as a result of inadequate segregation and inadequate extinguish of prior burn pit cycle one week prior. I discussed mitigation measures with operator and issue is resolved. Operator to oversee the mixed yard debris with C&D component. Insure only yard debris in vicinity of burn area. Insure proper extinguish and complete soil cover daily after burns.

Site Representative: Michael Green

SCDHEC / EQC: Benjamin Buchanin (803) 896-0620

Reported By: Andy Tolleson, PE

Attest: [Signature] Date: 12/18/2009
Approximate location of burn pit on WCS facility property
Environmental Quality Control
Incident Report
Incident No.: 200907949

County: Richland   District: Columbia EQC Office   District Log No.: 

Incident Type: Air - Open Burning   Sub Type: Demolition Debris   Incident Status: Closed
Created: 12/16/2009 by Benjamin R Buchanan   Updated: 12/16/2009 by Benjamin R Buchanan
Caller: Anonymous

Description of incident: Caller indicated there was visible smoke at the intersection of Hwy 321 and Wessinger Road.
Documents attached:

Potential Responsible Party: Whitaker Container Service Inc
7429 Fairfield Rd
Columbia SC 29203
Phone: 803-699-1783

Observed:
Occurred:
DHEC Notified: 12/16/2009 13:38:19 via Phone Benjamin R Buchanan
Assigned to: Benjamin R Buchanan

48 Hour Goal Met? Y   5 day goal met? Y   CBEP? N
Closure comments: Department investigated December 16, 2009 at 1400. Smoke was visible from Wessinger Road which was originating near the air curtain incinerator associated with Construction Permit 1900-0238-CA. Michael Green with Whitaker Container Service, Inc. was contacted and opened the gate to access the site. One burn pit approximately 150 feet x 60 feet was observed during the investigation. The burn pit contained demolition debris and land clearing debris. Photographs were taken. A copy of the Open Burning Investigation Report and SC Air Pollution Control Regulation No. 61-62.2 were given to the site representative at the time of the investigation.

Signature: ___________________________   Date: ___________________

May 02, 2011 (w)   Incident 200907949
Tasks
Complaint Inspections (Inspection) Status: Complete Started: 12/16/09 Completed: 12/16/09 Results: Complete
Open Burning Investigation Report
Bureau of Air Quality

Date Received: 12-16-2019
Date Investigated: 12-16-2019
Time Investigated: 14:30

Location of Burning Activity (Street, City, State and Zip):
1500 Southclapper Rd, Beaufort Air Control Incinerator (1900-0238-CA)
County: Beaufort

Responsible Party:
Name: David Watson
Mailing Address:
241 River Glass Way
Bluffton, SC 29910
Phone #: 803-699-7855

On-Site Contact:
Name: Michael Green
Phone #: 803-513-0254
Position with Company: OPS Manager

Contents of Burn Pile (check all that apply):

- Household Garbage
- Construction Waste
- Landclearing Debris
- Industrial Waste
- Waste Oils
- Other
- Tires / Rubber Products
- Demolition Debris

Give detailed description of burn site (i.e., amount and type of materials being burned, number and size of pile(s), distance from nearest structure or road, etc.).

The burn pit is approximately 150 feet long and 60 feet in width.
The burn pit was actively burning at the time of the investigation. Burn pit contained demolition debris and landclearing debris. Photographs were taken.

If this box is marked, this burning activity constitutes a violation of South Carolina Air Pollution Control Regulation No. 61-62.2, Prohibition of Open Burning. Violation(s) of this regulation may lead to additional enforcement actions which can include an assessment of penalties.

I certify that the inspector has supplied me with a copy of this report and SC DHEC Regulation 61-62.2, and has explained this investigation and any violation(s) which may be noted above.

Print Name: David Watson
Signature:

DHEC Inspector
Print Name: Ben Buchholz
Signature: [Signature]
Phone #: 803-894-0620
Andrew Tolleson 803-783-9013
Tolleson Engineering 803-269-2651 cel!
He indicated they regularly bring in
yard debris and clearing debris from
offsite and burn the material in
the pit I observed and that the
C&D material got dumped over some
hot embers and inadvertently caught
fire. 12-16-2009 @ 1520
June 3, 2014

David Whitaker
PO Box 112
State Park, SC 29147

RE: Whitaker Container Service Inc – Permit Number 1900-0238 Permit Cancellation (Closed)

Dear Mr. Whitaker:

Available information indicates that Whitaker Container Service Inc has permanently ceased all production operations at the 7429 Fairfield Rd location in Columbia, South Carolina. In consideration of this and pursuant to the provisions of the Pollution Control Act, Sections 48-1-50(5) 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 South Carolina Department of Health and Environmental Control (Department) hereby notifies you that all permits (construction permits, state operating permit, and any other permits) previously issued by the Bureau of Air Quality are hereby canceled and considered null and void.

In accordance with the South Carolina Regulation 61-62.1, "Any person who plans to construct, alter, or add to a source of air contaminants, including installation of any device for the control of air contaminant discharges, shall first obtain a construction permit from the Department." Therefore, from this date forward, any person who intends to operate at this site must first obtain all necessary permits.

Should you have any questions, please contact Veronica Barringer of my staff at (803) 898-4276 or whitespw@dhec.sc.gov.

Sincerely,

[Signature]

Elizabeth J. Basil, Director
Engineering Services Division
Bureau of Air Quality

EJB: VB/PWW:EIL

cc: Permit File: 1900-0238
ec: Benjamin Buchanan, BEHS
    Internal BAQ Contacts