

South Carolina Department of Health and Environmental Control
Bureau of Air Quality
Response to Comments
Public Notice #22-066-TV-C
International Paper – Georgetown Mill (1140-0002-DK)

Question 1

It is the City of Georgetown’s understanding that SCDHEC notified the USEPA that the Howard # 3 (45-043-0011) monitoring site for PM10 was discontinued on April 3, 2019 because during the previous 10 years there were no exceedances. Hence, it is safe to assume the City is currently in compliance with the NAAQS’ PM10, PM2.5, and O3. Or is DHEC considering the City as a potential area for non-attainment with the NAAQS in the future?

Response: Georgetown County, including the City of Georgetown, is currently designated as attainment for all National Ambient Air Quality Standards (NAAQS). The Department has no data indicating potential non-attainment in the future.

Monitoring stations in South Carolina’s ambient air monitoring network are specifically located to represent ambient pollution levels in a diverse set of geographical areas. In accordance with 40 CFR Part 58 Appendix D, ambient air monitors are required to be placed in areas with the highest population, or where the highest pollutant concentrations are expected to occur. If an ambient monitor located in an area of higher emissions or concentrations demonstrates the air pollutant concentrations are lower than the levels set by the national health protective standards, then it is reasonable to expect that the air pollutant concentrations in other areas with lower emissions or concentrations will also be lower than the national standards.

Question 2, 3, 4, and 5

2. In its application, International Paper noted that “Removal of the baghouses will result in a small increase in emissions of particulate matter (PM), particulate matter less than 10 microns in aerodynamic diameter (PM10) and particulate matter less than 2.5 microns in aerodynamic diameter (PM2.5). As shown in Table 1 [in the application], emissions increases are well below the triggers for a major modification. Also, as demonstrated in the Post-Project Annual Emissions, the Ash Handling System is deemed an Insignificant Source.” With no

monitoring sites in the City of Georgetown, how can DHEC provide assurances that PM_{2.5} or PM₁₀ emissions won't exceed the standards as a result?

3. With the applicability of Section 61-62.6 to the International Paper facility, how will the fugitive emissions be monitored and minimized to ensure the state-wide requirements of this regulation are met given that there are no monitoring sites in proximity of the facility and/or the City of Georgetown?

4. Standard No. 2 is "Applicable but exempt" with emission rates (after removal of the baghouses) being less than 1.14 lb/hr for PM₁₀ and PM_{2.5}, each[;] how DHEC will ensure the emission rates will continue being less if there are no monitoring sites in place?

5. SCDHEC has "determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards." What assurances does the City of Georgetown have from DHEC if there are no monitoring sites in place?

Response: First, as discussed above in response to Question 1, the Department's ambient air monitoring network is designed to represent pollution levels in a diverse set of areas throughout the state based on the placement of monitors in areas representing the highest population or expected highest pollutant concentrations. Thus, the absence of monitors in a particular area does not prevent evaluation of NAAQS compliance for nearby facilities seeking air quality permits.

Second, as part of the application process, all air permit applicants must demonstrate to the Department that emissions from a proposed change will not cause a violation of or interfere with the NAAQS.

One method of demonstrating that a project will not cause a violation or interfere with NAAQS attainment is to show that the source's emissions are below exemption thresholds exempting a permit applicant from air dispersion modeling requirements (*i.e.*, levels below which the Department has determined emissions will not cause a NAAQS violation). For the International Paper – Georgetown Mill (IP-G) permit application, emissions from the silos, which would include fugitive emissions, were quantified to determine the source's "potential to emit" as required by Department air quality regulations. Potential to emit is defined as "...the maximum capacity of a stationary source to emit a pollutant under its physical and operational design."¹ The maximum uncontrolled potential emissions from IP-G's ash handling systems are less than the established threshold for exemption from air dispersion modeling. Based on these minimal emissions, the facility is expected to be in

¹ S.C. Regulation 61-62.1, Section I(71); 40 CFR 51.165(a)(1)(iii)

compliance with the NAAQS at and beyond the property boundary. Additionally, the change is not deemed a major modification under SC Regulation 61-62.5, Standard No. 7 – Prevention of Significant Deterioration because the change in potential to emit upon removal of the baghouses is below the significance threshold.

All permitted sources, regardless of proximity to ambient air pollution monitors, are subject to requirements to control fugitive particulate matter under S.C. Regulation 61-62.6. To address fugitive emissions, the permit for this project requires the permittee to ensure that fugitive particulate matter is “minimized to the extent practicable in a manner with good air pollution control practices,” and to control fugitive emissions from dust buildup by proper housekeeping and/or wet suppression.

As noted, issuance of air quality permits is based on the Department’s determination that a source, if operated in accordance with the permit application, would meet all applicable requirements and emission standards. All sources, regardless of proximity to air pollution monitors, are responsible for achieving and maintaining compliance on an ongoing basis. Facility compliance with all applicable permit and regulatory provisions would be evaluated by the Department during both comprehensive inspections and in response to any complaint-driven inspections for a facility.

Question 6

On the odor emitted by the IP facility, is there anything that DHEC or IP can do to improve its technology to eliminate the odor?

Response: There are no state or federal odor regulations. Permitting decisions are based on the Department’s technical review of an applicant’s application and the regulatory requirements in place at the time of the review. However, the Department’s regional offices investigate citizen complaints, including odor complaints. The presence of odor does not necessarily signal the presence of dangerous air pollution. Many air pollutants have an odor threshold far below the level that would cause harm.

The pulp and paper industry specifically is known for its distinctive smell. This smell comes from the decay of wood, which releases naturally occurring sulfur compounds, as well as sulfur-containing chemicals used in the pulping process.

Sulfur-containing chemicals are often detected by the human sense of smell in very low concentrations and have an unpleasant odor, sometimes similar to rotten eggs. These chemicals can be smelled at concentrations much lower than those associated with being harmful to health.

The Department encourages the commenter to contact the regional office whenever abnormal odor is detected so that the Department can investigate. Abnormal odors could be an indication of a malfunction or equipment issue. The Department has an automated tool for reporting environmental concerns and encourages its use to ensure all pertinent information is captured and an investigation can occur in a timely manner.

<https://scdhec.gov/about-dhec/contact-us/report-it/report-environmental-concern>