



STATEMENT OF BASIS
Page 1 of 3
BAQ Air Permitting Division

Company Name:	International Paper - Georgetown Mill	Permit Writer:	Katharine K Buckner
Agency Air Number:	1140-0002	Date:	December 31, 2024
Permit Number:	CP-50000040 v1.0		

DATE APPLICATION RECEIVED: October 11, 2021
DATE OF OCRM APPROVAL: February 17, 2022

FACILITY DESCRIPTION

SIC CODE: 2611 – Pulp Mills, 2621 – Paper Mills
NAICS CODE: 322121 – Paper Mills, 322130 – Paperboard Mills

International Paper (IP-Georgetown) operates an integrated Kraft pulp and paper mill adjacent to the city of Georgetown, Georgetown County, in eastern South Carolina on the banks of the Sampit River. The Mill began operations in 1937. The primary activities at International Paper’s Georgetown pulp and paper mill are pulp and paper production. The facility produces both hardwood and softwood Kraft pulps from purchased chips and chips processed from roundwood received at the mill. Operations at the mill include multiple fuel-fired boilers, electricity generation (internal use only), wood and wood chip processing, Kraft process pulping, Kraft pulp bleaching, Kraft chemical recovery, bleached and unbleached papermaking (two paper machines), market pulp (one pulp machine), and additional operations and equipment necessary to support these operations. The current nominal annualized pulp capacity of the mill is 2,190 oven dried tons of pulp per day (ODTP/d).

PROJECT DESCRIPTION

Under Section 169A of the Clean Air Act, the South Carolina Implementation Plan (SIP) is required to contain measures necessary to make reasonable progress toward meeting the national goal for visibility protection for Federal Class I areas. This construction permit documents the limits that will be promulgated into 40 CFR 52 – Approval and Promulgation of Implementation Plans, Subpart PP – South Carolina.

LIMITS

IP – Georgetown Mill will limit sulfur dioxide emissions from their affected sources as follows:

- No. 1 Recovery Furnace (TV EU ID 01, equipment ID RB01):
 - SO₂ less than 330.0 tons per year (12-month rolling sum)
- No. 2 Recovery Furnace (TV EU ID 01, equipment ID RB02):
 - SO₂ less than 1,132.0 tons per year (12-month rolling sum)
 - SO₂ less than 130 parts per million @ 8% O₂, dry basis (annual average)
- Nos. 1 and 2 Power Boilers (TV EU ID 01, equipment IDs PB01 and PB02):
 - SO₂ less than or equal to 340 ng/J heat input (0.80 lb/million Btu) derived from liquid fossil fuel or liquid fossil fuel and wood residue; (3 hour rolling average)
 - SO₂ less than or equal to 520 ng/J heat input (1.2 lb/million Btu) derived from solid fossil fuel or solid fossil fuel and wood residue (3 hour rolling average)
 - 2.3 lb/million Btu heat input (3 hour rolling average)

MONITORING AND RECORD KEEPING

For No. 1 and No. 2 Recovery Furnaces:

A 12-month rolling sum will be calculated for SO₂ emissions based on the Department approved algorithm. The algorithm includes the monthly use of each fuel, using emission factors for burning Black Liquor Solids



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from performance tests and the AP-42 factors for No. 6 Fuel Oil, Ultra-Low Sulfur Diesel, Natural Gas, and Propane. Sulfur contents for No. 6 Fuel Oil and Propane will be based on the fuel supplier’s certification. The sulfur content of the ultra-low sulfur diesel is, as established by definition, 15 ppm or (0.0015%). Records of monthly fuel use, sulfur contents, and stack test results will be kept on site. The 12-month rolling sum of SO₂ emissions will be reported semiannually.

In addition to the ESP, the No. 2 Recovery Furnace (RB02) is equipped with a wet scrubber that is also used to demonstrate compliance with the 12-month rolling sum and the ppm, annual average SO₂ limits. The wet scrubber will be monitored in accordance with the requirements for this scrubber in 40 CFR 63, Subpart MM. Operational ranges for the monitored parameters were derived from stack test data and 40 CFR 63, Subpart MM range limitations, which demonstrate the proper operation of the equipment. Although the scrubber monitoring uses 40 CFR Part 63 monitoring methods, the conditions in the permit are not 40 CFR Part 63 (MACT) conditions.

For No. 1 and No. 2 Power Boilers:

As required by 40 CFR Part 60, Subpart D, both boilers are equipped with a SO₂ continuous emissions monitoring system (CEMS) and shall calculate the SO₂ emissions as prescribed in the regulation for demonstrating compliance with the limits listed above.

STARTUP/SHUTDOWN

The No. 1 and No. 2 Recovery Furnaces do not have short term limits during startup, shutdown, and malfunction. Emissions during startup, shutdown, and malfunctions are required to be quantified and included in the twelve-month rolling sum for determining compliance with the ton per year limit for each Recovery Furnace.

No. 1 and No. 2 Power Boilers are required to operate continuous emissions monitoring systems (CEMS) for SO₂, in accordance with 40 CFR 60, Subpart D. Emissions from startup and shutdown will be accounted for in the CEMS monitoring and the calculations performed for demonstrating compliance with the limits in 40 CFR 60, Subpart D.

REPORTING

The reporting periods for Regional Haze compliance have been defined as January – June and July – December. Reports will be submitted by the 30th day after the end of the reporting period.

For No. 1 and No. 2 Recovery Furnaces, reports of the calculated values and each twelve-month rolling sum, calculated for each month in the reporting period, will be submitted.

For No. 2 Recovery Furnace, reports of excursions, exceedances, corrective actions taken, and monitor downtimes shall be submitted. Also, if required, information required for implementation of a QIP and/or stack testing protocols and reports, shall be submitted.

For No. 1 and No. 2 Power Boilers, excess emissions are calculated and reported on each six-month period and includes the information prescribed in §60.7(c).



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OPERATING PERMIT INCORPORATION

So that this project can be incorporated into the TV OP as an administrative permit amendment, this project will be public noticed in accordance with:

- South Carolina Regulation 61-62.70.7(d)(1)(v) - Incorporates into the Part 70 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of Sections 70.7 and 70.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in Section 70.6.

PUBLIC NOTICE

This construction permit has undergone a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(E), SC Regulation 61-62.1, Section II(N), SC Regulation 61-62.70.7(d)(1)(v), SC Regulation 61-62.70.7(h), and SC Regulation 61-62.70.8. The comment period was open from April 26, 2024 to May 28, 2024 and the draft permit was placed on the BAQ website during that time period. Comments were received during the comment period.

The comments identified two SO₂ limits in the final SIP revision submitted to EPA on March 2, 2022 that were not in the noticed draft construction permit, and that averaging times were missing from two limits. The limits and averaging times have been added to the permit.

Additionally, we received comments on the Regional Haze facility selection, four-factor analysis, and other aspects of the Regional Haze SIP process. These were the same comments received on the draft SIP submittal and are similarly addressed in the Response to Comments document. These were not comments on the content of this permit.

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.