Facility Name: **WestRock Lithia Springs Preprint Plant**
City: Lithia Springs
County: Douglas
AIRS #: 04-13-097-00089

Application #: TV-66907
Date Application Received: December 21, 2017
Permit No: 2679-097-0089-V-02-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Manny Patel
ISMU	Anna Gray	Dan McCain
SSCP	Stephen Damaske	Tammy Martiny
Toxics	N/A	N/A
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: WestRock Lithia Springs Preprint Plant

2. Parent/Holding Company Name

   WestRock CP, LLC

3. Previous and/or Other Name(s)

   aka WestRock CP, LLC – Lithia Springs

4. Facility Location

   600 Riverside Parkway, Building A
   Lithia Springs, Georgia 30122 (Douglas County)

5. Attainment, Non-attainment Area Location, or Contributing Area

   The facility is located in the Atlanta ozone and PM2.5 non-attainment areas.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Permit No. 2679-097-0089-P-01-0	October 6, 2016	Construction and operation of a Flexographic Printing press and printing plate production equipment.
ERC	September 21, 2016	ERC transfer
Off Permit Change	November 4 , 2016	Installation of a dust collector for material handling system
Amendment No. 2679-097-0089-P-01-1	September 8, 2017	Installation of a second plate processor

D. Process Description

1. SIC Codes(s)

2679

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces high quality printed linerboard using a flexographic print press.

3. Overall Facility Process Description

WestRock Lithia Springs Preprint Plant is a flexographic printing facility which produces high quality printed linerboard that is incorporated into corrugated boxes and other packaging, as well as point of purchase displays. The facility includes a nine-color flexographic press for the manufacture of preprint linerboard. The preprint linerboard is then shipped off-site and manufactured into corrugated cardboard for boxes and other packaging. There are also flexographic printing plate processors with a solvent recovery system and associated storage tanks.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

WestRock Lithia Springs Preprint Plant site is a major source under NSR regulations because potential emissions VOC are greater than 25 tpy.

The facility conducted a New Source Review for the initial permit. Though the project emissions had exceeded the NAA-NSR major source threshold, the facility-wide potential emissions of VOC were less than 100 tpy. Therefore, the facility was subject to Best Available Control Technology (BACT) requirements for VOC rather than Lowest Achievable Emission Rate (LAER) requirements as stated in 391-3-1-.03(8)(c)13(iii). The following limits were

included as part of the NSR for Permit No. 2679-097-0089-P-01-0. The BACT emission limit for the plate processors was reevaluated in Permit No. 2679-097-0089-P-01-1 due to the addition of the second plat processor.

- VOC emissions from the Flexographic Printing Plate Processors 1 and 2 are limited to 10 tpy
- VOC emissions from the flexographic printing press are limited to 34.8 tpy
- VOC content of less than 5%, by weight for materials used in the flexographic printing press
- Good housekeeping and operating practices

The requirements to obtain VOC emission reduction credits which were required in the previous permits were not included in this permit since these have been obtained by the facility.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM_{10}	Yes			✓
$PM_{2.5}$	Yes			✓
SO_2	No			
VOC	Yes	✓		
NO_x	No			
CO	No			
TRS	No			
H_2S	No			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The facility is a major source of Hazardous Air Pollutants (HAPs); therefore, it is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations.

As a minor source of HAP emissions, the facility is classified as an area source and would be applicable to any NESHAPs for area sources. However, there are no area source NESHAPs that are applicable to flexographic printing operations or printing plate processors. The direct-fired dryers as part of the preprint press are not subject to 40 CFR 63 Subpart JJJJJJ.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 2 - NSR	yes
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M – Part 63 NESHAP	no
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted with this application.

D. Permit Conditions

Not applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P1	Flexographic Printing Press 1	NAA-NSR 391-3-1-.03(8) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm)	3.2.1, 3.2.3, 3.4.1, 3.4.2. 3.5.1, 6.2.1, 6.2.2, 6.2.3, 6.2.6, 6.2.7	N/A	None
PP1	Printing Plate Processor No. 1	NAA-NSR 391-3-1-.03(8) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.2.4, 3.4.1, 3.4.2. 3.5.1, 6.2.1, 6.2.4, 6.2.5, 6.2.7,	N/A	None
PP2	Printing Plate Processor No. 2	NAA-NSR 391-3-1-.03(8) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.2.4, 3.4.1, 3.4.2. 3.5.1, 6.2.1, 6.2.4, 6.2.5, 6.2.7	N/A	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

VOC emissions from Flexographic Printing Plate Processors 1 and 2 are limited to 10 tpy as part of the BACT requirements. The previous limit of 3.66 tons for Plate Processor 1 was modified in Permit No. 2679-097-0089-P-01-1 due to the reevaluation of the BACT limit for the addition of Plate Processor 2. As a result, the BACT emission limit is 10 tpy for both plate processors.

VOC emissions from flexographic printing press are limited to 34.8 tpy as part of the BACT requirements.

The materials used in the flexographic printing press are limited to a VOC content of less than 5%, by weight as part of the BACT requirements.

Rules and Regulations Assessment:

Georgia Rule (b) - *Visible Emissions* applies to any visible emissions for all of the equipment at the facility.

Georgia Rule (e) - *Particulate Emission from Manufacturing Processes* applies to all of the equipment at the facility.

Georgia Rule (mm) - *VOC Emissions Graphic Arts Systems* applies to the flexographic printing press. The flexographic press will be subject to Section 1, subpart (i) which limits the VOC content of any ink or coating, as applied, to either: less than 25 percent by volume of the volatile content of the ink/coating; or 40 percent by volume of the coating ink, less water; or 0.5 pound of VOC per pound of coating solids. This Rule also requires good housekeeping practices to minimize fugitive VOC emissions. The VOC content of the water-based coatings will be less than 5%, so the facility will be inherently compliant with this rule. The requirements of this Rule will be subsumed under the BACT requirements.

The solvent storage tank is subject to Georgia Rule 391-3-1-.02(2)(vv) - *Volatile Organic Liquid Handling and Storag*e because it has a capacity of 4,000 gallons and stores a volatile organic liquid. As required by this Rule, the facility will install submerged fill pipes for this tank.

The dryers are not subject to Georgia Rule (g) – *Sulfur Dioxide* because they do not meet the definition of "fuel burning equipment". They are part of a manufacturing piece of equipment for which the primary purpose is not the production of thermal energy.

The facility is not subject to Georgia Rule (w) - *VOC Emissions from Paper Coating* because there are no paper coating lines. The flexographic printing press has one station as part of the print line that applies a clear coat, but as this is applied as part of the print line and not in a stand-alone coater, this Rule is not applicable. The clear coat station will comply with the standards and the VOC limits of Georgia Rule (mm) as part of the flexographic printing line. As such the VOC limits on the clear coat will be just as stringent as those stated in Rule (w).

Georgia Rule (tt) - *VOC Emissions from Major Sources* is not applicable since the VOC emissions from equipment that is not covered by another VOC regulating state rule, which would be the plate processors, do not have potential VOC emissions greater than 25 tpy, the major source threshold in a non-attainment county.

C. Permit Conditions

- Condition 3.2.1 limits the VOC emissions from Flexographic Printing Press 1 to 34.8 tpy in order to comply with the BACT requirements.
- Condition 3.2.2 limits the VOC emissions from Flexographic Printing Plate Processors 1 and 2 to 10 tpy in order to comply with the BACT requirements.
- Condition 3.2.3 requires the use of inks and coatings in flexographic printing operations with VOC content, as applied, equal to or less than 5 percent by weight of the volatile content of the coating or ink, averaged on a 24-hour basis. This limit is part of the BACT requirements for this emission unit. This condition also satisfies Georgia Rule (mm).
- Condition 3.2.4 requires the flexographic plate processor to be equipped with a closed loop solvent recovery system as part of the BACT requirement for this equipment.
- Condition 3.4.1 subjects the facility to Georgia Rule (b).
- Condition 3.4.2 subjects the facility to Georgia Rule (e).
- Condition 3.4.3 subjects the storage tank(s) to Georgia Rule (vv) and requires submerged fill pipes. The facility has one solvent storage tank and one wastewater (ink wash-up) tank.
- Condition 3.5.1 requires good housekeeping in order to minimize fugitive VOC emissions. This condition and these practices are part of the BACT assessment and requirements for the printing press and the plate processors.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Not applicable.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable because there are no control devices at the facility. The closed-loop solvent recovery system is not considered a control device. It is considered a process equipment.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

- Condition 6.2.1 requires the facility to maintain monthly VOC usage records.
- Conditions 6.2.2 and 6.2.3 require the facility to calculate the monthly VOC emission and the 12-month rolling total VOC emissions for the flexographic printing press. The facility is also to report if any one month exceeds 2.9 tons or if any 12-month rolling total exceeds 34.8 tpy.
- Conditions 6.2.4 and 6.2.5 require the facility to calculate the monthly VOC emission and the 12-month rolling total VOC emissions for Flexographic Printing Plate Processors 1 and 2. The facility is also to report if any one month exceeds 0.83 tons or if any 12-month rolling total exceeds 10 tpy.
- Condition 6.2.6 details the calculation methods and record keeping requirement for complying with the VOC content limit for the inks and coatings to be used in the flexographic printing press. The facility will use a 24-hour average to show compliance with the BACT limit of using coatings with a VOC content of less than 5%, by weight.
- Condition 6.2.7 requires a monthly inspection to assess compliance with the housekeeping requirements of Condition 3.5.1 and record the inspection in a log suitable for inspection.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative