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ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Jeng-Hon Su

FROM: Ginger Payment

DATE: December 7, 2022

Facility Name:	**WestRock Lithia Springs**
AIRS No.:	097-00089
Location:	Lithia Springs, GA (Douglas County)
Application #:	28395
Date of Application:	May 9, 2022

Background Information

WestRock Lithia Springs (hereinafter "facility") is an existing 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 is located at 600 Riverside Parkway, Building A in Lithia Springs (Douglas County). The facility was issued Title V Permit No. 2679-097-0089-V-02-0 on June 11, 2018 for the initial Title V permit for the facility.

"Preprint" generally refers to the printing that is done on the outside liner of a box before the paperboard undergoes corrugating and/or converting operations. The facility includes a 9-color, water-based flexographic press with natural gas fired dryers, two printing plate makers with a solvent recovery system, a scrap collection system, and other ancillary equipment including storage tanks. The preprint linerboard is then shipped off-site and manufactured into corrugated cardboard for boxes and other packaging.

A BACT determination in Application No. 23884 was included in Permit No. 2679-097-0089-P-01-0. As part of the analysis, the flexographic printing press required use of materials with a VOC content of less than 5% by weight, good housekeeping and operating practices and a 34.8 tpy VOC emission limit. The flexographic printing plate processors required use of a closed loop solvent distillation recovery system for both plate processors and a 10 tpy VOC limit for both plate processors (updated in Application No. 26096 for two processors).

Purpose of Application

Application No. 28395 was received on May 9, 2022 to request the construction and operation of a HP PageWide Digital Press T1195. The digital press is approximately 41' wide and 113'long and will be capable of printing linerboard rolls up to 110'wide. The maximum print speed will be 1,000 feet per minute with six colors. The inks used in the digital press are water based and are low VOC with no HAPs/TAPs. The preprinted linerboard will be shipped offsite. A small material handling system will be installed to remove paper scrap and dust from each linerboard roll. This will be similar to the existing one for the

existing flexographic press. The material handling system will have 4 blowers, pipes and a cyclone. The blower will route trim scrap through the cyclone. The proposed digital press will have an electric ink dryer.

The facility also requested a change in status from a Title V source to a synthetic minor source. Because the potential VOC emissions from the facility (excluding sources being subject to other specific GA RACT rules) exceed 25 tpy, applicable sources would be subject to Georgia Rule (tt) – *VOC Emissions from Major Sources*. The Flexographic Printing Plate Processors 1 and 2 and the proposed digital press are subject to Georgia Rule (tt) – *VOC Emissions from Major Sources* with a RACT determination for the application. The RACT determination was provided on October 11, 2022.

A public advisory (PA0522-2) was issued for the application on May 9, 2022 and expired on June 10, 2022. No comments were received by the Division.

Updated Equipment List

Emission Units			Associated Control Devices	
Source Code	**Description**	**Installation Date**	**Source Code**	**Description**
P1	Flexographic Printing Press 1	1982	--	--
PP1	Printing Plate Processor No. 1	1996	--	--
PP2	Printing Plate Processor No. 2	1982	--	--
DP1*	HP PageWide Digital Press T1195	2022*	--	--

*proposed within current application

The facility has one volatile organic liquid handling and storage tank which has a capacity of 7,000 gallon.

Emissions Summary

The emissions from the flexographic printing press and the printing plate processors are based on product usage and the VOC/HAP content.

The projected ink usage for the proposed digital press was based on the maximum throughput of the linerboard and the estimate usage of varnish, primer and ink as pounds per million square feet. The estimated amount of product usage was then used with the VOC content. The facility estimated 41.8 tpy potential VOC emissions using an ink with the highest VOC content (3.76% VOC content). This is a conservative estimate since the other inks do not have a VOC content this high. The estimated actual emissions in the following table uses a 1.82% average VOC content in ink for the digital press.

The PM emissions from the proposed material handling system are based on data provided from the cyclone manufacture and are estimated to be approximately 2.1 tpy. The existing material handling system for the flexographic printing press is a similar system; therefore, the PM emissions are estimated to be the same.

Facility-Wide Emissions
(in tons per year)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
$PM/PM_{10}/PM_{2.5}$	2.1	4.2	2.1	<2.1	<4.2	<2.1
NOx	--	--	--	--	--	--
SO_2	--	--	--	--	--	--
CO	--	--	--	--	--	--
VOC	44.8	86.6	41.8	19.1	39.69	20.59
Max. Individual HAP	0.04	0.04	--	0.04	0.04	--
Total HAP	0.1	0.1	--	0.1	0.1	--
Total GHG (if applicable)	--	--	--	--	--	--

Although the potential VOC emissions are estimated to be below 100 tpy, the facility requested for a <100-tpy VOC emission cap in the permit.

Regulatory Applicability

The facility will have VOC emissions limited to less than 100 tpy to change the status of the facility from a Title V to a synthetic minor.

The facility's manufacturing processes will continue to be subject to Georgia Rule (b) – *Visible Emissions* and Georgia Rule (e) – *Particulate Emissions from Manufacturing Processes*.

The flexographic press will continue to be subject to Georgia Rule (mm) – *VOC Emissions from Graphic Arts Systems*. This regulation, applicable to sources located in Douglas County, limits the VOC content of any ink or coating as applied for flexographic printing as follows: (1) equal to or less than 25% by volume of the volatile content of the coating or ink; or (2) equal to or less than 40% by volume of the coating or ink, minus water; or (3) equal to or less than 0.5 lb VOC/lb coating solids. Sources subject to this regulation must comply with the following housekeeping requirements for any affected cleaning operation: (1) store all VOC-containing cleaning materials and used shop towels in closed containers; (2) ensure that storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials; (3) minimize spills of VOC-containing cleaning materials; (4) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and (5) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. According to the application, the facility proposes to comply with the emission limits by the continued use of water-based inks. In a conversation with the facility on December 5, 2022, the facility requested to remove the option of "averaging on a 24-hour weighted basis the VOC content of all inks and coatings" in order to simplify the records kept by the facility.

The existing 7,000-gallon tank to store overprint varnish is subject to Georgia Rule (vv) – *Volatile Organic Liquid Handling and Storage*. The two 300-gallon solvent recovery tanks in the plate making process will not be subject to this rule because these do not exceed the 4,000 gallon criteria for applicability.

Georgia Rule (w) – VOC Emissions from Paper Coating is not applicable because the facility will not be coating. It will be printing linerboard.

The application of adhesives will be subject to Georgia Rule (yyy) – *VOC Emissions from the Use of Miscellaneous Industrial Adhesives* and limits the VOC content of the adhesives to 1.0 pound per gallon, excluding water.

The facility will not be subject to 40 CFR 60 Subpart QQ - *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing* or 40 CFR 60 Subpart FFF - *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing* because these rules apply to rotogravure printing which the facility does not use.

The facility will not be subject to 40 CFR 63 Subpart KK - *National Emission Standard for the Printing and Publishing Industry* because this applies to major sources of HAP emissions. The facility is an area source of HAP emissions.

There are no combustion sources at the facility; therefore, there are no applicable NSPS or NESHAP rules for the dryers. The dryers are electric sources.

Because the VOC emissions from sources not being subject to other specific GA RACT rules (PP1, PP2, and DP1, combined) will exceed 25 tpy, the facility will now be subject to Georgia Rule (tt) - *VOC Emissions from Major Sources*, and a RACT (Reasonably Available Control Technology) analysis was conducted. The following is the RACT analysis included in Application No. 28395. The sources of emissions at the facility are flexographic preprint press, two platemaking devices, ancillary equipment including storage tanks and the proposed digital press. Because the flexographic preprint press is already subject to Georgia Rule (mm) – *VOC Emissions from Graphic Arts Systems*, it will not be included in the RACT analysis. Because the storage tank is already subject to Georgia Rule (vv) – *Volatile Organic Liquid Handling and Storage*, it will not be included in the RACT analysis. Per Georgia Rule 391-3-1-.02(2)(tt)2, RACT means the utilization and/or implementation of water-based or low-solvent coatings, VOC control equipment such as incineration, carbon adsorption, refrigeration or other like means as determined by the Director to represent reasonably available control technology for the source category in question.

Although a RACT determination could result in less stringent controls and emission limitations than a BACT determination, Westrock Lithia Springs has been complying with GA EPD's VOC BACT determination and associated air permit requirements since 2017 for the existing Printing Plate Processor PP1 and PP2. WestRock proposes VOC RACT for the existing emission Printing Plate Processor PP1 and PP2 equal to the previously determined BACT. BACT for the Printing Plate Processor PP1 and PP2 required use of a closed loop solvent distillation recovery system for both plate processors and a 10 tpy VOC limit for both plate processors.

The proposed digital press is not subject to any other Georgia RACT Rules; therefore, it is subject to RACT.

RACT Review for VOC

The proposed digital press has potential emissions of 41.18 tpy. The associated scrap system has no VOC emissions. VOC emissions from the digital press are generated by evaporation of the small amounts of VOC in the water-based ink, precoat bonding agent, and overprint varnish applied by the press. The majority of the VOC evaporates within the dryers that cure the inks and overprint varnish coating. Minimal fugitive emission loss outside of the dryers is expected because the web is exposed to plant air for a very short period of time before it enters the infra-red and forced air dryer, and the partial pressures of VOC constituents within the waterborne ink and overprint varnish formulations are extremely low. Accordingly, the RACT analysis for the digital printing press does not consider additional VOC capture devices (total enclosures or close capture hoods) beyond the substantial capture achieved by the press dryers.

Low-VOC, waterborne inks formulated for this digital press can be generally characterized as containing about 30%-to-35% solids (resin / pigment / other additives), 0.6% to 4% VOC (1.82% average concentration), and the balance of the volatile portion is water (>60%). The overprint varnish has even less VOC than the inks, with a VOC content of 0.05%.

The digital press technical specifications state the combined dryer exhaust design flow rate is 34,300 scfm. When this flow rate is used with the PTE emission rate of 9.8 lbs/hour and an average molecular weight of the VOC's of approximately 80 lb./lb.-mol, the resulting VOC concentration in this combined press exhaust stream would be very low; approximately 23 ppmv. Generally, a very dilute exhaust stream such as this is very difficult and costly to treat.

Identify Product Alternative

1. Digital Press

   There are no alternative options for the proposed digital press.

Identify Technological Alternatives

Westrock Lithia Springs evaluated RACT for the densifier by determining what process changes and add-on emission controls are technically feasible for the specific type of equipment. Potential emission reduction options were determined from EPA's RACT/BACT/LAER (RBLC) Clearinghouse and other research. The following control technologies are identified as potential control technologies:

1. Thermal oxidation
2. Catalytic oxidation
3. Carbon adsorption
4. Biofiltration
5. Condensation
6. Rotary Concentrator
7. Wet scrubbing
8. Low VOC materials with good operating practices

Eliminate Technically Infeasible Options

1. Thermal oxidation
   Thermal oxidizers treat VOC by oxidizing the organic compounds to CO_2 and water vapor at a high temperature. An RTO generally consists of at least two chambers packed with ceramic media. The VOC laden gas enters one hot ceramic bed where the gas is heated to the desired combustion temperature (typically 1,500°F or higher). Auxiliary fuel may be required in this stage, depending on the heating value of the inlet gas.

   The use of low VOC inks is not conducive to a high destruction / removal efficiency (DRE) and would also require substantial supplemental fuel for complete combustion, which would create higher secondary NOx and other combustion emissions. U.S. EPA guidance indicates that target outlet VOC concentrations should be in the range of 20 ppmv. Based on the exhaust analysis summarized in Section 5.2 of this RACT analysis, the inlet concentration for the proposed digital press would be approximately 23 ppmv at the PTE emission rate, or approximately equal to the target post-oxidation threshold of 20 ppmv. Given the extremely low inlet concentrations predicted for the proposed digital press exhaust, these oxidation technologies were determined to be technically infeasible.

2. Catalytic oxidation

   Like an RTO, a regenerative catalytic oxidizer (RCO) converts VOC to CO2 and water vapor. The RCO design is very similar to the RTO with the exception that catalyst is located above the ceramic media beds. The catalyst effectively lowers the activation energy required for oxidation so that the oxidation can be accomplished at a lower temperature than in an RTO (typically a pre-heat temperature around 650°F).

   The use of low VOC inks is not conducive to a high destruction / removal efficiency (DRE) and would also require substantial supplemental fuel for complete combustion, which would create higher secondary NOx and other combustion emissions. The inlet concentration for the proposed digital press would be approximately 23 ppmv at the PTE emission rate, or approximately equal to the target post-oxidation threshold of 20 ppmv. Given the extremely low inlet concentrations predicted for the proposed digital press exhaust, these oxidation technologies were determined to be technically infeasible.

3. Carbon Adsorption

   The core component of a carbon adsorption system is an activated carbon bed contained in a steel vessel. The VOC laden gas passes through the carbon bed where the VOC is adsorbed on the activated carbon. The cleaned gas is discharged to the atmosphere. The spent carbon can be regenerated on site if the adsorber is configured as a regenerative unit (typically with multiple vessels allowing one or more to be off-line for steaming / drying / cooling).

   The use of low VOC inks on the proposed digital press would generate an exhaust stream containing less than 23 ppmv VOC. Coupled with a high temperature and moisture content, the digital press exhaust gas stream would have an extremely poor adsorption capacity. Moreover, the high exhaust rate would require a very large carbon adsorber system, with an adsorption bed flow area of approximately 425 square feet. This would be equivalent to a single adsorption vessel that is more than 23 feet in diameter. These vent stream characteristics are not conducive to the use of an

adsorption technology. Therefore, carbon adsorption was eliminated as technically infeasible for the proposed digital press exhaust stream.

4. Biofiltraion

In biofiltration, off-gases containing biodegradable organic compounds are vented, under controlled temperature and humidity, through a biologically active material. The process uses a biofilm containing a population of microorganisms immobilized on a porous substrate such as peat, soil, sand, wood, compost, or numerous synthetic media. As an air stream passes through the biofilter, the biodegradable organic compounds in the air stream partition from the gaseous phase to the liquid phase of the biofilm. Once biodegradable organic compounds pass into the liquid phase, they become available for biodegradation by the microorganisms inhabiting the biofilm.

With a very low (23 ppmv) VOC concentration in the exhaust gas stream from the proposed digital press, there would be little driving force to absorb the vapor phase VOC into the water film on the biomass that is required for this technology to work properly. Accordingly, this technology was judged to be technically infeasible. Biofilters are also prone to operating upsets if any of the key parameters (i.e., temperature, moisture, nutrients, acidity, and microorganism population) needed to maintain a healthy biomass are compromised, which would be the case given the nature of the variable operation of a digital printing press.

Biofiltration has also not been demonstrated in practice for waterborne digital presses similar to the proposed press; therefore, it was eliminated as a technically infeasible control technology.

5. Condensation

Condensers operate by lowering the temperature of the exhaust gas streams containing condensable VOC to a temperature at which the target VOC's vapor pressure is lower than its entering partial pressure. This condition is commonly referred to as the saturation point. Before the VOC can condense, any sensible heat present in the exhaust gas above the saturation point must be removed. Cooling the exhaust stream to a temperature below the saturation point removes the latent heat from the exhaust and allows the VOC to condense on the surface of the condenser tubes for collection and recycle to the process or disposal to an appropriate location.

This technology is typically used when the vent stream has a relatively high concentration of condensable organics and a relatively low concentration of non-condensables (such as air). Because the digital press exhaust would have very low concentrations of the VOC components and thus high concentrations of non-condensable air, it would require reducing the gas temperature to extremely low levels to reach the dew points of the VOCs. Given the high water content, this would create a substantial freezing issue and render the technology infeasible. Even if the freeze-up problem could be resolved, an extremely large condenser consuming a tremendous amount of energy would be necessary to create enough cooling for this application. Finally, since condensers have not been demonstrated in practice for waterborne digital presses of this nature, this control technology was determined to be technically infeasible for the proposed digital press exhaust stream.

6. Rotary Concentrator

Rotary Concentrators are designed to take large volumes of air (typically 20,000 to 60,000 scfm) containing a very low concentration of volatile organic compounds (VOC's) and adsorb these organic materials onto a zeolite adsorbent material. This adsorbent material is mounted in the "rim" of a continuously rotating zeolite "wheel". The VOC laden air passes from the outside of the wheel, through the "rim" of the wheel (where the VOCs are removed onto the adsorbent), and into the interior of the wheel, from which the now cleaned air can be discharged to the atmosphere. The adsorbed VOC is then stripped with a hot air source into a much more concentrated gas stream (typically at least 10 times higher VOC concentrations) for treatment in an integral oxidizer within the system.

A zeolite wheel rotary concentrator is considered to be technologically infeasible due to the fact that that the very low concentration of VOC (23 ppmv) in the digital press exhaust would have a poor adsorption capacity. More importantly, the projected temperature of the press exhaust (approximately 200°F) is too high to allow for effective adsorption efficiency on a zeolite wheel; a maximum gas temperature of 150°F is recommended for successful application of the technology. Rotary concentrators have not been demonstrated in practice for waterborne digital presses of this nature; therefore, this control technology was deemed as technically infeasible for the proposed digital press exhaust stream.

7. Wet Scrubber

Wet scrubbing is an absorption process typically conducted with a packed column where pollutants are absorbed by a counter-current flow of scrubbing liquid. Packed-bed scrubbers consist of a chamber of variously shaped packing material that provides a large surface area for liquid-gas contact. Scrubbing liquid is evenly introduced above the packing and flows down through the bed.

The use of a packed-bed water scrubber to achieve meaningful emission reductions is problematic because of the very low VOC concentration of the digital press exhaust stream. With the total VOC concentration predicted to be approximately 23 ppmv at the PTE emission rate, there is little driving force to achieve good mass transfer rates between the exhaust gas and the scrubbing water. Scrubbing has not been demonstrated in practice at waterborne digital presses of this nature; therefore, this control technology was deemed as technically infeasible for the proposed digital press exhaust stream.

<u>Technical Feasibility Determination</u>

8. Low VOC materials with good operating practices

The proposed HP PageWide T1195 Digital Press is designed to use low VOC inks (typically below 4% by weight) and the overprint varnish applied by the press contains even less VOC. The press will be washed with an automated cleaning system using an aqueous detergent with VOC content of less than 5%. As it is has done with the existing flexographic press, the facility will implement good operating practices by properly maintaining the press and associated equipment, keeping containers that hold VOC-containing materials and shop towels with VOC-content materials on them closed when not in use, promptly cleaning up spills of VOC containing materials, and using an enclosed and automated press washer system. As such, the use of low VOC materials (less than 5% VOC

content) and good operating practices is a technically feasible VOC control technique for the digital press.

Rank Remaining Control Technologies

None of the add-on control technology options were determined to be technically feasible, primarily due to the high volume and very dilute exhaust stream that would have to be treated. The only control technology determined to be technically feasible was the use of low VOC materials with good operating practices. A 5% VOC content limit and work practices results in a 93% VOC reduction compared to a traditional solvent-based flexographic printing press which uses materials with approximately 75% VOC.

Energy, Environmental and Economic Impacts

The single control technology identified as technically feasible is the use of low VOC materials (less than 5% VOC content) and good operating practices. Since the proposed digital press is designed to use low VOC materials, the facility already employs good operating practices for minimizing VOC emissions for the existing press and plans to do so for the digital press, there are no additional energy, environmental, or economic considerations associated with the control option.

Selection of VOC RACT

The facility proposed that RACT for the digital press is the use of materials with a VOC content of less than 5% by weight and good housekeeping and operating practices.

The facility also proposed that the previously approved BACT for the Printing Plate Processor PP1 and PP2 be the RACT for these emission sources. They were required to use of a closed loop solvent distillation recovery system for both plate processors and a 10 tpy VOC limit for both plate processors.

The Division agrees with the proposed VOC RACT of use of materials with a VOC content of less than 5% by weight and good housekeeping and operating practices for the digital press. The Division also agrees with the proposed VOC RACT of use of a closed loop solvent distillation recovery system for both plate processors and a 10 tpy VOC limit for both existing plate processors.

In a conversation with the facility on December 5, 2022, the facility requested to remove the option of the 24-hour weighted average basis the VOC content of all inks and coatings. This is to simplify the records kept by the facility.

Permit Conditions

- Condition 2.1 limits the VOC emissions to less than 100 tpy which makes the facility a synthetic minor source of VOC emissions.
- Condition 2.2 subjects the facility to Georgia Rule (b).
- Condition 2.3 subjects the facility to Georgia Rule (e).
- Condition 2.4 subjects Flexographic Printing Press to Georgia Rule (mm) and states the limits for VOC emissions from equipment.

- Condition 2.5 details the option to meet the VOC emissions limits from equipment subject to Georgia Rule (mm). The option of the 24-hour weighted average is not included at the request of the facility in order to simplify the recordkeeping.
- Condition 2.6 limits the VOC emissions from Flexographic Printing Plate Processors 1 and 2 to less than 10 tpy as an approved RACT determination.
- Condition 2.7 requires the use of closed-loop solvent recovery system for the flexographic printing plate processors as an approved RACT determination.
- Condition 2.8 limits the materials used in the digital press to a VOC content of less than 5%, by weight as part of the RACT requirements.
- Condition 2.9 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 2.10 subjects the adhesive/adhesive primer Georgia Rule (yyy) and limits the VOC content to 1.0 pounds per gallon, excluding water.
- Condition 3.1 requires good housekeeping in order to minimize fugitive VOC emissions. This condition and these practices are part of the RACT assessment and requirements for the digital press. This is also the GA Rule (mm) house keeping requirements for the flexographic printing press.
- Condition 5.1 requires the facility to conduct a monthly inspection and maintain a log for records of the good housekeeping requirements.
- Condition 7.1 requires the facility to maintain usage records of materials containing VOCs.
- Conditions 7.2 and 7.3 require the facility to determine the VOC emissions for each month and each twelve-month consecutive period from the entire facility. The facility is required to notify the Division if the VOC emissions exceed 8.3 tons during any month or 100 tons during any twelve-month period.
- Conditions 7.4 and 7.5 require the facility to determine the VOC emissions for each month and each twelve-month consecutive period from Flexographic Printing Plate Processors 1 and 2. The facility is required to notify the Division if the VOC emissions exceed 0.83 tons during any month or 10 tons during any twelve-month period from Flexographic Printing Plate Processors 1 and 2.
- Condition 7.6 requires the facility to determine the VOC emissions from the digital press for compliance with the RACT requirement in Condition 2.8.
- Condition 7.7 details the requirements for the flexographic press to comply with Georgia Rule (mm).
- Condition 7.8 requires the facility to notify the Division if there are any problems with the closed-loop solvent recovery system for the flexographic plate making processors.
- Condition 7.9 requires the facility to track the adhesive/adhesive primer and the VOC content.
- Condition 8.2 requires the facility to pay annual fees.
- Condition 8.3 revokes the permit for the previous permit.

Toxic Impact Assessment

There are no increases in HAPs/TAPs due to construction and operation of the proposed digital press. However, there are HAP/TAP emissions from existing sources. The facility provided a summary of the HAP/TAP emissions. The emission rates were evaluated to the MER (minimum emission rate) located in Appendix A for the Georgia Air Toxics Guidelines. A summary of the MER for the pollutants is shown in the table below. The emission rates were below the MER; therefore, a toxic impact assessment was not necessary.

Pollutant	CAS	Emission Rate (lb/yr)	MER (lb/yr)	Modeling Required?
Acrylic Acid	79107	79.46	243.33	No

Pollutant	CAS	Emission Rate (lb/yr)	MER (lb/yr)	Modeling Required?
Dioxane (1,4-)	123911	0.02	5,310	No
Ethyl acrylate	140885	2.87	11,588.095	No
Formaldehyde	50000	0.53	267	No
Methyl methacrylate	80626	2.87	170,331	No
Styrene	100425	104.49	243,330	No
Triethylamine	121448	0.34	1,703.31	No

Summary & Recommendations

I recommend issuance of Permit No. 2679-097-0089-S-03-0 to WestRock Lithia Springs for the operation of a printing facility, construction and operation of a new digital press and a change in operating status from a Title V major source to a synthetic minor source. A public advisory was issued and expired on June 10, 2022.