

## AIR QUALITY PERMIT

**Permit No.**  
**2679-097-0089-P-01-0**

**Effective Date**  
**October 6, 2016**

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: **WestRock CP, LLC – Lithia Springs**

Mailing Address: 3950 Shackleford Road  
Duluth, Georgia 30096

is issued a Permit for the following:

Construction and operation of a flexographic printing facility including a flexographic printing press and a flexographic printing plate processor.

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

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 23884 dated June 30, 2016; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **8** pages.

[Signed]  
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Director  
Environmental Protection Division

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**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the flexographic printing press, volatile organic compound (VOC) emissions in amount equal to or exceeding 34.8 tons during any consecutive 12-month period. This limit applies at all times.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

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- 2.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the flexographic printing plate processor, volatile organic compound (VOC) emissions in amount equal to or exceeding 3.66 tons during any consecutive 12-month period. This limit applies at all times.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 2.3 The Permittee shall use inks and coatings in flexographic printing operations with VOC content, as applied, equal to or less than 5 percent, by weight, of the coating or ink averaged on a 24-hour weighted for all inks and coatings. This limit applies at all times.  
[40 CFR 51.165, 391-3-1-.03(8)c, 391-3-1-.02(2)(mm)subsumed]
- 2.4 The Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.  
[391-3-1-.02(2)(b)]
- 2.5 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matters (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)]
- a.  $E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour;
- b.  $E = 55P^{0.11} - 40$ , for process input weight rate in excess of 30 tons per hour.
- 2.6 The Permittee shall ensure that any storage tank with a capacity greater than 4,000 gallons, that contains a volatile organic liquid be equipped with submerged fill pipes.  
[391-3-1-.02(2)(vv)]

**3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

**4. Process & Control Equipment**

- 4.1 The Permittee shall not operate the flexographic plate making processor without being equipped with a closed-loop solvent recovery system.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

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**5. Monitoring**

- 5.1 The Permittee shall comply with the following housekeeping requirements for any VOC handling operations:
- a. store all VOC-containing materials and used shop towels containing VOC-content cleaner in closed containers;
  - b. ensure that storage containers use for VOC-containing cleaning materials are kept closed at all times except when depositing or removing materials;
  - c. minimize spills of VOC-containing materials;
  - d. convey VOC-containing materials from one location to another in closed containers or pipes;
  - e. 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.

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

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**7. Notification, Reporting and Record Keeping Requirements**

- 7.1 The Permittee shall maintain monthly usage records of all VOC containing materials used at the entire facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the volatile content of waste materials from the VOC emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the VOC content of the containerized waste material, and documentation of the method for determining the VOC content of the waste material. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.2 The Permittee shall use the records required in Condition No. 7.1 to calculate combined total monthly VOC emissions from the flexographic printing press. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in Condition No. 7.1. The Permittee shall notify the Division in writing if the combined total monthly VOC emissions from the flexographic printing press exceed 2.9 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.3 The Permittee shall use the monthly VOC emission data required in Condition 7.2 to calculate the combined 12-month rolling total of VOC emissions from the flexographic printing press for each calendar month. The Permittee shall notify the Division in writing if the combined 12-month rolling total of VOC emissions from the flexographic printing press equals or exceeds 34.8 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition No. 2.1.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.4 The Permittee shall use the records required in Condition No. 7.1 to calculate combined total monthly VOC emissions from the flexographic plate processor. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in Condition No. 7.1. The Permittee shall notify the Division in writing if the combined total monthly VOC emissions from the flexographic plate processor exceed 0.31 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

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7.5 The Permittee shall use the monthly VOC emission data required in Condition 7.4 to calculate the combined 12-month rolling total of VOC emissions from the flexographic plate processor for each calendar month. The Permittee shall notify the Division in writing if the combined 12-month rolling total of VOC emissions from the flexographic plate processor equals or exceeds 3.66 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition No. 2.2.

[40 CFR 51.165 and 391-3-1-.03(8)c]

7.6 The Permittee shall use the following records and calculation methods to demonstrate compliance with the VOC emission limit in Condition 2.3. All calculations used to determine compliance with Condition 2.3 shall be kept as part of the record.

[391-3-1-.02(2)(mm), PTM 2.45 & 391-3-1-.02(6)(b)1. 40 CFR 51.165 and 391-3-1-.03(8)c]

a. Maintain a daily record of the following information/data for the specific painting/coating line:

(i) The total quantity of each coating or ink used each day in units of pounds (lbs), as applied.

(ii) The weight fraction of VOC in each coating or ink, as applied.

b. Calculate the mass-weighted 24-hour average of VOC content of all the inks and coatings applied on the specific printing/coating line. Calculations shall use the procedures specified in PTM Section 2.45.3(c)(1) and Equation 7.6:

$$VOC_{(i)(C)} = \sum_{i=1}^n [(L_i)(W_{VOCi})] \quad \text{Equation 7.6}$$

Where:

$VOC_{(i)(C)}$  = The weighted 24-hour average VOC content in units of pounds of VOC per pound of coating and ink solids, used each day on the printing/coating line.

$i$  = Subscript denoting a specific coating or ink, as applied.

$n$  = The number of different coatings and/or inks, as applied, used each day on the printing/coating line.

$L_i$  = The total quantity of each coating or ink in units of pounds (lbs), as applied, used each day on the printing/coating line.

$W_{VOCi}$  = The weight/mass fraction of VOC in each coating or ink, as applied.

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- 7.7 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 7.8 or 7.9. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.
- 7.8 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:  
[391-3-1-.02(6)(b)1]
- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
  - b. Total process operating time during each reporting period.
  - c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
  - d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
  - e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
  - f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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7.9 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 7.8, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1, 40 CFR 51.165 and 391-3-1-.03(8)c]

- a. Excess emissions: (means for the purpose of this Condition and Condition 7.8, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - i. None required to be reported in accordance with Condition 7.8.
- b. Exceedances: (means for the purpose of this Condition and Condition 7.8, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any 12-month rolling total of VOC emissions from the flexographic printing press, which equals or exceeds 34.8 tons.
  - ii. Any 12-month rolling total of VOC emissions from flexographic plate processor, which equals or exceeds 3.66 tons.
  - iii. Any VOC content of ink or coating, as applied, on the flexographic printing lines which exceeds 5 percent by weight of the volatile content of the coating or ink on a 24-hour average;
- c. Excursions: (means for the purpose of this Condition and Condition 7.8, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
  - i. None required to be reported in accordance with Condition 7.8.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 7.8:
  - i. Any failure to comply with the provisions of Condition 5.1, as detected by the inspection requirements of Condition 7.11.
  - ii. Any instance that the flexographic plate making equipment is not equipped with a solvent recovery system as required in Condition 4.1



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- 7.10 The Permittee shall submit written notification to the Division of the actual date of initial startup of each piece of equipment, the flexographic printing press and the flexographic plate processor. This notification shall be postmarked within 15 days of the initial startup date.
- 7.11 The Permittee shall conduct a monthly inspection to assess compliance with Condition 5.1. The Permittee shall maintain an inspection log recorded in a permanent form suitable for inspection and submission to the Division.  
[391-3-1-.02(6)(b)1 and 391-3-1-.03(8)c]

**8. Special Conditions**

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."
- 8.3 The Permittee shall within 12 months of startup of the facility, as detailed in the notification required in Condition 7.10, submit a Title V Operating Permit Application.