

**Statement of Basis  
WestRock Mahrt Mill  
Facility No. 211-0004  
Significant Title V Mod**

**Introduction**

The Department electronically received an application on May 29, 2025, from WestRock Mahrt Mill (WRM or the Mill) for a proposal to modify their Title V Major Source Operating Permit to change the total reduced sulfur (TRS) monitoring parameter from pH to scrubber liquid makeup flow. Monitoring the scrubber liquid makeup flow is more responsive to process control and would indicate TRS emission control. Additionally, the Mill requested the averaging time be established as 12-hour blocks instead of 3-hour blocks to match the averaging period of the TRS emission standards for recovery furnaces and lime kilns under ADEM Admin. Code 335-3-5-.04 (7) and 40 CFR Part 60 Subpart BB. The 12-hour block average is justifiable as the monitoring requirement for 40 CFR Part 60 Subpart BB specifies scrubber parameters be recorded "once per shift." Though not specifically defined, a shift is assumed to represent 12 hours as evidenced by the updated 40 CFR Part 60 Subpart BBa requirement to record and calculate 12-hour block averages for the scrubber parameters.

The Mill has proposed the following revisions and conditions to the Title V permit:

**No. 1 Smelt Dissolving Tank**

- Emission Monitoring Proviso 3 (State Only) – update language to specify 12-hour block average scrubber liquid makeup flow rate be monitored instead of 3-hour block average pH.
- Recordkeeping and Reporting Proviso 2 (State Only) – specify all 12-hour block average scrubber liquid makeup flow rates be recorded instead of all 3-hour block average pHs.

**No. 2 Smelt Dissolving Tank**

- Emission Monitoring Proviso 5 – update language to specify 12-hour block average scrubber liquid makeup flow rate be monitored instead of 3-hour block average pH.
- Recordkeeping and Reporting Proviso 4 – specify all 12-hour block average scrubber liquid makeup flow rates be recorded instead of all 3-hour block average pHs.

**Title V Modification**

The proposed changes should be classified as a significant modification to the Title V permit. A 30-day public comment period and a 45-day EPA comment period would be required. The modifications would be incorporated into the Title V permit upon completion of the EPA review.

**Recommendations**

I recommend that WestRock Mahrt Mill's Title V permit be modified to incorporate the changes mentioned above.



Steven Bissey  
Industrial Chemicals Section  
Chemical Branch

June 11, 2025

Date