

ZD  
9/13/22



701 Manufacturer's Road  
Chattanooga, TN 37405

office: 423-266-7381  
www.westrock.com

*JA*

September 9, 2022

Mr. Alan Frazier  
Chattanooga-Hamilton County Air Pollution Control Bureau  
6125 Preservation Drive  
Chattanooga, TN 37416-3638

Re: Title V Part 70 Permit # 47-065-3455 Renewal Application

Dear Alan,

Per your guidance find the renewal application forms for the permit referenced above. Please contact me at (423) 702-2119 or [gary.j.brown@westrock.com](mailto:gary.j.brown@westrock.com) if you need additional information.

Sincerely,

Gary Brown  
Technical Director  
WestRock Chattanooga Mill

Attachments: Part 70 Permit Application Update  
Form 70-01  
Form 70-31  
Permit Certification of Source Identification

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**PART 70 PERMIT APPLICATION UPDATE**

*JA*

1. WestRock Converting, LLC hereby resubmits all of the information in our current Part 70 operating permit application that is presently on file at the Chattanooga-Hamilton County Air Pollution Control Bureau (the Bureau) except as changed by the attached Part 70 permit application forms, along with all previously submitted applications for permit modifications currently on file at the Bureau, as the renewal application for the WestRock Chattanooga mill.

2. The permittee name that is currently on file with the Tennessee Secretary of State Business Services Division is WestRock Converting, LLC.

3. Responsible Official (check one)

The responsible official or officials are:

as shown on the present Part 70 permit.

changed for the renewal. Provide the name and title of each responsible official:

Name: Title:

Name: Title:

4. Compliance Assurance Monitoring Rule (check one)

The Compliance Assurance Monitoring Rule (40 CFR Part 64) does not apply to this facility.

The Compliance Assurance Monitoring Rule (40 CFR Part 64) will apply to this facility upon renewal. If so, attach new compliance demonstration Part 70 permit application forms documenting the requirements of 40 CFR Part 64.4. A new Form 70-19 is required. If monitoring compliance using control system parameters Form 70-22 is required. Depending on the monitoring strategy proposed, Form 70-20, 70-21, 70-23, 70-25, and/or 70-27 may also be required.

5. The following additional applicable requirements should be added to our renewal Part 70 permit. Attach Form 70-30 showing all current applicable requirements if there are any changes in the applicable requirements.

a.

b.

c.

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6. The following applicable requirements no longer apply and should be deleted from our renewal Part 70 permit:
- a.
  - b.
  - c.
7. The facility emissions summary is as shown below (If the emissions summary from the facility has changed, complete Form 70-29.)

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
SOx	556.87	556.87
NOx	N/A	163
CO	N/A	75.53
VOCs	N/A	54.95
PM	118.61	50.39
HAPs	N/A	24.89
GHGs (as CO <sub>2</sub> equivalents)	N/A	120,269.1

8. Insignificant activities listed in our initial Part 70 operating permit application pursuant to Section 4-56 (c)(12) have changed as listed below. If there are any changes to the insignificant activities attach a completed Form 70-02 listing the current insignificant activities.

Insignificant Activity	Add	Delete

9. The following operational flexibility notification(s) previously sent to the Bureau and to U.S. EPA Region 4 should be incorporated into the Part 70 permit. Attach the Part 70 permit application forms documenting any equipment replaced, or added, using operational flexibility provisions. (Forms 70-03 through 70-18 as appropriate.)

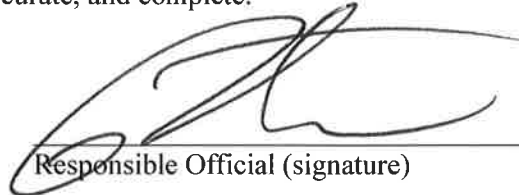
Description	Date Submitted

10. Attach a completed Form 70-01 with "Permit renewal to operate" checked and a completed Form 70-31.

Except as noted on the attached Compliance Plan and Compliance Certification (Form 70-31), I certify that this permittee has been in compliance with all applicable requirements contained in our existing Part 70 permit, will continue to comply with all applicable requirements, and will be in compliance with future applicable requirements to be added to the renewal Part 70 permit by the specified compliance date.

Based on information and belief formed after reasonable inquiry, the statements and information in this renewal application are true, accurate, and complete.

9/7/22  
Date

  
Responsible Official (signature)

Title: Regional General Manager

Company: WestRock Converting, LLC

Address: 701 Manufacturers Road

Chattanooga, TN 37405

-----  
**State of Tennessee, County of Hamilton**

Sworn to and subscribed before me this 9<sup>th</sup> day of September 2022

Notary Public Linda M. Greywitt

My commission expires: 09-09-2025



**Major Source Operating Permit Application**

**Form 70-01**

**Facility Identification**

1	Facility Name	Sonoco Products Company		For APCB use only	Company No.
	Owner's Name if different from the facility name:	Sonoco Products Company			
	Mailing Address:	701 Manufacturers Road			
	City, State, Zip Code	Chattanooga, TN 37405			
2	Facility Location (St/Rd/Hwy)	701 Manufacturers Road			
	County Name	Hamilton			
	City, State, Zip Code	Chattanooga, TN 37405			
	Telephone # (including area code)	(423) 265-8937			
3	Facility's Primary Activity and all Applicable SIC Codes:	Recycled Paperboard Production; SIC Code; 2631			
4	Contact Person for this Facility	James Haun			
	Title	Plant Manager			
	Telephone # (including area code)	(423) 265-8937			
5	If Facility is located in an area designated as "Nonattainment", indicate the pollutant(s) for the designation.	Not Applicable			
6	List all air pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)]	Part 70 Permit No: 47-065-3455 Emission Units: 001, 002, 003			
7	Permit Requested for:	<input type="checkbox"/> Initial Application to Operate <input type="checkbox"/> Relocation to operate		<input type="checkbox"/> Permit renewal to operate	
		<input type="checkbox"/> Modification <input type="checkbox"/> Revision (Administrative Amendments)			
8	Owner's registered agent's name	Sonoco Products Company			
	Registered agent's address for service of process	1 North 2 <sup>nd</sup> Street, Hartsville, SC 29550 Attention Michael Steele, Mail Code P20			
	Telephone # (including area code)	(843) 383-3383			
9	Is this facility subject to the provisions governing prevention of accidental releases of Hazardous air contaminants contained in Section 112(r)(7) of the Clean Air Act?			<input type="checkbox"/> Yes <input type="checkbox"/> No	
	If yes, are you in compliance with the provisions of Section 112(r)(7) of the Clean Air Act?			<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Page Number	Revision Number	Date of Revision		

Chattanooga-Hamilton County Air Pollution Control Bureau  
6125 Preservation Drive  
Chattanooga, TN 37416

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**SEP 12 2023**

**CHATTANOOGA-HAMILTON  
COUNTY AIR POLLUTION  
CONTROL BUREAU**

Facility Identification

1	Facility Name	WestRock Converting, LLC		For APCB use only	Company No.
	Owner's Name if different from the facility name:	WestRock Company			
	Mailing Address:	701 Manufacturers Road			
	City, State, Zip Code	Chattanooga, TN 37405			
2	Facility Location (St/Rd/Hwy)	701 Manufacturers Road			
	County Name	Hamilton			
	City, State, Zip Code	Chattanooga, TN 37405			
	Telephone # (including area code)	(423) 266-7381			
3	Facility's Primary Activity and all Applicable SIC Codes:	Recycled Paperboard Production; SIC Code: 2631			
4	Contact Person for this Facility	Patrick Cowan			
	Title	Regional General Manager			
	Telephone # (including area code)	(423) 266-7381			
5	If Facility is located in an area designated as "Nonattainment", indicate the pollutant(s) for the designation.	Not Applicable			
6	List all air pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)]	Part 70 Permit No: 47-065-3455			
		Emission Units: 001, 002, 003			
7	Permit Requested for:	<input type="checkbox"/> Initial Application to Operate	<input type="checkbox"/> Relocation to operate		
		<input type="checkbox"/> Modification	<input checked="" type="checkbox"/> Permit renewal to operate		
		<input type="checkbox"/> Revision (Administrative Amendments)			
8	Owner's registered agent's name	WestRock Company			
	Registered agent's address for service of process	1000 Abernathy Road NE, Suite 125, Atlanta, GA 30328			
	Telephone # (including area code)	(770) 448-2193			
9	Is this facility subject to the provisions governing prevention of accidental releases of Hazardous air contaminants contained in Section 112(r)(7) of the Clean Air Act?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	If yes, are you in compliance with the provisions of Section 112(r)(7) of the Clean Air Act?	<input type="checkbox"/> Yes <input type="checkbox"/> No			
10	Page Number	Revision Number	Date of Revision		

Chattanooga-Hamilton County Air Pollution Control Bureau  
6125 Preservation Drive  
Chattanooga, TN 37416

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SEP 13 2022

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701 Manufacturer's Road  
Chattanooga, TN 37405

office: 423-266-7381  
www.westrock.com

**PART 70 PERMIT CERTIFICATION OF SOURCE IDENTIFICATION**

**WESTROCK CONVERTING COMPANY**  
PERMIT NUMBER 47-065-3455

Emission Unit No.	Equipment
001	Babcock & Wilcox Boilers #1 and #2
002	Process Chemical Usage
003	Paperboard Trim Conveying System

I certify that equipment listed in the table above does correspond to the proper Emission Unit No. as listed in Part 70 Permit Number 47-065-3455.

I further certify that the equipment is currently in compliance with all the "Conditions of General Applicability" and "Conditions Applicable to the Entire Facility" and with each Emission Unit Special Condition in Part 70 Permit Number 47-065-3455, according to the methods specified therein for determining compliance status.

I have reviewed this document and do make oath to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Signed: 

Date: 9/9/22

Patrick Cowan, Regional General Manager  
WestRock Converting, LLC - Chattanooga Mill  
701 Manufacturer's Road  
Chattanooga, TN 37405

**Notary**

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State: Tennessee

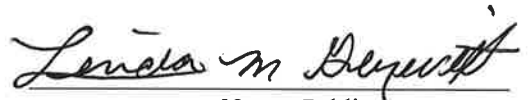
SEP 13 2022

County: Hamilton

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Personally appeared before me, Patrick Cowan, and who acknowledged that he/she executed the within instrument for the purpose therein contained.

Witnessed my hand, at office, this 9<sup>th</sup> day of September, 2022.

  
Notary Public

My commission expires: 09-09-2025







*Jan*

August 10, 2023

VIA OVERNIGHT MAIL

Chattanooga-Hamilton County Air Pollution Control Board  
6125 Preservation Drive, Suite 102  
Chattanooga, TN 37416-3740

Re: Transfer of: Part 70 Permit No. 47-065-3455  
Facility: Chattanooga Paper Mill  
Transferor: WestRock Converting, LLC  
Transferee: Sonoco Products Company

Dear Mr. Alan Frazier,

The Chattanooga-Hamilton County Air Pollution Control Board ("Board") has issued the above-referenced air operating permit ("Air Permit") to the pulp and paper mill located at 701 Manufacturer's Road, Chattanooga, Tennessee ("Mill"), which is currently owned and operated by WestRock Converting, LLC ("WestRock"). On November 9, 2022, WestRock entered into a definitive agreement to sell the Mill and certain other assets to Sonoco Products Company ("Sonoco"). Pursuant to this agreement, WestRock has agreed to transfer all ownership, rights, and interests in the Air Permit to Sonoco at closing, and Sonoco has agreed to assume the responsibility, coverage, and liability for the Air Permit as of the closing. We currently anticipate that sale from WestRock to Sonoco will close in the third quarter of 2023 with an expected date of closing being September 8, 2023.

Following the closing, Sonoco intends to run the Mill's paperboard manufacturing process in substantially the same manner as it operates today. Additionally, the Responsible Official for the Mill, Patrick Cowan, will not change with the sale.

If you have any questions about this request, please contact me or Michael Steele at (843) 383-3383 or michael.steele@sonoco.com. Thank you for your cooperation in this matter.

Sincerely,

Edward Harrington  
Director – Sonoco Global Environmental Services  
843-339-6333

cc: Nina Butler – WestRock Converting, LLC

See replacement letter dated 8/21/23.

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AUG 14 2023

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August 21, 2023

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AUG 23 2023

AIR POLLUTION  
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RECEIVED AUG 23 2023

VIA OVERNIGHT MAIL

Chattanooga-Hamilton County Air Pollution Control Board  
6125 Preservation Drive, Suite 102  
Chattanooga, TN 37416-3740

AIR POLLUTION  
CONTROL BUREAU

AUG 23 2023

RECEIVED  
CHATT / HAMILTON CO.

Re: Transfer of: Part 70 Permit No. 47-065-3455  
Facility: Chattanooga Paper Mill  
Transferor: WestRock Converting, LLC  
Transferee: Sonoco Products Company

Dear Mr. Alan Frazier,

This letter is a follow up notification from one previously submitted that is dated August 10, 2023. The current Responsible Official (Patrick Cowan) was expected to stay at the Chattanooga facility after the transfer however he will now be staying with WestRock. The new Responsible Official after the transfer will be James Haun.

The Chattanooga-Hamilton County Air Pollution Control Board ("Board") has issued the above-referenced air operating permit ("Air Permit") to the pulp and paper mill located at 701 Manufacturer's Road, Chattanooga, Tennessee ("Mill"), which is currently owned and operated by WestRock Converting, LLC ("WestRock"). On November 9, 2022, WestRock entered into a definitive agreement to sell the Mill and certain other assets to Sonoco Products Company ("Sonoco"). Pursuant to this agreement, WestRock has agreed to transfer all ownership, rights, and interests in the Air Permit to Sonoco at closing, and Sonoco has agreed to assume the responsibility, coverage, and liability for the Air Permit as of the closing. We currently anticipate that sale from WestRock to Sonoco will close in the third quarter of 2023 with an expected date of closing being September 8, 2023.

Following the closing, Sonoco intends to run the Mill's paperboard manufacturing process in substantially the same manner as it operates today. The Responsible Official for the Mill will be James Haun.

If you have any questions about this request, please contact me or Michael Steele at (843) 383-3383 or michael.steele@sonoco.com. Thank you for your cooperation in this matter.

Sincerely,

Ed Harrington  
Director – Sonoco Global Environmental Services

Cc: Nina E. Butler  
VP, Chief Environmental Officer & Deputy General Counsel



**Tre Hargett**  
Secretary of State

**Division of Business Services**  
**Department of State**  
State of Tennessee  
312 Rosa L. Parks AVE, 6th FL  
Nashville, TN 37243-1102

### Filing Information

Name: **SONOCO PRODUCTS COMPANY**

#### General Information

**SOS Control #** 000041496  
**Filing Type:** For-profit Corporation - Foreign  
**Status:** Active  
**Duration Term:** Perpetual  
**Formation Locale:** SOUTH CAROLINA  
**Date Formed:** 04/06/1965  
**Fiscal Year Close** 12

**Registered Agent Address**  
UNITED AGENT GROUP INC.  
205 POWELL PL  
BRENTWOOD, TN 37027-7522

**Principal Address**  
CORP TAX DEPT MS B04  
1 N 2ND ST  
HARTSVILLE, SC 29550-3300

The following document(s) was/were filed in this office on the date(s) indicated below:

Date Filed	Filing Description	Image #
03/02/2023	2022 Annual Report	B1348-3373
03/07/2022	2021 Annual Report	B1174-4686
03/23/2021	2020 Annual Report	B1004-1412
03/25/2020	2019 Annual Report	B0845-6012
01/25/2019	2018 Annual Report	B0643-7120
12/22/2017	2017 Annual Report	B0468-8703
	Principal Address 3 Changed From: CORP TAX DEPT. - MS: B04 To: CORP TAX DEPT MS B04	
06/26/2017	Registered Agent Change (by Entity)	B0412-0951
	Registered Agent Organization Name Changed From: C T CORPORATION SYSTEM To: UNITED AGENT GROUP INC.	
	Registered Agent Physical Address 1 Changed From: 800 S GAY ST To: 205 POWELL PL	
	Registered Agent Physical Address 2 Changed From: STE 2021 To: No Value	
	Registered Agent Physical City Changed From: KNOXVILLE To: BRENTWOOD	
	Registered Agent Physical County Changed From: KNOX COUNTY To: WILLIAMSON COUNTY	
	Registered Agent Physical Postal Code Changed From: 37929-9710 To: 37027-7522	
12/21/2016	2016 Annual Report	B0322-9545
	Principal Address 1 Changed From: 1 N 2ND ST # MS-B04 To: 1 N 2ND ST	
	Principal Address 3 Changed From: No value To: CORP TAX DEPT. - MS: B04	