600 Thilmany Road Kaukauna, WI 54130

Mark Nessmann
Environmental Manager
P 920-766-8235
Mark.Nessmann@experaspecialty.com

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July 29, 2015

Ms. Michelle Farley
Air Engineer
Department of Natural Resources
2984 Shawano Avenue
Green Bay, Wisconsin 54313-6727

Mr. Manoj Patel
Environmental Engineer
Air Enforcement and Compliance Assurance Branch (MI/WI)
US Environmental Protection Agency
Air and Radiation Division, Region 5
77 W. Jackson Blvd. AE-17J
Chicago, IL. 60604

1st half 2015

RE: Pulp and Paper MACT I and II ~~2nd Half 2014~~ Excess Emissions/CMS Performance and Periodic SSM Reports for Expera Specialty Solutions Thilmany Mill

Dear Michelle and Manoj:

Expera Specialty Solutions Thilmany Mill is an affected source under 40 CFR Part 63 Subpart S and MM and is subject to the requirements in NR 464 as well as the MACT General Provisions as outlined in NR 460. The compliance dates were April 16, 2002 for MACT I and April 16, 2004 for MACT II. On April 17, 2006, the mill also became subject to MACT I Phase II requirements (NR 464).

This combined semi-annual report meets the requirement for submitting an Excess Emissions & CMS Performance Report and Periodic SSM Reports pursuant to NR 460.09(5)(c) and NR 460.09(4)(e) as well as 40 CFR 63.10(d)(5); 40 CFR 63.10(e)(3); and 40 CFR 63.867(c) for the reporting period January 1- June 30, 2015. The report encompasses the condensate collection system, the condensate treatment system, the NCG LVHC collection and incineration system, the Nos. 8 and 10 Recovery Boilers, the Nos. 8 and 10 Smelt Dissolving Tanks, and the Lime Kiln.

For the 1st half 2015 the condensate collection ranged from 14.24 to 15.88 lbs. MeOH/ODTP on a 15 day rolling average basis with an average of 14.77. The minimum collection required is 11.0 lbs. MeOH/ODTP.

Listed below is an outline of the separate reports appended:

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8/4/15

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MACT I Condensate Collection and Treatment System

I. Monthly Optiquest Model Validation Sampling Results

II. Methanol Treatment Results for the days that Optiquest Model Failed

III MACT I - Condensate Collection and Treatment System and NCG LVHC Collection and Incineration System

a. Title Page
b. CMS List
c. Excess Emissions Summary Report
d. CMS Performance Summary Report

IV. MACT II – Nos. 8 and 10 Recovery Boilers , Nos. 8 and 10 Smelt Dissolving Tanks, Lime Kiln

a. Title Page
b. CMS List

Lime Kiln

c. Excess Emissions- CMS Performance Summary Report
d. Excess Emissions- CMS Performance Detail Report
e. CMS Performance Summary Report
f. CMS Performance Detail Report

8 and 10 Recovery Boilers

g. Opacity Excess Emissions – CMS Performance Summary Report
h. Opacity Excess Emissions—CMS Performance Detail Report
i. CMS Performance Summary Report
j. CMS Performance Detail Report

8 and 10 Recovery Boiler Bypass Stack

k. Excess Emissions-CMS Performance Summary Report
l. Excess Emissions-CMS Performance Detail Report

8 Smelt Dissolving Tank

m. Excess Emissions-CMS Performance Summary Report
n. Excess Emissions-CMS Performance Detail Report
o. CMS Performance Summary Report
p. CMS Performance Detail Report

10 Smelt Dissolving Tank

q. Excess Emissions-CMS Performance Summary Report

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r. **Excess Emissions-CMS Performance Detail Report**
s. **CMS Performance Summary Report**
t. **CMS Performance Detail Report**

8 and 10 Smelt Dissolving Tank Bypass Stacks
u. **Excess Emissions and CMS Performance Summary Report**

If you have any questions concerning the information on these reports, please contact me at (920) 766-8235.

Sincerely,

Mark Nessmann
Environmental Manager

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ATTACHMENT I

Monthly Optiquest Model Validation Sampling Results

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Monthly Summary of Methanol Analysis and Calculation of #MeOH / ODTP

MONTHLY QA SAMPLING PROGRAM

1st Half 2015

Collection

Date -- >		Jan	Feb	Mar	Apr	May	June
		1/5/2015	2/2/2015	3/2/2015	4/6/2015	5/6/2015	6/3/2015
		1/5/2015 6:00	2/2/2015 6:00	3/2/2015 6:00	4/6/2015 6:00	5/6/2015 6:00	6/3/2015 6:00
		1/6/2015 6:00	2/3/2015 6:00	3/3/2015 6:00	4/7/2015 6:00	5/7/2015 6:00	6/4/2015 6:00
Methanol concentration in condensate (mg/L)		2850	2070	2630	2940	2480	2640
Gallons of condensate /day	193	268,336	270,682	256,773	241,756	248,700	272,615
O.D. Tons Pulp Produced (proficy)	2643	442	398	454	387	524	458
# MeOH / ODTP		**14.43**	**11.74**	**12.41**	**15.34**	**9.83**	**13.12**

Treatment

Lagoon outlet (mg/L)		68	90	88	50.4	65.7	60.9
UNOX outlet (mg/L)		0.15	0.15	0.15	0.15	0.15	0.15
Optiquest prediction		no test req'd	no test req'd	no test req'd	no test req'd	no test req'd	no test req'd
F_{bio} MeOH Removal Eff.- Mass Balance		99.6%	99.5%	99.6%	99.5%	99.5%	99.6%
F_{bio} MeOH Removal Appendix C calculations		99.6%	99.5%	99.6%	99.5%	99.5%	99.6%
r = ratio of minor HAPS		1.06%	1.06%	1.06%	1.06%	1.06%	1.06%
R = HAP removal eff.(%)		**98.5%**	**98.4%**	**98.4%**	**98.4%**	**98.4%**	**98.4%**
Methanol Removal (#/ODTP)		**14.36**	**11.66**	**12.34**	**15.26**	**9.77**	**13.05**

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ATTACHMENT II

Methanol Treatment Results for the days that Optiquest Model Failed

No Failures during 2nd Half 2014

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ATTACHMENT III

Condensate Collection and Treatment System and NCG LVHC Collection and Incineration System

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COMPLIANCE REPORT

for meeting reporting requirements in 40 CFR 63.10(d)(5), 63.10(e)(3) and applicable standard

General Information

Facility Identification Name:	Expera Specialty Solutions-Thilmany Mill
Address:	600 Thilmany Road
City:	Kaukauna State: Wisconsin Zip: 54130
End of Reporting Period	6/30/2015
Relevant standard that is the basis for this report	Pulp and Paper Industry NESHAP - Subpart S, §63.440-- NR 464
Process units covered by this report	- NCG LVHC Collection and Incineration System - Condensate Collection - Condensate Treatment
Reports submitted for each process unit	- SUMMARY REPORT - Excess Emission [§63.10(e)(3)(vi), §63.10(d)(5)(i)] - SUMMARY REPORT - CMS Performance [§63.10(e)(3)(vi), §63.10(d)(5)(i)] - DETAIL REPORT - Excess Emission [Submitted if total excess emissions >1%, §63.10(e)(3)(v), §63.10(e)(3)(viii)] - DETAIL REPORT - CMS Performance [Submitted if total CMS downtime >5%, §63.10(e)(3)(v), §63.10(e)(3)(viii)] - STARTUP, SHUTDOWN & MALFUNCTION REPORT - Excess Emission [§63.10(d)(5)(i)] - STARTUP, SHUTDOWN & MALFUNCTION REPORT - CMS Performance [§63.10(d)(5)(i)]

Were any changes made to the SSM plan since the last reporting period? §63.6(e)(3)(viii)

No [X] Yes [ ] If yes, superceded versions are maintained on site in accordance with 40 CFR 63.6(e)(3)(v).

Were there any changes in CMS, processes, or controls since the last reporting period? §63.10(e)(3)(vi)(K)

No [X] Yes [ ] If yes, describe below or a separate page.

Were all applicable procedures described in Subpart S performed for this reporting period? §63.453(o)

No [ ] Yes [X] If no, describe below or a separate page.

Notes/Comments:

Certification

Based on information and belief formed after reasonable inquiry, I certify, to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

Name - Mark Nessmann

Title - Environmental Manager

Signature Mark Nessmann

Report Date 7/29/15

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Continuous Monitoring System Equipment List

Report Run Date

7/29/2015 13:57

End Of Reporting Period: 6/30/2015

Relevant standard that is the basis for this report: Pulp and Paper Industry NESHAP - Subpart S, §63.440 --- NR 464

Emission Point	Monitoring Equipment	CMS Manufacturer	CMS Model No.	Date of Latest Certification or Audit
Condensate Collection and Treatment	Condensate Flow Meter	Foxboro	IMT-25	July 30, 2014
	Digester Cook Counter (0-32000)	OSi Software		June 21, 2015
	MeOH Analyzing Equipment 0.3-10,000 ppm	Multiple		June 3, 2015
	Optiquest MeOH Treatment Predictive Model	Optiquest Technologies		June 3, 2015

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SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill

Condensate Collection

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/28/2015 9:41 AM

Hazardous Air Pollutants (HAPS) Monitored:	Methanol as a surrogate for total HAPs [Subpart S, §63.457(g)].
Brief description of process unit:	Condensates are collected from the Blow Heat Condenser, A6 and B6 liquor Evaporator feed effects and the Accumulator to meet the mass collection requirement.

Emission Data Summary

Emission Point:	Condensate Collection
Source Operating Time:	176.9 Days
Operating Parameter:	lbs MEOH/ODTP
Averaging Period:	15-Day Avg
Parameter Limit:	11.00 lb/ODTP

Duration of Excess Emissions In Reporting Period Due To:	Duration Days	Count No.
a. Startup/Shutdown	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0
c. Process Problems-Malfunction	0.0	0
d. Other Known Causes	0.0	0
e. Other Unknown Causes	0.0	0
Total Other excess emissions	0.0	0
[(Total Other excess emissions)/(Total source operating time)]X100 (%)	0.00%	
Total duration of excess emissions	0.0	0
[(Total duration of excess emissions)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total duration of excess emissions)/(Total source operating time)] X 100 (%)": Total excess emissions of 1% or greater for the reporting period, requires submittal of the Emission Data Detail for SSM Events and Other Events in accordance with 40 CFR 63.10(e)(3)(viii).

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SUMMARY REPORT - Continuous Monitoring System Performance

Condensate Collection

Thilmany Mill

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date: 7/28/2015 9:41 AM

CMS Performance Summary		
Emission Point:	Condensate Collection	
Source Operating Time:	176.9 Days	
Monitoring Equipment:	Pulp production (ODTP) and Condensate Flow	
CMS Downtime In Reporting Period Due To:	Duration	Count
	Days	No.
a. Monitor Equipment Malfunctions	0.0	0
b. Non-Monitor Equipment Malfunctions	0.0	0
c. Quality Assurance/Quality Control Calibrations	0.0	0
d. Other Known Causes	0.0	0
e. Other Unknown Causes	0.0	0
Total CMS downtime	0.0	0
[(Total CMS downtime)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Monitor Equipment Malfunctions, Non-Monitor Equipment Malfunctions, and Quality Assurance/Quality Control Calibrations": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total CMS downtime)/(Total source operating time)] X 100 (%)": Total CMS downtime of 5% or greater for the reporting period, requires submittal of the CMS Performance Detail for SSM Events and Other Events in accordance with 40 CFR 63.10(e)(3)(viii).

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SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Condensate Treatment

Thilmany Mill

Report Run Date 7/28/2015 9:41 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Hazardous Air Pollutants (HAPS) Monitored:	Methanol, methyl ethyl ketone, acetaldehyde, and proprionaldehyde as a surrogate for total HAPs for open biological treatment [Subpart S, §63.4579(g)].
Brief description of process unit:	Pulp mill process foul condensates are 'hard-piped' to the UNOX pure oxygen activated sludge secondary treatment system. Treatment is verified daily using the Optiquest model or sample analysis.

Emission Data Summary		
Emission Point:	Condensate Treatment	
Source Operating Time:	176.9 Days	
Operating Parameter:	Optiquest Model Pass	
Averaging Period:	24-Hr Avg	
Parameter Limit:	92% HAP Removal or 10.1 lbs MeOH/ODTP	
Duration of Excess Emissions In Reporting Period Due To:	Duration Days	Count No.
a. Startup/Shutdown	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0
c. Process Problems-Malfunction	0.0	0
d. Other Known Causes	0.0	0
e. Other Unknown Causes	0.0	0
Total Other excess emissions	0.0	0
[(Total Other excess emissions)/(Total source operating time)]X100 (%)	0.00%	
Total duration of excess emissions	0.0	0
[(Total duration of excess emissions)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total duration of excess emissions)/(Total source operating time)] X 100 (%)": Total excess emissions of 1% or greater for the reporting period, requires submittal of the Emission Data Detail for SSM Events and Other Events in accordance with 40 CFR 63.10(e)(3)(viii).

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Startup, Shutdown, and Malfunction Report - Gaseous and Opacity Excess Emissions

Thilmany Mill

Condensate Treatment

Report Run Date: 7/28/2015 9:41 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
Condensate Treatment							
			Condensate Treatment UNOX	No Events			

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SUMMARY REPORT - Continuous Monitoring System Performance

Thilmany Mill — Condensate Treatment

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date: 7/28/2015 9:41 AM

CMS Performance Summary	
Emission Point:	Condensate Treatment
Source Operating Time:	176.9 Days
Monitoring Equipment:	Optiquest Model

CMS Downtime In Reporting Period Due To:	Duration (Days)	Count (No.)
a. Monitor Equipment Malfunctions	0.0	0
b. Non-Monitor Equipment Malfunctions	0.0	0
c. Quality Assurance/Quality Control Calibrations	0.0	0
d. Other Known Causes	0.0	0
e. Other Unknown Causes	0.0	0
Total CMS downtime	0.0	0
[(Total CMS downtime)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Monitor Equipment Malfunctions, Non-Monitor Equipment Malfunctions, and Quality Assurance/Quality Control Calibrations": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total CMS downtime)/(Total source operating time)] X 100 (%)": Total CMS downtime of 5% or greater for the reporting period, requires submittal of the CMS Performance Detail for SSM Events and Other Events in accordance with 40 CFR 63.10(e)(3)(viii).

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SUMMARY REPORT - Gaseous and Opacity Excess Emissions

LVHC System

Thilmany Mill

Report Run Date 7/28/2015 9:41 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Hazardous Air Pollutants (HAPS) Monitored:	Methanol as a surrogate for total HAPs [Subpart S, §63.457(f)(2)].
Brief description of process unit:	Low-volume, high concentration (LVHC) gases are transported to the Lime Kiln or No. 11 Boiler for incineration using a closed vent system.

Emission Data Summary

Emission Point:	LVHC System	
Source Operating Time:	4250.0 Hours	
Operating Parameter:	System Bypass	
Averaging Period:	Instantaneous	
Parameter Limit:	Collect and Destroy Gases	
Duration of Excess Emissions In Reporting Period Due To:	Duration Hours	Count No.
a. Startup/Shutdown	0.02	6
b. Control Equipment Problems-Malfunction	0.00	0
c. Process Problems-Malfunction	0.02	9
d. Other Known Causes	0.02	7
e. Other Unknown Causes	0.01	3
Total Other excess emissions	0.02	10
[(Total Other excess emissions)/(Total source operating time)]X100 (%)	0.00%	
Total duration of excess emissions	0.07	25
[(Total duration of excess emissions)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total duration of excess emissions)/(Total source operating time)] X 100 (%)": Total excess emissions of 1% or greater for the reporting period, requires submittal of the Emission Data Detail for SSM Events and Other Events in accordance with 40 CFR 63.10(e)(3)(viii).

Footnote 3 for, "[(Total other excess emissions)/(Total source operating time)] X 100 (%)": Periods of excess emissions are not a violation of 40 CFR 63.443(c)-(d) provided that the time of excess emissions (excluding periods of startup, shutdown and malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 1% for LVHC systems.

Footnote 4: When there are two or more concurrent excess emission events, each minute is only counted once on the Emission Data Summary according to the following hierarchy: Other Unknown Causes, Other Known Causes, Startup/Shutdown, Control Equipment Problems, Process Problems.

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Startup, Shutdown, and Malfunction Report - Gaseous and Opacity Excess Emissions

Report Run Date: 7/28/2015 9:41 AM

Thilmany Mill

LVHC System

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events

Start Time	End Time	Duration (Minutes)	Location	Trouble	Cause	Correction	Report Code
	LVHC System						
2/21/2015 8:28 AM	2/21/2015 8:28 AM	0.2	Acc NCG Vent Viv Vent	High Pressure (DIG_PT-302)	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
2/21/2015 8:29 AM	2/21/2015 8:30 AM	0.2	Acc NCG Vent Viv Vent	High Pressure (DIG_PT-302)	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/9/2015 3:34 AM	3/9/2015 3:34 AM	0.2	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/9/2015 4:45 AM	3/9/2015 4:45 AM	0.2	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/9/2015 5:16 AM	3/9/2015 5:16 AM	0.1	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/14/2015 12:04 PM	3/14/2015 12:04 PM	0.2	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/14/2015 12:48 PM	3/14/2015 12:48 PM	0.2	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
3/14/2015 12:48 PM	3/14/2015 12:48 PM	0.2	Acc NCG Vent Viv Vent	High Accumulator pressure	Air infiltration in the system	See if sys neg pre/post blow/purge	Process Problems
4/23/2015 4:08 PM	4/23/2015 4:08 PM	0.1	Acc NCG Vent Viv Vent	High Pressure (DIG_PT-302)	Startup	Min emissions/follow SU procedures	Startup/Shutdown
4/23/2015 4:09 PM	4/23/2015 4:09 PM	0.1	Acc NCG Vent Viv Vent	High Pressure (DIG_PT-302)	Startup	Min emissions/follow SU procedures	Startup/Shutdown
4/23/2015 8:06 PM	4/23/2015 8:06 PM	0.4	Acc NCG Vent Viv Vent	High Pressure (DIG_PT-302)	Startup	Min emissions/follow SU procedures	Startup/Shutdown
6/23/2015 9:38 PM	6/23/2015 9:39 PM	0.4	Acc NCG Vent Viv Vent	High Accumulator pressure	Startup	Minimize emissions/follow SU proc.	Startup/Shutdown
4/23/2015 4:09 PM	4/23/2015 4:09 PM	0.1	BHC NCG PVB Vent	High Pressure (DIG_PT-302)	Startup	Min emissions/follow SU procedures	Startup/Shutdown
4/23/2015 4:08 PM	4/23/2015 4:09 PM	0.3	Blw Tk NCG PVB Vent	High Pressure (DIG_PT-302)	Startup	Min emissions/follow SU procedures	Startup/Shutdown
			Cent Coll NCG PVB Vent	No Events			
			Evap NCG PVB Vent	No Events			
			Gas Holdr NCG PVB Vent	No Events			
			Incinerator NCG RD Vent	No Events			
2/26/2015 1:12 PM	2/26/2015 1:12 PM	0.0	Turp Cond NCG PVB Vent	High Pressure	Too much relief gas from digesters	Manual close relief valves	Process Problems
			Turp NCG Safety Viv Vent	No Events			
			Turp/Evap NCG RD Vent	No Events			

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ATTACHMENT IV

MACT II – Nos. 8 and 10 Recovery Boilers
Nos. 8 and 10 Smelt Dissolving Tanks
Lime Kiln

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COMPLIANCE REPORT

for meeting reporting requirements in 40 CFR 63.10(d)(5), 63.10(e)(3) and applicable standard

General Information

Facility Identification Name:	Expera Specialty Solutions
Address:	600 Thilmany Road
City:	Kaukauna State: Wisconsin Zip: 54130
End of Reporting Period	6/30/2015
Relevant standard that is the basis for this report	Chemical Recovery Combustion Sources NESHAP - Subpart MM, §63.860
Process units covered by this report	- Recovery Furnaces B08, B10 - Smelt Dissolving Tanks SDT 8, SDT 10 - Lime Kiln
Reports submitted for each process unit	- Emission Data Summary §63.10(e)(3)(vi) - CMS Performance Summary §63.10(e)(3)(vi) - Emission Data Detail for SSM Events and Other Events §63.867(c), §63.10(c), 63.10(d)(5)(i) - CMS Performance Detail for Downtime Events §63.867(c), §63.10(c), 63.10(d)(5)(i)

Were any changes made to the SSM plan since the last reporting period? §63.6(e)(3)(viii)

No [X] Yes [ ] If yes, superceded versions are maintained on site in accordance with 40 CFR 63.6(e)(3)(v).

Were there any changes in CMS, processes, or controls since the last reporting period? §63.10(e)(3)(vi)(K)

No [X] Yes [ ] If yes, describe below or a separate page.

Certification

Based on information and belief formed after reasonable inquiry, I certify, to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

Name Mark Nessmann

Title Environmental Manager

Signature Mark Nessmann

Report Date 7/29/15

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Continuous Monitoring System Equipment List

Report Run Date 7/29/2015 12:59

End Of Reporting Period: 6/30/2015

Relevant standard that is the basis for this report: Chemical Recovery Combustion Sources NESHAP - Subpart MM, §63.860

Emission Point	Monitoring Equipment	CMS Manufacturer	CMS Model No.	Date of Latest Certification or Audit*
B08 and B10 - A Stack	COMS	USI	500C	June 23, 2015
B08 and B10 - B Stack	COMS	Durag	D-R 290	June 23, 2015
SDT8	Differential Pressure	ABB	600T-EN	July 29, 2014
SDT8	Scrubber Water Flow	Krohne	IFC-080/ F / MP	July 29, 2014
SDT10	Differential Pressure	ABB	600T-EN	July 29, 2014
SDT10	Scrubber Water Flow	Yokogawa	AM-11-DEA1A	July 29, 2014
Lime Kiln	Ahlstrom Scrubber Flow	Foxboro	8003A-WCR-PJG-FNA-A	July 29, 2014
Lime Kiln	Ahlstrom Scrubber Pressure	Bailey	PTPGP72020E	July 29, 2014
Lime Kiln	Turbotak Air Pressure	Foxboro	821GM-IS1NM2	July 29, 2014
Lime Kiln	Turbotak Water Flow	ABB	10DX3111EDE	July 29, 2014

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SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill — **Lime Kiln**

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/28/2015 2:17 PM

Hazardous Air Pollutants (HAPS) Monitored: Particulate Matter (PM) emissions as a surrogate for HAP metals (Subpart MM, §63.860).

Brief description of process unit: Calcium Carbonate (Lime Mud) is calcined in the Lime Kiln producing Calcium Oxide. PM emissions are controlled by the Ahlstrom scrubber and the Turbotak scrubbing components.

Emission Data Summary

Emission Point:	LK Ahlstrom				LK Turbotak			
Source Operating Time:	4252.3 Hours				3587.3 Hours			
Operating Parameter:	Flow		Pressure		Flow		Pressure	
Averaging Period:	3-hr Avg		3-hr Avg		3-hr Avg		3-hr Avg	
Parameter Limit:	276.6 gpm		267.5 PSI		44.1 gpm		96.4 PSI	
Monitoring Exceedances In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.
a. Startup/Shutdown	0.0	0	0.0	0	0.0	0	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0	0.0	0	0.0	0	0.0	0
c. Process Problems-Malfunction	0.0	0	0.0	0	0.0	0	0.0	0
Total SSM monitoring exceedances	0.0	0	0.0	0	0.0	0	0.0	0
d. Other Known Causes	0.0	0	0.0	0	3.0	1	0.0	0
e. Other Unknown Causes	0.0	0	0.0	0	0.0	0	0.0	0
Total Other monitoring exceedances	0.0	0	0.0	0	3.0	1	0.0	0
[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%		0.08%		0.00%	
Total monitoring exceedances	0.0	0	0.0	0	3.0	3	0.0	0
[(Total monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%		0.08%		0.00%	
Number of 24 hour periods with one or more non-SSM monitoring exceedances	1							

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "Number of 24-hour periods with one or more non-SSM monitoring exceedances": Periods of excess emission are not a violation of 40 CFR 63.862 provided the number of 3-hour parameter exceedances is not 6 or greater during the source operating time within a semi-annual period per 40 CFR 63.864(k)(2)(iii), excluding periods of startup, shutdown and malfunction [40 CFR 63.6(f)(1)]. No more than one exceedance shall be attributed to any 24-hour period per 40 CFR 63.864(k)(3).

ED_005481B_00000853-00020

EXPERA specialty solutions

DETAIL REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill

Lime Kiln

Report Run Date: 7/28/2015 2:17 PM

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
	Lime Kiln						
			LK1 Ahlstrom Flow EE	No Events			
			LK1 Ahlstrom Pressure EE	No Events			
5/30/2015 6:00 AM	5/30/2015 9:00 AM	3.0	LK1 Turbotak Flow EE	Low Scrubber Water Flow	Loss of water flow	Restore Water flow and operation	Other Known Causes
			LK1 Turbotak Pressure EE	No Events			

ED_005481B_00000853-00021

EXPERA specialty solutions

SUMMARY REPORT - Continuous Monitoring System Performance

Lime Kiln

Thilmany Mill

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/28/2015 1:03 PM

CMS Performance Summary

Emission Point:	LK							
Source Operating Time:	4252.3 Hours							
Monitoring Equipment:	Ahlstrom Flow		Ahlstrom Pressure		Turbotak Flow		Turbotak Pressure	
CMS Downtime In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.
a. Monitor Equipment Malfunctions	0.0	0	0.0	0	0.0	0	0.0	0
b. Non-Monitor Equipment Malfunctions	1.0	1	2.0	2	1.0	1	1.0	1
c. Quality Assurance/Quality Control Calibrations	0.0	0	0.0	0	0.0	0	0.0	0
Total malfunctions & QA/QC calibrations	1.0	1	2.0	2	1.0	1	1.0	1
d. Other Known Causes	3.0	3	2.0	2	2.0	2	3.0	3
e. Other Unknown Causes	2.0	1	2.0	1	2.0	1	2.0	1
Total Other causes	5.0	4	4.0	3	4.0	3	5.0	4
Total CMS downtime	6.0	5	6.0	5	5.0	4	6.0	5
[(Total CMS downtime)/(Total source operating time)]X100 (%)	0.14%		0.14%		0.12%		0.14%	

Footnote 1 for, "Monitor Equipment Malfunctions, Non-Monitor Equipment Malfunctions, and Quality Assurance/Quality Control Calibrations": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

ED_005481B_00000853-00022

EXPERA specialty solutions

DETAIL REPORT - Continuous Monitoring System Performance

Report Run Date: 7/28/2015 1:03 PM

Thilmany Mill

Lime Kiln

Reporting Period: From 1/1/2015 To 7/1/2015

CMS Performance Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
	Lime Kiln						
3/22/2015 7:00 AM	3/22/2015 8:00 AM	1.0	LK1 Ahlstrom Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	LK1 Ahlstrom Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Other Correction	Other Known Causes
4/5/2015 8:00 AM	4/5/2015 9:00 AM	1.0	LK1 Ahlstrom Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
4/19/2015 9:00 AM	4/19/2015 10:00 AM	1.0	LK1 Ahlstrom Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	LK1 Ahlstrom Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes
3/22/2015 7:00 AM	3/22/2015 8:00 AM	1.0	LK1 Ahlstrom Pressure CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	LK1 Ahlstrom Pressure CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
4/5/2015 8:00 AM	4/5/2015 9:00 AM	1.0	LK1 Ahlstrom Pressure CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
4/19/2015 9:00 AM	4/19/2015 10:00 AM	1.0	LK1 Ahlstrom Pressure CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	LK1 Ahlstrom Pressure CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes
3/22/2015 7:00 AM	3/22/2015 8:00 AM	1.0	LK1 Turbotak Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	LK1 Turbotak Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Other Correction	Other Known Causes
4/5/2015 8:00 AM	4/5/2015 9:00 AM	1.0	LK1 Turbotak Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	LK1 Turbotak Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes
3/22/2015 7:00 AM	3/22/2015 8:00 AM	1.0	LK1 Turbotak Pressure CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	LK1 Turbotak Pressure CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Other Correction	Other Known Causes
4/5/2015 8:00 AM	4/5/2015 9:00 AM	1.0	LK1 Turbotak Pressure CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
5/18/2015 9:00 AM	5/18/2015 10:00 AM	1.0	LK1 Turbotak Pressure CMS	Bad/No Signal to Proficy	PI Communication Error	Other Correction	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	LK1 Turbotak Pressure CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes

ED_005481B_00000853-00023

EXPERA specialty solutions

SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Recovery Furnace 8-10

Thilmany Mill

Report Run Date 7/29/2015 10:37 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Hazardous Air Pollutants (HAPS) Monitored:	Particulate Matter (PM) emissions as a surrogate for HAP metals (Subpart MM, §63.860).
Brief description of process unit:	No. 8 and No. 10 Recovery Furnaces are non-direct contact, low-odor steam generating units firing black liquor. The exhaust gases combine and are treated in parallel by two 3-field precipitators (A&B).

Emission Data Summary

Emission Point:	RF 8-10A				RF 8-10B			
Source Operating Time:	4,126.6				4173.2			
Operating Parameter:	Opacity		Opacity		Opacity		Opacity	
Averaging Period:	6-min Avg		60-min Avg		6-min Avg		60-min Avg	
Parameter Limit:	35%		20%		35%		20%	
Monitoring Exceedances In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.	Duration Hours	Count No.
a. Startup/Shutdown	0.0	0	0.0	0	0.0	0	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0	0.0	0	0.0	0	0.0	0
c. Process Problems-Malfunction	0.0	0	0.0	0	0.0	0	0.0	0
Total SSM monitoring exceedances	0.0	0	0.0	0	0.0	0	0.0	0
d. Other Known Causes	0.0	0	0.0	0	0.0	0	0.0	0
e. Other Unknown Causes	0.0	0	0.0	0	0.0	0	0.0	0
Total Other monitoring exceedances	0.00%		0.00%		0.00%		0.00%	
[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)	0.0	0	0.0	0	0.0	0	0.0	0
Total monitoring exceedances	0.00%		0.00%		0.00%		0.00%	
[(Total monitoring exceedances)/(Total source operating time)]X100 (%)								

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)": Periods of excess emissions are not a violation of 40 CFR 63.862 provided that opacity does not exceed 35% for 6 percent or more of the source operating time within a quarterly period per 40 CFR 63.864(k)(2)(i), excluding periods of startup, shutdown and malfunction [40 CFR 63.6(h)(1)].

ED_005481B_00000853-00024

EXPERA specialty solutions

DETAIL REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill

Recovery Furnace 8-10

Report Run Date: 7/29/2015 10:37 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
Recovery Furnace 8-10							
			RF8-10A Opacity EE (6-Min)	No Events			
			RF8-10A Opacity EE (60-Min)	No Events			
			RF8-10B Opacity EE (6-Min)	No Events			
			RF8-10B Opacity EE (60-Min)	No Events			

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EXPERA specialty solutions

SUMMARY REPORT - Continuous Monitoring System Performance

Thilmany Mill

Recovery Furnace 8-10

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/29/2015 11:39 AM

CMS Performance Summary				
Emission Point:	RF 8-10A		RF 8-10B	
Source Operating Time:	4126.6		4173.2	
Monitoring Equipment:	Opacity		Opacity	
CMS Downtime In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.
a. Monitor Equipment Malfunctions	0.0	0	0.0	0
b. Non-Monitor Equipment Malfunctions	0.0	0	0.0	0
c. Quality Assurance/Quality Control Calibrations	18.5	177	19.3	177
Total malfunctions & QA/QC calibrations	18.5	177	19.3	177
d. Other Known Causes	3.3	5	3.2	4
e. Other Unknown Causes	0.0	0	0.0	0
Total Other causes	3.3	5	3.2	4
Total CMS downtime	21.8	182	22.5	181
[(Total CMS downtime)/(Total source operating time)]X100 (%)	0.53%		0.54%	

Footnote 1 for, "Monitor Equipment Malfunctions, Non-Monitor Equipment Malfunctions, and Quality Assurance/Quality Control Calibrations": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

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SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Recovery Furnace 8-10 Bypass

Thilmany Mill

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/28/2015 10:35 AM

Hazardous Air Pollutants (HAPS) Monitored:	Particulate Matter (PM) emissions as a surrogate for HAP metals (Subpart MM, §63.860).
Brief description of process unit:	No. 8 and No. 10 Recovery Furnaces are non-direct contact, low-odor steam generating units firing black liquor. The exhaust gases combine and are treated in parallel by two 3-field precipitators (A&B). This report documents precipitator bypass emissions.

Emission Data Summary		
Emission Point:	RF 8-10 Bypass	
Source Operating Time:	4234.6 Hours	
Operating Parameter:	System Bypass	
Averaging Period:	Instantaneous	
Parameter Limit:	Bypass Closed During Operation	
Monitoring Exceedances In Reporting Period Due To:	Duration Hours	Count No.
a. Startup/Shutdown	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0
c. Process Problems-Malfunction	0.0	0
Total SSM monitoring exceedances	0.0	0
d. Other Known Causes	0.0	0
e. Other Unknown Causes	0.0	0
Total Other monitoring exceedances	0.0	0
[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%	
Total monitoring exceedances	0.0	0
[(Total monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%	

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

ED_005481B_00000853-00027

EXPERA specialty solutions

DETAIL REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill | Recovery Furnace 8-10 Bypass | Report Run Date: 7/28/2015 10:35 AM

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events and Other Events

Start Time	End Time	Duration (Minutes)	Location	Trouble	Cause	Correction	Report Code
Recovery Furnace 8-10 Bypass							
			RF 8-10 Bypass	No Events			

ED_005481B_00000853-00028

EXPERA specialty solutions

SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill — **Smelt Dissolving Tank 8**

Reporting Period:	**From**	1/1/2015	**Report Run Date**
	To	7/1/2015	7/28/2015 12:47 PM

Hazardous Air Pollutants (HAPS) Monitored:	Particulate Matter (PM) emissions as a surrogate for HAP metals (Subpart MM, §63.860).
Brief description of process unit:	Molten inorganic kraft cooking chemicals (smelt) recovered by the No. 8 Recovery Furnace are dissolved in weak wash to produce Green Liquor. PM emissions are controlled by a Turbulaire scrubber.

Emission Data Summary

Emission Point:	SDT8			
Source Operating Time:	4150.9 Hours			
Operating Parameter:	dP		Flow	
Averaging Period:	3-hr Avg		3-hr Avg	
Parameter Limit:	5.0 " H2O		30.0 gpm	
Monitoring Exceedances In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.
a. Startup/Shutdown	0.0	0	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0	0.0	0
c. Process Problems-Malfunction	0.0	0	0.0	0
Total SSM monitoring exceedances	0.0	0	0.0	0
d. Other Known Causes	0.0	0	0.0	0
e. Other Unknown Causes	0.0	0	0.0	0
Total Other monitoring exceedances	0.0	0	0.0	0
[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%	
Total monitoring exceedances	0.0	0	0.0	0
[(Total monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%	
Number of 24 hour periods with one or more non-SSM monitoring exceedances	0			

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "Number of 24-hour periods with one or more non-SSM monitoring exceedances": Periods of excess emission are not a violation of 40 CFR 63.862 provided the number of 3-hour parameter exceedances is not 6 or greater during the source operating time within a semi-annual period per 40 CFR 63.864(k)(2)(iii), excluding periods of startup, shutdown and malfunction [40 CFR 63.6(f)(1)]. No more than one exceedance shall be attributed to any 24-hour period per 40 CFR 63.864(k)(3).

ED_005481B_00000853-00029

EXPERA specialty solutions

DETAIL REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill | Smelt Dissolving Tank 8 | Report Run Date: 7/28/2015 12:47 PM

Reporting Period: From 1/1/2015 To 7/1/2015

Emission Data Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
Smelt Dissolving Tank 8							
			SDT8 dP EE	No Events			
			SDT8 Flow EE	No Events			

ED_005481B_00000853-00030

EXPERA specialty solutions

SUMMARY REPORT - Continuous Monitoring System Performance

Thilmany Mill — **Smelt Dissolving Tank 8**

Reporting Period: From 1/1/2015 To 7/1/2015

Report Run Date 7/28/2015 12:47 PM

CMS Performance Summary

Emission Point:	SDT8			
Source Operating Time:	4150.9 Hours			
Monitoring Equipment:	dP		Flow	
CMS Downtime In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.
a. Monitor Equipment Malfunctions	0.0	0	0.0	0
b. Non-Monitor Equipment Malfunctions	0.0	0	1.0	1
c. Quality Assurance/Quality Control Calibrations	0.0	0	0.0	0
Total malfunctions & QA/QC calibrations	0.0	0	1.0	1
d. Other Known Causes	4.0	3	5.0	4
e. Other Unknown Causes	2.0	1	2.0	1
Total Other causes	6.0	4	7.0	5
Total CMS downtime	6.0	4	8.0	6
[(Total CMS downtime)/(Total source operating time)]X100 (%)	0.14%		0.19%	

Footnote 1 for, "Monitor Equipment Malfunctions, Non-Monitor Equipment Malfunctions, and Quality Assurance/Quality Control Calibrations": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

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EXPERA specialty solutions

DETAIL REPORT - Continuous Monitoring System Performance

Thilmany Mill | Smelt Dissolving Tank 8 | Report Run Date: 7/28/2015 12:47 PM

Reporting Period: From 1/1/2015 To 7/1/2015

CMS Performance Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
	Smelt Dissolving Tank 8						
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	SDT8 dP CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Other Correction	Other Known Causes
4/5/2015 7:00 AM	4/5/2015 9:00 AM	2.0	SDT8 dP CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
4/19/2015 9:00 AM	4/19/2015 10:00 AM	1.0	SDT8 dP CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	SDT8 dP CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes
3/22/2015 7:00 AM	3/22/2015 8:00 AM	1.0	SDT8 Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Call Process Control or IT (8585)	Non-Monitor Equipment Malfunctions
3/26/2015 9:00 PM	3/26/2015 10:00 PM	1.0	SDT8 Flow CMS	Bad/No Signal to Proficy	DCS to PI Interface Problem	Other Correction	Other Known Causes
4/5/2015 7:00 AM	4/5/2015 9:00 AM	2.0	SDT8 Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
4/19/2015 9:00 AM	4/19/2015 10:00 AM	1.0	SDT8 Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Known Causes
5/18/2015 9:00 AM	5/18/2015 10:00 AM	1.0	SDT8 Flow CMS	Bad/No Signal to Proficy	PI Communication Error	Other Correction	Other Known Causes
6/19/2015 9:00 PM	6/19/2015 11:00 PM	2.0	SDT8 Flow CMS	Bad/No Signal to Proficy	Server Failure	Call Process Control or IT (8585)	Other Unknown Causes

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EXPERA specialty solutions

SUMMARY REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill — **Smelt Dissolving Tank 10**

Reporting Period:	**From**	1/1/2015	**Report Run Date**
	To	7/1/2015	7/28/2015 10:35 AM

Hazardous Air Pollutants (HAPS) Monitored:	Particulate Matter (PM) emissions as a surrogate for HAP metals (Subpart MM, §63.860).
Brief description of process unit:	Molten inorganic kraft cooking chemicals (smelt) recovered by the No. 10 Recovery Furnace are dissolved in weak wash to produce Green Liquor. PM emissions are controlled by a Turbulaire scrubber.

Emission Data Summary

Emission Point:	SDT10			
Source Operating Time:	3793.2 Hours			
Operating Parameter:	dP		Flow	
Averaging Period:	3-hr Avg		3-hr Avg	
Parameter Limit:	5.0 " H2O		35.0 gpm	
Monitoring Exceedances In Reporting Period Due To:	Duration Hours	Count No.	Duration Hours	Count No.
a. Startup/Shutdown	0.0	0	0.0	0
b. Control Equipment Problems-Malfunction	0.0	0	0.0	0
c. Process Problems-Malfunction	0.0	0	0.0	0
Total SSM monitoring exceedances	0.0	0	0.0	0
d. Other Known Causes	0.0	0	0.0	0
e. Other Unknown Causes	0.0	0	0.0	0
Total Other monitoring exceedances	0.0	0	0.0	0
[(Total Other monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%	
Total monitoring exceedances	0.0	0	0.0	0
[(Total monitoring exceedances)/(Total source operating time)]X100 (%)	0.00%		0.00%	
Number of 24 hour periods with one or more non-SSM monitoring exceedances	0			

Footnote 1 for, "Startup/Shutdown, Control Equipment Problems, and Process Problems": Except for actions which may have been previously reported according to 40 CFR 63.10(d)(5)(ii), actions taken in response to SSM events were consistent with the procedures specified in the SSM plan required by 40 CFR 63.6(e)(3). These actions were documented pursuant to 40 CFR 63.6(e)(3)(iii) and reported per 40 CFR 63.10(d)(5)(i).

Footnote 2 for, "Number of 24-hour periods with one or more non-SSM monitoring exceedances": Periods of excess emission are not a violation of 40 CFR 63.862 provided the number of 3-hour parameter exceedances is not 6 or greater during the source operating time within a semi-annual period per 40 CFR 63.864(k)(2)(iii), excluding periods of startup, shutdown and malfunction [40 CFR 63.6(f)(1)]. No more than one exceedance shall be attributed to any 24-hour period per 40 CFR 63.864(k)(3).

ED_005481B_00000853-00033

EXPERA specialty solutions

DETAIL REPORT - Gaseous and Opacity Excess Emissions

Thilmany Mill | **Smelt Dissolving Tank 10** | **Report Run Date:** 7/28/2015 10:35 AM

Reporting Period: **From** 1/1/2015 **To** 7/1/2015

Emission Data Detail for SSM Events and Other Events

Start Time	End Time	Duration (Hours)	Location	Trouble	Cause	Correction	Report Code
	Smelt Dissolving Tank 10						
			SDT10 dP EE	No Events			
			SDT10 Flow EE	No Events			

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