Thilmany Mill 600 Thilmany Road Kaukauna, WI 54130

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June 8, 2015

Via Overnight Mail

Molly Smith
Nicole Cantello
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency - Region 5
77 W. Jackson, Blvd.
Chicago, IL 60604

Re: Response to Request for Information Pursuant to Clean Air Act: Thilmany LLC, Expera Specialty Solutions

Dear Ms. Smith and Ms. Cantello:

The purpose of this letter is to respond to Items 5-11 of the United States Environmental Protection Agency's ("U.S. EPA" or the "Agency") letter from George Czerniak, dated March 13, 2015, requesting certain information pursuant to Section 114 of the Clean Air Act concerning Expera Specialty Solutions' ("Expera's" or the "Company's") facility ("Thilmany Mill") in Kaukauna, Wisconsin (the "Information Request"). This Information Request was received by Expera on March 19, 2015.

The Information Request contains 34 items. Expera provided its response to Item 1 on March 27, 2015. On May 19, in accordance with an approved extension of time to respond, Expera provided its response to Items 2-4 and 12-14 of the Information Request. Based on further discussions with U.S. EPA, Expera received an extension until June 8, 2015 to respond to Items 5-11. Expera also received an extension to respond to the items related to the installation of ambient air monitors for particulate matter ("PM") to enable the parties enter into an agreement providing an alternative to the requested monitoring.

General Objections

While Expera has made a good faith effort to respond to the Information Request, the Company made several general objections to both the form and content of the Information Request in its May 19, 2015 response. These objections apply to the Information Request as a whole, not just Items 2-4 and 12-14, and the objections are incorporated by reference into this response.

All of Expera's responses are made subject to and without waiving the general objections contained in the May 19, 2015 letter. Additionally, Expera is also making specific objections to certain individual questions as set forth below. All of Expera's responses are made subject to and without waiving these general objections.

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Scope of Response

Attached to this letter is information responsive to Items 5-11 of the Information Request.

Narrative responses to Items 5-11 of the Information Request are set forth below. Responsive documents that supplement these narrative responses are included as accessible and searchable Portable Document Format ("PDF") documents on the enclosed compact disc. This disc has been scanned for viruses using Microsoft Forefront Client Security. This disc contains folders that identify the applicable questions by number. Where documents are responsive to more than one question, the location of responsive documents is identified in the narrative response below.

Expera has made a diligent, good faith effort to provide documents and information that could reasonably be collected and produced during the time-frame allotted for this response. Expera has determined that it has a substantial portion of the information requested. To the extent that information is not available, it is noted in the responses to individual questions. Expera reserves the right to supplement this response as necessary to the extent that it becomes aware of additional responsive information.

Information responsive to these questions was provided by Mark Nessmann and Heath Hoffman.

Specific Responses to Items 5-11

2. **For the Stoker Power Boiler No. 7 provide the following information for January 1, 2013 to January 1, 2015, in electronic excel format when applicable:**

   a. **Wet Scrubber unit C02 water flow rates (gallons per minute); and**

   b. **Differential pressure across the wet scrubber unit C02 (inches water column).**

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_000333 - EXP_000424.

Pursuant to Operation Permit Conditions I.A.1.b.(3)(a) and (b), Expera is required to operate the C02 scrubber with a minimum water flow of 141.2 gallons per minute on a 3-hour average basis and with a minimum differential pressure drop across the scrubber of 2.3 inches water column of on a 3-hour average basis. Consistent with these applicable requirements, Expera has provided the requested information on a 3-hour average basis. Where the boiler was not in operation, operating on gas, or there were issues with a frozen tap. Expera has so noted in the response.

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6. **For the Single Cycle Power Boiler No. 9 and Twin Cycle Power Boiler No. 11, provide the following information from January 1, 2013 to January 1, 2015, in electronic excel format when applicable:**

   a. **Periods of time when boilers were operating without all associated control devices, include start (date and time) and end (date and time);**

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Document EXP_000425.

Boiler No. 9 is controlled by multiclone C06 and electrostatic precipitator ("ESP") C07 in series and Boiler No. 11 is controlled by multiclone C11 and ESP C07 in series. Pursuant to Operation Permit Condition I.B.1.b.(1), Expera is required to operate the applicable control devices at all times that the respective boilers are in operation except in certain conditions. Specifically, Expera may bypass the control devices during warm up or cool down and when both of the boilers are firing at least 85% natural gas by heat input and no more than 15% heat input from other permitted fuels. As indicated by the attached document, there were only four instances that Boiler 9 bypassed the emission controls. In each instance, the boiler was combusting natural gas. Boiler No. 11 was not bypassed.

   b. **Provide continuous opacity monitor (COM) measurements (opacity per minute);**

Expera objects to this request to the extent that it requests information in a format that is not required to demonstrate compliance with applicable opacity requirements. Subject to and without waiving the general and specific objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_000426 - EXP_000966.

Expera has provided COM measurements on a 6-minute average basis consistent with applicable requirements. Expera has included in this response all data collected by the COMS, including data considered invalid and therefore not included when demonstrating compliance with applicable opacity limitations. Invalid data is noted in the comments column of the document.[1]

As stated in Expera's May 19, 2015 response to Question 12 of the Information Request, on September 4, 2014, lightning struck and damaged the COM for the Boilers No. 9 and No. 11 stack. This monitor was replaced with a new unit and certified on October 16, 2014. During this period the COM recorded inaccurate data while the monitor was not in operation. As part of the mill's emergency backup procedure, Expera conducted daily visible emission testing on the stack when coal was being combusted in the boilers to evaluate opacity while the monitor was out of service and for seven days after the monitor was replaced.

[1] If there are comments or a code in the column next to the data then that data is considered invalid.

After the lightning strike, Boiler 11 was taken out of service for a planned outage on September 7. At the beginning of this outage, there was a problem in the coal bunker that resulted in Boiler 9 operating on natural gas until September 19. Accordingly, daily Method 9 testing was conducted on the stack for the period September 19, 2014 - October 24, 2014. These test results were provided in response to Question 12.

c. For each boiler, provide the average hourly sulfur dioxide (SO_2) emission rate (pounds per hour and pounds per million BTU) calculated using the equations from the Wisconsin Department of Natural Resources approved QA/QC plan;

Subject to and without waiving the general objections set forth above, Expera responds as follows. Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_000967 - EXP_001613.

Expera has included in the responsive document, average hourly SO_2 emissions on a pounds per hour and lbs/mmBTU basis. Expera has noted on the documents those times when the respective boilers were down or combusting gas. Also noted in the document, on September 4, 2014, a lightning strike temporarily disabled the SO_2 CEMS. The CEMS was brought back on line within 24 hours.

d. Provide continuous emission monitor (CEMS) measurements:

i. SO_2 emissions in pounds per hour; and
ii. SO_2 emissions in pounds per million BTU; and

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_001614 - EXP_002100.

Boilers No. 9 and No. 11 discharge through a common stack, combust the same fuel and share a common SO_2 CEMS. Where both boilers were not operational and combusting coal, we have noted that in the attached document. Also noted in the document, on September 4, 2014, a lightning strike temporarily disabled the SO_2 CEMS. The CEMS was brought back on line within 24 hours. To the extent that data collected during this event is included in the attached document, it is marked invalid.

e. Identify when a bypass stack was in operation:

i. the hours of operation; and
ii. the number of days each calendar year used.

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question. *See* Bates Labeled Document EXP_002101. As noted above in response to Item 6.a, Expera may bypass the emission controls on Boilers No. 9 and 11 in certain instances. As detailed in the

attached document, Boiler 9 vented to the bypass stack during four periods when natural gas was being combusted and other instances where Boiler 9 was not operational. The bypass stack on Boiler 11 is not used.

7. **For No. 8 Non-Direct Contact Evaporator Recovery Boiler and No. 10 NDCE Recovery Boiler provide the following information from January 1, 2013 to January 1, 2015 in electronic excel format when applicable:**

   a. **Periods of time when boilers were operating without all associated control devices, include start (date and time) and end (date and time); and**

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_002102 - EXP_002103.

Boiler No. 8 and Boiler No. 10 have a combined exhaust which splits and is controlled by two ESPs.[2] The A-Side ESP is designated as C04 and exhausts to stack S10. The B-Side ESP is designated as C03 and exhausts to Stack S08. Generally, an ESP must be operated when either boiler is in operation, with the exception of periods of normal startup and shutdown as defined the startup, shutdown and precipitator procedures. *See* Operation Permit Condition I.D.1.b.(2). Additionally, Expera may bypass the ESPs when operating on natural gas or residual fuel oil. *See* Operation Permit Condition I.D.1.b.(7). Expera has provided information regarding the permitted bypasses.

Expera has also provided information regarding those instances where one of the two ESPs was not operating. As detailed in the attached, there were four instances where there were issues with the A-Side ESP. During these events, Boilers No. 8 and No. ere either offline or combusting gas. There were also instances where there were issues with the B-Side ESP. In each of these events, the damper to the B-Side ESP was closed, and emissions were controlled by the A-Side ESP.

   b. **Provide COM measurements (opacity per minute)**

Expera objects to this request to the extent that it requests information in a format that is not required to demonstrate compliance with applicable opacity requirements. Subject to and without waiving the general and specific objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_002104 - EXP_003487.

Expera has provided COM measurements on a 6-minute average basis consistent with applicable requirements. Expera has included in this response all data collected by the COMS, including data considered

[2] The exhaust from Boilers No. 8 and No. 10 combine and then split before reaching the ESPs. The exhaust into the two ESPs is a mixed exhaust from both boilers. In the event one ESP is offline, the damper to the ESP can be closed, and both boilers can exhaust to the other ESP.

invalid and therefore not included when demonstrating compliance with applicable opacity limitations. Invalid data is noted in the comments column of the document.[3]

As stated in Expera's May 19, 2015 response to Question 12 of the Information Request, on September 4, 2014, lightning struck and damaged the COM for the Recovery Boiler stack (S08). The COM was put back into service after the strike but on September 18, it failed its quarterly calibration error audit. This monitor was replaced with a new unit and calibrated on October 16, 2014. During this period, the COM recorded inaccurate data while the monitor was not in operation. As part of the mill's emergency backup procedure, Expera conducted daily visible emission testing on the stack when the process was in operation to evaluate opacity while the monitor was out of service and for seven days after the monitor was replaced. For this stack, daily Method 9 testing was provided in response to Question 12 for the period September 19, 2014 - October 24, 2014.

8. For No. 8 and No. 1 Smelt Dissolving Tanks provide the following information from January 1, 2013 to January 1, 2015, in electronic excel format when applicable.

a. Continuous parameter monitoring system (CPMS) results for:

i. Pressure drop (inches of water column); and

ii. Water flow rate (gallons per minute).

Expera does not operate a No. 1 Smelt Dissolving Tank, but it does operate a No. 10 Smelt Dissolving Tank. Expera has interpreted this question to seek information regarding the No. 10 Smelt Dissolving Tank.

Consistent with this interpretation and subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_003488 - EXP_003925.

Pursuant to Operation Permit Condition I.E.4.b.(1), Expera is required to maintain a 3-hour pressure drop across each scrubber at no less than 4.9 inches of water unless the exceedance is excused or the Wisconsin Department of Natural Resources ("WDNR") approves an alternative range. Pursuant to Operation Permit Condition I.E.4.b.(2), Expera is required to maintain a 3-hour average scrubbing liquid flow rate to scrubber C05 of no less than 30 gallons per minute unless the exceedance is excused or WDNR approves an alternative range. Consistent with these permit requirements, Expera has provided data on a 3-hour average basis. As detailed in the responsive document, Expera has not included invalid or missing data or data where the unit was offline. The basis for all invalid or missing data points is provided in the response.

[3] If there are comments or a code in the column next to the data then that data is considered invalid.

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9. **For the C13 Lime Kiln provide the following information from January 1, 2013 to January 1, 2015, in excel electronic format when applicable:**

   a. **Provide the hours of operation, by month;**

Expera objects to this question to the extent it seeks information not required to be maintained pursuant to its operation permit. Subject to and without waiving the general and specific objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Document EXP_003926.

   b. **CEMS data for total reduced sulfur (TRS) (parts per million by volume on a dry basis corrected to 10% oxygen) and oxygen discharge concentrations;**

Expera objects to this question to the extent that is vague as to the unit of time for which CEMS data is requested. Subject to and without waiving the general and specific objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_003927 - EXP_004089.

Expera has provided hourly data for oxygen discharge concentrations and for TRS, but notes that under Operation Permit Condition I.F.6.a, it is required to meet a TRS limitation of 8 ppmv on a dry basis corrected to 10% oxygen based on a 12-hour average basis. This hourly data is used to calculate the 12-hour averages. Additionally, Expera has provided all data from the CEMS. Invalid data and the basis for the invalid designation are noted in the comments.

   c. **CPMS results for:**

      i. **Liquid pressure (pounds per square inch) to the Ahlstrom nozzles in the C13 wet scrubber;**
      ii. **Air pressure (pounds per square inch) to the Turbotak nozzles in the C13 wet scrubber; and**
      iii. **Liquid flow rate (gallons per minute) to both the Ahlstrom and Turbotak nozzles in the C13 wet scrubber.**

Subject to and without waiving the general objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_004090 - EXP_004454.

Expera operates an Ahlstrom wet scrubber to control TRS from its lime kiln. Following installation of the Ahlstrom unit, the Turbotak unit was added to ensure compliance with applicable emission limitations at higher kiln feed rates.

Pursuant to Operation Permit Condition I.F.7.b.(2), Expera is required to maintain the following minimum parameters for the scrubbing liquid used by the Ahlstrom nozzles on a 3-hour average basis unless an exceedance is excused or WDNR approves an alternative range: (a) liquid pressure of 249 pounds per square inch; and (b) liquid flow rate of no less than 249 gallons per minute. Condition I.F.7.b.(3) requires Expera to maintain the following minimum parameters for the Turbotak nozzles n a 3-hour average basis unless an exceedance is excused or WDNR approves an alternative range: (a) air pressure of 90 pounds per square inch; and (b) liquid flow rate of no less than 40 gallons per minute.

In response to this question, Expera has provided data on a 3-hour average basis. Expera has not included in this response invalid or missing data from the distributed control system ("DCS") or data when the lime kiln was offline (designated as "no potential to emit" on the Ahlstrom nozzles). Additionally, Expera has not provided data where operation of the Turbotak nozzles was not required because the kiln feed rate was below the threshold at which the Turbotak controls are necessary to demonstrate compliance with applicable requirements (designated as "no potential to emit" on the Turbotak).

10. **For the Digester, multiple-effect evaporator, and turpentine non-condensible gas (NCG) collection system routed to Lime Kiln P12 and Power Boiler B11 provide the following information from January 1, 2013 to January 1, 2015 in electronic excel format when applicable:**

    a. **Continuous monitoring system (CMS) results for collected pounds of hazardous air pollutant (HAP) per ton of oven dry pulp (ODP) on a daily average.**

Expera objects to this question to the extent it is vague as to the information requested. The question requests information to be provided on a daily average basis. While Expera maintains daily records, compliance with the applicable limitation is determined on a 15-day rolling average basis. *See* Operation Permit Condition I.H.a.(2)(a) (requiring collection of no less than 11.0 pounds of HAP per ton of ODP on a 15-day rolling average). Consistent with this permit requirement and subject to and without waiving the general and specific objections set forth above, Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_004455 - EXP_004469.

11. **For the UNOX biological treatment tank/reactor, identify the compliance method selected by the facility in Permit number 445031180-P12. For the selected compliance method, provide the following information from January 1, 2013 to January 1, 2015 in electronic excel format when applicable:**

    a. **Daily results of the methanol percent reduction calculation found at H.9.(a) in the facility's permit; or**

    b. **Daily results of the Optiquest model.**

Subject to and without waiving the general objections set forth above, Expera responds that it has the option under its Operation Permit to use either compliance set forth above, but it has elected to comply with the HAP requirements applicable to the UNOX biological treatment tank through the use of the Optiquest model.

Expera has attached information responsive to this question in accessible and searchable pdf format. *See* Bates Labeled Documents EXP_004470 - EXP_004494. This information includes daily results for the Optiquest model except for those days where the model shows that a test should be undertaken or the mill was not operating. For the days when tests were run due to the model calling for testing, Expera has provided the test results.

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Conclusion

In conclusion, to the extent that documents produced by Expera in response to this request purport to make legal conclusions or use terms of art that may have legal significance, Expera does not concede that such terms are accurate or appropriate. Additionally, this production of documents does not act to authenticate such documents for the purposes of admissibility in any administrative or judicial proceeding. Attached is the Certification of Responsible Official that is being submitted with this letter in accordance with your Information Request. If you have any questions concerning this response, please do not hesitate to contact Mark Nessmann at 920-766-8235.

Sincerely,

Lee R. Hammen

Lee R. Hammen
Mill Manager

Enclosures

cc: Steve Myers
Mark Nessmann
Cynthia A. Faur, Quarles and Brady LLP

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Certification of Responsible Official

I certify under penalty of law that I have examined and am familiar with the information in this letter. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to sections 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

By: Lee R. Hammer

Title: MILL MANAGER

Date: JUNE 8, 2015