UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Expera Specialty Solutions LLC
600 Thilmany Rd.
Kaukauna, Wisconsin 54130

ATTENTION:

Barbara Liesch
Environmental Engineer

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Expera Specialty Solutions LLC (Expera or You) to submit certain information about the facility at 600 Thilmany Rd., Kaukauna, Wisconsin. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Expera owns and operates an emission source at the Kaukauna, Wisconsin facility. We are requesting this information to determine whether your emission source is complying with 40 C.F.R. Part 63, Subpart S: NESHAP for Pulp & Paper Production at Kraft Pulp Mills; 40 C.F.R. Part 63, Subpart MM: NESHAP for Chemical Recovery Combustion Sources at Kraft Pulp Mills; and your Title V Permit.

Expera must send all required information to:

> Attn: Compliance Tracker, AE-18J
> Air Enforcement and Compliance Assurance Branch
> U.S. Environmental Protection Agency
> Region 5
> 77 W. Jackson Boulevard
> Chicago, Illinois 60604

Expera must submit all required information under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. 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 Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Expera to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Muhammed Shuaibi at 312-353-2075 or Victoria Nelson at 312-886-9481.

6/12/18
Date

Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.

2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.

3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.

4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.

5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.

6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.

4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).

5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.

6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq*.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.

2. The term "AP-42" shall refer to the *Compilation of Air Pollutant Emission Factors* published since 1972 by the EPA as the primary compilation of emission factor information.

3. The term "NCASI" shall refer to the National Council for Air and Stream Improvement, Inc.

4. The terms "Chemical Recovery Operations" and "Pulping Operations" shall refer to all process operations outlined within your Air Pollution Control Operation Permit, dated January 12, 2017.

Appendix B

Information You Are Required to Submit to EPA

Expera Specialty Solutions LLC must submit the following information about its facility located at 600 Thilmany Rd., Kaukauna, Wisconsin (the Facility) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 30 calendar days of receipt of this Request:

1. Provide a copy of all final air permits issued to the Facility by the Wisconsin Department of Natural Resources (WDNR), including, but not limited to, construction permits, minor source operating permits, federally enforceable state operating permits (FESOPs), and Part 70 (Title V) Operating Permits from May 2008 to the present.

2. Provide a copy of all permit applications and related correspondence submitted to the WDNR from May 2008 to the present.

3. Provide a list of all emissions tests and wastewater sampling conducted at the Facility for any reason, from May 2008 to the present, and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the emission test reports:

    a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the test report was shared with IEPA.

    b. **Copies:** Provide full emission test and wastewater sampling reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.

4. Provide copies of all annual emissions reports submitted to WDNR for the Facility from May 2013 to the present, and include:

    a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used; and

    b. Any documents outlining procedures for calculating annual emissions.

5. When AP-42 emission factors were not used or available for emission calculations, provide all documentation and reports that were used to develop emission factors (i.e. NCASI Technical Bulletins and Special Reports).

6. Provide copies of all air emissions reports (quarterly reports, semi-annual compliance reports, or equivalent documents) submitted to either WDNR or EPA from May 2013, to the present.

7. Provide all detailed, up to date, facility process flow diagrams for the Chemical Recovery Operations, Pulping Operations, Wastewater Treatment Operations, and UNOX biological treatment including the following information:

    c. A narrative process overview;

    d. Emission units; and

    e. Air pollution control equipment with collection/destruction efficiency, when applicable.

8. If air dispersion modeling has previously been conducted for the Facility, include the following information:

    a. Input and output files for all modeling software (including pre- and post-processors);

    b. Version number for any modeling software used;

    c. Meteorological data used, including years and station location for all surface data (1-minute and hourly, if applicable) and upper air data; and

    d. Modeling report or text file describing the modeling methodology and input data.

9. In an Excel spreadsheet, provide emission rates of sulfur dioxide (SO_2) in pounds per hour (lbs/hr) and tons per year (tpy), emitted from each point (stack) and non-point (fugitive) source at the Facility for the years 2013 to the present.

10. Provide the following information pertaining to the Facility:

    a. Building dimensions for all buildings located on the Facility property: length, width, and height (specify units), as well as the dimensions for each tier of any multi-leveled (tiered) buildings;

    b. Geographic coordinates (Universal Transverse Mercator (UTM) coordinates or latitude and longitude) of each building corner and coordinates of all corners of each tier of any multi-leveled (tiered) building. Specify the datum used (*e.g.*, NAD83, NAD27, WGS84, *etc.*);

    c. Property boundary coordinates (UTM coordinates or latitude and longitude); and

    d. Location of any fencing or other barriers surrounding the Facility and the locations of any nearby residents

11. Provide a list of all emission sources that emit SO_2 at the Facility, broken down as follows:

    a. For all point sources (stacks), provide the following (specify units):

i. Stack height;

ii. Stack inside diameter;

iii. Stack effluent temperature;

iv. Stack exit velocity (identify if stack is obstructed (*e.g.*, rain cap_ or has a horizontal or downward release); and

v. Geographic coordinates (UTM coordinates or latitude and longitude) of each stack. Specify the datum used (*e.g.*, NAD83, NAD27, WGS84, *etc.*).

b. For all nonpoint sources including, but not limited to, fugitives, vents, outlets, dust piles, specify each source and provide the following:

i. Dimensions: length, width, and height (specify units);

ii. A physical and process description of the source;

iii. A photograph of the source; and

iv. Geographic coordinates (UTM coordinates or latitude and longitude) of each corner of a non-point (fugitive) source. Specify the datum used (*e.g.*, NAD83, NAD27, WGS84, *etc.*).

12. Provide the following information for the No. 8 and No. 10 non-direct contact evaporator (NDCE) recovery boilers, B08 and B10, from May 2013 to the present:

a. The daily total hours of operation and the corresponding fuel being burned for each unit;

b. The SO_2 emission factors used for each fuel burned; and

c. The date(s) the electrostatic precipitators (ESPs), C03 and C04, by-pass stack was used, the reason(s) emissions were routed through the by-pass stack; and the fuels that were used when the by-pass stack was in use.

13. Provide the following information for the No. 8 and No. 10 smelt dissolving tanks, P08 and P10, from May 2013 to the present:

a. All dates and times units P08 and P10 were in operation without their corresponding scrubbers, C05 and C10, respectively. Describe the reason for each incident;

b. The monthly total hours the scrubber by-pass was utilized during time of routine purging or emergency;

c. An Excel spreadsheet of the recorded 3-hour average pressure drop across scrubbers C05 and C10; and

d. An Excel spreadsheet of the recorded 3-hour average scrubbing liquid flow rate at scrubber C05 and C10;

14. Provide the following information for the Lime Kiln, P12, from May 2013 to the present:

a. All documentation and reports pertaining to the compliance demonstration specified in Condition F.3.b.(1) of your Title V permit;

b. Provide a description of how noncondensible gases (NCG) from the Digester system are being controlled during the compliance demonstration contained in Condition F.3.b.(1) of your Title V permit;

c. An Excel spreadsheet with the following daily averages:

i. Hours that the Lime Kiln operated;

ii. Total amount of lime produced, in tons;

iii. Amount of No.6 fuel oil used, in gallons;

iv. BTU content of No.6 fuel oil used, in millions BTUs per 1000 gallons;

v. Sulfur dioxide emissions, in pounds per ton of lime produced;

vi. Sulfur dioxide emissions, in pounds per hour;

vii. For each day when No.6 fuel oil is used, sulfur dioxide emissions in pounds per million BTU of heat input from No. 6 fuel oil; and

viii. Identification of the emission factors that were used to calculate sulfur dioxide emissions.

d. An Excel spreadsheet of recorded 12-hour average Total Reduced Sulfur (TRS) and oxygen concentrations;

e. An Excel spreadsheet of all recorded 3-hour average parameters at the Lime Kiln's wet scrubber, C13.

15. Provide the following information for the Digester system, multiple effect evaporator, and turpentine noncondensible gas (NCG) collection system, P17, from May 2013 to the present:

a. A narrative description of how emissions are routed, controlled, and vented to the atmosphere;

b. All leak detection and repair records outlined in Condition H.4 of your Title V permit;

c. All demonstrations that each enclosure opening is maintained at negative pressure;

d. An Excel spreadsheet containing the following daily parameters:

i. Number of softwood and hardwood cooks;

ii. Total condensate flow;

iii. Methanol content of condensate collected;

iv. Pounds of total Hazardous Air Pollutants (as methanol) collected per ton of ODP on a daily basis and 15-day rolling average.

e. All spreadsheets and calculations used in demonstrating compliance with Condition H.1.a.(2)(c) of your Title V permit.

16. Provide the following information for paper machines, P11, P13, P14, P15, and P16, from May 2013 to the present:

a. An Excel spreadsheet containing all recorded particulate matter and volatile organic compounds emissions. Provide an explanation as how the emissions are calculated.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, *42 U.S.C. § 7414*, is not entitled to confidential treatment under 40 C.F.R. Part 2.

"Emission data" means, with reference to any source of emissions of any substance into the air:

> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
>
> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
>
> A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Barbara Liesch
Expera Specialty Solutions
600 Thilmany Road
Kaukauna, Wisconsin 54130

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-mail to:

Maria Hill, Acting Chief, Compliance,
Enforcement, and Emission Inventory Section,
Maria.Hill@wisconsin.gov

On the 14th day of June 2018.

Kathy Jones

Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7017 0660 0000 3661 7390