UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Thilmany, LLC
Expera Specialty Solutions
600 Thilmany Road
Kaukauna, Wisconsin 54130

ATTENTION:

Keith Morgan
Mill Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Thilmany, LLC (Expera or you) to submit certain information about the facility at 600 Thilmany Road, 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 according to the schedule provided in Appendix B.

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 and monitoring. 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 the Wisconsin State Implementation Plan, requirements of your Operating Permit Number 445031180-P12, and the CAA.

Expera must send all required information to: smith.molly@epa.gov, cantello.nicole@epa.gov, and R5enforcement@epa.gov.

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 and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. 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 Expera, a specific entity as part of a discrete 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 Molly Smith at (312) 353-8773.

3/13/15
Date

George T. Czerniak
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 format, and not in image

format. If Excel format are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.

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.*, and the Wisconsin State Implementation Plan.

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 terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Thilmany, LLC (Expera) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) according to the schedule provided below for your facility located at 600 Thilmany Road, Kaukauna, Wisconsin.

1. Within 10 days of receipt of this request, Expera shall submit a written certification of its intent to comply with this request. Expera shall submit the certification to smith.molly@epa.gov, cantello.nicole@epa.gov, and R5enforcement@epa.gov.

For Items 2 – 14, submit the following information within thirty (30) calendar days of receipt of this request.

2. Provide the following information for the time period of January 1, 2013 to January 1, 2015:

    a. Every bulk solid material handled;
    b. The annual tonnage throughput for each bulk solid material;
    c. The handling methods used to receive, store, and ship each bulk solid material;
    d. Identify which bulk solid materials are screened and/or crushed;
    e. Identify any dust controls used to minimize emissions from stockpiles for each bulk solid material, such as dust suppressants or tarp covers; and
    f. The maximum onsite storage for each bulk solid material.

3. Provide copies of all documentation relating to any stack testing, internal audits, emissions test runs, emissions characterizations, visible emission testing, or emissions studies, conducted or attempted at the facility for the period of January 1, 2010 to January 1, 2015 (i.e. stack tests, emission studies conducted on the plant or on specific production processes).

4. Provide copies of your Operating Permit Number 445031180-P12 annual compliance certifications, semiannual compliance certifications, and deviation reports from January 1, 2010 to January 1, 2015.

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

    a. Wet scrubber unit C02 water flow rates (gallons per minute); and
    b. Differential pressure across wet scrubber unit C02 (inches water column).

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);
   b. Provide continuous opacity monitor (COM) measurements (opacity per minute);
   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;
   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
   e. Identify when a bypass stack was in operation:
      i. the hours of operation; and
      ii. the number of days each calendar year 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
   b. Provide COM measurements (opacity per minute).

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).

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

   a. Provide the hours of operation, by month;
   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;
   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 Turkotak nozzles in the C13 wet scrubber.

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.

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.

12. Provide copies of any visible emissions testing (Reference Method 9 or 22) conducted at the facility between January 1, 2013 and January 1, 2015, if not already include in Item 3.

13. Provide a complete facility-wide emissions calculation for the time period January 1, 2013 to January 1, 2015. Emissions calculations must follow any equations listed in Permit Number 445031180-P12 and be submitted in an electronic excel document.

14. Provide a list of any complaints Expera has received from neighbors between the time period January 1, 2013 and January 1, 2015. The list should include the date the complaint was received, description of the complaint, and any corrective action taken by Expera to address the complaint.

<u>For Items 15-34, the following monitoring, results, and general information for shall be installed/provided within the specified time frames:</u>

PM_{10} Monitors and Siting

15. Expera shall install ambient air monitors for particulate matter (PM) at its facility.

16. Within 30 days of receipt of this information request, Expera shall submit proposed monitoring site locations for EPA review and approval prior to

establishing the monitoring sites. The proposal for monitoring site locations shall include a map showing the property lines of the facility, the locations of nearby residences and industrial properties, and proposed locations of the monitoring sites. At least one monitor shall be placed in the prevailing downwind location. Expera shall submit an annual wind rose and four seasonal wind roses showing wind patterns as reported for the past five years at the nearest available meteorological station.

17. Within 30 days of EPA approval of the monitoring site locations specified in Item 16, Expera shall install, operate, and maintain at least one ambient monitoring site at the facility. The site shall contain at least one continuous Federal Equivalent Method (FEM) real-time PM10 monitor. The site shall contain at least one Federal Reference Method (FRM) PM10 filter-based monitor operating every third day.

18. The monitoring site and monitoring equipment shall conform with the following requirements:

    a. The PM_{10} real-time monitor shall meet all of the specifications of FRM/FEM monitors on this list; www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf;
    b. Expera shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58, Appendix E;
    c. PM_{10} concentrations from filter-based sampling shall be determined according to 40 CFR Part 50, Appendix J – "Reference Method for the Determination of Particulate Matter as PM_{10} in the Atmosphere";
    d. All data collected shall be consistent with units in the National Ambient Air Quality Standards for PM_{10}; and
    e. A data logger shall be attached to the monitors to record readings from the continuous monitors.

19. Expera shall follow all monitoring, siting, and quality assurance criteria as detailed in 40 CFR Part 58, Appendix A "Quality Assurance Requirements for SLAMS, SPMs, and PSD Air Monitoring" and Appendix D "Network Design Criteria for Ambient Air Quality Monitoring."

20. The monitors shall be operated in accordance with operating procedures identified in the Quality Assurance Handbook for Air Pollution Measurement Systems "Volume I: A Field Guide to Environmental Quality Assurance" and "Volume II: Ambient Air Quality Monitoring Program."

21. Expera shall be responsible for all operation and maintenance associated with the PM10 monitors. Expera shall properly change the PM10 filters in all sampling devices. Maintenance shall include, at a minimum, the replacement of any

equipment and cleaning on a schedule specified in the manufacturer's maintenance manual.

22. Expera shall order and pay for any necessary replacement parts, accessories, maintenance, etc.

23. Expera shall archive all filters from the PM10 filter-based instruments for at least two years.

24. Monitoring shall take place for at least one year from the date of installation.

Wind Speed and Direction Monitoring

25. Expera shall install a meteorological tower at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Expera shall correlate 1-hr and 24-hr ambient PM_{10} measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM10 concentrations (e.g., a pollution wind rose that displays the pollution concentration and wind direction frequency). The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) PM10 concentrations as recorded by the monitors. Expera shall maintain and/or submit reports and records in accordance with the paragraphs below.

26. With respect to the meteorological monitoring site, Expera shall follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at: http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf.

27. The internal clocks of all PM10 analyzers, data loggers, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference clock at least once every 30 days. Instrument clocks that are more or less than 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log.

28. Expera shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Expera shall order and pay for any necessary replacement parts, accessories, maintenance, etc.

General Requirements Applicable to All Requests

29. Within 30 days of EPA approval of the monitoring sites, Expera shall submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf.

30. Expera shall provide EPA access to the monitoring sites and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Expera shall take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance shall be approved by EPA prior to the change.

31. Expera shall keep a daily log and monthly reports of the following information:

    a. Each site visit and operator activities;
    b. Any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
    c. Any possible interferences observed by the operator such as nearby construction or demolition; and
    d. Any calibration data provided by the manufacturer or performed by Expera.

32. Hourly data from each monitor and meteorological monitoring site, and 24-hour data from gravimetric monitors shall be downloaded as ASCII comma-delimited files and provided to EPA on CD every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row. All filter analysis data, including any specification data shall also be provided.

33. Monthly reports and data specified in Items 31 and 32 above shall be submitted to EPA for a period of at least one year. Each report is due within 14 days of the end of the month being reported. At the end of the twelfth month, Expera may apply to EPA for a modification or termination of this request. At that time, EPA will re-evaluate and adjust, if necessary, the Section 114(a) request.

34. Expera shall submit the monthly reports via electronic mail to smith.molly@epa.gov, cantello.nicole@epa.gov, and R5enforcement@epa.gov. Expera shall also submit these monthly reports to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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

Keith Morgan, Mill Manager
Thilmany, LLC
Expera Specialty Solutions
600 Thilmany Road
P.O. Box 600
Kaukauna, Wisconsin 54130

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

Bill Baumann
Section Chief, Compliance and Enforcement
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707

Imelda Stamm
Supervisor, South Air Team
Wisconsin Department of Natural Resources
625 E. County Road Y, Suite 700
Peshtigo, Wisconsin 54157

On the 16th day of March 2015.

Kathy Jones
for Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2640 6387