

DHEC ORDER AUGUST 27th STATUS UPDATE

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1	New-Indy must provide public notice of activities that may increase odors.	5/17	<p>Plan submitted to DHEC 5/17.</p> <p>05/21/21 Update: New-Indy is building a website to provide updates to the public on activities the mill is taking to address odor concerns. The website display formats, graphics, and user interfaces are being designed to provide easy access to clearly understandable facts and data in a professional manner.</p> <p>05/28/21 Update: On May 26, 2021, New-Indy launched a website dedicated to facilitating communication and transparency with local residents and regulatory agencies (www.newindycatawba.com). This website includes daily reports explaining the EPA’s independent hydrogen sulfide data collection as well as information about our mill. The website will also include any public notices required by DHEC’s May 7, 2021 order and New-Indy’s May 17, 2021 Public Notification Plan.</p> <p>New-Indy met with representatives of DHEC and with local businesses to learn more about community engagement boards in South Carolina. New-Indy is in the process of organizing a community engagement board in a manner consistent with the information provided by DHEC and the local businesses. Among other things, New-Indy has asked various state and local officials to help us produce a list of people who may have an interest in participating on such board. New-Indy expects to have the board organized and to commence outreach to potential members next week.</p> <p>06/04/21 Update: The web site has begun seeing a larger increase in site visits since Friday, May 28. This increased site traffic is being fed by references from multiple other sites such as Facebook, PRNewswire, and Recycling Today. In response to DHEC feedback on the website, New-Indy is working on various enhancements to the website’s contents.</p> <p>New-Indy has compiled a complete list of potential community engagement board members from all officials. New-Indy finalized the comprehensive list of participants for the community engagement board and invitations to those participants are expected to start going out next week.</p> <p>06/11/21 Update: New-Indy has received final feedback from all officials on recommendations for the board members. The organizational documents for the community engagement board</p>

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			<p>have been completed this week. Invitations for all board members have been written and will go out next week.</p> <p>06/18/21 Update: New Indy issued a public notice on 06/16/21 regarding additional activities starting on 06/18 to continue surface solids removal from the ASB. New Indy shall continue to provide such notices as required.</p> <p>New Indy continues working to develop the data reporting process for delivering onsite and offsite results to the company web site as a part of our commitment to transparency with the public. At New-Indy’s direction, TRC Environmental Corporation (TRC) has set up three continuous air monitoring systems onsite at the Catawba mill. Subject to DHEC’s approval of New-Indy’s Offsite Monitoring Quality Assurance Project Plan, TRC will establish five additional air monitoring systems in various areas surrounding the mill in the near future (as further detailed in update number 4 below). TRC’s onsite air monitoring systems measure air H2S concentrations, wind direction, and wind speed. New-Indy has regularly submitted TRC’s onsite air monitoring results to EPA and will follow a similar process with the offsite monitoring results once the offsite systems are operational. The technology used in TRC’s air monitoring systems is similar to the technology used in EPA’s Vipor monitoring systems that have been monitoring H2S concentrations in the areas surrounding the mill.</p> <p>New-Indy’s website has displayed the EPA’s Vipor air monitoring data since May 13, 2021. To increase transparency and dialogue with local residents, New-Indy is in the process of updating its website landing page to also include TRC’s daily onsite and offsite air quality monitoring data. New-Indy presently intends to have daily onsite TRC H2S results available on the website landing page by the end of next week.</p> <p>New-Indy issued invitations to the community engagement board members on 6/18/21. The first board meeting is set to occur in the next two weeks.</p> <p>06/25/21 Update: New Indy continues to work with our consultant to finalize the data reporting format for both onsite and offsite monitoring results. Property owner approvals for installation of the offsite monitors is in progress. The onsite monitors will report both H2S</p>

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			<p>readings and wind direction & speed. The offsite monitors will report only H2S and will reference onsite monitor meteorological data as the reference for wind speed and direction.</p> <p>07/02/21 Update: All five (5) offsite monitors have been installed and are operational. The five monitors are either at the same location as used by EPA or in very close proximity, and are therefore completely representative of the areas being monitored. Once the report formatting and distribution lists are completed, the reports will be shared with governing agencies and posted onto the company websites for community awareness. The daily monitor reports will include both onsite and offsite monitor data for each location, and each of the offsite property owners/custodians shall receive the reports via email prior to posting on the company website. All reports shall be submitted and posted daily. There have been no exceedances of the EPA specified levels detected at any off-site monitor since such monitors were installed, and there have been no exceedances of the EPA specified levels detected at any on-site monitor since June 17, 2021.</p> <p>The first community engagement group meeting was held this week.</p> <p>07/09/21 Update: The Landing Page continues to undergo revisions to address the shift in reporting from EPA to New-Indy Catawba-supplied data reports on a daily basis. Historical data will be retained and accessible.</p> <p>Daily reports from the five (5) offsite monitors are being compiled and communicated regularly to both the resident hosts and governing agencies. The Daily average values are being built into the infographic on the Landing Page, as are links to each day's PDF reports. The daily PDF reports include both offsite and onsite monitor station data.</p> <p>07/16/21 Update: Ongoing.</p> <p>07/23/21 Update: Ongoing.</p> <p>07/30/21 Update: Ongoing.</p> <p>08/06/21 Update: New-Indy is working on additional improvements to the landing page, including additional explanatory information and data as well as a link to an online form residents can use to report odor complaints.</p>

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			<p>08/13/21 Update: The odor observation form is now live on www.Newindycatawba.com so, neighbors of the mill can report odor observations directly to us. The team is continuing to finalize other updates to the website.</p> <p>08/20/21 Update: New-Indy continues to make progress on final developments and revisions to a visual timeline of New Indy activities and a list of FAQ's with answers to be included on the website.</p> <p>08/27/21 Update: New Indy continues to wrap up the final stages of activities reported last week.</p>
2	Update and submit to DHEC a Notification of Intent for returning the stripper to operation	5/17	<p>Plan submitted to DHEC 5/17.</p> <p>05/21/21 Update: After implementing an aggressive schedule to ensure the Condensate Stripper was returned to service in a safe, clean, and reliable operating condition, it began processing foul condensate on May 3 and has continued to operate without interruption.</p> <p>With the stripper in service, the IPT was revised accordingly to reflect a combined use of the condensate stripper and the hard pipe arrangement for methanol destruction. The revised IPT was submitted to Michael Shroup of DHEC on May 17, 2021.</p> <p>The New-Indy project team continues to explore the Reduced Sulfur Compound test methods for use during the IPT.</p> <p>05/28/21 Update: Additionally, guidance from both NCASI and ALS Lab specialists has led NICB to select the ALS Sulfur Liquid + HACH 6000 method for measuring Reduced Sulfur Compounds during the IPT testing. The IPT is being revised to reflect these two changes, and the revised plan shall be submitted to the Department the week of 5/31/21.</p> <p>New-Indy has retained EBS to conduct a lithium tracer study in the ASB the week of 5/31/21 to determine specific sample point locations during the ASB methanol removal performance testing scheduled for July 7-11, 2021.</p> <p>06/4/21 Update: The ASB lithium tracer study is slightly delayed due to delivery issues.</p> <p>NICB received an EPA 114 Information request on 6/2/21 regarding the IPT and requesting additional Plan modifications. This EPA request has delayed completion of the final IPT to</p>

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			<p>DHEC and is being thoroughly evaluated to ensure that NICB’s IPT is effectively developed and documented. NICB’s response to EPA is due 6/16/21, a copy of which shall also be provided to DHEC.</p> <p>Please be advised that due to a required operations maintenance outage scheduled for 6/16-18/21, the IPT dates have been delayed one week to 6/21/21 – 7/11/21.</p> <p>06/11/21 Update: As referenced on 6/4/21, NICB continues to compile information and develop responses to EPA’s 114 information request regarding the IPT. New Indy has also received an additional set of questions from SC DHEC regarding process measurements and sampling & testing protocols within the IPT. All responses will be compiled and submitted by the 6/16/21 deadline. Once New Indy’s responses are submitted and the regulatory agency’s requirements are satisfied, the revised IPT shall then be updated and re-submitted to DHEC.</p> <p>The condensate stripper was shutdown this week as scheduled for the removal of an in active piece of the stripper. The piece of equipment was shipped off site to have it reconditioned. Once that piece of equipment is returned to New-Indy we will take another short outage to install that piece of equipment.</p> <p>06/18/21 Update: NICB modified the IPT based on comments from both the US EPA (via a Section 114 Information Request dated 6/2/2021) and from David Monroe of the DHEC Source Evaluation Section. This updated IPT was submitted to the Department on 6/15/21. Sampling under the IPT protocol will begin 6/21/21.</p> <p>The historically inactive component which was removed from the foul condensate stripping operation continues to undergo an extensive rebuild process. Once complete, the refurbished component will become an additional active component in the foul condensate stripping process.</p> <p>06/25/21 Update: The stripper system shutdown reported in the 06/11 update has not been ongoing as has been suggested by outside resources. The shutdown began at 1100 on June 8 and was completed with the stripper being back online and operational at 0030 on June 9 for a total downtime of only 13.5 hours.</p> <p>Refurbishment repairs are ongoing for the component which was removed on June 8.</p>

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			<p>07/02/21 Update: The stripper remains fully operational and treats on average 470 gpm. The US EPA issued a Section 114 Letter on 6/30/21 requiring a method change for measurement of TRS compounds during the IPT sampling and testing effort. New-Indy is coordinating with laboratories capable of conducting the US EPA-mandated test method to complete the testing protocol within the scheduled timeline of July 7-11, 2021.</p> <p>07/09/21 Update: Coordination with a secondary laboratory to meet the EPA requirement for an alternate TRS compound test protocol has been completed. The three-day sampling program centering on the ASB and stripper operations will be conducted 7/9-11/21, which will complete the IPT.</p> <p>The reflux trim condenser repairs are ongoing and are estimated to be completed for re-installation in the near future.</p> <p>07/16/21 Update: The Initial Performance Test was completed on 7/11/21. A proposal for Subpart S demonstration of continuous compliance until the IPT report is finalized and approved was submitted to DHEC and EPA on 7/15/21. EPA has approved New-Indy's request to submit the final report by 8/30/21.</p> <p>The reflux trim condenser repairs are near completion. Once the mechanical contractor has completed pressure testing on the vessel, it will be returned to the mill for reinstallation.</p> <p>07/23/21 Update: Samples are being analyzed by the contract laboratories. New-Indy is compiling the information to submit the final report to DHEC by 8/30/21.</p> <p>The Trim Reflux Condenser repairs are complete, the unit has been delivered back to the mill and has been installed. Final installation checkouts are being performed to ensure it is safely returned to service.</p> <p>07/30/2021 Update: Samples continue to be analyzed. New-Indy will submit the final report to DHEC by 8/30/21.</p> <p>08/06/21 Update: The reflux trim condenser repairs have been completed, and the unit has been re-installed. Final system checks are in progress to ensure that Process Safety Management standards are met prior to re-commissioning the condenser back into full-time service.</p>

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			<p>New-Indy will submit the final IPT report to DHEC by 8/30/21.</p> <p>08/13/21 Update: New-Indy continues to compile the results of the Initial Performance Test for submittal of the report to DHEC by 8/30/21.</p> <p>08/20/21 Update: The Initial Performance Test report will be submitted to the Department by 8/30/21.</p> <p>08/27/21 Update: Process Safety Management system checks are ongoing for activating the Trim Reflux Condenser.</p> <p>The Initial Performance Test report is under review and will be submitted to the Department by 8/30/21.</p>
3	New-Indy is required to evaluate all potential sources of odors on-site with NCASI, with focus on how the conversion from bleached to brown paper impacts emissions.	6/1	<p>NCASI staff continues to work closely with New-Indy to evaluate all potential odor sources and associated methods to minimize odorous emissions.</p> <p>A key focal point in this effort is to re-evaluate the predicted environmental impact of converting from bleached to high kappa unbleached products. Although widely accepted industry standards were used for initial predictions, using a combination of newly available information from NCASI and the data from planned stack testing will position New-Indy to establish a more site-specific prediction for environmental capabilities (as opposed to more generic industry standards).</p> <p>05/28/21 Update: Ongoing consults with NCASI have confirmed that New Indy correctly applied all emission factors utilized in the 2019 and 2020 Air permitting applications. This review also confirms that the emission factors utilized are the most up-to-date factors available for modeling New Indy’s Catawba operation. New Indy continues to rely on NCASI input and guidance to review and address operating conditions to minimize potential odor emissions.</p> <p>The final response to this item remains on target for submittal by the June 1, 2021 deadline.</p> <p>06/4/21 Update: On June 1, New-Indy submitted the final response to the Department. NCASI has confirmed that all calculations and emissions factors associated with the 2019 and 2020 air permitting applications were accurate. Using these factors, New-Indy is decreasing H2S</p>

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			<p>emissions by 1.9 tons/year by running the foul condensate stripper (compared to historic bleached operation with the foul condensate stripper in service).</p> <p>06/11/21 Update: New Indy has determined that the wastewater treatment plant’s post-aeration basin may be an occasional contributor to onsite elevated hydrogen sulfide readings. In response, the basin has been covered with a tarp and placed under slight negative pressure by a fan which pushes the air volume through an activated carbon filter unit. This system received DHEC approval prior to initiation on June 8, 2021.</p> <p>Preliminary operating data (only two days) suggests that the carbon filter unit is a potentially effective solution. Additional operating time is required to define the long term effectiveness, but New Indy will continue its operation as a temporary method. Meanwhile, New Indy is also consulting with other outside resources to explore potential best practices approach to this kind of situation on a longer term basis.</p> <p>6/18/21 Update: New-Indy continues to utilize the temporary activated carbon filtration (ACF) system at the post-aeration basin (PAB). The temporary cover was reinforced on 06/14 to address damage created by a strong thunderstorm over the preceding weekend. Additionally, the PAB vapor exhaust system has been upgraded to improve the vapor capture for treatment in the ACF system. Early testing continues to demonstrate improved H2S levels around the PAB structure. The potential value and/or need for a permanent vapor filtration system is still being studied.</p> <p>Meanwhile, New-Indy continues to contact additional environmental treatment companies to review potential PAB vapor treatment options to determine the best long term solution, should that be deemed necessary.</p> <p>New-Indy continues to implement corrective measures this week at Pond 1. These measures include continued use of two (2) surface aerators (pond’s north end) and the addition of ferric chloride to Pond 1’s influent (started 6/17/21).</p> <p>06/25/21 Update: The activated carbon media was replaced in the filtration system June 19, 2021. Hydrogen peroxide addition was initiated in #1 Holding Pond on 6/25/21.</p> <p>07/02/21 Update: No new actions have been implemented since the last update. New-Indy continues to add hydrogen peroxide and ferric chloride to the No.1 Holding Pond, run extra</p>

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			<p>aerators at the No.1 Holding Pond entrance, and operate the carbon filtration system at the Post-Aeration Basin.</p> <p>07/09/21 Update: Ongoing. No new activities.</p> <p>07/16/21 Update: No new actions were implemented over the last week. All monitoring parameters demonstrate the positive impacts of the hydrogen peroxide, ferric chloride and oxygen additions to the wastewater, as well as the carbon filtration system efficiency at the Post-Aeration Basin.</p> <p>07/23/21 Update: There have been no changes to the current WWTP management program. New-Indy continues to add hydrogen peroxide, ferric chloride and oxygen to the wastewater treatment system, operate 2 aerators in the #1 Holding Pond, and utilize a carbon filtration system at the Post-Aeration Basin.</p> <p>07/30/21 Update: Ongoing. No new potential odor sources have been identified.</p> <p>08/06/21: SLR Consulting conducted an analysis of the wastewater treatment facility to further identify potential sources of odor during the week. New-Indy will provide DHEC with the findings once they are received from SLR.</p> <p>08/13/21 Update: New-Indy continues to add hydrogen peroxide, ferric chloride and oxygen to the wastewater treatment system, operate 2 aerators in the #1 Holding Pond, and utilize a carbon filtration system at the Post-Aeration Basin.</p> <p>The SLR Consulting evaluation has been completed, and New-Indy is awaiting SLR's report and recommendations.</p> <p>08/20/21 Update: New-Indy continues to evaluate operations for potential sources of hydrogen sulfide generation. New-Indy is investigating the addition of ferric chloride to the ASB sludge dredge line to tie up any sulfide content in the material.</p> <p>08/27/21 Update: New-Indy is preparing the ePermitting application for the addition of ferric chloride to the ASB sludge dredge line as referenced in the 8/20/21 update.</p>

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4	New-Indy is required to develop a QAPP to monitor H2S onsite and offsite.	6/1	<p>New Indy’s consultant (TRC) continues compiling the QAPP for fence line monitoring per the EPA Emergency Order requirements. TRC is also compiling a proposed monitoring plan for off-site monitoring which shall be generally consistent with the current effort implemented by EPA with their community monitors.</p> <p>05/28/21 Update: The Onsite specific QAPP has been completed, and the offsite QAPP is being finalized. New Indy conducted a preliminary review meeting with DHEC on May 27, 2021 to discuss New Indy’s plan and DHEC expectations for offsite monitoring. The suggestions made by DHEC during this meeting are being incorporated into the initial Draft plan for submission by the June 1 deadline.</p> <p>06/04/21 Update: New-Indy submitted a revised onsite monitoring QAPP to the Department on June 1, 2021. New-Indy received EPA approval for its Final Remedial Plan on 05/28/2021, and this approval notification included some additional comments and guidance regarding the Onsite QAPP which had been submitted to them earlier that same week. The comments and guidance were incorporated into a final revision, and the final Onsite QAPP was then submitted to the Department on June 1, 2021.</p> <p>New-Indy initiated a conference call with the Department on May 25 to preliminarily review the offsite monitoring QAPP. The call was scheduled and held on May 27, which was very productive. New-Indy’s consultant then incorporated DHEC input into a further revision of the Offsite QAPP, and the final version was submitted to the Department on June 1, 2021.</p> <p>06/11/21 Update: Both onsite and offsite QAPP documents are being revised to address input from both EPA and DHEC. Once the feedback from both agencies is addressed within the documents, the final versions of each document shall be supplied to each agency.</p> <p>06/18/21 Update: Revisions have been completed with feedback from both agencies for both Onsite and Offsite QAPP documents. Internal review is being finalized with an expected submittal to DHEC and EPA by close of business on 06/18/21.</p> <p>A review meeting was held with DHEC on 06/16/21 to discuss the status of the QAPP documents. During that meeting, DHEC confirmed that the initially proposed offsite locations are acceptable. Accordingly, while the QAPP documents are undergoing final internal review, New Indy and our consultant are simultaneously finalizing the specific siting details for each of</p>

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			<p>the five (5) offsite monitor locations. Once the site locations are finalized on 06/18/21, New Indy will immediately seek property owner approvals and begin positioning these monitors in the field to bring them online.</p> <p>06/25/21 Update: The finalized QAPP documents were submitted to both regulatory agencies on 06/21/2021. New Indy, our consultant, and legal team are working to finalize offsite property owner approval for monitor siting and setup with a goal to complete the offsite monitor installations prior to the cessation of EPA’s offsite monitoring on 06/30. New Indy is also developing the data reporting format to allow monitor results to be easily accessed and understandable as we move forward with this implementation.</p> <p>07/02/21 Update: Following up from the last round of comments from DHEC, the offsite QAPP has been revised and is in final review with an estimated completion and resubmittal by the end of day, July 2, 2021.</p> <p>All five (5) offsite monitors are in place and reporting data. The data report format is finalized and final distribution lists determined, the reports have been communicated to the reporting agencies, monitor hosts, and will be subsequently posted to the company landing page.</p> <p>07/09/21 Update: All five (5) offsite monitors continue to function and report data. One monitor experienced a short term data communication error which was resolved very quickly, and there was no loss of data. At the property owner’s requests, two of the offsite monitors were slightly repositioned to a nearby more wide-open area, and one of those monitors was rechecked for precision detection, and the rechecked instrument was verified to be reading accurately. Additionally, New-Indy Catawba’s consultant has reinforced their ability to support both onsite and offsite monitoring with additional personnel availability and personnel training.</p> <p>07/16/21 Update: There was one more incident of delayed data uploading which apparently is due to poor cellular signals in that location. New Indy’s consultant is reviewing options to improve the situation for more reliable data uploads. Again, as with last week, there was no loss of data.</p> <p>New Indy’s consultant investigated a report of “missing wind direction data around the due North direction, and discovered an errant calculation setting in the Station 1’s software</p>

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			<p>settings. The setting has been corrected, and this only affects less than 0.30% of that station’s data. The same issue was not found with the meteorological units at either Station 2 or Station 3. This calculation error affected only the wind direction data, and had no impact on the measured H2S readings.</p> <p>07/23/21 Update: All offsite monitors underwent their scheduled periodic maintenance this week on Wednesday, July 21. The one offsite monitor in Riverchase which has experienced multiple data upload delays was replaced this week. New Indy’s consultant continues to explore the potential for switching that monitor location to a different cell service as a potential long term solution.</p> <p>As a follow-up on the “missing wind direction data” from Station 1 (onsite), New Indy’s consultant will go back through the wind direction data to correct the previously reported erroneous data points. Revisions and resubmittals will take place for any previous reports affected by these data corrections. All corrected reports shall be communicated to EPA, DHEC, and posted to the New Indy landing page website. A general statement shall also be included to thoroughly and clearly explain the correction to report recipients.</p> <p>07/30/21 Update: TRC completed the quarterly maintenance this week for all three onsite monitoring stations. There have been no further upload delays from the offsite monitor in Riverchase. TRC is also completing the data corrections for the northerly quadrant direction data points, and are estimating completion by Friday, August 6, 2021.</p> <p>08/06/21 Update: TRC is on schedule to complete the above referenced corrections to northerly quadrant wind direction data for Station 1 by the end of the day, Friday, August 6. Once these corrections are completed, all affected daily reports will be regenerated and redistributed to the agencies and the company Landing Page.</p> <p>During this past week, there were two incidents of power loss on monitoring stations, one offsite, and one onsite. The battery failed in the offsite monitor at Catawba Head Start, resulting in a short loss of data on Sunday, August 2. On Wednesday, August 4, the portable generator failed at one of the onsite monitor stations (Station 2). Corrective actions have been implemented to minimize potential repeated battery failures for all offsite monitors, and there is already an ongoing project to supply permanent power to the two onsite stations which</p>

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			<p>currently operate on portable generators. Permanent power installation is pending completion of the power company's permitting process.</p> <p>08/13/21 Update: TRC has completed the northerly quadrant data corrections and is in the process of updating all affected Daily reports.</p> <p>08/20/21 Update: Report updates are continuing, and final revisions to the offsite QAPP document is under review in preparation for submittal to DHEC.</p> <p>08/27/21 Update: Report updates are continuing, and final revisions to the offsite QAPP document is under review in preparation for submittal to DHEC. New Indy and TRC held a review call with Scott Reynolds (DHEC) early this week to ensure that this pending submittal addresses DHEC's questions and guidance.</p> <p>Additional questions were received last week from EPA regarding the onsite QAPP which are also being addressed by New Indy's consultant.</p>
5	New-Indy is required to develop a plan to test the stacks and vents to determine if emissions have increased.	6/1	<p>New-Indy has retained consultants to develop an enhanced stack testing plan and protocol. The scope of testing will be broader than that proposed by EPA and DHEC so that the resultant air dispersion modeling is representative of actual manufacturing conditions with the reconfigured operation.</p> <p>Developing this enhanced protocol is a direct result of New-Indy's commitment to aggressively and responsibly address the environmental concerns communicated by the local community and both government agencies. New-Indy seeks to generate air dispersion modeling results that accurately reflect the Catawba mill's actual manufacturing conditions.</p> <p>05/28/21 Update: The site-specific test plan is drafted and under review. Testing is scheduled for the weeks of June 21, 2021 and June 28, 2021. This plan will be submitted to the Department on 6/1/2021.</p> <p>06/04/21 Update: New-Indy submitted the Stack Test Plan to the Department on June 1, 2021. New Indy received additional questions on June 3, and completed a very productive and informative site visit with DHEC staff to review details associated with their questions. New-Indy expects to receive additional questions during the week of June 7, and will respond accordingly.</p>

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			<p>06/11/21 Update: On 6/10/21, NICB responded to the DHEC questions regarding the stack test plan which was submitted by the 06/01 deadline. DHEC staff has subsequently provided additional input with additional testing requirements on the Combination Boilers, the Pulp Dryer Vent and the 6 Dryer Vents on PM3. Satisfying the new stipulations will require New Indy to make engineered modifications to the PM3 and Dryer vent ducts.</p> <p>Despite New-Indy’s best efforts, the testing company is unable to start the test program until June 21, but such company has assured us that the full test will be complete on or before the date for such requirement set forth in the order.</p> <p>06/18/21 Update: New Indy continues to work with the DHEC Source Evaluation Section to establish the PM3 Dryer Exhaust Vent and Pulp Dryer Exhaust Vent testing protocol. The team decided that Methods 1-4 need to be applied to this testing, and this requires that all the vents be mechanically modified prior to testing. New Indy has held daily conference calls with DHEC staff to review the vent modifications. All PM3 dryer vent stacks have been modified accordingly, and our stack testing contractor has verified the absence of cyclonic flow (one of the testing requirements). The required design modification to the Pulp Dryer vent stack is ongoing.</p> <p>The Source Evaluation Section reviewed the Combination Boiler operating parameters for the Combination Boiler stack testing effort. New-Indy received final approval for the testing protocol on 6/18/21. Testing is scheduled to begin 6/21/21 and to wrap up on 6/30/21.</p> <p>Air dispersion modeling will begin no later than 15 days after completion of the stack testing, and completion of this effort will be within 45 days of the stack test completion.</p> <p>06/25/21 Update: The testing required under this condition was initiated on 6/21/21 and has been performed daily throughout the week. New-Indy and DHEC staff have worked cooperatively to develop a robust testing protocol that will fully meet the intent of this condition. New-Indy has hosted DHEC staff each day to allow for observation of testing activities and review the preliminary data and data validation efforts. New Indy shall complete all required testing by 6/30/21 deadline.</p> <p>07/02/21 Update: The stack testing required by this Condition was completed on 6/27/21. Data collection and sample analyses are ongoing.</p>

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			<p>New-Indy has submitted a proposed timeline for the facility-wide air dispersion modeling to the Department for review and approval. This tentative schedule was developed in consultation with DHEC Source Evaluation team members.</p> <p>07/09/21 Update: Stack testing is complete, and sample analysis is ongoing. Final results shall be provided to DHEC for review by the scheduled completion date of 07/27/21.</p> <p>07/16/21 Update: Data analysis is ongoing, and New Indy remains on schedule to submit results to the DHEC staff by the week of 7/26/21.</p> <p>07/23/21 Update: Complete. New-Indy submitted the test report to DHEC via Fed Ex on 7/23/21. The terms of this condition have been met.</p> <p>07/30/21 Update: Complete.</p>
5	New-Indy must commence that test with DHEC personnel to observe.	6/15	<p>New-Indy will provide the required notice to DHEC so they have the opportunity to observe the testing. After much discussion and schedule review with the stack testing contractor, testing cannot begin until the week of June 21, 2021, but the DHEC required testing will be completed by the June 30 deadline.</p> <p>05/28/21 Update: New-Indy will provide the required notice and opportunity for DHEC personnel to observe the planned testing. As noted above, the testing schedule will be 6/21/21 – 7/2/21.</p> <p>06/04/21 Update: Provided an informational tour of the paper machine and pulp dryer roof vents to DHEC staff to allow the Department to better evaluate the effectiveness of the testing protocol in meeting the objectives of this condition. New-Indy remains on track to perform the testing between 6/21/21 – 7/2/21.</p> <p>06/11/21 Update: Discussions have been held with the Source Evaluation Section to finalize the stack testing protocol. NICB remains on track to perform the testing between 6/21-30/2021. To ensure that NICB meets the 06/30/2021 deadline for test completion, NICB will be testing every day between those start and completion dates, including weekend days.</p> <p>06/18/21 Update: NICB remains on track to perform the testing between 06/21-30/2021, pending protocol approval by DHEC.</p>

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			<p>06/25/21 Update: New-Indy has hosted DHEC staff each day to allow for observation of the test, review, and validation of the preliminary data.</p> <p>07/02/21 Update: New-Indy hosted DHEC staff every day of the testing program as requested under this condition. Complete access was provided to the testing site, control room operating personnel, and any other area of interest.</p> <p>07/09/21 Update: Testing is complete. Nothing new to report.</p> <p>07/16/21 Update: Complete.</p>
5	Test the stacks and vents to determine if emissions have increased.	6/30	<p>As mentioned above, New-Indy seeks stack test results that are truly representative of Catawba's current operating performance. Accordingly, stack testing will be performed on additional stack vents which have not been required by EPA or DHEC.</p> <p>DHEC required testing is scheduled for completion by the June 30 deadline. All additional stack testing outside of the original order is scheduled for completion by July 2, 2021.</p> <p>05/28/21 Update: No updates this week.</p> <p>06/04/21 Update: See comments above.</p> <p>06/11/21 Update: See comments above.</p> <p>06/18/21 Update: See comments above.</p> <p>06/25/21 Update: See comments above.</p> <p>07/02/21 Update: See comments above.</p> <p>07/09/21 Update: See comments above.</p> <p>07/16/21 Update: See comments above.</p> <p>07/23/21 Update: Complete.</p>
5	New-Indy must conduct a facility wide air dispersion analysis.	7/15	<p>As mentioned in earlier discussion points, New-Indy is working closely with NCASI and consultants to complete a truly representative air dispersion modeling analysis. This enhanced modeling will not only be consistent with pre-conversion modeling efforts when the mill was</p>

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			<p>producing bleached pulp and paper products, it will also provide the most accurate comparative before/after analysis.</p> <p>05/28/21 Update: New Indy has thoroughly reviewed this requirement with both NCASI and ALL4, both of whom are highly experienced with this type of air dispersion modeling.</p> <p>06/04/21 Update: New-Indy and its consultants are prepared to conduct the facility-wide air dispersion modeling upon the release of the analytical results of the stack, vent and condensate testing.</p> <p>06/11/21 Update: Once the stack testing is completed, the samples shall be analyzed and all test results submitted through standard QA checks and reviews. It is very important that the data quality be validated before being used in an air dispersion model. NICB shall initiate modeling 15 days after the completion of the stack test.</p> <p>06/18/21 Update: Air dispersion modeling will begin no later than 15 days after completion of the stack testing, and completion of this effort will be within 45 days of the stack test completion.</p> <p>06/25/21: Air dispersion modeling will begin no later than 15 days after the completion of the stack testing.</p> <p>07/02/21 Update: New-Indy has submitted a proposed timeline for the facility-wide air dispersion modeling to the Department for review and approval. This tentative schedule was developed in consultation with DHEC Source Evaluation team members.</p> <p>07/09/21 Update: New-Indy Catawba has received DHEC approval for the proposed timeline for completion of the facility-wide air dispersion modeling. Consultants are ready to begin modeling once the stack test data is quality checked and DHEC has reviewed and approved all stack test data.</p> <p>07/16/21 Update: Stack test data are being compiled for submittal to DHEC for review and approval the week of 7/26/21. Modeling will commence once DHEC has completed its review.</p>

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			<p>07/23/21 Update: The stack test report was submitted to DHEC via Fed Ex on 7/23/21. Pending DHEC approval of test results, New-Indy will initiate modeling as required by this Condition.</p> <p>07/30/21 Update: New-Indy is preparing to conduct the facility-wide air dispersion modeling analysis for TRS, H2S and SO2 as required by this Condition. The final report will be submitted to DHEC by 8/30/21.</p> <p>08/06/21 Update: Ongoing.</p> <p>08/13/21 Update: The facility-wide air dispersion modeling analysis for TRS, H2S and SO2 is ongoing. The final report will be submitted to DHEC by 8/30/21.</p> <p>08/20/21 Update: New-Indy remains on track to submit the facility-wide air dispersion modeling analysis to DHEC by 8/30/21.</p> <p>08/27/21 Update: The facility-wide air dispersion modeling analysis will be submitted to DHEC by 8/30/21.</p>
6	Develop a corrective action plan for results of the evaluation of potential sources of H2S at the mill (order 3), which will become an “enforceable part of this Order” upon DHEC approval.	6/15	<p>Corrective actions are critically important to resolve performance gaps or deficiencies, and New-Indy is committed to both defining what deficiencies may exist and then resolving those issues in a timely and responsible manner. New-Indy and their consultants are actively working to develop a truly effective Corrective Action Plan to address all identifiable performance deficiencies, and this will be an increasingly progressive effort which will become more detailed and effective as additional data becomes available.</p> <p>For example, revalidating historically used emission factors and completed additional stack tests will both provide data from which the Catawba operation can be more accurately characterized.</p> <p>That said, the final version of this plan will be completed after the above activities are completed and air dispersion modeling results are available.</p> <p>In the meantime, all currently identifiable corrective actions and their implementation will be included in the preliminary plan which will be submitted by the June 15 deadline.</p> <p>05/28/21 Update: No updates this week.</p>

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			<p>06/4/21 Update: New Indy continues to evaluate its operations daily to identify and resolve any potential issues. Inspections are ongoing to ensure that operations remain in good mechanical condition.</p> <p>06/11/21 Update: As referenced in Condition 3, NICB has implemented an air filtration system at the post-aeration basin as of June 8, 2021. Additional process and operating parameters continue to be evaluated on a daily and weekly basis by both NICB and Consultant personnel. Furthermore, NICB continues working closely with our consultants to develop a thoroughly robust corrective action plan as directed by the Order.</p> <p>06/18/21: New-Indy submitted the Corrective Action Plan to the Department on 6/15/21 as required by the Order.</p> <p>New-Indy continues to use the temporary activated carbon filtration (ACF) system at the post-aeration basin (PAB). The temporary cover was reinforced on 06/14 to address damage created by a strong thunderstorm over the preceding weekend. Additionally, the PAB vapor exhaust system has been upgraded to improve the vapor capture for treatment in the ACF system. Early testing continues to demonstrate improved H2S levels around the PAB structure. The potential value and/or need for a permanent vapor filtration system is still being studied.</p> <p>In addition to the ongoing peroxide supplementation at the ASB inlet, other corrective measures implemented include the following:</p> <ul style="list-style-type: none"> - continued use of two (2) surface aerators (pond's north end), - ASB inlet oxygenation system was started up on 6/16/21, and - addition of ferric chloride to Pond 1's influent (started 6/17/21). <p>06/25/21 Update: The activated carbon media was replaced in the filtration system June 19, 2021.</p> <p>New-Indy continues to operate the two surface aerators.</p> <p>New-Indy continues to add ferric chloride to #1 Holding Pond.</p> <p>Hydrogen peroxide addition was initiated into the #1 Holding Pond on 6/25/21.</p> <p>07/02/21 Update: No new programs have been initiated to the system over the last 7 days. The currently implemented actions remain under close observation and evaluation to identify</p>

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			<p>and quantify their potential success. Ongoing monitoring demonstrates continuous improvement in water quality with the enactment of these initiatives.</p> <p>07/09/21 Update: No new programs have been initiated to the system over the last 7 days.</p> <p>07/16/21: New-Indy provided responses on 7/12/21 to the 7/7/21 DHEC request for information relative to the CAP.</p> <p>07/23/21 Update: No new information to report.</p> <p>07/30/21 Update: No new information to report.</p> <p>08/06/21 Update: Section 6.2 of the Corrective Action Plan presents the findings of the evaluation of potential sources of odor. The results of the emissions testing conducted in accordance with Condition 5 of this Order will be the basis for further efforts to reduce potential odor impacts from the operations. This report will be completed by August 30, 2021.</p> <p>08/13/21 Update: No new information to report.</p> <p>08/20/2021 Update: New-Indy received a new list of questions from DHEC on 08/16/21 regarding the CAP document submitted on 07/12/21. New-Indy is in the process of answering those questions.</p> <p>08/27/2021 Update: New-Indy continues to finalize responses to the DHEC CAP information request.</p>
7	Develop a CAP for the wastewater treatment plant.	6/15	<p>The corrective action plan for the wastewater treatment plant will be drafted once the results of the analysis of the potential sources of odors has been completed. NCASI is currently investigating modeling of H2S using their H2S modeling simulator.</p> <p>New-Indy is closely monitoring the WWTP operation and performance. Environmental Business Specialists LLC (EBS) and TRC have been retained to perform diagnostic analyses of the wastewater plant on a once/2-week cycle. The next visit is scheduled for May 25, 2021. Initial reviews have shown that ASB microbes are “alive and well” and that the ASB is performing as it should.</p> <p>SFC concluded their efforts in ASB solids removal activities and aerator repairs on May 19, 2021 with notable success. The amount of surface crust has been reduced and a total of 39</p>

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			<p>aerators are now in service. Discussions are underway with other contractors to develop the strategy for continued crust removal.</p> <p>This CAP requirement remains on schedule for submittal by the June 15 deadline.</p> <p>05/28/21 Update: Removal of ASB surface solids is an ongoing activity.</p> <p>The EBS biweekly review of the ASB confirmed viable microbiology in the system. The sampling performed this week identified the presence of more complex micro-organisms in the ASB.</p> <p>06/04/21 Update: New-Indy had a very productive meeting with its consultant this week to continue draft plan development. As plan development continues, New-Indy has already identified new technology for continual monitoring the ASB’s health and performance. Implementing this new technology is already built into the Plan. New Indy remains on schedule for completion and submittal to the Department by 6/15/21.</p> <p>06/11/21 Update: NICB has already implemented multiple actions aimed at mitigating hydrogen sulfide generation in the wastewater treatment plant.</p> <ul style="list-style-type: none"> - Two (2) surface aerators were approved by DHEC staff and installed in the #1 Holding Pond on 6/9/21. - Hydrogen Peroxide addition to the ASB influent was approved by DHEC and initiated on 6/9/21. - DHEC staff also approved the installation of 2 turbulator units in the ASB to improve mixing at the basin inlet. - Requests for approval for addition of chemicals to #1 Holding Pond were submitted on 6/10/21. <p>ASB Surface Solids removal is continuing, and NICB continues to adapt removal techniques to ensure that high rates of progress are effectively maintained. As additional surface solids are removed from around the aerators, repairs are made and those units returned to service in a controlled and consistent manner.</p> <p>06/18/21 Update: New-Indy continues to implement improvements to the WWTP operation. The actions below are in addition to those measures implemented the week of 6/11/21.</p>

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			<ul style="list-style-type: none"> - Oxygen addition to the inlet of the ASB was initiated on 6/16/21 to supplement the oxygen availability in the north end of the ASB. - Ferric chloride addition to the inlet of the #1 Holding Pond was implemented on 6/17/21. - Beginning 06/18/2021, the ASB surface solids removal process will be augmented with additional equipment in the north end of the ASB to improve the solids removal process. - Aerators will continue to be returned to service as access is made possible by the continuing removal of surface solids (estimated to last through mid-July). <p>06/25/21 Update: New-Indy continues to implement improvements to the WWTP operation. Actions enacted since the last update on 06/18/21 include:</p> <ul style="list-style-type: none"> - Activated carbon filtration media was replaced on 06/19/21. - ASB surface solids removal was supported with the use of two barge-mounted excavators. These units are accessing the areas in the north end of the basin which have not been achievable to-date. - Aerators will be returned to service in the north end of the pond as these solids are removed and access is created. - Hydrogen peroxide addition to the #1 Holding Pond was initiated on 6/25/21. <p>07/02/21 Update: Although no new programs were initiated since the most recent update, existing and ongoing actions continue to indicate progressive improvements in the water quality.</p> <p>The ASB solids removal program will be expanded to a third contract firm. This firm will work in addition to the existing two contract firms on solids removal.</p> <p>07/09/21 Update: The ASB solids removal program was expedited during the week with the start up of the third contract firm. Additional aerators are now accessible which will be repaired and returned to service over the upcoming week.</p> <p>07/16/21 Update: All aerators are accessible and diagnostic evaluations conducted. ASB solids removal continues this week at a brisk pace.</p>

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			<p>07/23/21 Update: Maintenance continues on the aerators. The ASB surface solids removal program is wrapping up. A Sentry Bioelectric Sensor was installed on the ASB effluent to provide real time monitoring of microbial metabolic activity to track system’s health and biological activity. Ongoing WWTP evaluations continue to reveal a high degree of restored health and function.</p> <p>07/30/21 Update: New cabling is being installed to continue the aerators repairs. The #1 Holding Pond level was reduced over the week, reducing the potential for odor generation in this basin. Sulfide testing showed minimal residuals.</p> <p>08/06/21 Update: Meetings with a second contractor have been held to increase settled sludge removal from the ASB as discussed in Item 2 of the CAP. The goal of this effort is to continue sludge removal from the ASB using a second dredge in September 2021. Aerator repairs reviewed in Item 4 of the CAP are ongoing with daily activity to complete repairs as quickly as possible. Item 6 of the CAP regarding weekly ASB microscopic and chemical analysis continue, and observations demonstrate viable microbiology resulting in high BOD removal across the basin. Sulfide concentrations throughout the system remain low at less than 0.2 mg/L. The Sentry probe listed in Item 7 was installed the week of July 23, 2021. Correlations between BOD and the bioelectric sensor continue to be developed. The wastewater treatment plant operations and maintenance manual (including the odor management plan) are complete and have been provided to DHEC.</p> <p>08/13/21 Update: The DHEC review of the wastewater treatment plant operations and maintenance manual (including the odor management plan) is completed, with opportunities for improvement to the document submitted to New-Indy on 8/6/21. New-Indy is editing the manual, with completion targeted by 8/24/21, at which time the revised manual will be provided to the DHEC.</p> <p>08/20/21 Update: The edit of the New-Indy operations and maintenance manual continues, targeting submittal for 8/24/21. Initiation of a second ASB sludge dredging operation continues, targeting a September 2021 start up. All 52 aerators in the ASB are now operational.</p>

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			08/27/21 Update: The revised operations and maintenance manual was submitted to the Department on 8/24/21.
8	Submit a weekly report each Friday to Renee regarding implementation of this order.	Start 5/14, weekly thereafter	<p>New-Indy is submitting this weekly report today and will continue to do so weekly. These reports will include all pertinent accomplishments from week-to-week. New-Indy will continue to work diligently to comply with DHEC expectations in a meaningful and effective manner.</p> <p>05/28/21 Update: Ongoing. 06/04/21 Update: Ongoing. 06/11/21 Update: Ongoing. 06/18/21 Update: Ongoing. 06/25/21 Update: Ongoing. 07/02/21 Update: Ongoing. 07/09/21 Update: Ongoing. 07/16/21 Update: Ongoing. 07/23/21 Update: Ongoing. 07/30/21 Update: Ongoing. 08/06/21 Update: Ongoing. 08/13/21 Update: Ongoing 08/20/21 Update: Ongoing. 08/27/21 Update: Ongoing.</p>