

ENVIRONMENTAL ANALYSIS AND DECISION ON THE NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT (EIS)

Form 1600-1

Rev. 6-2010

Department of Natural Resources (DNR)

Region or Bureau Air Management
Type List Designation Type II

NOTE TO REVIEWERS: This document is a DNR environmental analysis that evaluates probable environmental effects and decides on the need for an EIS. The attached analysis includes a description of the proposal and the affected environment. The DNR has reviewed the attachments and, upon certification, accepts responsibility for their scope and content to fulfill requirements in s. NR 150.22, Wis. Adm. Code. Your comments should address completeness, accuracy or the EIS decision. For your comments to be considered, they must be received by the contact person before 4:30 p.m., July 7, 2011

Contact Person: Bureau of Air Management Contact Paul Yeung
Title: Air Management Engineer
Address: P.O. Box 7921 Madison, WI 53707-7921
Telephone Number (608) 266-0672

Applicant: Green Bay Packaging Inc. – Green Bay Mill Division

Address: 1600 N. Quincy Street, P.O. Box 19017
Green Bay, WI 54307-9017

Title of Proposal: Green Bay Packaging Inc. – Green Bay Mill Division

Location: County: Brown City/Town/Village: Green Bay

Township Range Section(s): 24 North, Range 21 East Section 1

PROJECT SUMMARY

1. Brief overview of the proposal including the DNR action (include cost and funding source if public funds involved)

Green Bay Packaging Inc.-Green Bay Mill Division is proposing to replace the Fourdrinier table on the paper machine with a new table which may require the installation of a new stack to vent an additional vacuum pump. Also Green Bay Packaging is proposing to install a fine screen system, add a high density stock chest, base stock cleaning, modify the primary headbox, add a blow box, trial and replace felt and blanket designs. These changes may allow us to increase the actual paper production on a yearly basis to achieve our future potential of 800 tons of paper per day, as well as decrease energy demands. A potential building expansion to the fiber preparation area improvements may also occur. These changes will occur over a construction period of three years.

2. Purpose and Need (include history and background as appropriate)

Green Bay Mill Division has operated a containerboard (linerboard and medium) manufacturing facility at 1601 Quincy Street in the City of Green Bay since 1950. Within this facility, sources of secondary fiber (or equivalent) materials are treated to recover the fiber and are used for containerboard manufacturing. Green Bay Mill Division began using some recycled materials in 1950s and since 1991 has operated with 100 percent recycled materials.

Green Bay Mill Division is proposing the following modifications to increase the overall production capacity of the paper machine: Building expansion (including pouring cement pad and footings), replacement of the Fourdrinier table (which will include the installation of a new stack and additional vacuum pump), paper machine dryer section enhancements, paper machine press section enhancements, paper machine forming section enhancements, control system updates and/or

replacements, secondary fiber process modifications, process water and or stock system changes, paper machine cleaning changes, changes which may reduce energy demands, improve throughput, improve quality and or reduce downtime. The changes are needed for the facility to remain competitive and optimize resources.

3. Authorities and Approvals (list local, state and federal permits or approvals required)

An air pollution control permit must be acquired (issued) before commencement of construction of the proposed projects. An NR 405, Wisconsin Administrative Code, Prevention of Significant Deterioration Construction and Operation Air Pollution Control Permit application has been submitted to the WDNR.

Any expansion to the plant will be incorporated within the storm water plan if undertaken. There will be a local (City of Green Bay) building permit required for any construction. This may include an analysis to ensure that the increased footprint would not impact other sources in the event of a flood, as if so, easements may be required.

PROPOSED PHYSICAL CHANGES (more fully describe the proposal)

4. Manipulation of Terrestrial Resources (include relevant quantities - sq. ft., cu. yard, etc.)

A portion of the proposed changes in the fiber processing operations may require an addition to the existing facility. Total square footage of the new building structure will be defined during final engineering. A concrete floor will be poured and footings will be constructed to support the enclosure.

The Green Bay Mill Division is adjacent to the Proctor and Gamble- Fox River Mill. The proposed modification does not result in a significant PSD impact for PM, PM10 or PM2.5.

5. Manipulation of Aquatic Resources (include relevant quantities - cfs, acre feet, MGD, etc.)

None.

6. Buildings, Treatment Units, Roads and Other Structures (include size of facilities, road miles, etc.)

A portion of the proposed changes in the fiber processing operations may require an addition to the existing facility. A concrete floor will be poured and footings would be constructed to support the enclosure.

A new ventilation stack will be added to the building in conjunction with replacement of the Fourdiner table, for an added vacuum pump vent.

7. Emissions and Discharges (include relevant characteristics and quantities)

Air emission sources modified by the proposed project include P90 Paper Machine Cleaning, P91 Stock and Process Water Additives (includes secondary fiber processing) and P92 Paper Machine Emissions. Affected source will be Boilers (B26, B33), Fugitive dust (F02) unpaved roadway and traffic activities and (F05) ash handling. The proposed project will result in a potential increase in volatile organic compounds (VOCs) and particulate matter (PM/PM₁₀/PM_{2.5}) from the physically modified sources and an increase in SO₂, NO_x, and CO from the potential increased utilization of the Boilers. These quantities of boiler emissions do not require an increase over current permitted emissions levels.

The net emissions increases due to the proposed project are presented in the following table.

Net Emissions Increases

Process		Emissions (TPY)	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Lead
B26	Coal Fired Boiler	Past Actual	36.27	23.90	23.05	1199.45	131.47	1.05	105.22	0.009
		Future Actual	54.49	30.76	29.15	2299.79	443.82	2.02	201.74	0.017
P90	Paper Machine Cleaning	Past Actual	0	0	0	0		28.92	0	0
		Future Actual	0	0	0	0	0	75.92	0	0
P91	Stock and Process Water Additives	Past Actual	0	0	0	0	0	76.86	0	0
		Future Actual	0	0	0	0	0	138.70	0	0
P92	Fiber Preparation and Paper Machine	Past Actual	16.42	10.26	9.28	0	0	30.58	0	0
		Future Actual	20.44	12.77	11.55	0	0	38.06	0	0
F02	Unpaved Roadway Fugitive Emissions	Past Actual	2.59	0.66	0.08	0	0	0	0	0
		Future Actual	3.27	0.83	0.11	0	0	0	0	0
F04	Coal Pile Storage and Handling	Past Actual	0.21	0.21	0.21	0	0	0	0	0
		Future Actual	0.28	0.28	0.28	0	0	0	0	0
F05	Ash Handling and Loading	Past Actual	1.09	0.6	0.6	0	0	0	0	0
		Future Actual	1.91	1.05	1.05	0	0	0	0	0
Total		Past Actual	56.58	35.63	33.22	0	0	0	0	0
		Future Actual	80.39	45.69	42.14	0	0	0	0	0
Net Increase			23.81	10.06	8.92	1100.34	212.35	117.28	96.52	0.008
PSD Threshold			25.00	15.00	10.00	40.00	40.00	40.00	100.00	0.60
PSD Applicability			No	No	No	Yes	Yes	Yes	No	No

Since the net increases of SO₂, NO_x, and VOC emissions are more than the respective significant levels in s. NR 405.02(27), Wis. Adm. Code, the project is subject to major source review for these pollutants emitted due to this project. VOC emissions will be subject to best available control technology (BACT). The increases for SO₂ and NO_x emissions are due to debottlenecking of their coal fired boiler, and that boiler will have no physical modification, so as such the SO₂ and NO_x emissions will not be subject to BACT because of this project.

There will be no increase in hourly emission limits for CO, SO₂, and NO_x, therefore, the ambient air review done in the previous construction permit 06-DCF-070 will remain valid, and that showed compliance with ambient air standards and increment.

The increased production of secondary fiber pulps and increased paper production is not anticipated to result in wastewater discharges, but the potential increased production may require additional water input (and increased water vapor discharge as the paper is produced and dried). The Green Bay Mill Division operates a closed loop water system that does not have any significant wastewater discharges. Any additional water use will be within the amounts allowed under current permits and/or approvals. There may be additional storm water from the proposed building expansion placed over the semi-permeable gravel area, and water runoff from the building will be directed to existing collection systems. These changes (if the building expansion is undertaken) will be incorporated into the storm water plan.

8. Other Changes

No other changes are anticipated.

9. Identify the maps, plans and other descriptive material attached

- Attachment County map showing the general area of the project
- Attachment USGS topographic map
- Attachment Site development plan
- Attachment Plat map
- Attachment DNR county wetlands map
- Attachment Zoning map
- Attachment Other - Describe: Maps, plot plan provided with the construction permit application.

AFFECTED ENVIRONMENT (describe existing features that may be affected by proposal)

10. Information Based On (check all that apply):

Literature/correspondence (specify major sources)

Natural Heritage Inventory search, permit application

Personal Contacts (list in item 26)

Field Analysis By: Author Other (list in item 26)

Past Experience With Site By: Other (list in item 26)

11. Physical Environment (topography, soils, water, air)

Green Bay Packaging Inc. – Green Bay Mill Division is located on the northeast side of the City of Green Bay in a residential/industrial area, adjacent to the east bank of the Fox River approximately ½ mile from the river’s confluence with Green Bay. The elevation at the facility is approximately 590 feet above sea level. The topography surrounding the facility is relatively flat, with a rise in elevation to about 700 feet (ASL) occurring 5-6 km from the plant to the east and west. The facility is within the valley formed by the Fox River. The entire area is indicated as within the Fox River floodplain based on

the FEMA map overlays. Flooding has occurred within the last 20 to 30 years, when a strong offshore wind caused the river to back up.

12. Biological Environment (dominant aquatic and terrestrial plant and animal species and habitats including threatened/endangered resources; wetland amounts, types and hydraulic value)

This is an existing industrial site within a largely industrial area, and is just south of an elevated highway. A proposed building addition site, described as an addition to the fiber processing operations, is primarily gravel. There is little vegetation in the immediate area of the plant, but the area supports trees, shrubs, grasses and other plants typical of an urban / suburban environment. Terrestrial wildlife within the area is largely birds and small mammals. The nearby river and river mouth are home to riparian plants and animals (aquatic plants, insects, snails and other invertebrates, birds (including migratory birds), frogs, reptiles and numerous game and bait fish species and small mammals). There are nearby wetland / marsh areas, which provide habitat for a wide variety of plants and animals (wetland vegetation, insects, snails and other invertebrates, birds, frogs, reptiles, fish and small mammals).

A review of the Natural Heritage Inventory (NHI) for the Township / Range location area (42421) indicates that there may be sensitive species of birds, plants and invertebrates that reside within this area; however, NHI map overlays of the area show no sensitive or endangered species known to be located on the property.

13. Cultural Environment

- a. Land use (dominant features and uses including zoning if applicable)

The proposed project is a modification to an existing facility. No additional land is being acquired or developed. No zoning changes are required since the land is already zoned and developed as industrial.

- b. Social/Economic (including ethnic and cultural groups)

The area consists of a mixture of residential, commercial and industrial areas that have considerable ethnic and cultural diversity.

- c. Archaeological/Historical

No known archaeological or historical sites are known to exist within the site currently owned and occupied by Green Bay Mill Division.

14. Other Special Resources (e.g., State Natural Areas, prime agricultural lands)

There are no known special resources that will be affected by the projects.

ENVIRONMENTAL CONSEQUENCES (probable adverse and beneficial impacts including indirect and secondary impacts)

15. Physical (include visual if applicable)

The proposed projects may include an expansion of the existing structure at the facility's current site. This is an industrial site and it is therefore believed that this physical change would have minimal impact.

16. Biological (including impacts to threatened/endangered resources)

There are no known or anticipated adverse biological impacts expected as a result of the proposed action. The proposed building addition is not anticipated to impact or affect the habitat of sensitive species.

17. Cultural

- a. Land Use (including indirect and secondary impacts)

The land to come under cover is already owned and occupied by Green Bay Packaging Inc. – Green Bay Mill Division and is already in industrial use. The proposed building expansion would result in minimal environmental impact.

- b. Social/Economic (including ethnic and cultural groups, and zoning if applicable)

The proposed project is not anticipated to increase employment or have other significant social effects. A slight increase in vehicle traffic on local roads due to more deliveries of supplies and shipments of finished products is anticipated.

Overall the social aspects of the proposed project should be beneficial in that it will add to the sustained economic resource base of the community. The economic impact should be modest. No ethnic or cultural group would be socially or economically affected by this project.

c. Archaeological/Historical

There are no known or anticipated impacts to archaeological or historical sites as a result of the proposed action.

18. Other Special Resources (e.g., State Natural Areas, prime agricultural lands)

There are no known impacts to other special resources as a result of the proposed action.

19. Summary of Adverse Impacts That Cannot Be Avoided (more fully discussed in 15 through 18)

The modifications to the Mill may result in an increase in potential emissions of criteria air pollutants. The impact of these emissions cannot be avoided. However, the PSD significant impact evaluation has shown that the proposed modification does not result in a significant impact for PM, PM10 or PM2.5 under ch. NR 405, Wis. Adm. Code. Analysis of air quality as a portion of the permit review, indicates that the modified facility will meet current air quality standards. The project will not have a significant effect on the nearby river or wetlands as it will not require any clearance of vegetation.

Any additional storm water runoff created by the proposed building expansion will be handled by the existing collection systems. Though the building addition would occur within the floodplain, the entire facility is thought to be located within the floodplain, and there are no alternative sites available that would allow the expanded operations to be incorporated into the existing stock preparation process.

DNR EVALUATION OF PROJECT SIGNIFICANCE (complete each item)

20. Environmental Effects and Their Significance

- a. Discuss which of the primary and secondary environmental effects listed in the environmental consequences section are long-term or short-term.

The emissions that may result from the projects listed would add to the pollutant emissions loading of the surrounding area. Future projects may be restricted due to increment and air resource consumed (under ch. NR 404, Wis. Adm. Code). This is a long-term effect of the project.

VOC emissions are known to be precursors in the formation of ground-level ozone, but these additional emissions are not expected to cause or contribute to a violation of air quality standards for ozone. Brown County is currently classified as attainment for ozone. The building expansion may increase the amount of storm water runoff and the increased building footprint may have an effect in the event of a flood event. This is also a long-term effect of the project.

- b. Discuss which of the primary and secondary environmental effects listed in the environmental consequences section are effects on geographically scarce resources (e.g. historic or cultural resources, scenic and recreational resources, prime agricultural lands, threatened or endangered resources or ecologically sensitive areas).

Impacts on any geographically scarce resource are not known or anticipated.

- c. Discuss the extent to which the primary and secondary environmental effects listed in the environmental consequences section are reversible.

The majority of the environmental effects from emissions increases from the project are reversible by reductions in the emissions from the facility.

21. Significance of Cumulative Effects

Discuss the significance of reasonably anticipated cumulative effects on the environment (and energy usage, if applicable). Consider cumulative effects from repeated projects of the same type. Would the cumulative effects be more severe or substantially change the quality of the environment? Include other activities planned or proposed in the area that would compound effects on the environment.

The emissions that may result from the projects listed could add to the pollutant loading of the surrounding area. Future projects of the same type may be restricted due to the increment and air resource consumed as a result of the facility, and

other facilities in the area.

22. Significance of Risk

- a. Explain the significance of any unknowns that create substantial uncertainty in predicting effects on the quality of the environment. What additional studies or analysis would eliminate or reduce these unknowns?

There are always unknowns associated with environmental impact analyses that create uncertainty in predicting the effects a proposed action/s may have on the environment. However, the air impacts from the project are quantified/ modeled using current EPA approved models, and there are no significant impacts expected from the modifications on water quality. The significance of unknowns is not believed to be substantial. No additional studies or analyses should be required.

- b. Explain the environmental significance of reasonably anticipated operating problems such as malfunctions, spills, fires or other hazards (particularly those relating to health or safety). Consider reasonable detection and emergency response, and discuss the potential for these hazards.

The existing structure and the possible expansion are built according to all applicable fire control standards. Local emergency control agencies are informed of materials used and stored at a facility. Appropriate safety and spill response manuals are maintained. Employees are trained annually.

23. Significance of Precedent

Would a decision on this proposal influence future decisions or foreclose options that may additionally affect the quality of the environment? Describe any conflicts the proposal has with plans or policy of local, state or federal agencies. Explain the significance of each.

A decision on this proposal is not anticipated to influence decision or foreclosure options that may affect the quality of the environment.

24. Significance of Controversy Over Environmental Effects

Discuss the effects on the quality of the environment, including socio-economic effects, that are (or are likely to be) highly controversial, and summarize the controversy.

No significant controversy is anticipated as a result of this project.

ALTERNATIVES

- 25. Briefly describe the impacts of no action and of alternatives that would decrease or eliminate adverse environmental effects. (Refer to any appropriate alternatives from the applicant or anyone else.)

The changes being proposed are required for the Green Bay Mill Division to remain competitive in the linerboard and medium manufacturing market. Some of these changes may enable the facility to produce their product with less energy, increase usage of secondary fibers and lower the costs of production. No action could have negative economic ramifications.

The facility is proposing to control emissions from the facility under the federal PSD program, using the Best Available Control Technology (BACT). The Department requires that the project meets all applicable air quality requirements, meets PSD BACT and undergo public review prior to air permit issuance. During the public review period, the company or general public may comment on the proposed decision. The facility or public may also appeal the final decision by requesting a contested case hearing or by requesting judicial review.

SUMMARY OF ISSUE IDENTIFICATION ACTIVITIES

- 26. List agencies, citizen groups and individuals contacted regarding the project (include DNR personnel and title) and summarize public contacts, completed or proposed).

<u>Date</u>	<u>Contact</u>	<u>Comment Summary</u>
Feb, March 2011	Jennifer Peplinski Environmental Manager	Discussion of projects, EA
Dec.	Jonathan J. Wright	Discussion of projects, EA

PRELIMINARY DECISION

In accordance with s. 1.11, Wis. Stats., and Ch. NR 150, Wis. Adm. Code, the Department is authorized and required to determine whether it has complied with s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code.

The Department has made a preliminary determination that the Environmental Impact Statement process will not be required for this action/project. This recommendation does not represent approval from other DNR sections which may also require a review of the action/project.

Signature of Evaluator <i>Paul C. Lyons</i>	Date Signed 7/8/2011
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FINAL DECISION

The public review process has been completed. The Department received and fully considered responses to the news release or other notice.

Pursuant to s. NR 150.22(2)a., Wis. Adm. Code, the attached analysis of the expected impacts of this proposal is of sufficient scope and detail to conclude that this is not a major action, and therefore the environmental impact statement process is not required prior to final action by the Department.

The Department has determined that it has complied with s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code. This decision does not represent approval from other DNR sections which may also require a review of the action/project.

Signature of Environmental Analysis Program Staff <i>[Signature]</i>	Date Signed 7/8/2011
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NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review must name the Department of Natural Resources as the respondent.

To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing does not extend the 30 day period for filing a petition for judicial review.