

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

Form 1600-1

Rev. 6-2001

Department of Natural Resources (DNR)

Region or Bureau  
NER

Type List Designation  
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., Insert Date.

Contact Person:  
Don C. Faith III, P.E.

Title: Air Management Engineer

Address: 101 S. Webster (P.O. Box 7921)

Madison, WI 53707

Telephone Number

608 267-3135

Applicant: **Fort James Operating Company**

Address: **1919 South Broadway, Green Bay, WI, 54304 or  
P.O. Box 19130, Green Bay, WI 54307-9130**

Title of Proposal: **PSD Permit Application for Modifications to Multiple Paper Machines**

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

Township Range Section(s): **Quarter-Quarter Section SW, Quarter Section SE, Section 2, Township 23N, Range 20E.**

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PROJECT SUMMARY

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

**Fort James is proposing multiple projects on its paper machines numbers 1,5,6,7,8,9, and 10 to maintain or increase production capabilities. The proposed project may also involve replacement of paper machine dryer burners.**

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

**These projects are intended to improve machine efficiency, minimize variation, and afford the opportunity to increase total machine production tons at the mill.**

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

**Air emissions permitting: PSD application submitted by facility to Wisconsin Department of Natural Resources in February 2005.**

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PROPOSED PHYSICAL CHANGES (more fully describe the proposal)

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

**No terrestrial resources will be manipulated as these are changes to the existing paper machines.**

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

**No aquatic resources will be manipulated as these are changes to existing paper machines.**

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

**The buildings housing the paper machines will not change in dimension as a result of performing the proposed activities. Treatment units, roads, and other structures will also be unaffected.**

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

**This information is described in detail in the PSD application submitted by the facility to Wisconsin Department of Natural Resources in February 2005. The emissions shown on the attached page outline the potential/actual air emissions from the paper machine and the potential/actual emissions from any process or operation that may experience an increase in emissions as a result of the paper machine and associated processes operating at full capacity (e.g. boilers, pulping, ..., noted as 'affected sources'). The PSD review process evaluates the maximum net emissions increase possible by examining emissions from operation at maximum capacity less the current actual emissions from the facility. Generally, the potential emissions shown are the levels of emissions that the facility is currently allowed to emit, though actual emissions are typically much lower.**

8. Other Changes

**None significant.**

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

**Maps enclosed in PSD permit application (February 2005).**

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:

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

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

Literature/correspondence (specify major sources)

**The February 2005 PSD application for the Facility.**

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)

**The mill site is adjacent to the Fox River. The buildings housing the paper machine are approximately 700 feet west of the river. The ambient air quality is not classified as non-attainment for any air pollutant. The area around the mill is urban residential and commercial. The topography and soils will not be affected by this modification.**

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

**The terrestrial animal species present are typical of urban settings, comprised primarily of squirrels, chipmunks, and occasional rabbits. Plant life in the area is typical of mixed use urban / residential areas. A wide variety of birds are present including sea gull, pigeon, sparrow, and other land birds – plus migratory birds such as duck, robin, and blackbird. There are no wetland areas on the mill site proper. Aquatic life in the Fox River is predominantly assorted fish, amphibians and other riparian plants and animals.**

13. Cultural Environment

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

**The land surrounding the mill is used for residential and commercial purposes.**

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

**The area is predominantly white middle class.**

- c. Archaeological/Historical

**The area is not known to be a significant archaeological or historical site.**

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

**None.**

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

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- 15. Physical (include visual if applicable)

**The proposed project will have the potential to increase utilization of the mill's paper machines and is expected to result in an increase in actual and potential emissions. The emissions increases have been evaluated and have been determined to meet current applicable standards for air quality. Increased paper production will likely result in increased water and energy usage. The mill uses predominantly recycled paper as a feedstock for their paper production.**

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

**No significant biological impacts are anticipated as a result of these projects.**

- 17. Cultural

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

**No significant land use impacts are anticipated as a result of these projects.**

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

**No significant social or economic impacts to the community are anticipated as a result of these projects.**

- c. Archaeological/Historical

**No archaeological or historical consequences are anticipated as a result of these projects.**

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

**Not applicable.**

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

**No adverse impacts are anticipated from these projects.**

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DNR EVALUATION OF PROJECT SIGNIFICANCE (complete each item)

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- 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 potential increases in emissions from the project are expected to be long term, but these are not anticipated to result in large changes in actual emissions.**

- 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).

**The emissions increases from the project are not anticipated to have significant environmental effects, as the project and facility will continue to meet air quality standards. Note that the project will 'consume' some of the available increment and a portion of the available air resource.**

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

**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 anticipated cumulative effects of significance on the environment is from the use / 'consumption' of the available air resource, energy usage and water usage / discharge. Note that repeated projects of the same type could consume the available air resource to the point where no further expansion could occur, but the air quality standards used to establish the amount of available resource are intended to be protective of the environment. The project will have an effect on energy usage, water usage and water discharge from the facility (increased energy and water usage / discharge from increased paper production), though some aspects of the project are intended to improve efficiency.**

#### 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 no significant unknowns from these projects that would create substantial uncertainty in predicting effects on the quality of the environment.**

- 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.

**This change will not result in potential operating problems above those that are already reasonably anticipated to exist. Trained personnel in the mill are prepared to detect and respond as appropriate to malfunctions, spills, and fires.**

#### 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?

**No.**

Describe any conflicts the proposal has with plans or policy of local, state or federal agencies. Explain the significance of each.

**No conflicts have been identified,**

#### 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.**

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#### ALTERNATIVES

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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.)

**No action will ultimately lead to a significant decrease in the utilization of these paper machines.**

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#### SUMMARY OF ISSUE IDENTIFICATION ACTIVITIES

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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>
4/6/05	Rob Bermke	EA questionnaire provided.

DECISION (This decision is not final until certified by the appropriate authority)

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

Complete either A or B below:

A. EIS Process Not Required



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 which would significantly affect the quality of the human environment. In my opinion, therefore, an environmental impact statement is not required prior to final action by the Department.

B. Major Action Requiring the Full EIS Process



The proposal is of such magnitude and complexity with such considerable and important impacts on the quality of the human environment that it constitutes a major action significantly affecting the quality of the human environment.

Signature of Evaluator <i>Don C. Jett</i>	Date Signed 7/21/05
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Number of responses to news release or other notice:

*none (regarding EA)*

Certified to be in compliance with WEPA	
Environmental Analysis and Liaison Program Staff <i>Jim O'Neil</i>	Date Signed 9/8/05

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that 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, 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 shall name the Department of Natural Resources as the respondent.

To request a contested case hearing pursuant to section 227.42, 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. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the 30-day period for filing a petition for judicial review.

Note: Not all Department decisions respecting environmental impact, such as those involving solid waste or hazardous waste facilities under sections 144.43 to 144.47 and 144.60 to 144.74, Stats., are subject to the contested case hearing provisions of section 227.42, Stats.

This notice is provided pursuant to section 227.48(2), Stats.

Table 5-1. PSD Applicability - Emissions Summary -Paper Machine Projects (tons per year)

	Emission Increases (tons per year)									
	PM	PM <sub>10</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	VOC	Pb	Hg	HF	H <sub>2</sub> SO <sub>4</sub>
<b>Paper Machine Projects (a)</b>										
<b>Future Potential Emissions</b>	105	105	127	0.76	106	941	0.00063	0.00033	0	0
<b>Past Actual Emissions</b>	42	42	47	0.24	56	115	0.00020	0.00011	0	0
<b>Emissions Increase</b>	<b>63</b>	<b>63</b>	<b>80</b>	<b>0.52</b>	<b>51</b>	<b>825</b>	<b>0.00043</b>	<b>0.00022</b>	<b>0</b>	<b>0</b>
<b>Affected Sources</b>										
<b>Future Potential Emissions</b>	1930	1930	7369	32715	2052	479	1.5	0.23	62	473
<b>Past Actual Emissions</b>	529	442	4161	14212	753	103	0.00035	0.023	34	230
<b>Emissions Increase</b>	<b>1401</b>	<b>1487</b>	<b>3208</b>	<b>18503</b>	<b>1299</b>	<b>376</b>	<b>1.5</b>	<b>0.21</b>	<b>29</b>	<b>243</b>
<b>Sum of Paper Machine Projects and Affected Sources (b)</b>										
<b>Future Potential Emissions</b>	2035	2035	7496	32716	2158	1419	1.5	0.23	62	473
<b>Past Actual Emissions</b>	571	485	4208	14213	808	219	0.00055	0.023	34	230
<b>Emissions Increase</b>	<b>1464</b>	<b>1550</b>	<b>3287</b>	<b>18503</b>	<b>1350</b>	<b>1201</b>	<b>1.5</b>	<b>0.21</b>	<b>29</b>	<b>243</b>
<b>PSD Significance Level</b>	<b>25</b>	<b>15</b>	<b>40</b>	<b>40</b>	<b>100</b>	<b>40</b>	<b>0.6</b>	<b>0.1</b>	<b>3</b>	<b>7</b>
<b>PSD Triggered?</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

(a) Emission values provided for the Paper Machines are a sum of all emissions associated with the Machines. This includes the burners, chemical additives, solvent use, and other process emissions (e.g., particulate matter).

(b) Addresses the Paper Machines and source(s) that could be affected by the proposed projects. These values do not represent facility-wide totals.

DATE: September 7, 2005  
TO: Lloyd Eagan, Jeff Hanson  
FROM: Don C. Faith III  
SUBJECT: Addendum to the Preliminary Determination for Fort James Operating Company, Permit 05-DCF-058 and 05-DCF-058-OP/405032870-Construction.

FILE CODE: 4560

FID #: 405032870

Comments were received from the company, and from U.S. EPA region V. The notice was published on July 26, 2005 and included notification of the Environmental Assessment. No comments were received regarding the Environmental Assessment. ←

These comments received from U.S. EPA were received by e-mail on August 24, 2005 (from Ethan Chatfield):

1. General - If both actual and projected production is to be increased due to this modification (as described on pages 4-7), has WDNR confirmed that no other processes at this facility (i.e. boiler capacity at electrical and steam generating plant, pulping and bleaching processes, the wastewater treatment plant, printing, etc.) are being modified due to this modification?

*None of the boilers, pulping or any of the other upstream processes are being modified as a result of this project. This mill doesn't make their own pulp: It is a recycled paper mill (office / waste paper and some market pulps are used for their fiber). Although not modified, the analysis does examine the increases in emissions from 'debottlenecking' these other operations. Also see the response to Danny Marcus' comments.*

2. Page 23 of 85 - According to current research the use of low temperature SCR technology is technically feasible and available. Exclusion of this technology on this basis does not appear justifiable.

*The Department has requested that the facility conduct an analysis that examines low temperature SCR. This is attached following discussion of comments from the facility.*

3. Page 26 of 85 - Total cost of using ultra-low NOx burners should be considered before looking at incremental cost. Please revise BACT analysis accordingly.

*Regarding total cost of control: I'm going to try to explain what we've done, and our reasoning. It may just be that we've applied the term 'incremental' too broadly. Low NOx burners (ultra low) are not an 'add-on' control per se, that achieve some reduction / collection of emissions by addition of the control device, but are pieces of capital equipment that are capable of providing heat while producing less NOx (and more CO). Essentially, it is a pollution prevention technology. These ultra low NOx paper machine burners / heaters have a cost, as do ones which are only considered 'low NOx' or conventional. The 'incremental' analysis examines the additional cost of the ultra low NOx burners (as compared to a baseline), and the difference in emissions provided (in TPY of NOx), thus it is referred to as an incremental analysis in this circumstance (but may be what you are intending as a total cost of control analysis).*





Georgia-Pacific Corporation  
Consumer Products

1919 South Broadway  
P.O. Box 19130  
Green Bay, WI 54307-9130  
(920) 435-8821  
(920) 438-2364 fax  
www.gp.com

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

August 19, 2005

Mr. Don C. Faith, III, P.E.  
Wisconsin Department of Natural Resources  
Bureau of Air Management  
101 S. Webster Street, Box 7921  
Madison, WI 53707-7921

RECEIVED

AUG 24 2005

AIR MANAGEMENT

**Re: Fort James Operating Company – Green Bay Broadway Mill  
Facility ID # 405032870  
Public Notice for Permit No. 05-DCF-058 & 05-DCF-058-OP /405032870-  
Construction**

Dear Mr. Faith III:

Enclosed please find a copy of the public notice for the subject permit published in the July 26<sup>th</sup> Green Bay Press Gazette as well as a notarized proof of publication.  
If you have any questions, please call me at (920) 438-2213.

Sincerely,

A handwritten signature in cursive script that reads "Robert A. Bermke".

Robert A. Bermke  
Senior Environmental Engineer

A handwritten capital letter 'T' enclosed within a hand-drawn oval.

282193

142.37

Green Bay  
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Telephone - Direct (920) 431-8354

RECEIVED

AUG 24 2005

AIR MANAGEMENT

STATE OF WISCONSIN  
BROWN COUNTY

SARAH LINDSTROM

Being duly sworn, doth depose and say that she is an authorized representative of the Green Bay Press Gazette, a newspaper published at Green Bay, Wisconsin, and that an advertisement of which the annexed is a true copy, taken from said paper, which was published therein on

July 26, 2005 (#938093)

(Signed) Sarah Lindstrom

Preprint Coordinator/ Asst. to Ad Director

Signed and sworn to before me

Yvette Wilson  
Notary Public, Brown County, Wisconsin

my commission expires 5-3-09

**(1)S. 1 - Public notice  
BEFORE THE DE-  
PARTMENT OF NATU-  
RAL RESOURCES AIR  
MANAGEMENT PRO-  
GRAM**

Wisconsin Department  
of Natural Resources,  
Air Management Pro-  
gram, Preliminary De-  
termination on an Air  
Pollution Control Permit  
to Construct and Permit  
to Operate an Air Con-  
taminant Source at 1919  
S Broadway, Green Bay,  
Wisconsin.

Air Pollution Construc-  
tion and Operation Per-  
mit Nos. 05-DCF-058 and  
05-DCF-058-OP /  
405032870-P11

Fort James Operating  
Company, 1919 S Broad-  
way, Green Bay, Wiscon-  
sin, has submitted to the  
Department of Natural  
Resources (DNR) per-  
mit applications includ-  
ing plans and specifica-  
tions for mill wide paper  
machine modifications  
(paper machines #1, #5,  
#6, #7, #8, #9, and #10),  
paper machine #1 dryer  
replacement and vacu-  
um system upgrades.  
The Central Office of the  
DNR has analyzed these  
materials and has pre-  
liminarily determined  
that the project should  
meet applicable criteria  
for permit approval as  
stated in s. 285.63, Wis.  
Stats., including both the  
emission limits and the  
ambient air standards  
and should, therefore, be  
approved.

The issuance of a con-  
struction permit allows  
the construction or mod-  
ification and initial oper-  
ation of a source. An op-  
eration permit allows  
continued operation of a  
source. An operation  
permit may be issued  
after the permittee dem-  
onstrates compliance  
with the applicable re-  
quirements.

The permit application is  
reviewed under the Pre-  
vention of Significant  
Deterioration (PSD)  
Program (ch. NR 405,  
Wis. Adm. Code) for Vol-  
atile Organic Carbon  
(VOC's); Particulate  
Matter (PM); Nitrogen  
Oxides (NOx); Carbon  
Monoxide (CO) and Sul-  
fur Dioxide (SO<sub>2</sub>). The  
proposed project and the  
existing facility will con-  
sume the following incre-  
ments:

PM10 - 24 hr; 27.7 ug/m<sup>3</sup>  
out of 30.0 ug/m<sup>3</sup>  
(92.3%)

SO<sub>2</sub> - 3 hr; 238.1 ug/m<sup>3</sup>  
out of 512.0 ug/m<sup>3</sup>  
(46.5%)

PM10 - annual; 5.0 ug/m<sup>3</sup>  
out of 17.0 ug/m<sup>3</sup> (29.4%)

SO<sub>2</sub> - 24 hr; 52.7 ug/m<sup>3</sup>  
out of 91.0 ug/m<sup>3</sup> (57.9%)

NOx - annual; 6.46 ug/m<sup>3</sup>  
out of 25.0 ug/m<sup>3</sup> (25.8%)

SO<sub>2</sub> - annual; 4.34 ug/m<sup>3</sup>  
out of 20.8 ug/m<sup>3</sup> (20.7%)

In addition, the DNR has  
prepared an Environmen-  
tal Impact Statement in  
accordance with ch. NR  
150, Wis. Adm. Code and  
has made a preliminary  
determination that an  
Environmental Impact  
Statement will not be re-  
quired before a final de-  
cision is made on the  
proposed project. The  
DNR has determined  
that the proposed project  
will not cause significant  
adverse environmental  
effects. This preliminary  
determination does not  
constitute approval from  
the Air Management  
Program or any other  
DNR sections which may  
also require a review of  
the project.

The DNR hereby solicits  
written comments from  
the public regarding the  
preliminary determina-  
tion to approve the con-  
struction and operation  
permit applications.

These comments will be  
considered in the DNR's  
final decision regarding  
this proposal. Informa-  
tion, including plans, is  
available for public in-  
spection at the Depart-  
ment of Natural Re-  
sources Bureau of Air  
Management Headquar-  
ters, Seventh Floor, 101  
South Webster, Madison,  
Wisconsin; Wisconsin  
Department of Natural  
Resources, Northeast  
Region Air Program,  
2984 Shawano Avenue;  
PO Box 10448; Green  
Bay, WI 54307-0448; and  
at the Brown County Li-  
brary, 515 Pine St,  
Green Bay, WI 54301-  
5194; or contact Don C.  
Faith III, 608-267-3135.

This information is also  
available for download-  
ing from the Internet us-  
ing a World Wide Web  
browser at: [http://dnr.wi.gov/ora/awair/permits/APM\\_toc.htm](http://dnr.wi.gov/ora/awair/permits/APM_toc.htm).  
Interested persons wish-  
ing to comment on the  
preliminary determin-  
ations should submit  
written comments within  
30 days to: Wisconsin  
Department of Natural  
Resources, Central Of-  
fice, 101 S. Webster  
Street, Box 7921, Mad-  
ison, WI 53707-7921.  
Attn.: Don C. Faith III.  
A public hearing may be  
requested by a person  
who may be affected by  
the issuance of the per-  
mit. The request for  
hearing should indicate  
the interest of the party  
filing the request, how  
the person may be af-  
fected by issuance of the  
permit and reasons why  
a hearing is warranted.  
The Department may  
then hold a public hear-  
ing if it determines that  
there is a significant  
public interest in holding  
a hearing.

Reasonable accommoda-  
tion, including the provi-  
sion of informational  
material in an alterna-  
tive format, will be pro-  
vided for qualified indi-  
viduals with disabilities  
upon request.

Dated at Madison, Wis-  
consin, July 22, 2005.  
STATE OF WISCONSIN  
DEPARTMENT OF  
NATURAL RE-  
SOURCE  
For the Secretary  
By/s/ Lloyd L. Eagan  
Director, Bureau of Air  
Management  
July 26, 2005