

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

Form 1600-1 Rev. 3-87

Department of Natural Resources  
District or Bureau: NER / Air  
Type List Designation(s): II

Contact Person:

Don C. Faith III, P.E.

Title

Review Engineer

Address

101 S. Webster; P.O. Box 7921

Madison, WI 53707

Telephone Number

(608) 267-3135

NOTE TO REVIEWERS: Comments should address completeness, accuracy or the EIS decision. For your comments to be considered, they must be received by the contact person before:

\_\_\_\_\_,  
(time)

\_\_\_\_\_,  
(date)

Applicant: Inter Lake Papers  
Address: 433 North Main Street  
Kimberly, WI 54136-1490

Title of Proposal: Vinyl Laminator Modifications

Location: County - Outagamie City/Town/Village of **Kimberly**  
Township - 21N Range - 18E  
Section (s) - 27

**Project Summary**

**1. General Description (brief overview)**

Inter Lake Papers (ILP) is proposing to make several changes to create small production increases on the three paper machines at the mill. No. 97 paper machine modifications consist of a machine rebuild, speedsizer improvements, and a felt cleaning system for the off-machine coaters (971, 972 OMCs). The modification to No. 96 and No. 95 paper machines consist of a machine rebuild and addition of blow boxes, respectively.

In addition, it should be noted that No. 97 paper machine was constructed in 1988 and the current permitting process is an "after-the-fact" application based on current knowledge of VOC emissions that was not known when the original installation occurred. Therefore, it is our understanding that this document will pertain to work that is going to be performed and not that which has already taken place.

Much of the information presented in this EA is for the paper machine modification projects – the projects proposed for changes to the existing paper machine complexes. Information as it pertains to the original No. 97 paper machine installation is presented in an attachment to this document and is organized in similar format and order as the EA structure. Specific references to the No. 97 paper machine installation are made within this EA, referring the reviewer to the attachment for specific information.

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

The modifications will allow ILP to improve the quality of paper produced to remain competitive in a global market.

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

Chapter NR 405, Wis. Adm. Code  
Chapter NR 406, Wis. Adm. Code  
Chapter 285, Wisconsin Statutes

**4. Estimated Cost and Funding Source**

Funding for these projects is private. The total costs to complete the projects are estimated at \$44 million. Cost and funding information for the original installation of No. 97 paper machine is found in Attachment A.

**PROPOSED PHYSICAL CHANGES (More fully describe the proposal)**

*(Specific proposed physical changes presented below are for the paper machine modification projects. Information for the original installation of No. 97 paper machine is found in Attachment A.)*

**5. Manipulation of Terrestrial Resources (include relevant quantities-sq.ft., cu.yds.,ect)**

None. This project involves the modifications of existing processes inside existing structures. Furthermore, they will not require the expansion of the current facilities including buildings, roadways, and other on-site or off-site support structures.

**6. Manipulation of Aquatic Resources (include relevant quantities - cfs, acre feet, MGD, ect.)**

The projects specifically listed in the PSD application and the general category of projects account for a production increase of 253.5 tpy of coated paper. Based on the 1999 average freshwater consumption of 8400 gal/coated ton an additional 2,129,400 gpd would be required from the Fox River. This additional water would be treated at the mills wastewater treatment plant (WWTP) and discharged back into the Fox River, upstream of the mills freshwater intake. Inter Lake’s WWTP has operated well under its allowable limits and it is not expected that this additional loading would cause any significant impact on the effluent discharged to the Fox River.

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

None, as noted under (5).

**8. Emissions and Discharges (include relevant characteristics and quantities)**

PTE After                      Actual Emission

*See Table in ATTACHMENT B*

**9. Other Changes**

None

**10. Identify the maps, plans, and other descriptive materials attached.**

- Attachment \_\_\_\_\_ County map showing the general area of the project
- Attachment   X   USGS topography map
- Attachment \_\_\_\_\_ Site development map
- Attachment \_\_\_\_\_ Plat map
- Attachment \_\_\_\_\_ DNR county wetlands map
- Attachment \_\_\_\_\_ Zoning map
- Attachment   X   Other - Facility Layout

**AFFECTIVE ENVIRONMENT (Describe existing features that may be effected by the proposal)**

**Information Based On (Check all that apply):**

**Literature/Correspondence (specify major sources)**

Permit application and review, BACT analysis.

**Personal Contacts (list in item 28)**

**Field Analysis By:**  **Author**      **Other (list in item 28)**

**Past Experience With Site By:**  **Author**              **Other (list in item 28)**

**11. Physical (topography - soils - water - air)**

The only environmental aspect expected to be affected is air quality. The surrounding area is relatively flat. The air quality in the Kimberly area is classified as attainment/unclassified for all criteria air pollutants.

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

The area is typical of east central Wisconsin. Fauna includes deer, small mammals, and many types birds, etc. No known endangered resources.

**13. Cultural**

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

The facility site is currently zoned for industry. Surrounding properties are zoned as residential.

**b. Social/Economic (include ethnic and cultural groups)**

The improvement of product quality will keep ILP competitive which should help to preserve current jobs.

**c. Archaeological/Historical**

None

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

ILP is not located near any Class I areas such as national monuments, preserves, or refuges. In addition, ILP is not located within 100 km of the Forest County Potawatomi Reservation. There are no known archeological, historical, endangered species, or wetlands considerations involved with this project.

## **ENVIRONMENTAL CONSEQUENCES (Probable adverse and beneficial impacts including, indirect and secondary impacts)**

### **15. Physical (include visual if applicable)**

There will be an increase in the air emissions of pollutants into the atmosphere as stated in Item 8.

The effect of these emission increases was simulated with dispersion modeling. Predicted maximum concentrations from these emission increases were below standards designed to protect human health and welfare. The Kimberly area is in attainment of national and state ambient air quality standards. As such this project is not expected to have any significant environmental consequences.

### **16. Biological (include impacts to threatened/endangered species)**

See item 15 above.

### **17. Cultural**

#### **a. Land Use (include indirect and secondary impact)**

No consequences are anticipated.

#### **b. Social/Economic (include ethnic and cultural groups and zoning if applicable)**

The improvement of product quality will keep ILP competitive which should help to preserve current jobs.

#### **c. Archaeological/Historical**

No adverse impact is expected.

### **18. Other Special Resources (e.g., State Natural Area, prime agricultural lands)**

No other consequences are anticipated.

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

Since the expansion falls under the PSD rules, future expansion of air-emitting sources in the area may be restricted due to the use of available PSD air quality increments. The potential emission increases were simulated with dispersion modeling. Predicted maximum concentrations from the potential emission increases were below standards designed to protect human health and welfare.

**ALTERNATIVES (no action - enlarge - reduce - modify - other locations and/or methods)**

**20. Identify, describe and discuss feasible alternatives to the proposed actions and their impacts. Give particular attention to alternatives which might avoid some or all adverse environmental effects.**

No Action

No capital expenditure would take place, and product quality will not be improved, resulting in a loss of global competitiveness in the market, thereby resulting in a potential loss of profitability and jobs.

Action

The project was designed based on Inter Lake's needs, and must proceed in order that the Mill remain competitive in a global marketplace.

Other Locations

The project is to take place on existing equipment at the current location. Moving the project would not reduce any environmental impact and would make the project economically unfeasible.

**EVALUATION OF PROJECT SIGNIFICANCE (Complete each item)**

**21. Significance of Environmental Effects**

**a. Would the proposed project or related activities substantially change the quality of the environment (physical, biological, socio-economic)? Explain.**

Since the expansion falls under the PSD rules, future expansion in the area may be restricted due to the use increment. The emissions that may result from this project would add to the pollutant loading into the environment. However, the effect of these emission increases was simulated with dispersion modeling. Predicted maximum concentrations from these emission increases were below standards designed to protect human health and welfare. As such, no substantial change to the quality of the environment is expected.

**b. Discuss the significance of short term and long-term environmental effects on the proposed project including secondary effects; particularly to geographically scarce resources such as historic or agricultural lands, threatened or endangered species, or ecologically sensitive areas. (The reversibility of an action affects the extent or degree of impact.)**

There will be an increase in the air emissions of pollutants into the atmosphere as stated in Item 8.

The effect of these emission increases was simulated with dispersion modeling. Predicted maximum concentrations from these emission increases were below thresholds designed to protect human health and welfare. The Kimberly area is in attainment of national and state ambient air quality standards. As such this project is not expected to have any significant environmental consequences.

## 22. Significance of Cumulative Effects

**Discuss the significance of reasonable anticipated cumulative effects on the environment. Consider cumulative effects from repeated projects of the same type. What is the likelihood that similar projects would be repeated? 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.**

There will be an increase in the air emissions of pollutants into the atmosphere as stated in Item 8.

The effect of these emission increases was simulated with dispersion modeling. Predicted maximum concentrations from these emission increases were below thresholds designed to protect human health and welfare. The Kimberly area is in attainment of national and state ambient air quality standards. As such this project is not expected to have any significant environmental consequences.

## 23. Significance of Risk

**a. Explain the significance of any unknowns which create substantial uncertainty in predicting effects on the quality of the environment. What additional studies or analyses would eliminate or reduce these unknowns? Explain why these studies were not done.**

Air modeling was conducted. The effect of these emission increases was simulated with dispersion modeling. Predicted maximum concentrations from these emission increases were below thresholds designed to protect human health and welfare. The Kimberly area is in attainment of national and state ambient air quality standards. As such this project is not expected to have any significant environmental consequences.

VOC emissions are known to be precursors in the formation of ground-level ozone. There is no ozone problem in the Kimberly area and this project is not expected to cause a problem.

**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.**

Existing operations include emergency response procedures that are adequate to respond to potential operating problems. No new operations, hazards, or response requirements are anticipated as a result of these projects.

## 24. Significance of Precedent

**a. Would a decision on this proposal influence decisions or foreclose options that may additionally affect the quality of the environment? Explain the significance.**

The major source baseline date for emissions in this area has been established in accordance with the PSD rules. This project has used air quality increment. Future expansions of sources in the area may be restricted due to the use of the PSD increment.

**b. Describe any conflicts the proposal has with plans or policy of local, state or federal agencies that provide for the protection of the environment. Explain the significance.**

This project will be permitted in accordance with state and federal law. All modifications are to take place on existing equipment, in existing buildings. No conflicts with any regulatory agency or local business are anticipated.

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

None

26. **Explain other factors that should be considered in determining the significance of the proposal.**

None

#### **SUMMARY OF ISSUE IDENTIFICATION ACTIVITIES**

27. **Summarize citizen and agency involvement activities (completed and proposed).**

Department performance of permit review process.  
News release for Environmental Assessment.  
News release for preliminary determination.

The Wisconsin Department of Natural Resources, Bureau of Air Management is evaluating the air pollution control permit application and will issue that permit only if all environmental concerns are satisfied and will include conditions in the permit to insure compliance with all applicable limitations.

28. **List agencies, groups and individuals contacted regarding the project (include DNR personnel and title)**

<u>Date</u>	<u>Contact</u>	<u>Comment Summary</u>
N/A	Mark Nessmann Inter Lake Papers	Discussion of project.
N/A	Annabeth Reitter Consolidated Papers, Inc.	Discussion of project.
N/A	Don Faith WDNR - Bureau of Air Management Permit Section	Permit information and air pollution impacts.

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

**In accordance with s. 1.11, Stats., and Ch NR 150, WAC, the department is authorized and required to determine whether it has complied with s. 1.11, Stats., and Ch. NR 150, WAC.**

**29. Complete either A or B below.**

- A. EIS Process Not Required ..... 

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 of this project.
- 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.

<u>Don C. Fatt</u>	<u>3/21/00 (submitted via e-mail)</u>
Signature of Evaluator	Date Signed
<u>/s/ George Albright (via e-mail)</u>	<u>6/30/00</u>
Noted: Area Director or Bureau Director	Date Signed

Copy of new release or other notice attached?  Yes  No

Number of responses to notice 0

Public response log attached:  Yes  No - N/A - no comments

**CERTIFIED TO BE IN COMPLIANCE WITH WEPA**

<u>Jan D. Poe</u>	<u>9/18/2000</u>
District Director or Director of BEAR (or designee)	Date Signed

## 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 request 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., 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.

# ATTACHMENT A

## EA Information for Original Installation of No. 97 Paper Machine

No. 97 paper machine was constructed in 1988 and the current permitting process is an “after-the-fact” application based on current knowledge of VOC emissions that was not known when the original installation occurred.

### 4. Estimated Cost and Funding Source

Funding for this project was private. The total costs to complete the No. 97 paper machine project were \$283 million.

### PROPOSED PHYSICAL CHANGES (More fully describe the proposal)

### 5. Manipulation of Terrestrial Resources (include relevant quantities-sq.ft., cu.yds.,ect)

Approximately 350,000 cubic yards of earth was excavated for the construction of the 400,00 square foot building for No. 97 paper machine complex. This material was given to the Outagamie Highway Department for beneficial re-use as fill material on road construction projects requiring fill.

### 6. Manipulation of Aquatic Resources (include relevant quantities - cfs, acre feet, MGD, ect.)

With the installation of 97PM the mills freshwater consumption increased by about 2,000,000 gpd. There has been no adverse impact on the Fox River as the WWTP has continued to operate well under its allowable limits. This project also retired four older paper machines which had freshwater consumption rates of over 10,000 gal/coated ton.

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

No. 97 paper machine complex involved new buildings of 400,000 square feet attached to existing mill. No new roads were constructed as a result of the project. In addition less than one square block was converted from residential housing to mill parking lot - adjacent to the mill.

This lot shows up as blue on the plat mat in the PSD application and is bordered by Main Street and Maes Avenue.

### 8. Emissions and Discharges (include relevant characteristics and quantities)

PTE After                  Actual Emission

*See Table in ATTACHMENT B*

### 9. Other Changes

None

## ATTACHMENT B

### Emission Information for Paper Machine Modification Projects Inter Lake Papers, Kimberly, Wisconsin

#### Net Emission Increase from Proposed Paper Machine Modifications

SOURCE		NO <sub>x</sub>	SO <sub>2</sub>	PM*	CO	VOC
B21	PTE	317.3	1927.2	21.4	115.8	1.16
	96-97 Actual	187.25	625	38.9	68.35	0.7
	Difference	130.05	1302.20	-17.5	47.45	0.46
B22	PTE	380.8	2312.6	25.7	139	1.39
	96-97 Actual	290.9	974.2	62.25	106.1	1.05
	Difference	89.9	1338.4	-36.55	32.9	0.34
B23	PTE	131	464.9	13.1	75.5	5
	96-97 Actual	150.7	136.05	15.1	55.5	3.6
	Difference	-19.7	328.85	-2	20	1.4
B27	PTE	40.4	15.1	3	23.8	1.57
	96-97 Actual	10.3	0.065	0.55	6.2	0.4
	Difference	30.1	15.035	2.45	17.6	1.17
B28	PTE	240.4	159.4	19.8	100.1	5.2
	97-98 Actual	71.75	0.65	2.15	28.9	1.65
	Difference	168.65	158.75	17.65	71.2	3.55
95PM	PTE	5.34	0.048	0.24	7.98	19.6
	96-97 Actual	0	0	0	0	7.78
	Difference	5.34	0.048	0.24	7.98	11.82
96PM	PTE	27.7	0.16	0.78	26.17	25.03
	96-97 Actual	8.9	0.045	0.2	7.4	12.0
	Difference	18.8	0.115	0.58	18.77	13.03
97PM	PTE	34.5	0.5	2.3	105.1	54.61
	96-97 Actual	5.73	0.035	0.2	7.45	21.8
	Difference	28.77	0.465	2.1	97.65	32.81
WWTP	PTE	0	0	0	0	1.81
	96-97 Actual	0	0	0	0	1.02
	Difference	0	0	0	0	0.79
<b>TOTAL DIFFERENCE</b>		451.91	3143.863	-33.03	313.55	65.37
NSR Triggers		40	40	15	100	40

\*PM PTE emissions on Boilers B21 & B22 reflect recent installation of ESP controls for PM emissions.

Potential to Emit for paper machine complexes represents PTE after project modifications; PTE for boilers represent existing boiler capacity (no modifications proposed as a result of this project)

The emission values presented in this table represents the “actual to potential” net emission increase calculus for the proposed project to determine permitting applicability and requirements.

Patricia A. Plamann being duly sworn on her oath, says that she is an employee of The Post-Crescent, a newspaper published by The Post Crescent, Division of Gannett Midwest Publishing Inc., a Corporation organized under and by virtue of the laws of Wisconsin, whose principal place of business is at Appleton, Wisconsin, and that as such employee she makes this affidavit in its behalf and is authorized so to do;

That the said corporation, is the publisher and printer of The Post-Crescent, a newspaper published and printed in the city of Appleton, Outagamie County, State of Wisconsin, and that the notice of which the annexed is a copy, taken from the paper in which it was published, was published in the said newspaper on the following days or days:

Aug 11, 00

BEFORE THE DEPARTMENT OF NATURAL RESOURCES AIR MANAGEMENT PROGRAM  
 Wisconsin Department of Natural Resources, Air Management Program, Preliminary Determination of an Air Pollution Control Permit to Construct and Permit to Operate an Air Contaminant Source at Kimberly, Outagamie County, Wisconsin  
 Air Pollution Construction and Operation Permit Nos. 00-DCF-018 and 00-DCF-018-OP / 445030960-P02

Inter Lake Papers, 433 N. Main St. has submitted to the Department of Natural Resources (DNR) permit applications including plans and specifications for the construction of a paper machine (no. 97) and modification of three paper machines (nos. 95, 96 and 97). The Northeast Region Air Program of the DNR has analyzed these materials and has preliminarily determined that the project should meet applicable criteria for 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 construction permit allows the construction or modification and initial operation of a source. An operation permit allows continued operation of a source. An operation permit may be issued after the permittee demonstrates compliance with the applicable requirements.

This preliminary determination incorporates a review of the following pollutants under ch. NR 405, Wis. Adm. Code:

Nitrogen Oxides, Volatile Organic Compounds, Sulfur Dioxide and Carbon Monoxide.

The increment consumption as a result of this project is:

Pollutant	SO <sub>2</sub>	NO <sub>x</sub>	CO	SO <sub>x</sub>	NO <sub>2</sub>
Annual (lb/day)	24.4	24.4	24.4	24.4	24.4
3-Hour (lb/day)	92.01	92.01	92.01	92.01	92.01
Annual (lb/m <sup>3</sup> )	4.50	4.50	4.50	4.50	4.50
3-Hour (lb/m <sup>3</sup> )	18.0%	18.0%	18.0%	18.0%	18.0%
PSD Increment	20.0	91.0	91.0	512.0	25.0
% of Increment	22.5%	43.7%	43.7%	18.0%	55.1%

In addition, the DNR has prepared an Environmental Impact Assessment and has made a preliminary determination that an Environmental Impact Statement will not be required before a final decision 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 section which may also require a review of the project.

The DNR hereby solicits written comments from the public regarding the preliminary determination to approve the construction and operation permit application. These comments will be considered in the DNR's final decision regarding this proposal. Information, including plans and the DNR's preliminary analysis regarding this proposal, and the Environmental Impact Assessment, is available for public inspection at the Department of Natural Resources Headquarters, 101 South Webster Street, Sixth Floor, Appleton, WI 54912. Bureau of Air Management Headquarters, 1125 North Military Avenue, P.O. Box 10448, Green Bay, WI 54307, Phone: (920) 452-5800 and at Kimberly-Little Chute Public Library, 615 W. Kimberly Ave., Kimberly WI 54136-1335 or contact Don C. Faith III, P.E. at (608) 267-3135. This information is also available for downloading from the Internet using a world wide web browser at: <http://www.dnr.state.wi.us/org/aw/air/reg/regs.htm>.

Interested persons wishing to comment on the proposal and preliminary determinations should submit written comments within 60 days to:  
 Wisconsin Department of Natural Resources, Bureau of Air Management, P.O. Box 7921, Madison, Wisconsin, 53707, (608) 266-7718. Attention: Don C. Faith III, P.E.

A public hearing may be requested for any project if there is a significant concern to permit. The request for hearing should be made in the interest of the party filing the request and reasons why a hearing is warranted. The DNR may then hold a public hearing if it determines that there is a significant concern. The DNR will provide an opportunity for a reasonable accommodation including a provision of informational material in an alternative format will be provided for persons with disabilities upon request.  
 STATE OF WISCONSIN  
 DEPARTMENT OF NATURAL RESOURCES  
 Bureau of Air Management

P. A. Plamann

Subscribed and sworn to before me this

11 day of August 2000

Sandy Brunser

Notary Public, Outagamie County, WI