

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

Form 1600-8

Rev. 7-2006

Department of Natural Resources (DNR)

Region or Bureau
Northeast Region / Air Management

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:

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Applicant: Georgia-Pacific Consumer Products LP

Address: 1919 South Broadway, Green Bay, Wisconsin 54304

Title of Proposal: PSD Permit Application / Pulp Processing Consolidation Project

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

PROJECT SUMMARY

1. Brief overview of the proposal including the DNR action

Georgia Pacific is a major manufacturer and converter of sanitary paper products such as toilet tissue, napkins, and paper towels. Operations at the facility include steam and electrical generation, fiber recovery and bleaching, paper making and converting. Georgia Pacific plans to consolidate its pulp processing operations by retiring several fiber processing systems, upgrading others, and adding another fiber processing system at the Broadway Mill location. The result of the project will be the need for less organic solvents to remove contaminants such as "stickies" from paper machine clothing and will require less energy to produce the pulp. The Mill prior to the modification is classified as a major stationary source under the federal Prevention of Significant Deterioration (PSD) regulations. The proposed project yields potential emission increases above the PSD emission rates for ozone (due to a significant increase in volatile organic compound (VOC) emissions). As a result, the proposed project is subject to PSD permitting requirements as described in 40 CFR 52.21 and Wisconsin Administrative Code NR 405.

Georgia Pacific is proposing to make changes to the pulp (fiber) processing systems at its Broadway Mill which require an air emissions Prevention of Significant Deterioration (PSD) construction permit to be issued by DNR prior to commencing construction on the project. No other local or federal air permits are required for this project.

2. List the documents, plans, studies or memos on which this DNR review is based

October 2, 2007 permit application submitted by Georgia Pacific to WDNR Air Program, which includes the results of detailed emissions calculations. A dispersion modeling analysis using the AERMOD model was completed by the Department on December 10, 2007, to assess the impact of the biphenyl emissions on ambient air quality in support of the proposed construction permit.

DNR EVALUATION OF PROJECT SIGNIFICANCE

3. Environmental Effects and Their Significance

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

The primary effect to the environment would be a significant increase of volatile organic compounds (VOCs), which requires a PSD Permit and an increase of biphenyl, a hazardous air pollutant, to the ambient air. Ambient air dispersion modeling for long and short term effects of VOCs on the environment is not required to be conducted for emissions of VOCs that trigger PSD for ozone, so no modeling was conducted. The facility is however required to make a demonstration that there will be no adverse impacts upon soils, vegetation, visibility or growth (see section below). The operation will also produce significant quantities of two other hazardous air pollutants; acetaldehyde, and chloroform. The relative quantity of acetaldehyde is expected to be unchanged from the existing process, though the permit will make enforceable a significant reduction in the quantity of chloroform that is a result of the facility converting to chlorine free bleaching.

Ambient air dispersion modeling was conducted for biphenyl in order to demonstrate compliance with the ambient 24-hour standard. The facility conducted such modeling, and has demonstrated that this project is fully in compliance with the 24-hour standard.

There are no other environmental effects expected from ground disturbance or new construction because the modifications will take place within existing structures. No new stacks are to be constructed.

- b. Discuss which of the primary and secondary environmental effects listed in the supporting documents 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).

There are no known geographically scarce resources in the area. The Fox River, which is has a warm water fishery is located next to the facility. Since there will be no new discharges or withdrawals associated with this project direct adverse impacts are not anticipated. Georgia Pacific provided an impact analysis in its construction permit application which demonstrated no adverse impacts on soils or vegetation, no adverse effects on visibility, and no anticipated increase in industrial, commercial or residential growth as a result of the project. Georgia Pacific's impact analysis can be found in the permit application materials.

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

This project is not expected to increase primary or secondary environmental effects. There will be a significant decrease in chloroform emissions that would not be accomplished if the project were not to occur.

4. 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 only effect to the environment is the increase in ozone emissions (as a result of an increase in VOCs) and biphenyl. Brown County is currently classified as attainment for national and state ambient air quality standards, including those for ozone. The increase in ozone emissions is not expected to affect Brown County's ambient air quality standards classification. Further, through air modeling, the facility has demonstrated that there will be no affect to the environment from the biphenyl emissions.

As stated previously, the relative quantity of acetaldehyde is expected to be unchanged, and a limitation of the quantity of chloroform will be made enforceable in the construction permit. As such, this project is not expected to have any significant cumulative environmental consequences.

I am not aware of any other activities planned or proposed in the immediate area of this type that would compound effects on the environment.

5. 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 unknowns that would create uncertainty in predicting effects on the environment. Georgia Pacific has provided a detailed analysis on the air emissions as a result of the project and has provided modeling analyses to demonstrate compliance with the current air standards. There are no additional studies or analyses necessary.

- 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 such and malfunctions, spills, fires or other hazards. Trained personnel in the mill are already prepared to detect and respond as appropriate to malfunctions, spills, fires and other hazards.

6. 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.

This operation is similar to a number of other operations found locally and across the area. A decision to accept this proposal will not adversely affect the federal designation of Brown County as being an attainment area for air pollution. This proposal would not have any significant affect on other projects that would require an air pollution control permit since each project is evaluated separately.

No conflicts have been identified with local, state or federal agency plans or policy.

7. 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.

There should be no significant controversy expected as a result of this project.

ALTERNATIVES

- 8. 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 impact of no action is that product quality will not be improved and would significantly compromise the ability of Georgia Pacific to manufacture paper products. Since the project is to take place at the current location, moving the project would not reduce any environmental impact and would make the project infeasible.

SUMMARY OF ISSUE IDENTIFICATION ACTIVITIES

- 9. 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>
ongoing	Robert Bermke, Sr. Env. Engineer, Georgia Pacific	Discussion of Project
ongoing	Don C. Faith III, DNR Permit Engineer	Permit information
12/11/07	Jim Doperalski Jr.	EA review

- 10. On-site inspection or past experience with site by evaluator.

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>/s/ Michelle M. Farley</i>	Date Signed <i>/s/ 12/19/2007</i>
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Number of responses to news release or other notice: 1

Certified to be in compliance with WEPA	
Environmental Analysis and Liaison Program Staff <i>/s/ James P. Doperalski, Jr.</i>	Date Signed <i>/s/ 1/30/08</i>

NOTICE OF APPEAL RIGHTS

If you believe you have a right to challenge this decision made by the Department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing Department decisions.

To seek judicial review of the Department's decision, ss. 227.52 and 227.53, Stats., establish criteria for filing a petition for judicial review. Such a petition shall be filed with the appropriate circuit court and shall be served on the Department. The petition shall name the Department of Natural Resources as the respondent.