

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

Form 1600-1 Rev. 3-87

Contact Person:

Randy Matty

Title

Compliance Engineer

Address

1125 N. Military Ave., Box 10448

Green Bay, WI 54307-0448

Telephone Number

(920) 492-5858

Department of Natural Resources

District or Bureau: \_\_\_\_\_

Type List Designation(s): \_\_\_\_\_

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)

*Richard Walk 4/24/01*

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

Address: 1601 N. Quincy Street, P.O. Box 19017  
Green Bay, WI 54307-9017

Title of Proposal: Stock Preparation Process Operation Modification

Location: County Brown City Green Bay

Township 24 North, Range 21 East

Section(s) 1

PROJECT SUMMARY

1. General Description (brief overview)

Green Bay Packaging Inc. - Green Bay Mill Division is applying for an air pollution control construction and operation permit from the WDNR to modify the facility with the installation of stock thickening and other stock management equipment in the recovered post consumer (secondary) fiber process area.

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

Green Bay Packaging Inc. - Green Bay Mill Division has operated a linerboard manufacturing facility at 1601 Quincy Street in the City of Green Bay since 1950. Within this facility post consumer recycled paper materials are treated to recover secondary fiber materials used for linerboard manufacturing. Green Bay Packaging Inc. began using recycled materials in 1972 and since 1991 this mill has operated on 100 percent recycled materials. Green Bay Packaging Inc. - Green Bay Mill Division is proposing the installation of updated stock thickening and stock management equipment that will allow for increased quality in stock preparation operations. This modification will allow the Mill Division to remain competitive.

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

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An air pollution control permit must be acquired before commencement of construction of the proposed project. An NR 405, Wisconsin Administrative Code, Prevention of Significant Deterioration Construction and Operation air pollution control permit application has been submitted to the WDNR.

4. Estimated Cost and Funding Source

The estimated cost of the project is confidential. The project will be funded internally by Green Bay Packaging Inc.

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PROPOSED PHYSICAL CHANGES

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

No known or anticipated manipulation of terrestrial resources will occur because of the proposed air pollution control permit issuance. A relatively small extension to the plant in the stock preparation area will be necessary to bring the new equipment under cover. A concrete pad floor will be constructed for this purpose.

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

No known or anticipated manipulation of aquatic resources will occur as a consequence of the proposed air pollution control permit issuance. No additional water demand anticipated.

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

A 6000 square foot addition to the stock preparation area will be constructed to house the new equipment. A concrete floor will be poured and footings will be constructed to support the enclosure.

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

The proposed project will result in annual potential emissions of 300 tons of volatile organic compounds (VOC's). This amount represents no increase over current potential emissions (modified source S-91/F-91).

9. Other Changes

No other changes are known or anticipated.

10. 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 \_\_\_\_\_

AFFECTED ENVIRONMENT

Information Based On (check all that apply):

- Literature/correspondence (specify major sources)
- Permit Application \_\_\_\_\_
- 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)

Green Bay Packaging Inc. - Green Bay Mill Division is located on the northeast side of the City of Green Bay, adjacent to the east bank of the Fox River approximately 1/2 mile from the river's confluence with Green Bay. The majority of the surrounding land is densely developed including both residential and industrial. The topography is flat. The soil types in the area include Kewanee and Manawa. Green Bay Packaging Inc. - Green Bay Mill Division is located in an area that is attainment for all criteria pollutants.

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

Located within the City of Green Bay, the facility is surrounded by residential and industrial land uses. Wildlife in the area would include rabbits, squirrels, mice and various types of birds, including songbirds, gamebirds, and associated waterfowl. No known threatened or endangered animal or plant species are known to exist at this site.

13. Cultural

- 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 developed as industrial.
- b. Social/Economic (include ethnic and cultural groups)
 

The area surrounding the site is inhabited by people of diverse ethnic heritage, including Native Americans. The overall social aspects of the proposed project should be beneficial to the area, in that as the company is better able to compete

in the marketplace for its products. The economic impact on the community, aside from the initial construction cost should be minimal.

c. Archaeological/Historical

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

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

The Green Bay West Shores State Wildlife Area (GBWSSWA) is located on the west shore of Green Bay-Lake Michigan in Brown, Oconto and Marinette Counties. The GBWSSWA is a corridor extending for approximately 42 miles adjacent to Green Bay from just south of DUCK Creek, in the south, to the Peshtigo Harbor Wildlife Area in the north. At its closest point, the Green Bay Mill Division is located approximately 2.25 miles to the southeast. The facility is also located approximately 1 mile west of the Bay Beach Wildlife Bird Sanctuary (a 700 acre innovative exhibit zoo).

The GBWSSWA contains a high density of wildlife species common to open water including sedge meadow, emergent, shrub carr, swamp hardwoods, and associated upland communities. There are approximately 50 species of mammals and 350 species of birds (136 species that breed in the area) that can be found in portions of the GBWSSWA at any time or in a given season of the year. Reptiles and amphibians common to the Great Lakes region are found throughout the GBWSSWA. The coastal marshes of the GBWSSWA also provide nursery and spawning areas for over 30 species of fish.

Endangered species of birds that nest in some portions of lower Green Bay (including the GBWSSWA) include the Foster's tern, Common tern, Piping Plover, Trumpeter Swan, Snowy Egret, and Eagles. In addition, peregrine falcons (endangered) and red shouldered hawks (threatened) use the migration corridor of the west shore of Green Bay-Lake Michigan. There are no known endangered mammals inhabiting the area. While no studies have been conducted, it is thought that wood turtles (endangered), Blandings turtles and spotted salamanders (threatened) inhabit portions of the GBWSSWA.

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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 includes a small expansion of the existing structure at the facility's current site. This action may result in an aesthetic impact in the surrounding physical environment. However, this action is reversible and would result in minimal environmental impact.

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

There will be an increase in the air emissions of pollutants into the atmosphere as stated in Item 8. No known or anticipated adverse biological impacts are estimated as a result of the proposed action.

17. Cultural

a. Land Use (include indirect and secondary impacts)

The small amount of 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 small building expansion is reversible and would result in minimal environmental impact.

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

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 socio-economically affected by this project.

c. Archaeological/Historical

No known archaeological or historical sites will suffer any adverse environmental consequences as a result of the proposed action.

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

The proposed project is not anticipated to significantly affect the surrounding environment. Emissions of hazardous air pollutants from the facility do not exceed WDNR-defined significance levels, nor federal action levels. Emissions of criteria pollutants (VOC's, NOX, CO, SO2, and PM) will not significantly degrade air quality in the Green Bay area.

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

The modification to the Mill will result in an increase of emissions of criteria pollutants. Therefore, the impact of these emissions cannot be avoided. However, the air quality impact analyses have shown the impacts to fall within acceptable ranges.

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

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20. Identify, describe and discuss feasible alternatives to the proposed action 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 the Green Bay Mill Division needs, and must proceed in order that the Mill remain competitive in a global marketplace.

EVALUATION (Discuss each category. Attach additional sheets and other pertinent information if necessary.)

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21. Significance of Environmental Effects

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

The analyses that have been completed suggest that the proposed modification will not substantially change the quality of the environment.

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

The modification is not anticipated to have significant short-term, long-term, or secondary effects on geographically scarce resources, scenic and recreational resources, prime agricultural lands, threatened or endangered species, or ecologically sensitive areas. The proposed action is reversible and should contribute minimal impact to the environment.

22. Significance of Cumulative Effects

Discuss the significance of reasonably 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.

The area surrounding Green bay Packaging Inc. - Green Bay Mill Division is currently considered attainment for all criteria pollutants. It would be expected that if a large number of new sources (having VOC emissions equivalent to the potential emissions proposed for this facility) were to locate in the immediate surrounding area, ozone concentrations in the Green bay area would eventually rise. Currently the area has a background concentration (design value) of 0.098 ppm which is significantly less than the current ozone standard of 0.12 ppm.

The level of emissions of other criteria pollutants are relatively low and it would be expected that a fair number of similar facilities having equivalent emissions could locate in the general area.

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.

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

cuase 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.

Chemicals used in the stock preparation process are stored in totes or in some cases drums. All of these materials are stored within the facility. Any accidental spills would be confined as these areas are enclosed with a dike system and Green bay Packaging Inc. - Green Bay Mill Division personnel are trained in spill response.

The existing structure and the small possible expansion are built according to all applicable fire control standards. In the event of a fire, there is the potential for emissions of VOC's and hazardous air pollutants. These emissions would be similar in nature to those resulting from normal operations. Local emergency control agencies have been informed of materials used and stored at the facility.

24. Significance of Precedent

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

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

- 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.

The proposed action is not anticipated to conflict with present plans or policies of local, state, or federal agencies that provide for the protection of the environment.

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

None are known at this time.

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

No additional factors that should be considered in determining the significance of this proposal are known or anticipated.

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	Don Faith WDNR - Bureau of Air Management Permit Section	Permit information and air pollution impacts.
N/A	Randy Matty NER Air Management Compliance Engineer	Environmental Analysis information.
N/A	Kathy Nelson Green Bay Packaging	Discussion of project.

Project Name: Green Bay Packaging Inc. - Green Bay Mill Division County: Brown

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

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 and ch. NR 150.

Complete either A or B below:

A. EIS Process Not Required  [x]

The attached analysis of the expected impacts of the 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 on 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.

Signature of Evaluator <i>Randy Matthy</i>	Date Signed <i>04/24/01</i>
Noted: District Staff Specialist or Bureau Director	Date Signed

Copy of news release or other notice attached?  Yes  No

Number of responses to news release or other notice: 1

Public response log attached?  Yes  No

CERTIFIED TO BE IN COMPLIANCE WITH WEPA	
District Director or Director of BEAR (or designee) <i>Jim Paul (for Allan Stranz-NEA)</i>	Date Signed <i>6/11/01</i>

**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, 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 shall 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. 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, Wis. Stats., are subject to the contested case hearing provisions of section 227.42, Wis. Stats.

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

## **BEFORE THE DEPARTMENT OF NATURAL RESOURCES AIR MANAGEMENT PROGRAM**

Wisconsin Department of Natural Resources, Air Management Program, Preliminary Determination on an Air Pollution Control Permit to Construct and Permit to Operate an Air Contaminant Source at Green Bay, Brown County, Wisconsin.

Air Pollution Construction and Operation Permit Nos. 01-DCF-029 and 01-DCF-029-OP / 405 032 100- P03

Green Bay Packaging Inc. - Green Bay Mill Div., 1601 N. Quincy St. has submitted to the Department of Natural Resources (DNR) permit applications including plans and specifications for the modification of the stock additive, stock management equipment and the paper machine.

The Northeast Region Air Program of the DNR has analyzed these materials and has preliminarily 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 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 project constitutes a major source under the Prevention of Significant Deterioration rules of ch. NR 405, Wis. Adm. Code. Volatile Organic Compounds (VOC's) are the only significant pollutant from the project and these are reviewed under s. NR 405.08, Wis. Adm. Code.

In addition, the DNR has prepared an Environmental 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 sections 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 and on the environmental assessment. These comments will be considered in the DNR's final decision regarding this proposal. Information, including plans and the DNR's preliminary analysis, is available for public inspection at the Department of Natural Resources Bureau of Air Management Headquarters, Seventh Floor, 101 South Webster Street, Madison, Wisconsin, at the Northeast Region Air Program, 1125 North Military Avenue, P.O. Box 10448, Green Bay, WI 54307, Phone (920) 492-5800 and at Brown County Library; 515 Pine St.; Green Bay WI 54301-5194 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>

NOTICE IS HEREBY GIVEN that, pursuant to secs. 285.13(1), 285.61(7)(a) and 285.62(5)(a), Wis. Stats., DNR will hold a public hearing to receive public comments on the air pollution construction and operation permit applications of Green Bay Packaging for the proposed modification of the stock additive, stock management equipment and the paper machine.

NOTICE IS FURTHER GIVEN that the public hearing will be held:

Thursday, June 7, 2001 at 11:00 AM  
Bay Beach Wildlife Sanctuary, Wetland Room  
1660 East Shore Drive  
Green Bay, Wisconsin

Interested persons wishing to comment on the proposal, preliminary determination and environmental assessment may attend the hearing and/or submit written comments within 30 days to:

Wisconsin Department of Natural Resources, Bureau of Air Management, P.O. Box 7921, Madison, Wisconsin 53707, (608)266-7718 Attn: Don C. Faith III.

Reasonable accommodation, including the provision of informational material in an alternative format, will be provided for qualified individuals with disabilities upon request.

Dated at Madison, Wisconsin April 30, 2001.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By

  
Lloyd L. Eagan, Director  
Bureau of Air Management

Green Bay Packaging



Inc.

®

• MILL DIVISION

May 21, 2001

Mr. Don C. Faith III, P.E.  
Review Engineer  
Wisconsin Department of Natural Resources  
Northeast Region Air Program  
P.O. Box 7921  
Madison, WI 53707-7921

SUBJECT: Air Pollution Construction and Operation Permit Nos. 01-DCF-029  
and 01-DCF-029-OP/405 032 100-P03

Dear Mr. Faith:

Green Bay Packaging Inc.-Green Bay Mill Division wishes to submit for the Department's consideration the following comments in respect to the proposed construction and operating permit prepared by the Wisconsin Department of Natural Resources for this company.

1) Page 2 Part I Item A (1)(c)(3) Please modify the sentence to read as follows..."The permittee shall keep monthly records with the ability to demonstrate the daily records of the following". This incorporation would lessen the paper work but allow the WDNR access to the same information. Since there are not any daily limits in the permit it should be adequate as compliance demonstration.

2) Page 4 and 7 Part 1 Items A (1)(b)(2) and B (1)(b)(2) Please modify the second sentence to read as follows..."The facility is not required to use materials or procedures which may prevent the facility from meeting end product quality requirements, or which are economically infeasible to use". This additional incorporation is in keeping with the economical reasonableness evaluation factor within LACT and not based on product quality alone.

MAY 23 2001

3) Page 4 and 7 Part 1 Items A (1)(c)(6) and B (1)(c)(5) Please modify to read as follows..."The permittee shall submit a report to the Department in the second and fifth years of the permit that contains the results of the evaluation in Part 1 Items A (1)(b)(2) and B (1)(b)(2). This frequency of reporting is sufficient given the pace at which new materials are developed within this industry.

4) Page 7 Part 1 Item B (1)(a)(4), there is a typographical error which made this a second 3 when it should have been 4.

5) Page 7 Part 1 Item B (1)(a)(4) Based on the pace at which new material is developed and the length of time it takes to trial for this industry we request that you remove the "(not less than annual)" from this sentence and allow us to report on research on the second and fifth year of the permit.

Sincerely,  
GREEN BAY PACKAGING INC.

A handwritten signature in black ink, appearing to read "Kathleen A. Nelson". The signature is written in a cursive style with a large initial "K".

Kathleen A. Nelson  
Environmental Manager

cc: Lisa Bauer / File – GBP  
Jim Rickun, James S. Rickun Environmental Consulting