

ENVIRONMENTAL ANALYSIS AND DECISION ON THE NEED
FOR AN ENVIRONMENTAL IMPACT STATEMENT (EIS)
Form 1600-1 Rev. 3-87

Department of Natural Resources

Air Management
District or Bureau

TYPE II
Type List Designation

Contact Person: Paul O. Yeung

Title: Environmental Engineer

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: _____

Address: Bureau of Air Management
P.O. Box 7921
Madison, WI 53707
Telephone Number: (608) 266-0672

Applicant: Oshkosh Truck Corporation

Address: 2307 Oregon Street

Oshkosh, WI 54903-2566

Contact: Donald Draxler

Title: Director, Environmental Affairs

Title of Proposal: Air Pollution Control Permit Application

Telephone Number: (920) 233-9592

Location: County Winnebago

City/Town/Village Oshkosh

Township 18 North, Range 16 East

Sections(s) 35

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PROJECT SUMMARY

1. General Description

Oshkosh Truck Corporation manufactures a wide variety of heavy-duty specialized trucks and transportation equipment at its facility located in Oshkosh, Wisconsin (FID # 471032650). The facility is seeking to modify its operations at the South Plant, West Plant, and North Plant. The South Plant modification consists of the addition of two new dynamometers to be used on assembled vehicles.

Modifications to the West Plant include production increases in one existing booth and the installation of two new booths. Oshkosh Truck Corporation plans to increase production in existing Chassis Booth #10. This booth is currently exempt from permitting because the emissions are less than 1,666 pounds volatile organic compounds (VOC) per month. The two new booths will be used primarily for undercoating and secondarily for painting.

Modifications to the North Plant include the installation of six new booths. A new gluing booth will be used for attaching the skins to the inside of the cabs. Three new booths will be used primarily for the application of primer, inside topcoat, and exterior topcoat for S series cement trucks and for primer, topcoat, and floor prime on the medium tactical vehicle replacement (MTVR) project for the military. Two new booths will be used primarily for Rhino and/or undercoating. Rhino is a brand name for a coating, similar to a spray on bed-liner used on pick-up trucks. The coating is used to protect against corrosion and is applied to the inside floor area of the cabs. Along with Rhino and undercoating, some painting may also be performed in these two booths.

All new paint booths will be equipped with paint filters to control particulate emissions. The facility expansion will be subject to PSD requirements for VOC.

2. Purpose and Need

Oshkosh Truck Corporation is currently classified as a major source under Title V of the Clean Air Act Amendments (CAAA) of 1990 and the State of Wisconsin's corresponding NR 407, Wisconsin Administrative Code, because potential emission of VOCs are greater than 100 tons per year. Oshkosh Truck Corporation is also classified as a major source of VOC under NR 405, Wisconsin Administrative Code, because potential VOC emissions exceed 250 tons per year.

The expansion is needed to accommodate increasing market demands and new military contracts.

3. Authority and Approvals

A Prevention of Significant Deterioration permit application was submitted to the Wisconsin Department of Natural Resources (WDNR) on June 5, 2000. An air pollution control permit must be acquired before installation of the proposed project.

4. Estimated Cost and Funding Source

The estimated cost for the project is \$8,000,000 and Oshkosh Truck Corporation will fund it.

PROPOSED PHYSICAL CHANGES

5. Manipulation of Terrestrial Resources

The proposed new equipment will be located within existing buildings, therefore, there will be no new manipulation of terrestrial resources.

6. Manipulation of Aquatic Resources

No known or anticipated manipulation of aquatic resources will occur as a consequence of the expansion.

7. Buildings, Treatment Units, Roads, and Other Structures

All expansions and modifications will be performed inside the confines of the existing buildings.

8. Emissions and Discharges

Air

The proposed action is expected to increase stack-vented emissions, thereby resulting in the following potential emission rates:

Pollutant	Potential to Emit
Particulate Matter (PM)	4.75
PM-10	4.75
Nitrogen Oxides (NOx)	25.35
Carbon Monoxide (CO)	12.76
Sulfur Dioxide (SO2)	2.30
Volatile Organic Compounds (VOC)	288.33

In addition, the proposed project will result in increases in stack-vented emissions of a limited number of hazardous air pollutants (HAP), including the following:

- Acetaldehyde (75-07-0)
- Antimony (7440-36-0)
- Arsenic (7440-38-2)
- Barium (7440-39-3)

- Benzene (71-43-2)
- Beryllium (7440-41-7)
- Bromine (7726-95-6)
- Butanol (71-36-3)
- Cadmium (10108-64-2)
- Calcium Oxide (1305-78-8)
- Carbon Black (1333-86-4)
- Chlorine (7782-50-5)
- Chromium +3 (7440-47-3)
- Cobalt (7440-48-4)
- Copper (7440-50-8)
- Crotonaldehyde (123-73-9)
- Cumene (98-82-8)
- Ethylbenzene (100-41-4)
- Ethylbenzene (100-41-4)
- Formaldehyde (50-00-0)
- Glycol Ether (NA)
- Hexamethylene Diisocyanate (822-06-0)
- Hexane (110-54-3)
- Manganese (7439-96-5)
- MDI (101-68-8)
- MEK (78-93-3)
- Mercury (7439-97-6)
- Methyl Amyl Ketone (110-43-0)
- Methyl Iso Amyl Ketone (110-12-3)
- Methyl Iso Butyl Ketone (108-10-1)
- Molybdenum (7439-98-7)
- Naphthalene (91-20-3)
- Nickel (7440-02-0)
- Phosphorus (7723-14-0)
- POM
- Propionaldehyde (123-38-6)
- Selenium (7782-49-2)
- Stoddard Solvent (8052-41-3)
- Toluene (108-88-3)
- Toluene (108-88-3)
- Trimethylbenzene (25551-13-7)
- Xylene (1330-20-7)

Except for ethyl amyl ketone and methyl iso amyl ketone, all HAP emissions are less than the corresponding NR 445 regulatory thresholds. Dispersion modeling results for ethyl amyl ketone and methyl iso amyl ketone indicate that the emissions are acceptable with respect to applicable ambient air quality requirements. Emissions of HAPs attributed to natural gas combustion are exempt from regulation pursuant to s. NR 445.04, Wisconsin Administrative Code.

Water

The proposed action is not expected to impact the facility's ability of discharging wastewater to the POTW allowed under its existing permit. The facility has categorical pretreatment standards, which it must currently meet, and will continue to meet after the proposed modifications.

Solid Waste

The proposed action is anticipated to increase the facility's total generation of solid waste in the form of cardboard and packing. These materials, of which most are recycled, are a result of increased usage of assembly materials.

9. Other Changes

There are no other foreseen changes associated with this project.

10. Identify the Maps, Plans, and Other Descriptive Material Attached

Attachment 1: United States Geological Survey (USGS) topographic map, quadrangle

Attachment 2: Facility locator map

Attachment 3: Facility plot plan

AFFECTED ENVIRONMENT

Information based on:

1. Facility contacts
2. Past experience with the site, Oshkosh Truck Corporation, and RMT, Inc. personnel
3. Author: RMT Personnel
RMT, Inc.
150 N. Patrick Blvd., Suite 180
Brookfield, WI 53045-5854
(262) 879-1212

11. Physical

Oshkosh Truck Corporation is located in an industrial park in Oshkosh, Wisconsin. The facility is located in Winnebago County, which is designated as an attainment area.

12. Biological

The area surrounding the industrial facility consists primarily of industrial, agricultural, and residential areas. Wildlife in the area would include deer, rabbits, squirrels, mice, and various types of birds, including songbirds, game birds, and occasional waterfowl. No known threatened or endangered animal or plant species are known to exist at the proposed site.

13. Cultural

a. Land Use

The proposed site is located in an existing industrial setting. No additional land purchase will be required for the proposed project.

b. Social/Economic

People of diverse ethnic heritage inhabit the area surrounding the site. The overall social aspects of the proposed project should be beneficial to the area.

c. Archaeological/Historical

None are known to be within Oshkosh Truck Corporation's property boundary.

14. Other Special Resources

None are known.

ENVIRONMENTAL CONSEQUENCES

15. Physical

The proposed new equipment will be located within existing buildings.

16. Biological

No known or anticipated adverse biological impacts can be estimated as a result of the proposed action. An air quality analysis completed for the project has indicated predicted impacts to be below applicable state and national air quality standards.

17. Cultural

a. Land Use

The proposed project will not require any new land use.

b. Social/Economic

People of diverse ethnic heritage inhabit the area surrounding the site. The overall social aspects of the proposed project should be beneficial to the area. The economic impact, aside from the initial construction cost, should be negligible.

c. Archaeological/Historical

None are known to be within Oshkosh Truck Corporation's property boundary.

18. Other Special Resources

The proposed action is not anticipated to significantly affect the surrounding environment. Air quality analyses for particulates and Hazardous Air Pollutants have been completed. All predicted impacts were found to be below applicable air quality standards.

19. Summary of Adverse Impacts That Cannot Be Avoided

The proposed action will result in an increase of stack-vented emissions of both criteria air pollutants and HAPs. However, air quality impact analyses have shown the impacts to fall within National Ambient Air Quality Standards (NAAQS) and PSD increments.

ALTERNATIVES

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

No action

Future production at the facility would be restricted by the current production permit limit, thereby negatively impacting Oshkosh Truck Corporation's ability to compete with market demands. This action is necessary to sustain Oshkosh Truck Corporation as a valuable business in the Oshkosh area and as the primary supplier of military trucks to the United States military.

EVALUATION OF PROJECT SIGNIFICANCE

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.

The analyses (*e.g.*, dispersion modeling) that have been completed suggest that the proposed project 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).

Because the project does not affect any new land, there are not any significant short-term, long-term, or secondary effects anticipated on geographically scarce resources, scenic and recreational resources, prime agricultural lands, threatened or endangered species, or ecologically sensitive areas.

22. **Significance of Cumulative Impacts**

- a. 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 the Oshkosh Truck Corporation facility is currently considered in "attainment" of all criteria air pollutants. It would be expected that if a large number of new sources (having emissions equivalent to those potential emissions associated with the proposed modifications for this facility) were to locate in the immediate surrounding area, air quality in the Oshkosh area would eventually decline. However, the required air quality analyses for this project and for any additional projects of Oshkosh Truck Corporation or other facilities in the area would serve to prevent the degradation of air quality to levels below applicable air quality standards.

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.

There are always unknowns associated with environmental impact analyses, which create uncertainty in predicting the effects that a proposal has on the environment. However, as the techniques used to complete the air quality analyses are considered "state of the science," the significance of these unknowns is not believed to be substantial in the proposed project. No additional studies or analyses should be required.

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

The paint booths are equipped with particulate filters. Malfunctions in the filters could result in reduced control efficiency of the filter, thereby resulting in the release of increased stack-vented emissions of PM, PM-10, and PM-HAPs. Oshkosh Truck Corporation will inspect the filters each day of operation to ensure that they are operating correctly. In the event that there is a malfunction with the filter(s), Oshkosh Truck Corporation will implement procedures outlined in a malfunction prevention and abatement plan for the filters.

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 future decisions or foreclose options that may additionally affect the quality of the environment.

- b. Describe any conflicts the proposal has with plans or policies 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 of the quality of the environment, including socio-economic effects, that are (or are likely to be) highly controversial, and summarize the controversy.

None are known to be highly controversial 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.

SUMMARY OF ISSUE IDENTIFICATION PROCEDURES

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

The WDNR Bureau of Air Management has been presented with Oshkosh Truck Corporation's air pollution control permit application. The WDNR contact person is Paul Yeung.

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

<u>DATE</u>	<u>CONTACT</u>	<u>COMMENT SUMMARY</u>
None.		

Project Name: _____ County: _____

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

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 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

Date Signed

NOTED: AREA DIRECTOR OR BUREAU DIRECTOR

Date

Copy of news release or other notice attached? ___ Yes ___ No

Number of responses to notice

Public response log attached? ___ Yes ___ No

CERTIFIED TO BE IN COMPLIANCE WITH WEPA

District Director or Director of BEAR

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 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 section 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.

PAGE _____ OF _____

MADE BY _____ DATE _____

DISCUSSED WITH & CHECKED BY _____

RE. _____

DATE _____

PAR# _____

APPROVED _____ DATE _____

DATE _____

8/28 4:32pm
JIM:
Paul Young was
very anxious that
you review this
one at your
earliest convenience.
Steve

email
OK
8/30/2000

Yeung, Paul O

From: Stranz, Allan M
Sent: Monday, August 28, 2000 10:11 AM
To: Yeung, Paul O; Stamm, Imelda
Cc: Mermall, Stanley D; Pardee, James D; Stranz, Allan M
Subject: RE: Oshkosh Trucks construction permit

Imelda:

Was the EA and permit done at CO or her in NER. The process has been that if it is a CO generated EA and permit, the Jim Pardee in SS/6 reviews and certifies the EA. This should cut down on the delays due to confusion as to who does what, and when.

No I can't access the EA from that file.

al

From: Stamm, Imelda
Sent: Monday, August 28, 2000 9:58 AM
To: Yeung, Paul O
Cc: Mermall, Stanley D; Stranz, Allan M
Subject: RE: Oshkosh Trucks construction permit

Paul,

Is the EA also in the same file where the PD is? I'm copying Al Stranz in the Green Bay office who will be responsible for the EA sign-off. Thanks. (Al, please let me know if you can't get the EA out of this directory. I'll forward you an electronic version that you can get then. Thanks)

Imelda

Imelda R. Stamm, P.E.
Air Mgmt. South Team Supv.
Northeast Region
625 E. COUNTY Y Ste. 700
Oshkosh, WI 54901-9731

From: Yeung, Paul O
Sent: Monday, August 28, 2000 9:23 AM
To: Stamm, Imelda; Mermall, Stanley D; Hronek, Sally S
Cc: Hanson, Jeffrey C; Johnston, Dan L; Vakharia, Rajen M
Subject: Oshkosh Trucks construction permit

Hello,

I have put a preliminary determination and draft permit 00-POY-105 on the k:\ drive. It is in the constr\pubcom\ directory with a file name 00poy105.pd. Raj has looked at it here.

Please review and provide comments.

Imelda, would you please ask the EA in NER to look at the EA. Once (s)he gives the ok, I will process and public notice the EA together with the draft permit. Lloyd gets to sign the public notice because it is a PSD permit.

Thank you all.

Yeung, Paul O

From: Mermall, Stanley D
Sent: Tuesday, August 01, 2000 9:45 AM
To: Stamm, Imelda; Yeung, Paul O
Subject: RE: Oshkosh Truck

Hi Paul

I had a chance to look at the e-mail version of this EA it looks good to me. The email version did not include the maps so I did not review those documents. I believe that a DNR person should be the contact, not Don Draxler.

I am uncertain how to proceed from here. If you think it would be more efficient I have no objection to the EA being processed through BAM.....or not, depending on your needs and time line. In any case I have not received a hard copy of the application and I dont have the maps

Please advise as to how you wish me to proceed

Stan

From: Yeung, Paul O
Sent: Monday, July 24, 2000 12:17 PM
To: Mermall, Stanley D; Stamm, Imelda
Cc: Hronek, Sally S; Hanson, Jeffrey C
Subject: FW: Oshkosh Truck

Hi, Stan, I thought Imelda said that you were on vacation. Anyway this is the EA ATTACHED

Paul O. Yeung

Paul O.Yeung
Bureau of Air Management
(608) 266-0672

From: JoAnna Perdzock[SMTP:JoAnna.Perdzock@rmtinc.com]
Sent: Wednesday, July 19, 2000 12:27 PM
To: Yeung, Paul O
Subject: Oshkosh Truck

<<File. env_impact_stat doc>>

Hi Paul

Attached in the environmental analysis for the Oshkosh Truck Project. You should receive a hard copy tomorrow along with a letter addressing the Paint BACT issues you dicuseed with Marty Stomberger. If you have any questions, please let me know.

Thanks,