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	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., 30 days from publication of the public notice.

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

Title: Air Management Engineer

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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: Green Bay Packaging Inc. – Green Bay Mill Division

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

Township Range 24 North, Range 21 East Section 1

PROJECT SUMMARY

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

Green Bay Packaging Inc. – Green Bay Mill Division (will be referred to as the Green Bay Mill Division) is applying for an air pollution control construction and operation permit from the WDNR to modify its linerboard and medium manufacturing operations at the facility located at 1601 North Quincy Street in the City of Green Bay. Changes to the paper machine cleaning, fiber preparations processes, the paper machine, rewinding and roll handling process and equipment are proposed in order to improve the runnability of the paper machine to achieve its maximum potential of 40 tons of paper per hour. A estimated 6000 sq. ft. building expansion is expected to be needed for the fiber preparation area improvements.

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

Green Bay Mill Division has operated a containerboard (linerboard and medium) manufacturing facility at 1601 Quincy Street in the City of Green Bay since 1950. Within this facility, sources of secondary fiber (or equivalent) materials are treated to recover the fiber and is used for containerboard manufacturing. Green Bay Mill Division began using some recycled materials in 1972 and since 1991 has operated on 100 percent recycled materials.

Green Bay Mill Division is proposing the following modifications to increase the overall production capacity of the paper machine: Paper machine dryer section enhancements, paper machine press section enhancements, paper machine forming section enhancements, control system updates and/or replacements, secondary fiber process modifications, process water and

or stock system changes, paper machine cleaning changes, changes which may reduce energy demands, improve throughput, improve quality and or reduce downtime. The changes are needed for the facility to remain competitive.

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

An air pollution control permit must be acquired (issued) before commencement of construction of the proposed projects. An NR 405, Wisconsin Administrative Code, Prevention of Significant Deterioration Construction and Operation Air Pollution Control Permit application has been submitted to the WDNR.

The physical plant expansion changes (6000 sq. ft. area) will be incorporated within the storm water plan if undertaken. There will be a local (City of Green Bay) building permit required for the construction. This may also include an analysis to assure that the increased building footprint will not have an impact on other sources in the event of a flood event, and if so, easements may be required.

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.)

A portion of the proposed changes in the fiber processing operations will require an addition to the existing facility. Preliminary estimates (which are subject to change) indicate a 6000 square foot building will be necessary to house the new equipment. Total square footage of the new building structure will be defined during final engineering. A concrete floor will be poured and footings will be constructed to support the enclosure.

The Green Bay Mill Division is the property adjacent to the Proctor and Gamble- Fox River Mill. The proposed modification does not result in a significant PSD impact for PM10.

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

None.

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

A portion of the proposed changes in the fiber processing operations will require an addition to the existing facility. It is estimated approximately 6000 square feet will be necessary to house the new equipment. A concrete floor will be poured and footings will be constructed to support the enclosure.

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

Air emission sources modified by the proposed projects include P90 Paper Machine Cleaning, P91 Stock and Process Water Additives (includes secondary fiber processing) and P92 Paper Machine Emissions. Affected source will be the Boilers (B26, B33, B29, B30), Fugitive dust (F02) unpaved roadway and traffic activities and (F05). ash handling. The proposed projects will result in a potential increase in volatile organic compounds (VOCs) and particulate matter (PM/PM_{10}) from the physically modified sources and an increase in SO_2 , NO_x, and CO from the potential increased utilization of the Boilers. This quantity of boiler emissions is not an increase over current permitted emissions levels.

The increased production of secondary fiber pulps and increased paper production is not anticipated to result in wastewater discharges, but the potential increased production may require additional water input (and increased water vapor discharge as the paper is produced and dried) The Green Bay Mill Division operates a closed loop water system that does not have any significant wastewater discharges. Any additional waster use will be within the amounts allowed under current permits and/or approvals. There will be additional storm water from the 6000 sq. ft. building expansion placed over the semi-permeable gravel area, and water runoff from the building will be directed to existing collection systems. These changes (if the building expansion is undertaken) will be incorporated into the storm water plan.

8. Other Changes

No other changes are anticipated.

9. 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 X Other - Describe: Maps, plot plan provided with the construction permit application.

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)

Natural Heritage Inventory search, permit application

☒ 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)

Green Bay Packaging Inc. – Green Bay Mill Division is located on the northeast side of the City of Green Bay in a residential/industrial area, adjacent to the east bank of the Fox River approximately ½ mile from the river's confluence with Green Bay. The elevation at the facility is approximately 590 feet above sea level. The topography surrounding the facility is relatively flat, with a rise in elevation to about 700 feet (ASL) occurring 5-6 km from the plant to the east and west. The facility is within the valley formed by the Fox River. The entire area is indicated as within the Fox River floodplain based on the FEMA map overlays. Flooding has occurred within the last 20 to 30 years, when a strong offshore wind caused the river to back up.

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

This is an existing industrial site within a largely industrial area, and is just south of an elevated highway. The building addition site, described as an addition to the fiber processing operations, is primarily gravel. There is little vegetation in the immediate area of the plant, but the area supports trees, shrubs, grasses and other plants typical of an urban / suburban environment. Terrestrial wildlife within the area is largely birds and small mammals. The nearby river and river mouth are home to riparian plants and animals (aquatic plants, insects, snails and other invertebrates, birds (including migratory birds), frogs, reptiles and numerous game and bait fish species and small mammals). There are nearby wetland / marsh areas, which provide habitat for a wide variety of plants and animals (wetland vegetation, insects, snails and other invertebrates, birds, frogs, reptiles, fish and small mammals).

A review of the Natural Heritage Inventory (NHI) for the Township / Range location area (42421) indicates that there may be sensitive species of birds, plants and invertebrates that reside within this area: The bird species noted are Orchard Oriole, Redhead, and Black-Crowned Night Heron. There are three snail species noted (land snail, two types of Vertigo snails; Iowa Pleistocene and Midwest Pleistocene). There is fish species noted: Redside Dace which is a minnow. A plant species called American Sea – Rocket was also noted (typically resides on lake shore sand dunes).

13. Cultural Environment

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 zoned and developed as industrial.

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

The area consists of a mixture of residential, commercial and industrial areas that have considerable ethnic and cultural diversity.

c. Archaeological/Historical

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

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

There are no known special resources that will be affected by the projects.

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

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15. Physical (include visual if applicable)

The proposed projects include an expansion of the existing structure at the facility's current site. This is an industrial site and it is therefore believed that this physical change would have minimal impact.

The significant impact evaluation has shown that the proposed modification does not result in a significant additional air quality impact for fine particulate matter (PM10). Therefore, these emissions are not expected to have a significant impact on endangered species which may be present in the area. The air quality analysis shows that the impacts from this facility and other facilities within the area will not exceed the National Ambient Air Quality standards and increments for Particulate Matter, NO_x, SO_2 and CO.

The proposed project is not anticipated to significantly affect the surrounding environment. Emissions of hazardous air pollutants from the facility do not exceed WNDR – defined significance levels, nor federal action levels. Emissions of criteria pollutants from Green Bay Mill Division (VOCs, NO_X, CO, SO_2, and PM) will not significantly degrade air quality in the Green Bay area and are not anticipated to cause or contribute to a violation of national ambient air quality standards

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

There are no known or anticipated adverse biological impacts expected as a result of the proposed action. The building addition is not anticipated to impact or affect the habitat of sensitive species.

17. Cultural

a. Land Use (including indirect and secondary impacts)

The 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 building expansion would result in minimal environmental impact.

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

The proposed project is not anticipated to increase employment or have other significant social effects. A slight increase in

vehicle traffic on local roads due to more deliveries of supplies and shipments of finished products is anticipated.

Overall the social aspects of the proposed project should be beneficial in that is will add to the sustained economic resource base of the community. The economic impact should be modest. No ethnic or cultural group would be socially or economically affected by this project.

c. Archaeological/Historical

There are no known or anticipated impacts to archaeological or historical sites as a result of the proposed action.

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

There are no known impacts to other special resources as a result of the proposed action.

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

The modifications to the Mill will result in an increase in potential emissions of criteria air pollutants. The impact of these emissions cannot be avoided. However, the PSD significant impact evaluation has shown that the proposed modification does not result in a significant impact for PM10 under ch. NR 405, Wis. Adm. Code. Analysis of air quality as a portion of the permit review, indicates that the modified facility will meet current air quality standards. The project will not have a significant effect on the nearby river or wetlands is it will not require any clearance of vegetation.

Additional storm water runoff will be handled by the existing collection systems. Though the building addition will occur within the floodplain, the entire facility is thought to be located within the floodplain, and there are no alternative sites available that would allow the expanded operations to be incorporated into the existing stock preparation process.

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 emissions that may result from the projects listed would add to the pollutant emissions loading of the surrounding area. Future projects may be restricted due to increment and air resource consumed (under ch. NR 404, Wis. Adm. Code).

The Air Dispersion modeling indicates that the proposed modification does not result in an exceedance of an air quality standard or increment.

VOC emissions are known to be precursors in the formation of ground-level ozone, but these additional emissions are not expected to cause or contribute to a violation of air quality standards for ozone. Brown County is currently classified as attainment for ozone. The building expansion will increase the amount of storm water off and the increased building footprint may have an effect in the event of a flood event.

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).

Impacts on any geographically scarce resource are not known or anticipated.

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

The majority of 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 emissions that may result from the projects listed would add to the pollutant loading of the surrounding area. Future projects of the same type may be restricted due to the increment and air resource consumed as a result of the facility, and other facilities in the area.

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 always unknowns associated with environmental impact analyses that create uncertainty in predicting the effects a proposed action/s may have on the environment. However, the air impacts from the project are quantified / modeled using current EPA approved models, and there are no significant impacts expected from the modifications on water quality. The significance of unknowns is not believed to be substantial. 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 existing structure and the possible expansion are built according to all applicable fire control standards. Local emergency control agencies are informed of materials used and stored at a facility.

The appropriate safety and spill response plans have been developed and employees are trained annually.

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

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

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.

ALTERNATIVES

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.)

The changes being proposed are required for the Green Bay Mill Division to remain competitive in the linerboard and medium manufacturing market. Some of these changes may enable to the facility to produce their product with less energy, increase usage of secondary fibers and lower the costs of production. No action could have negative economic ramifications on the area.

The facility is proposing to control emissions from the facility under the federal PSD program, using the Best Available Control Technology (BACT). The Department requires that the project meets all applicable air quality requirements, meets PSD BACT and undergo public review prior to air permit issuance. During the public review period, the company or general

public may comment on the proposed decision. The facility or public may also appeal the final decision by requesting a contested case hearing or by requesting judicial review.

SUMMARY OF ISSUE IDENTIFICATION ACTIVITIES

26. List agencies, citizen groups and individuals contacted regarding the project (include DNR personnel and title) and summarize public contacts, completed or proposed).

Date	Contact	Comment Summary
March, May 2006	Kathleen Nelson, Environmental Manager	Discussion of projects, EA
March 2006	Randy Matty, DNR Air Management Compliance Engr.	Discussion of projects, EA
May 2006	Meg Galloway – State Dam Safety Engineer	discussion of floodplain issues

Project Name: Green Bay Packaging – Mill Division County: Brown

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	Date Signed
Dan C. Jackson	6/28/06

Number of responses to news release or other notice: 0

Certified to be in compliance with WEPA	
Environmental Analysis and Liaison Program Staff	Date Signed
[illegible]	6/28/06

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.

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