



Steve Bullock, Governor
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August 23, 2013

Mark Allen
Roseburg Forest Products
P.O. Box 4007
Missoula, MT 59806

Dear Mr. Allen:

Montana Air Quality Permit #2303-18 is deemed final as of August 23, 2013, by the Department of Environmental Quality (Department). This permit is for a particle board facility. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Julie Merkel
Air Permitting Supervisor
Air Resources Management Bureau
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JM:JO:KW

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Roseburg Forest Products
Missoula Particleboard
PO Box 4007
Missoula, MT 59806

Montana Air Quality Permit (MAQP) Number: 2303-18

Preliminary Determination Issued: July 5, 2013

Department Decision Issued: August 7, 2013

Permit Final: August 23, 2013

1. *Legal Description of Site:* The Roseburg plant is located approximately 1 mile northwest of the Missoula, Montana city limits on Raser Road, in the NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Section 8, Township 13 North, Range 19 West, in Missoula County, Montana.
2. *Description of Project:* Roseburg Forest Products submitted an application fee of \$500 on February 25, 2013, and an application for modification to the MAQP and the Title V Operating Permit on February 27, 2013, with additional information submitted through July 2, 2013.

This project enables the conversion of the existing facility through the use of equipment at the site, along with some additional equipment or equipment upgrades. Roseburg's plant modernization is being done to achieve greater efficiency and lower operating costs. With the plant modernization, the overall production capacity will be 217,333 thousand square feet per year (Msf/yr) (3/4 inch basis).

The line 1 modernization project includes a new pre-screening system to provide better size classification. The screening, milling and drying equipment will be reconfigured to include the installation of a disk screen system with an air density separator to remove large pieces of wood, rocks and metal; installation of metering bins on the dryers to help obtain accurate, consistent material flow to the dryers; re-route the conveyor system downstream of DRY 200 (final dryer); reconfigure the refiners in milling and drying.

Additionally, the existing forming line is being replaced with one taken from an idled Roseburg facility. It will include a forming line equipped with a continuous prepress and flying cut off saw that will result in increased line speed, reduced wood usage, resin, waste and mat rejects. A new hydraulic system will be installed on the press that will increase the speed and reduce energy consumption. The board cooler vents will now be ducted to a baghouse rather than emitting directly to atmosphere and the Sander Dust Boiler will be equipped with a new low-oxides of nitrogen (NOx) burner and a new baghouse. Installation of the new burners will decrease the boiler's maximum heat input capacity from 55 million British thermal units per hour (MMBTu/hr) to 52 MMBtu/hr.

Additional changes include the addition of eight (8) new baghouses to control particulate emissions from several sources and to provide general cleanup of various areas of current fugitive dust. These include:

- BH52 – Green Material transfers (Predryer baghouse) at 21,000 dry standard cubic feet per minute (dscfm);
- BH56 – Furnish Building baghouse at 20,000 dscfm;
- BH62 – Prescreen baghouse at 25,000 dscfm;
- BH64 – Wet bins baghouse at 25,000 dscfm;
- BH70- M&D face baghouse at 28,000 dscfm;
- BH72- M&D core baghouse at 28,000 dscfm;
- BH74 –Board Cooler baghouse, 45,000 dscfm; and
- BH76 – Sander Dust Boiler baghouse (boiler flowrate of 34,000 acfm).

Also, as part of the plant modernization project, Roseburg plans to remove the following baghouses from the facility:

- BH55 – Milling and Drying baghouse;
- BH60 – Predryer baghouse;
- BH100R – Line 1 reject system relay baghouse;
- BH400 – Reman flat line sander relay baghouse; and
- BH401R – Schilling and Bullnose system relay receiver baghouse.

3. *Objectives of Project:* The modification request would be to reconfigure the particle board manufacturing process to employ a single production line. This project would enable the conversion of the existing facility through the use of equipment at the site, along with some additional equipment or equipment upgrades. The main objective of Roseburg’s plant modernization would be completed to achieve greater efficiency and lower operating costs.
4. *Alternatives Considered:* In addition to the proposed action, the Department also considered the “no-action” alternative. The “no-action” alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the “no-action” alternative to be appropriate because Roseburg demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the “no-action” alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a Best Available Control Technology (BACT) analysis, would be included in MAQP #2303-18.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.
7. *The following table summarizes the potential physical and biological effects of the proposed project on the human environment.* The “no-action” alternative was discussed previously.

Potential Physical and Biological Effects							
		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats				X		yes
B.	Water Quality, Quantity, and Distribution			X			yes
C.	Geology and Soil Quality, Stability, and Moisture			X			yes
D.	Vegetation Cover, Quantity, and Quality			X			yes
E.	Aesthetics			X			yes
F.	Air Quality			X			yes
G.	Unique Endangered, Fragile, or Limited Environmental Resource			X			yes
H.	Demands on Environmental Resource of Water, Air, and Energy			X			yes
I.	Historical and Archaeological Sites				X		yes
J.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS

The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Overall, additional impacts to terrestrial life and habitats would not occur because the changes proposed in this permit action would take place at an existing facility to existing equipment. It was previously determined that this area does not appear to contain any critical or unique wildlife habitat or aquatic life. Since the project would occur in an already disturbed area at an existing facility; there would be no impact to terrestrial and aquatic life and habitats.

B. Water Quality, Quantity, and Distribution

Minor, if any, impacts would be expected on water quality, quantity, and distribution from the proposed project because of the relatively small size of the project. While the facility would emit air pollutants, and corresponding deposition of pollutants would occur, as described in Section 7.F. of this EA, the Department determined that this permit action would not result in any additional impacts. Therefore, the Department determined that only minor impacts would occur from the deposition of pollutants on water quality, quantity, and distribution.

C. Geology and Soil Quality, Stability, and Moisture

Minor impacts would occur on the geology and soil quality, stability, and moisture from the proposed project because minor construction would be required to complete the project. However, any impacts to the geology and soil quality, stability, and moisture from facility construction would be minor because the project would occur at an existing industrial site and on existing equipment.

Further, while deposition of pollutants would occur, as described in Section 7.F of this EA, the Department determined that deposition of pollutants in the areas surrounding the site would be minor due to dispersion characteristics of pollutants and the atmosphere and conditions that would be placed in MAQP #2303-18. Therefore, overall, any impacts to the geology and soil quality, stability, and moisture would be minor.

D. Vegetation Cover, Quantity, and Quality

This permitting action would have a minor effect on vegetation cover, quantity, and quality. The proposed project would occur at an existing, industrial property that has already been disturbed. No additional vegetation on the site would be disturbed for the project. The project would result in increased utilization of existing equipment. Additionally, Roseburg proposed to add new baghouses throughout the process to control particulate. Overall, any impacts to vegetation cover, quantity, and quality would be minor.

E. Aesthetics

The proposed modification to the facility would be contained to the area of the existing facility that has previously been disturbed. Therefore, only minor impacts to aesthetics would occur during construction.

F. Air Quality

Deposition of pollutants would occur as a result of the project. The Department determined that any air quality impacts from deposition would be minimal and minor due to dispersion characteristics of pollutants (stack height, stack temperature, etc.), the atmosphere (wind speed, wind direction, ambient temperature, etc.) and conditions that would be placed in MAQP #2303-18. Additionally, Roseburg proposed to add several new baghouses to various processes to minimize particulate emissions. Therefore, only minor impacts to air quality would occur as a result of this permit action.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The changes proposed would occur at an existing facility and would not change the footprint of the facility. Therefore, there would be no impacts to existing unique endangered, fragile, or limited environmental resources in the area. As explained in Section 7.F of this EA, there would be a slight increase in emissions, but with the conditions that would be placed in MAQP #2303-18, any impacts from deposition of pollutants would be minor.

H. Demands on Environmental Resources of Water, Air, and Energy

As described in Section 7.B of this EA, this permitting action would have little to no effect on the environmental resource of water as there would be no discharges to groundwater or surface water associated with this permitting action. In addition, the project would not increase current water use at the facility. There would be no additional impacts on energy resources because the project would not require additional energy or upgrades to existing infrastructure.

Previous modeling efforts, using allowable levels, showed compliance with National and Montana Ambient Air Quality Standards (NAAQS/MAAQS). Overall, this project would result in a minor effect on the air resource.

I. Historical and Archaeological Sites

The proposed project would take place within a previously disturbed industrial site. According to previous correspondence from the Montana State Historic Preservation Office, there would be a low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within the area. Therefore, it would be unlikely the proposed project would have an effect on any known historic or archaeological site.

J. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts from the proposed project would be minor. The project would involve adding a eight new baghouses, increased utilization of the existing equipment and the addition of low NOx burners and a baghouse on the Sander Dust Boiler. All changes would occur within the existing facility. Impacts to air, soil, and water quality would be minimized by conditions that would be placed in MAQP #2303-18.

8. *The following table summarizes the potential social and economic effects of the proposed project on the human environment. The "no-action" alternative was discussed previously.*

Potential Social and Economic Effects							
		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Social Structures and Mores				X		yes
B.	Cultural Uniqueness and Diversity				X		yes
C.	Local and State Tax Base and Tax Revenue				X		yes
D.	Agricultural or Industrial Production			X			yes
E.	Human Health			X			yes
F.	Access to and Quality of Recreational and Wilderness Activities				X		yes
G.	Quantity and Distribution of Employment				X		yes
H.	Distribution of Population				X		yes
I.	Demands for Government Services			X			yes
J.	Industrial and Commercial Activity				X		yes
K.	Locally Adopted Environmental Plans and Goals				X		yes
L.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL SOCIAL AND ECONOMIC EFFECTS:
The following comments have been prepared by the Department.

A. Social Structures and Mores

The proposed facility would not cause a disruption to any native or traditional lifestyles or communities (social structures or mores) in the area because the project would occur at a previously disturbed industrial site. Therefore, the proposed project would not change the nature of the site.

B. Cultural Uniqueness and Diversity

The proposed project would not cause a change in the cultural uniqueness and diversity of the area because the land is currently used as a particleboard manufacturing plant; therefore, the land use would not be changing. The use of the surrounding area would not change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The proposed project would not result in any impacts to the local and state tax base and tax revenue because the proposed project would not require new permanent employees to be hired.

D. Agricultural or Industrial Production

The proposed project would not result in any impacts to agricultural or industrial production because the proposed project would not displace any agricultural or industrial land. The project would occur at the existing facility. The Department determined that any impacts from deposition would be minor due to dispersion characteristics of pollutants and the atmosphere and conditions that would be placed in MAQP #2303-18.

E. Human Health

The project would not be expected to cause or contribute to any violations of the NAAQS/MAAQS, which are set to protect the public health. Any impacts would be minimized by maintaining compliance with the conditions of MAQP #2303-18. The Department believes there would be minimal additional impacts to human health as a result of this project.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed action would not alter any existing access to or quality of any recreational or wilderness area activities. This project would not have an impact on recreational or wilderness activities because the site is far removed from recreational and wilderness areas or access routes. Furthermore, the facility is contained on private property and would continue to be contained within private property boundaries. Therefore, the Department determined there would be no additional impact to access or quality of recreational and wilderness activities.

G. Quantity and Distribution of Employment

The proposed project would not result in any impacts to the quantity or distribution of employment at the facility or surrounding community. No new employees would be hired at the facility as a result of the project.

H. Distribution of Population

The proposed project would not involve any significant physical or operational change that would affect the location, distribution, density, or growth rate of the human population.

I. Demands of Government Services

There would be a minor impact on demands of government services because of the required permit issuance; however, no additional time (beyond what is currently dedicated) would likely be required by government agencies to assure compliance with applicable rules, standards, and MAQP #2303-18. The Department determined there would be minimal additional impacts as a result of this permit action.

J. Industrial and Commercial Activity

No additional impacts would be expected on the local industrial and commercial activity because the proposed project would take place at an existing facility. No additional industrial or commercial activities would be expected to take place in the area due to the project.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals that would be affected by issuing MAQP #2303-18. Roseburg would be required to maintain compliance with the applicable ambient air quality standards. The State Implementation Plan (SIP) demonstration of attainment indicated that the emission limitations contained in MAQP #2303-18, along with control measures applied to other sources, will bring the Missoula area into compliance with the PM₁₀ standards.

L. Cumulative and Secondary Impacts

Overall, the social and economic cumulative and secondary impacts from this project would be minor because the proposed project would take place at the existing facility. New businesses would not be drawn to the area and permanent jobs would not be created or lost due to the proposed project. Because no new employees would be hired for the proposed project, there would be no economic impacts from new employees.

Recommendation: An Environmental Impact Statement (EIS) is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The impacts resulting from this project would not be significant. Overall, the changes to the permit would result in increased utilization of the existing equipment. Further, MAQP #2303-18 would include conditions and limitations to ensure the facility would operate in compliance with all applicable rules and regulations.

Other groups or agencies contacted or that may have overlapping jurisdiction: Montana Natural Heritage Program - Natural Resource Information System

Individuals or groups contributing to this EA: Department of Environmental Quality - Air Resources Management Bureau

EA prepared by: Jenny O'Mara

Date: June 17, 2013