



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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November 18, 2008

Ellen Porter
Roseburg Forest Products
PO Box 1088
Roseburg, OR 97470

Dear Ms. Porter:

The Department of Environmental Quality (Department) has made its decision on the Montana Air Quality Permit application for Roseburg Forest Products' Missoula Particleboard facility. The application was given permit number 2303-15. The Department's decision may be appealed to the Board of Environmental Review (Board). A request for hearing must be filed by December 3, 2008. This permit shall become final on December 4, 2008, unless the Board orders a stay on the permit.

Procedures for Appeal: Any person jointly or severally adversely affected by the final action may request a hearing before the Board. Any appeal must be filed before the final date stated above. The request for a hearing shall contain an affidavit setting forth the grounds for the request. Any hearing will be held under the provisions of the Montana Administrative Procedures Act. Submit requests for a hearing in triplicate to: Chairman, Board of Environmental Review, P.O. Box 200901, Helena, Montana 59620.

Conditions: See attached.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-3490

Moriah Peck, P.E.
Environmental Engineer
Air Resources Management Bureau
(406) 444-4267

VW: MAP:vs
Enclosures

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

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

Air Quality Permit Number: 2303-15

Preliminary Determination Issued: 10/17/08

Department Decision Issued: 11/18/08

Permit Final:

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:* This EA incorporates the changes included in MAQP #2303-14 and the current permitting action #2303-15, as one project. For the most recent permitting action, the Department received a complete application from Roseburg on September 16, 2008, requesting that the Department modify MAQP #2303-14. In order to comply with the Plywood and Composite Wood Product MACT rule, Roseburg installed a RTO to control emissions of VHAPs from its existing wood-fired green furnish predryer. This RTO was installed on the outlet of the existing wet electrostatic precipitator and is fueled by natural gas. The installation of the RTO was permitted under MAQP #2303-14, which included a provision limiting the particulate matter emitted from the RTO to 0.10 gr/dscf corrected to 12% CO₂ and calculated as if no auxiliary fuel had been used. This limit is a BACT-derived limit intended to be consistent with ARM 17.8.316. However, since the issuance of MAQP #2303-14, Roseburg has discovered that the RTO is not capable of achieving this BACT-derived limit. Therefore, Roseburg proposes to modify the particulate BACT limit for the RTO in this permit action.
3. *Objectives of Project:* Installation of the RTO will result in a reduction of emissions of VHAPs from the wood-fired green furnish predryer.
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 BACT analysis, would be included in Permit #2303-15.
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

This permitting action would have a minor effect on terrestrial and aquatic life and habitats, as the proposed project would affect an existing, industrial property that has already been disturbed. Impacts to terrestrial life and habitats may occur as a result of the potentially increased air emissions (SO₂, NO_x, CO, VOC, PM₁₀, and PM). Habitat impacts could result in a change of diversity or abundance of terrestrial or aquatic life. However, this area does not appear to contain any critical or unique wildlife habitat or aquatic life and the project would occur in an already disturbed area.

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, due to dispersion characteristics of pollutants and the atmosphere and conditions that would be placed in Permit #2303-15, any impacts from deposition of pollutants on water quality, quantity, and distribution would be minor.

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. 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 Permit #2303-15. 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 affect an existing, industrial property that has already been disturbed. No additional vegetation on the site would be disturbed for the project. The increase in potential levels of NO_x, CO, VOC, PM₁₀, and PM from historical emission levels might have a minor effect on the surrounding vegetation; however, the air quality permit associated with this project contains limitations to minimize the effect of the emissions on the surrounding environment. Overall, any impacts to vegetation cover, quantity, and quality would be minor.

E. Aesthetics

The proposed modification to the facility would be constructed in the area that has previously been disturbed and already has noise associated with its operation. The construction involved in the project would be limited to the construction of an RTO. Therefore, only minor impacts to aesthetics would be anticipated.

F. Air Quality

There would be air quality impacts resulting from the proposed project. The installation of the RTO would result in a significant decrease in emissions of VOCs and volatile organic hazardous air pollutants from the predryer exhaust. The combustion of natural gas in the RTO, however, would result in some increased emissions. The net emissions increases associated with the project would be as shown in the table below.

	PM	PM₁₀	CO	NO_x	VOC	SO₂
Potential Emissions Increases (TPY)	0.26	0.26	8.06	6.66	0.19	0.02

Deposition of pollutants would occur as a result of the project. However, the Department determined that any air quality impacts from deposition would be 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 Permit #2303-15.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The current permit action would result in an increase in emissions, which could result in minor impacts to existing unique endangered, fragile, or limited environmental resources in the area. The Department determined that the chance of the project impacting any endangered, fragile, or limited environmental resources in the area would be minor because of the reasons identified in the air quality impact analysis in Section 7.F of this EA. As explained in Section 7.F of this EA, due to the relatively small increase in emissions, dispersion characteristics of pollutants and the atmosphere, and conditions that would be placed in Permit #2303-15, 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.

As described in Section 7.F of this EA, the impact on the air resource in the area of the facility would be minor because the air emissions from the proposed project would be low and the facility would be required to maintain compliance with other limitations affecting the overall emissions from the facility. In addition, the project would not increase current water use at the facility.

There would be a minor impact on energy resources because the project would require the use of natural gas to run the RTO.

Actual levels of pollutant emissions may increase as a result of this project; however, this action would not include an increase in allowable levels. 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 is low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within the area. Therefore, it is 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. No additional equipment or facilities would be expected to locate in the area due to the proposed project. Impacts to air, soil, and water quality would be minimized by conditions that would be placed in Permit #2303-15.

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 be constructed at a previously disturbed industrial site. 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. While air emissions from the facility may increase and corresponding deposition of pollutants would occur, as described in Section 7.F. of this EA, 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 Permit #2303-15.

E. Human Health

The installation of the RTO would result in only minor impacts to human health due to an increase in air emissions discharged from the facility. However, the emissions would not change significantly from prior levels. 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. Roseburg conducted a health risk assessment and demonstrated that the project would present a negligible risk to human health. Also, any impacts would be minimized by maintaining compliance with the conditions of Permit #2303-15.

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.

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 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 Permit #2303-15.

J. Industrial and Commercial Activity

No 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 Permit #2303-15. Roseburg would be required to maintain compliance with the applicable ambient air quality standards. The SIP demonstration of

attainment indicated that the emission limitations contained in Permit #2303-15, along with control measures applied to other sources, will bring the Missoula area into compliance with the PM₁₀ standards. The state standards would protect the proposed site and the environment surrounding the site.

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 in that the installation of the RTO would be considered a pollution control project and a benefit to the environment. Permit #2303-15 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: Moriah Peck, P.E.

Date: October 1, 2008