Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

June 8, 2012

Roseburg Forest Products
Chuck Ulik
P. O. Box 4007
Missoula, MT 59806

Dear Mr. Ulik

The Department of Environmental Quality (Department) has made its decision on the Montana Air Quality Permit application for Roseburg Forest Products. The application was given permit number 2303-16. The Department's decision may be appealed to the Board of Environmental Review (Board). A request for hearing must be filed by June 25, 2012. This permit shall become final on June 26, 2012, 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 by the date stated in the Department's Decision on this permit. 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, MT 59620.

Conditions: See attached.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Jenny O'Mara
Environmental Engineer
Air Resources Management Bureau
(406) 444-1452

VW:JO

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

Montana Air Quality Permit (MAQP) Number: 2303-16

Preliminary Determination Issued: May 23, 2012
Department Decision Issued: June 8, 2012
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 ¼ of SW ¼ of Section 8, Township 13 North, Range 19 West, in Missoula County, Montana.

2. *Description of Project:* On May 1, 2009, the Department approved a de minimis change to allow Roseburg to utilize 14 million British thermal units per hour (MMBtu/hr) of land fuel gas (LFG) from Allied Waste. The Department approved this request and as a result, Roseburg can burn this fuel in the Sander Dust Boiler with the option to burn it in the Solagen Sander Dust Boiler. This permit action would add this de minimis request to the permit.

   On March 30, 2012, Roseburg submitted a permit application for modification of MAQP #2303-15 and a renewal application for the Title V Operation Permit (OP) #2303-06. Both applications were deemed complete on April 16, 2012.

   In summary, Roseburg requested the Department: (1) remove Line 2 and all associated equipment (including the GEKA200 Burner) from the MAQP and OP; (2) remove Dryer stack's #5 and #6 because these are no longer used; (3) change baghouse references in Section I.H.1 to Roseburg's naming convention and numbering system; (4) remove the cyclone requirement from the predyer because the cyclone is used as product recovery rather than control; (5) add the regenerative thermal oxidizer (RTO) in addition to the wet electrostatic precipitator (WESP) as control for the predyer as all the exhaust gases are routed here; (6) change the reference from the wood particle dryer to the wood particle rotary dryer; (7) remove a portion of the Remanufacturing process because these were part of Line 2; and (8) change the temperature requirement on the dryer alarm system from 1100 degrees Fahrenheit (ºF) to 600 ºF to coincide with 40 Code of Federal Regulations (CFR) 63, Subpart DDDD.

   Additionally, Roseburg requested that the Department change referral of the 'dryer stacks' to the 'Line 1 Dryer stack'. Both permits list six (6) dryers and Roseburg requested the Department remove the #5 and #6 dryers. Also, because the dryers are all routed to common stack (Line 1 dryer stack), Roseburg requested a combined emission limit of 19.4 pounds per hour for all the dryers. The combined emission limit would be particulate matter (PM) and PM with an aerodynamic diameter of less than or equal to 10 micrograms (PM_{10}).

3. *Objectives of Project*: In addition to the items listed above, the main purpose of this permit action would be to re-purpose the Six-Head Sander Baghouses (BH 300 A & B) to collect dust from the Line 1 Blending and Forming area, and the Line 1 M & D shaker screens and dryer conveyor area.

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 MAQP #2303-16.

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 facility changes due to the permit action would result in a decrease in air emissions. 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, with an overall decrease in emissions; 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 re-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 #2303-16. 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 a decrease in emissions as a result of removing Line 2 and associated equipment. Overall, any impacts to vegetation cover, quantity, and quality would be minor.

E. Aesthetics

The proposed modification to the facility would be constructed in an area that has previously been disturbed. Once the project is constructed, there would be no changes to aesthetics in the area. Therefore, only minor impacts to aesthetics would occur during construction.

F. Air Quality

Deposition of pollutants would occur as a result of the project. However with removal of Line 2 and the associated equipment, the facility would have less allowable emissions. 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 #2303-16. 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 current permit action would result in a decrease in emissions. The changes proposed would occur at an existing 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 due to the overall decrease in emissions and the conditions that would be placed in MAQP #2303-16, 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 a no additional impacts on energy resources because the project would not require additional energy.

Actual levels of pollutant emissions would decrease as a result of this project. 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 MAQP #2303-16.

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 #2303-16.

E. Human Health

The re-purposing of baghouses and removal of Line 2 would result in only emissions decrease. 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 #2303-16.

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 #2303-16.

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 MAQP #2303-16. 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 #2303-16, along with control measures applied to other sources, will bring the Missoula area into compliance with the PM_{10} 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. Overall, the changes to the permit would result in a decrease in emissions. Further, MAQP #2303-16 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: May 16, 2012