

From: [Karl Schumacher](#)
To: [Yamazaki, Shingo \(ECY\)](#)
Cc: [Paul Sponenburg](#)
Subject: RE: SEPA Checklist - Order 4153 Modification
Date: Friday, October 05, 2018 10:30:51 AM
Attachments: [image001.png](#)
[image002.png](#)
[Appendix B - WDOE SEPA Checklist-Tacoma PB6 Steam Limit \(10.3.18 revision\).pdf](#)

Shingo – Here is a digital copy of the signed SEPA. It is going out today by FedEx to your attention at the address we use for Stephanie:

Stephanie Ogle
Washington Department of Ecology – Industrial Section
PO Box 47600
Olympia, WA 98504-7600

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

From: Karl Schumacher
Sent: Thursday, October 04, 2018 6:37 AM
To: 'Yamazaki, Shingo (ECY)' <syam461@ECY.WA.GOV>
Subject: RE: SEPA Checklist - Order 4153 Modification

Shingo – It looks like our mill manager will be back on Friday so I'll have him sign then and send the hardcopy by mail and email you a signed copy as well.

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

From: Yamazaki, Shingo (ECY) [<mailto:syam461@ECY.WA.GOV>]
Sent: Wednesday, October 03, 2018 4:30 PM
To: Karl Schumacher <karl.schumacher@westrock.com>
Subject: RE: SEPA Checklist - Order 4153 Modification

EXTERNAL - Use Caution

Thank you Karl. Could please you send the updated and signed SEPA Checklist to me via mail?

Shingo

From: Karl Schumacher [<mailto:karl.schumacher@westrock.com>]
Sent: Wednesday, October 03, 2018 3:29 PM
To: Yamazaki, Shingo (ECY) <syam461@ECY.WA.GOV>

Subject: RE: SEPA Checklist - Order 4153 Modification

Shingo – I made the change to the language in A.12 and added the PSD Netting Analysis Summary table to B.2. I didn't put any additional language in B.2 as the table discloses all emission increases.

Your question about water usage impact is a good one and the short answer is that there is no additional water demand or discharge. Let me explain... There are three steam pressures that are supplied by our boilers to those process customers: 425 PSI, 180 PSI and 65 PSI. PB6 only supplies steam to the 425 PSI header while PB7 and RB4 supply 875 PSI steam to the turbine. Having PB6 running at its capacity more often throughout the year means that the 425 PSI extraction out of the steam turbine will be either closed or near closed most of the time. The turbine also provides extracted steam to the 180 and 65 PSI systems. The demand for these steam supplies will not increase so any additional steam passed through the turbine will end up in the turbine condenser. This device condenses the steam, as the name implies, and returns the water to the boiler feed water system. While PB6 will use more water to produce the greater amount of steam over the year, this will be completely compensated by the return of the condensed steam out of the turbine. Zero extra water is used or discharged.

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

From: Yamazaki, Shingo (ECY) [<mailto:syam461@ECY.WA.GOV>]

Sent: Wednesday, October 03, 2018 11:04 AM

To: Karl Schumacher <karl.schumacher@westrock.com>

Subject: SEPA Checklist - Order 4153 Modification

EXTERNAL – Use Caution

Karl,

A few follow-up comments/questions regarding the SEPA checklist.

- 1) The SEPA checklist (Section A.12) states that there will be no short term production increase but there will be a long term annual average increase. I assume WestRock is talking about “steam” production and not “pulp” production. Please update to include this clarification.
- 2) I do not see a discussion of GHGs in the B.2 of the SEPA checklist. I see it briefly later on in the “energy” section. A discussion of GHG emissions should be included in the “Air” section.
- 3) Section B.2 should be more robust in general. Please include additional information regarding emissions increase values and ambient air impact values.
- 4) Water usage. Are there additional water demands from the increase in steam production? Is this minimal? Is all the water reused so there is not net increase in water consumption?

Thanks,

Shingo

This electronic message contains information from WestRock Company (www.westrock.com) or its subsidiaries, which may be confidential, privileged or otherwise protected from disclosure. The information is intended to be disclosed to and used by only the named recipient(s). If you are not the intended recipient, then your review, use, disclosure, printing, copying, or distribution of this message or its contents is prohibited. If you have received this message in error, please notify WestRock immediately at postmaster@westrock.com, and delete the message from your system. For information about WestRock's privacy practices, including how WestRock collects, processes, transfers, and stores Personally Identifiable Information shared with us, please visit [WestRock Privacy Policy](#). Unless previously authorized in writing, this message does not constitute an offer, acceptance, or agreement of any kind. Sender is not liable for damage, errors or omissions related to or caused by transmission of this message.
(c) WestRock Company.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [\[help\]](#)

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#)

No. 6 Power Boiler Steam Limit: Requesting Modification to NOC Order 4153-AQ07 (the “Project”)

2. Name of applicant: [\[help\]](#)

WestRock CP, LLC – Tacoma Mill

3. Address and phone number of applicant and contact person: [\[help\]](#)

801 Portland Avenue, Tacoma, Washington 98421

Contact Person: Karl Schumacher – (253)-596-0296

4. Date checklist prepared: [\[help\]](#)

06/07/2018

5. Agency requesting checklist: [\[help\]](#)

Washington Department of Ecology

6. Proposed timing or schedule (including phasing, if applicable): [\[help\]](#)

Proposed Start of Construction: No construction (low-NOx burner NOC application submitted separately)

Proposed Completion of Construction: October 2018 low-NOx burners will be installed and desire to have steam limit removed once operational

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [\[help\]](#)

Yes. An NOC application was submitted in 2017 for the installation of low-NOx burners on No. 6 Power Boiler (PB6). Department of Ecology determined on July 25, 2017 that an NOC Order was not required for this installation.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [\[help\]](#)

A Notification of Construction Permit Application to modify an existing NOC Order 4153-AQ07 has been prepared for submittal to the Washington Department of Ecology.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [\[help\]](#)

A Title V Operating Permit renewal application for the Tacoma Mill was submitted to the Department of Ecology and the revised permit is being finalized. An NOC application was submitted for Chip Thickness Screening Project in 2018. Public notice provided on 5/31/18 and public hearing was held on 7/17/18.

10. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)

Notice of Construction Order 4153-AQ07 must be modified by the Department of Ecology prior to operating the boiler at higher annual steam output.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [\[help\]](#)

During the permitting process for the project related to a new steam generator permitted in 2006, the Tacoma mill indicated that additional utilization of PB6 steam capacity was not anticipated at the time because of the high cost of the fuel (oil or natural gas). At that time the Tacoma Mill proposed an annual steam limit (based upon the maximum 2-year average over the previous 10 years) to ensure that there would be no increase in emissions from PB6 that would need to be considered as part of the Steam Turbine Generator Project. This steam generation limit was included in Finding No. 9 and Requirement No. 1 for PB6 in Appendix A of the Simpson Tacoma Kraft Company, LLC Notice of Construction Order No. 4153-AQ07 issued by Ecology on May 23, 2007 for the Steam Turbine Generator Project (see Appendix F). Over the past few years since completion of the Steam Turbine Generator Project, natural gas prices have fallen significantly. With the mill's existing electrical power sales agreement, it is now more economical to maximize the steam generated from the biomass fired No. 7 Power Boiler and Recovery Boiler #4 towards electrical

power generation and to utilize the natural gas-fired PB6 for meeting more of the process steam requirements. The implementation of this project will not allow the facility to achieve a higher production rate from process equipment. With the exception of PB6, no other emission units will experience emissions increases related to the proposed changes. The intent of restoring the steam limit to its original rate is exclusively aimed towards managing the steam generation at the mill to maximize electrical power generation.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. [\[help\]](#)

The Project is proposed to be located on existing property owned by WestRock CP, LLC at 801 Portland Avenue, Tacoma, Washington 98421. The No. 6 Boiler has been in operation since 1960. The only impacted source is the No. 6 Power Boiler. The proposed change does not increase steam production rate on a short-term basis. By removing the 12-month rolling steam limit, PB6 will be able to produce more steam over a longer-term, annual, basis.

B. ENVIRONMENTAL ELEMENTS [\[help\]](#)

1. Earth [\[help\]](#)

a. General description of the site: [\[help\]](#)

(circle one): **Flat**, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)? [\[help\]](#)

The Tacoma Mill property location is comprised of generally flat ground (<1% grade). There is a bulkhead wall along a portion of the eastern side of the property.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [\[help\]](#)

The property is situated on a 15 to 20 foot depth of historically placed fill above Commencement Bay.

The proposed change will involve no excavation or other impacts to existing soils or vegetation.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#)

No, there is no indication or history of unstable soils in the immediate vicinity of the Tacoma Mill property.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [\[help\]](#)

Not Applicable – Not a construction project

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [\[help\]](#)

Not Applicable – Not a construction project

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [\[help\]](#)

Not Applicable – Not a construction project

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [\[help\]](#)

Not Applicable – Not a construction project

2. Air [\[help\]](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [\[help\]](#)

Construction is not required for this project. Prior to increasing the steaming rate limit, four new low-NOx burners will be installed, which have the same heat input capacity as the old existing burners, will result in a 48% reduction in the hourly maximum NOx emission rate. There will be no increase in short-term emission rates for other regulated pollutants, including HAPs/TAPs. Annual emissions of criteria pollutants are all below Significant Emission Rates.

Pollutant	Annual Emissions (tons per year)			PSD Significant Emission Rates	PSD Review Required?
	Baseline Current Actual PB6 Emissions ^(b) (24-Month Baseline)	Projected Future Potential PB6 Emissions ^(c) (Combined Firing)	Net Emissions Impact Summary	(tons per year)	(Yes / No)
Filterable PM	0.98	1.93	0.95	25	No
Total PM ₁₀	3.93	7.72	3.78	15	No
Total PM _{2.5}	3.93	7.72	3.78	10	No
SO ₂	0.30	0.58	0.28	40	No
NO _x	144.91	147.90	2.99	40	No
CO	43.47	86.63	43.16	100	No
VOC as C	2.85	5.70	2.86	40	No
Lead	2.59E-04	5.08E-04	2.49E-04	0.6	No
H ₂ SO ₄	0.00	0.00	0.00	7	No
Total Fluorides (Excluding Hydrogen Fluoride)	0.00	0.00	0.00	3	No
H ₂ S	0.00	0.00	0.00	10	No
Reduced Sulfur	0.00	0.00	0.00	10	No
TRS	0.00	0.00	0.00	10	No
CO ₂	62,946.06	123,488.04	60,541.97	-	-
CH ₄	1.19	2.33	1.14	-	-
N ₂ O	0.12	0.23	0.11	-	-
Total GHG	62,947.37	123,490.60	60,543.23	-	-
Total CO ₂ e	63,011.12	123,615.67	60,604.55	75,000	No
<p>(a) See Appendix C for detailed calculations. (b) The PB6 24-month operating period utilized for determining the baseline actual annual emissions rate was January 2012 - December 2013. (c) The maximum potential annual emissions for PB6 were calculated assuming the unit fires natural gas at the maximum heat input rating of 241.2 MMBtu/Hr for all 8,760 hours of the year. Emission factor for NOx reflects the new low-NOx burners.</p>					

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [\[help\]](#)

None. There are no off-site sources of emissions or odor that may affect the proposed Project.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: [\[help\]](#)

Not Applicable – Not a construction project

3. Water [\[help\]](#)

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. [\[help\]](#)

The Tacoma Mill is surrounded by water on three sides. The Puyallup River is to the east, Commencement Bay is to the north, and the Saint Paul Waterway is to the west. All run-off from the site is protected from entering the river by a berm along the river bank, which directs all site drains to the mill's NPDES permitted treatment facility before being discharged to Commencement Bay. There should be no impacts to surface water from the construction of this Project.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. [\[help\]](#)

No.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. [\[help\]](#)

None.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [\[help\]](#)

No.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [\[help\]](#)

The site does not fall within a 100-year floodplain under the City's sensitive areas, which are based on the FEMA floodplain maps.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. [\[help\]](#)

No.

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [\[help\]](#)

No.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [\[help\]](#)

None.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. [\[help\]](#)

No additional runoff or stormwater will be generated as a result of this project.

2) Could waste materials enter ground or surface waters? If so, generally describe. [\[help\]](#)

No.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. [\[help\]](#)

No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: [\[help\]](#)

None.

4. **Plants** [\[help\]](#)

a. Check the types of vegetation found on the site: [\[help\]](#)

___deciduous tree: alder, maple, aspen, other

___evergreen tree: fir, cedar, pine, other

___shrubs

___grass

___pasture

___crop or grain

___ Orchards, vineyards or other permanent crops.

___ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

___water plants: water lily, eelgrass, milfoil, other

___other types of vegetation

The Project site is inside the building currently housing the No. 6 Power Boiler (the mill proper), so no vegetation will be impacted.

b. What kind and amount of vegetation will be removed or altered? [\[help\]](#)

None.

- c. List threatened and endangered species known to be on or near the site. [\[help\]](#)

There are no known listed threatened or endangered plant species at or near the Tacoma Mill site. Listed plant species identified by U.S. Fish and Wildlife Service (USFWS) to be present in Pierce County include golden paintbrush (*Castilleja levisecta*), water howellia (*Howellia aquatilis*), and marsh sandwort (*Arenaria paludicola*). These species are not likely to be present at the site due to lack of suitable habitat within and adjacent to the project area.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [\[help\]](#)

No landscaping or vegetation enhancement is proposed as part of this Project.

- e. List all noxious weeds and invasive species known to be on or near the site. [\[help\]](#)

Himalayan blackberry and Goatsrue are invasive species observed on the Mill property. In addition, Tansy ragwort is listed by Pierce County as a site infestation at the Mill property.

5. Animals [\[help\]](#)

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. [\[help\]](#)

Examples include:

birds: hawk, heron, eagle, songbirds

mammals: harbor seal

fish: salmon, trout, shellfish

- b. List any threatened and endangered species known to be on or near the site. [\[help\]](#)

The table below presents federally listed threatened or endangered species and their habitat with the potential to occur near the site.

Common Name (Scientific Name)	Jurisdiction	ESA Status	Critical Habitat
Chinook salmon (<i>Oncorhynchus tshawytscha</i>) Puget Sound ESU	NMFS	Threatened	Designated
Steelhead (<i>Oncorhynchus mykiss</i>) Puget Sound DPS	NMFS	Threatened	Proposed
Bocaccio (<i>Sebastes paucispinis</i>) Puget Sound/Georgia Basin DPS	NMFS	Endangered	Proposed
Bull trout (<i>Salvelinus confluentus</i>) Coastal-Puget Sound DPS	USFWS	Threatened	Designated
Marbled murrelet (<i>Brachyramphus marmoratus</i>)	USFWS	Threatened	None in Project area

Marbled murrelets are not expected in Puyallup Waterway at any time of the year based on rare observations in Commencement Bay and no known/confirmed breeding locations nearby (Tirhi pers. comm. 2013). The Washington Department of Fish and Wildlife Priority Habitats and Species database records no species occurrence for marbled murrelets in or near the project area (WDFW 2014). The nearest marbled murrelet critical habitat areas to Commencement Bay are located approximately 40 miles northwest on the Olympic Peninsula, 40 miles southwest in the Capitol State Forest, and 30 miles southeast near Mount Rainier National Park (61 FR 26257).

USFWS identifies the additional species of Canada lynx (*Lynx canadensis*), gray wolf (*Canis lupus*), grizzly bear (*Ursus arctos*), and northern spotted owl (*Strix occidentalis caurina*) as present in Pierce County (USFWS 2014); however, these terrestrial species are likely not present due to lack

of suitable habitat within and adjacent to the project area. National Marine Fisheries Service listed species yelloweye rockfish (*Sebastes ruberrimus*) and canary rockfish (*S. pinniger*) would not be present due to lack of suitable habitat in south Puget Sound.

- c. Is the site part of a migration route? If so, explain. [\[help\]](#)

The Project site is within the Pacific Flyway for waterfowl. The nearby Puyallup River is a migratory route for juvenile and adult salmonids.

- d. Proposed measures to preserve or enhance wildlife, if any: [\[help\]](#)

No wildlife is expected to be disturbed due to the operation of this Project. Therefore, no measures are proposed to preserve or enhance wildlife.

- e. List any invasive animal species known to be on or near the site. [\[help\]](#)

There are no known invasive animal species on or near the site.

6. Energy and Natural Resources [\[help\]](#)

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [\[help\]](#)

Two primary forms of energy are required for the pulp and papermaking process: steam and electricity. Boilers are used to generate steam at high pressure and then that pressure is reduced through an electricity turbine generator. Steam is then extracted at the necessary process pressure for further use in the manufacturing process. Eliminating the annual steam limit for PB6 will allow more effective and efficient use of steam from the two biomass fed power boilers to make electricity while allowing PB6 to satisfy more of the process needs for steam.

The new low-NOx burners installed as replacements for the existing conventional burners in No. 6 Power Boiler will continue to fire natural gas as the primary fuel (recycled fuel oil fired during natural gas curtailment or interruption) to generate steam for the manufacturing process without significant increases in traditional pollutants. The project is expected to result in an increase in CO₂e, but to levels less than the PSD significance thresholds.

- b. Would your project affect the potential use of solar energy by adjacent properties?

If so, generally describe. [\[help\]](#)

No.

- c. What kinds of energy conservation features are included in the plans of this proposal?

List other proposed measures to reduce or control energy impacts, if any: [\[help\]](#)

The new low-NOx burners installed prior to restoring the steam limits to traditional levels will be more efficient than the existing conventional burners in No. 6 Power Boiler. The new programmable logic controller (PLC)-based Burner Management System (BMS) and Combustion Control System (CCS) should also facilitate greater stability and efficiency for boiler operations.

7. Environmental Health [\[help\]](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. [\[help\]](#)

No.

1) Describe any known or possible contamination at the site from present or past uses. [\[help\]](#)

None.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. [\[help\]](#)

There are no known hazardous chemicals that might affect the Project. Existing utilities, including natural gas, are within the existing Portland Avenue right of way and will not be altered nor affected by this Project.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. [\[help\]](#)

No hazardous chemicals are proposed to be stored, used, or produced as part of the Project.

4) Describe special emergency services that might be required. [\[help\]](#)

No special emergency services will be required upon Project completion and during the operating life of the Project.

5) Proposed measures to reduce or control environmental health hazards, if any: [\[help\]](#)

No environmental hazards not already present are anticipated due to the implementation of this Project and as such, no control measures are proposed.

b. Noise [\[help\]](#)

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [\[help\]](#)

Regular industrial noise associated with the existing equipment/operations at the Tacoma Mill exists at the Project site. Other sources of noise include truck and train traffic adjacent to the site. However, these existing sources of noise are not expected to be affected by the Project.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [\[help\]](#)

None. Unit will operate identically to how it operates now with the exception of operating at capacity more frequently.

3) Proposed measures to reduce or control noise impacts, if any: [\[help\]](#)

None.

8. Land and Shoreline Use [\[help\]](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [\[help\]](#)
Tacoma Mill is an existing industrial site (pulp and paper mill) owned by WestRock on which pulp and paper production activities occur. The Project will not affect the current land use on or adjacent to the Mill.
- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [\[help\]](#)
No, the Project site has not been used as working farmlands or forest lands.
- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: [\[help\]](#)
There are no known agricultural uses of the surrounding land that could affect the Project.
- c. Describe any structures on the site. [\[help\]](#)
No additional structures will be constructed. The Mill consists of a pulping area, pulp washing area, pulp bleaching plant, chlorine dioxide generation plant, chemical recovery area, paper machines, old corrugated container (OCC) pulping area, wastewater treatment area and power generation area. The Mill also contains large diameter concrete clarifier tanks, warehouses for finishing, storage, and shipping, wood chip loading conveyors, effluent pipes, and office buildings.
- d. Will any structures be demolished? If so, what? [\[help\]](#)
No structures will be demolished.
- e. What is the current zoning classification of the site? [\[help\]](#)
The Tacoma Mill (including the Project site) has a zoning classification of Port Maritime and Industrial.
- f. What is the current comprehensive plan designation of the site? [\[help\]](#)
The Tacoma Mill (including the Project site) has a comprehensive plan designation of Port Maritime and Industrial.
- g. If applicable, what is the current shoreline master program designation of the site? [\[help\]](#)
Not applicable. The Project will not be located in the 50-foot buffer for the S-10 High Intensity shoreline master program designation.
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [\[help\]](#)
No, the Project will not occur in the 50-foot buffer for the S-10 High Intensity shoreline master program designation.
- i. Approximately how many people would reside or work in the completed project? [\[help\]](#)
The Project is not expected to change the current workforce at the Mill.

j. Approximately how many people would the completed project displace? [\[help\]](#)

The completed Project is not expected to displace anyone in the current workforce at the Mill.

k. Proposed measures to avoid or reduce displacement impacts, if any: [\[help\]](#)

Not applicable since the completed Project is not expected to displace anyone in the current workforce at the Mill.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [\[help\]](#)

Since the Project will not change the existing use of the site (Tacoma Mill), no measures are being proposed to ensure compatibility with projected land uses.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: [\[help\]](#)

There are no nearby agricultural or forest lands of long-term commercial significance. Therefore, no measures are proposed to ensure compatibility.

9. **Housing** [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [\[help\]](#)

The Project will not create any new housing.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [\[help\]](#)

The Project will not eliminate any existing housing.

c. Proposed measures to reduce or control housing impacts, if any: [\[help\]](#)

No housing impacts are expected. Therefore, no measures to reduce or control impacts are proposed.

10. **Aesthetics** [\[help\]](#)

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [\[help\]](#)

Not applicable. The Project will not be installing any new structures or buildings.

b. What views in the immediate vicinity would be altered or obstructed? [\[help\]](#)

None. The Project will not be installing any new structures or buildings.

b. Proposed measures to reduce or control aesthetic impacts, if any: [\[help\]](#)

None. The Project will not be installing any new structures or buildings.

11. **Light and Glare** [\[help\]](#)

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [\[help\]](#)

None. The Project will not be installing or altering any structures or buildings that would require lighting.

b. Could light or glare from the finished project be a safety hazard or interfere with views? [\[help\]](#)
No. The Project will not be installing or altering any new structures or buildings that would require lighting.

c. What existing off-site sources of light or glare may affect your proposal? [\[help\]](#)
No offsite sources of light or glare are expected to affect the Project.

d. Proposed measures to reduce or control light and glare impacts, if any: [\[help\]](#)
Not applicable. The Project will not be installing any new structures or altering existing structures that would require lighting.

12. Recreation [\[help\]](#)

a. What designated and informal recreational opportunities are in the immediate vicinity? [\[help\]](#)
The Project is located at the Tacoma Mill, which is adjacent to Commencement Bay. The bay offers fishing and boating opportunities. The uplands in the vicinity of the Mill are generally used for industrial purposes and provide no recreational opportunities.

b. Would the proposed project displace any existing recreational uses? If so, describe. [\[help\]](#)
No, the Project will not displace any existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [\[help\]](#)
The Project will not displace any existing recreational uses. Therefore, no measures are proposed to reduce or control impacts on recreation.

13. Historic and cultural preservation [\[help\]](#)

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [\[help\]](#)
There are no known places or objects listed on, or proposed for, national, state, or local preservation.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [\[help\]](#)
The land on which Tacoma Mill is situated has been in industrial use since the creation of the Commencement Bay waterways starting in 1918. Professional Study - Historic Inventory Report for David W. Lyle Plywood Company Building, April 14, 2014. The site is located within the historical boundaries of the Puyallup Tribe of Indians. The Project will take place inside the building currently housing the No. 6 Power Boiler. The Project involves no excavation. Therefore, no impacts to any potential areas of cultural significance can occur.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of

archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [\[help\]](#)

Not applicable. The Project will take place inside the building currently housing the No. 6 Power Boiler. The Project involves no excavation. Therefore, no impacts to any potential areas of cultural significance can occur.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. [\[help\]](#)

Not applicable. Since there will be no impacts to historic or cultural properties, no mitigation measures are proposed.

14. **Transportation** [\[help\]](#)

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [\[help\]](#)

The Tacoma Mill (and the Project site) can be accessed via several gates from Portland Avenue.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [\[help\]](#)

The Tacoma Mill is not served by public transit. The nearest stop is approximately 1.5 miles south on Puyallup Avenue.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [\[help\]](#)

The Project is not expected to result in a change in the number of parking spaces at the Mill.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [\[help\]](#)

No.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [\[help\]](#)

The Project will not use or occur in the immediate vicinity of water, rail or air transportation.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [\[help\]](#)

The Project is not expected to alter the current number of vehicular trips per day to the site.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. [\[help\]](#)

No.

h. Proposed measures to reduce or control transportation impacts, if any: [\[help\]](#)

Not applicable. There will be no transportation impacts. Therefore, no measures are proposed to reduce or control transportation impacts.

15. **Public Services** [\[help\]](#)

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help]
The Project will not result in an increased need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any. [help]
This Project will not impact public services. Therefore, no measures are proposed to reduce or control impacts on public services.

16. Utilities [help]

a. Circle utilities currently available at the site: [help]
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [help]
Natural gas, which is already supplied to the existing No. 6 Power Boiler burners, will be supplied to the new low-NOx burners.

C. Signature [help]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:  _____

Name of signee: Stephen J. Devlin

Position and Agency/Organization: General Manager – Tacoma Mill

Date Submitted: 10/5/16

From: [Karl Schumacher](#)
To: [Yamazaki, Shingo \(ECY\)](#)
Subject: RE: Energy Generation - PB6 Limit Modification
Date: Wednesday, October 10, 2018 12:23:04 PM
Attachments: [image001.png](#)

Shingo – We average around 38 MWh power production. The expectation is that we'd be able to generate another 1 to 3 MWh on average over the course of the year. That being said, we already hit 45 or maybe even a bit higher on days when we've got the boilers running hard and steam demand is correctly set up to help maximize the power generation. This peak value won't change as a result of the project. So it is more accurate to state that we'll generate between 0 or perhaps 5 MWh additional on a daily basis which will average out to be 1 to 3 MWh extra for the year.

I've got to leave for the rest of the day but will be checking my emails in an hour or so. If you want to chat by phone, hit me up on my mobile and if I can't take the call immediately, I'll call you back.

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

From: Yamazaki, Shingo (ECY) [mailto:syam461@ECY.WA.GOV]
Sent: Wednesday, October 10, 2018 10:18 AM
To: Karl Schumacher <karl.schumacher@westrock.com>
Subject: Energy Generation - PB6 Limit Modification

EXTERNAL – Use Caution

Karl,

Quick question (I foresee this being a question I am asked about the PB 6 limit modification). Do you know how many MWh (or GWh) of electrical generation you currently produce VS. what the facility will be able to produce following the limit restoration at PB 6?

Shingo Yamazaki, P.E.

Washington State Department of Ecology
Solid Waste Management, Industrial Section
PO Box 47600
Olympia, Washington 98504
Office: (360) 407-7563
Fax: (360) 407-6102

This electronic message contains information from WestRock Company (www.westrock.com) or its subsidiaries, which may be confidential, privileged or otherwise protected from disclosure. The information is intended to be disclosed to and used by only the named recipient(s). If you are not the intended recipient, then your review, use, disclosure, printing, copying, or distribution of this message or its contents is prohibited. If you have received this message in error, please notify WestRock immediately at postmaster@westrock.com, and delete the message from your system. For information about WestRock's privacy practices, including how WestRock collects, processes, transfers, and stores Personally Identifiable Information shared with us, please visit [WestRock Privacy Policy](#). Unless previously authorized in writing, this message does not constitute an offer, acceptance, or agreement of any kind. Sender is not liable for damage, errors or omissions related to or caused by transmission of this message.

(c) WestRock Company.

From: [Karl Schumacher](#)
To: [Yamazaki, Shingo \(ECY\)](#)
Subject: RE: Draft NOC Order Modification
Date: Friday, October 19, 2018 11:55:39 AM
Attachments: [image001.png](#)

Shingo – My quick answer on this is that increasing use of PB6 would lead to less steam being extracted from the turbine into the 425# header. We have steam flow meters on the extraction and on PB6. The combination of these two steam flows to the 425# header should not change as a result of the increased use of PB6.

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

From: Yamazaki, Shingo (ECY) <syam461@ECY.WA.GOV>
Sent: Friday, October 19, 2018 11:00 AM
To: Karl Schumacher <karl.schumacher@westrock.com>
Subject: Draft NOC Order Modification

EXTERNAL – Use Caution

Karl,

Here is the draft NOC Order modification.

One question for you is, how do you (could you) defend and confirm the statement that there will be no increase in process steam from this project?

Through general monitoring of production? Through monitoring of steam production at PB7, RF 4, PB 6? Steam production is tricky since the steam turbine also “generates” process steam.

Any thoughts?

Shingo Yamazaki, P.E.

Washington State Department of Ecology
Solid Waste Management Program, Industrial Section
PO Box 47600
Olympia, Washington 98504
Office: (360) 407-7563
Fax: (360) 407-6102

This electronic message contains information from WestRock Company (www.westrock.com) or its subsidiaries, which may be confidential, privileged or otherwise protected from disclosure. The information is intended to be disclosed to and used by only the named recipient(s). If you are not the intended recipient, then your review, use, disclosure, printing, copying, or distribution of this message or its contents is prohibited. If you have received this message in error, please notify WestRock immediately at postmaster@westrock.com, and delete the message from your system. For information about WestRock's privacy practices, including how WestRock collects, processes, transfers, and stores Personally Identifiable Information shared with us, please visit [WestRock Privacy Policy](#). Unless previously authorized in writing, this message does not constitute an offer, acceptance, or agreement of any kind. Sender is not liable for damage, errors or omissions related to or caused by transmission of this message.

(c) WestRock Company.

From: [Karl Schumacher](#)
To: [Yamazaki, Shingo \(ECY\)](#); [Ogle, Stephanie \(ECY\)](#)
Subject: PB6 Steam and GHG
Date: Tuesday, October 30, 2018 12:46:27 PM
Attachments: [image001.png](#)

Stephanie and Shingo – As a follow-up to our conversation today, here are the increases from baseline for the two scenarios: 1) PTE – the maximum increase if PB6 ran at capacity for a year and 2) a reduced steam rate that is a slight adjustment to the number we discussed by phone. Feel free to give me a call if you would like me to calculate a different scenario.

Scenario	Steam Rate (lb/hr)	Steam Rate (klbs/yr)	Natural Gas (MMBtu/yr)	CO ₂ (tons/yr)	CH ₄ (tons/yr)	N ₂ O (tons/yr)	CO ₂ e (tons/yr)	Delta from Baseline (tons/yr)
Baseline	88,325	773,724	1,077,023	62,946	1.2	0.1	63,011	0
Mitigation	130,365	1,142,000	1,589,735	92,911	1.8	0.2	93,007	29,996
PTE	173,268	1,517,829	2,112,912	123,488	2.3	0.2	123,616	60,605

Karl Schumacher
Environmental Manager – Tacoma Mill



P: 253-596-0296
C: 253-254-4136

This electronic message contains information from WestRock Company (www.westrock.com) or its subsidiaries, which may be confidential, privileged or otherwise protected from disclosure. The information is intended to be disclosed to and used by only the named recipient(s). If you are not the intended recipient, then your review, use, disclosure, printing, copying, or distribution of this message or its contents is prohibited. If you have received this message in error, please notify WestRock immediately at postmaster@westrock.com, and delete the message from your system. For information about WestRock's privacy practices, including how WestRock collects, processes, transfers, and stores Personally Identifiable Information shared with us, please visit [WestRock Privacy Policy](#). Unless previously authorized in writing, this message does not constitute an offer, acceptance, or agreement of any kind. Sender is not liable for damage, errors or omissions related to or caused by transmission of this message.
(c) WestRock Company.