

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:

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: **OCC Pulper Upgrade**
2. Name of applicant: **Port Townsend Paper Corporation**

3. Address and phone number of applicant and contact person:

Darren Wilson

100 Mill Road, Port Townsend, WA 98368

360-370-2079

darren.wilson@ptpc.com

4. Date checklist prepared: **8/1/18**

5. Agency requesting checklist: **Washington State Department of Ecology**

6. Proposed timing or schedule (including phasing, if applicable):

The upgrade of the OCC pulper will be completed during the 2019 annual maintenance shutdown at the end of October 2019. PTPC is expecting to start coordinating with engineering consultants and contractors at the start of the fourth quarter of 2018. By November 2018, PTPC is expecting to begin ordering equipment and scheduling contract labor to complete the installation.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. **No**

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Notice of Construction Application

PSD Applicability Determination Application

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. **NA**

10. List any government approvals or permits that will be needed for your proposal, if known.

Notice of Construction Application

PSD Applicability Determination Application

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.)

PTPC is planning to install a continuous pulper in the OCC plant in order to increase pulp production for PM2. This pulper will replace the existing batch pulper. Because the new system will operate continuously, the plant will be able to produce 50% more OCC pulp without modifications to the footprint of the plant or significant upgrades to material processing equipment.

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.

The project will occur at the OCC facility at Port Townsend Paper Corporation, located at 100 Mill Road, Port Townsend, WA 98368. The project area is located in Jefferson County in the Southeast Quarter, Section 16, Township 30N, Range 1W.

B. Environmental Elements [\[HELP\]](#)

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

a. General description of the site:

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

The project will be installed inside an existing building on a flat floor.

b. What is the steepest slope on the site (approximate percent slope)?

The project area is flat (<1% grade) and is inside an existing building.

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.

Fill soils

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

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.

Due to the increase expected in truck deliveries, an outbound truck scale will be added to improve the logistics and traffic flow to and from the mill. The truck scale will be located parallel to the incoming scale and the road widened to allow for outbound traffic not requiring the scale. Approximately 1200 square yards (SY) asphalt and 160 cubic yards (CY) of earth fill will be removed and disposed of. Once the scale is installed, the area will be backfilled with 50 CY of crushed aggregate No. 8910 and 400 CY of compacted fill material. The 600 SY surface will be cleaned, primed, and laid with asphalt. All other work relating to the OCC project will occur in the existing building and no other excavation work will be required.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No, as the project is inside an existing structure.

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

No change in total impervious surface area from this project.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:
Construction will conform to Jefferson County Building Codes and is inside an existing structure.

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. **See below**

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No change in odors is expected from this project because Kraft pulp production will not be increasing.

Each new source review (NSR) pollutant is presented in Table 1 as well as the expected increase from the OCC upgrade project. This increase is based on maximum potential production rates by 2019 and is compared to current max production rates for OCC. No pollutants are projected to be emitted at quantities above the exemption levels listed in WAC 173-400-110(5)(a)(ii). As shown in Table 1, all emissions from the OCC pulper upgrade are below exemption thresholds and significant emission rates (SER).

Table 1 – NSR Pollutant Emissions

Pollutant	Exemption Threshold ¹ (tpy)	SER ² (tpy)	Expected Increase from Project (tpy)	Facility Net Emission Increase (tpy) ⁵
Carbon monoxide	5	100	0.0 ³	0.0
Lead	0.005	0.6	0.0 ³	0.0
Nitrogen oxides	2	40	0.0 ³	0.0
PM-10	0.75	15	0.0 ³	0.0
PM-2.5	0.5	10	0.0 ³	0.0
Total suspended particulates	1.25	25	0.0 ³	0.0
Sulfur dioxide	3.66	40	0.0 ³	0.0
Volatile Organic Compounds, total	2	40	0.8	0.8
Ozone Depleting Substances, total ⁴	1	40 tpy of VOCs	0.8	0.8

Toxic Air Pollutants	The de minimis emission rate specified for each TAP in WAC 173-460-150.	NA	See Table 2 for TAP emissions.	NA
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1 – WAC 173-400-110(5)(a)(ii)

2 – WAC 173-400-810(27)

3 – Compounds are associated with Kraft pulping but have not been quantified as a pollutant from OCC processing facilities, assumed not to be present.

4 – The emission factor for volatile organic compounds (VOCs) was derived from NCASI technical bulletin No. 973 (2010), table 10.4 "Air Toxics Emissions from OCC and Recycled Paperboard Stock Preparation". This table lists the minimum, maximum, median, and mean emission rates for tested sources. 9.83E-3 lb/ADTP was selected as this value was equal to both the mean and median. The same emission factor was selected for total ozone depleting substances.

5 – Includes No. 2 paper machine, No. 1 pulp machine, OCC plant, recovery boiler, digesters, lime kiln, package boiler, and #10 power boiler.

Table 2 – TAP Emission Summary

POLLUTANT	De Minimis ¹	SQER ¹	Projected Emissions Increase	Above De Minimis?	Above SQER?
	(lb/averaging period)				
Acetaldehyde	3.55	71	111.78	YES	YES
Carbon Disulfide	5.26	105	0.42	No	No
Chloroform	0.417	8.35	4.80	YES	No
Cumene	2.63	52.6	0.15	No	No
Formaldehyde	1.6	32	13.30	YES	No
Methanol	26.3	526	0.67	No	No
Methyl Ethyl Ketone	32.9	657	0.07	No	No
Methylene Chloride	9.59	192	16.19	YES	No
Phenol	1.31	26.3	0.08	No	No
Toluene	32.9	657	0.42	No	No

1 - WAC 173-460-150

c. Proposed measures to reduce or control emissions or other impacts to air, if any: PTPC has investigated best available control technologies (BACT) for pollutants listed above which increase as a result of the project. Trace quantities of particulate matter emissions may be present in OCC stock preparation area vents. Measurement data to quantify these emissions is scarce. The volumes of air exhausted are large and the concentration of emissions is small (the exhausts are mostly air and water vapor), making method detection limits an important issue in the measurement of emissions. These extremely high airflow rates make it technically challenging to treat OCC preparation area emissions with incineration controls. Furthermore, PTPC is not aware of any pulp mills that have implemented add-on VOC controls for recycled stock preparation sources.

PTPC will conduct construction and operate the OCC pulping facility in a manner consistent with good air pollution control practices. Construction dust will be minimal, and is expected to be minimized further by the fact that the project is slated to occur during winter wet-season months.

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

a. Surface Water: [\[help\]](#)

- 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.

The mill is located on the waterfront of Glen Cove and Port Townsend Bay.

- 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.

No, the project takes place inside existing structures

- 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.

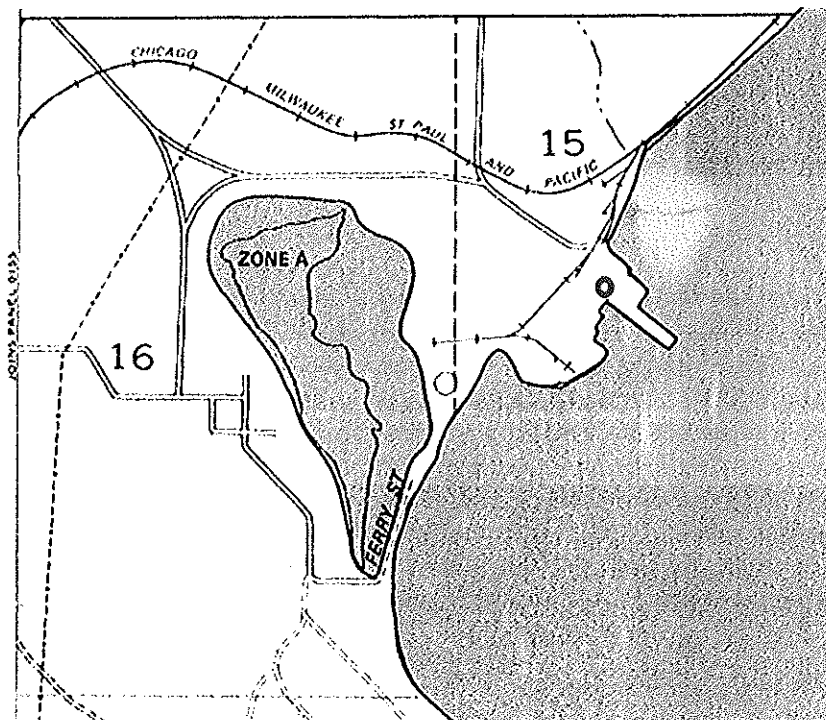
None

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No, the project area is marked by the red circle. The 100-year flood plain is marked as the shaded "Zone A" region on the map below



- 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.

The OCC plant currently discharges 270 gpm of wastewater which equals 0.4 million gallons per day. This water contains 1,142 ppm of fiber solids which equates to 1.9 tons per day. Current estimations from project engineers is 260 gpm and 2.0 tons per day of fiber solids after the upgrade. The current solids loading rate is based on sewer study measurements, whereas the post project value is an engineering estimate. The new cleaning system will produce more yield, and is expected to reduce fiber losses to wastewater. Because of the improved fiber yield, there will be no increase in sewer loading from OCC to the wastewater treatment system. Most fibers from OCC are settleable and are removed in the primary clarifier. Any carry over will settle in the ASB. Discharge of fibers into the wastewater system is not expected to result in a discharge of fibers to a surface water (Port Townsend Bay).

b. Ground Water: [\[help\]](#)

- 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.

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.

Does not apply

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.

Since this project is inside an existing structure there is no impact to Stormwater.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

No, this project is inside existing an existing building and is not exposed to water runoff.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage

pattern impacts, if any: **Not applicable**

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

- a. Check the types of vegetation found on the site: **This project is inside an existing building**

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

- b. What kind and amount of vegetation will be removed or altered?

None

- c. List threatened and endangered species known to be on or near the site.

Unknown

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None

- e. List all noxious weeds and invasive species known to be on or near the site.

Unknown

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.

Birds: **hawk, heron, eagle, songbirds**

Mammals: **deer, beaver, otter**

Fish: **salmon, trout, herring, sculpins, shellfish**

There are a number of birds, mammals and marine fish and shellfish known to inhabit Glen Cove, Port Townsend Bay. The animals indicated above are known to inhabit the surrounding area, but not in the building where the project is located.

- b. List any threatened and endangered species known to be on or near the site.

PTPC is unaware of any state threatened or endangered species that inhabit the area.

- c. Is the site part of a migration route? If so, explain.

Yes, different species of ducks and geese have been observed in this area, and also utilize the ASB pond on-site.

d. Proposed measures to preserve or enhance wildlife, if any:

None

e. List any invasive animal species known to be on or near the site.

Unknown

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.

Electric power will be purchased as part of the normal mill power purchase.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

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:

None

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. **No**

1) Describe any known or possible contamination at the site from present or past uses.

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. **None**

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. **None**

4) Describe special emergency services that might be required.
No additional emergency services will be required.

5) Proposed measures to reduce or control environmental health hazards, if any: **None**

b. *Noise*

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **None**

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. **All short term and long term noise would be inside the existing structure and not distinguishable from outside. Construction noise will not be louder than typical industrial noise associated with the facility.**

3) Proposed measures to reduce or control noise impacts, if any: **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.

Industrial site – Kraft pulp and paper mill. This project will not affect current land uses.

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? **No**

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: **No**

c. Describe any structures on the site. **Boiler buildings, Kraft pulp mill buildings, paper machines, offices, mechanical and maintenance buildings.**

d. Will any structures be demolished? If so, what? **No**

e. What is the current zoning classification of the site? **Heavy industrial**

f. What is the current comprehensive plan designation of the site? **Heavy Industrial (HI) from Jefferson County Comprehensive Plan (2003)**

g. If applicable, what is the current shoreline master program designation of the site? **High Intensity Shoreline per Jefferson County Shoreline Master Program (2010)**

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. **According to Jefferson County's online jMap portal, the project area has the following sensitivities: Seismic Hazard, Coastal SIPZ, Port Townsend Bay Tidelands/Wetland (Composite(DNR, NWI, SCS))**

i. Approximately how many people would reside or work in the completed project?
No additional people required

j. Approximately how many people would the completed project displace? **None**

k. Proposed measures to avoid or reduce displacement impacts, if any: **Does not apply**

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **Does not apply**

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: **Does not apply**

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

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **Does not apply**

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **Does not apply**

c. Proposed measures to reduce or control housing impacts, if any: **Does not apply**

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? **The project is located inside an existing building with no external changes.**

b. What views in the immediate vicinity would be altered or obstructed? **None**

b. Proposed measures to reduce or control aesthetic impacts, if any: **None**

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

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **None, the project is located inside an existing building with no external changes.**

b. Could light or glare from the finished project be a safety hazard or interfere with views? **None, the project is located inside an existing building with no external changes.**

c. What existing off-site sources of light or glare may affect your proposal? **None**

d. Proposed measures to reduce or control light and glare impacts, if any: **None**

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

a. What designated and informal recreational opportunities are in the immediate vicinity? **Port Townsend Bay provides fishing and boating recreational opportunities.**

b. Would the proposed project displace any existing recreational uses? If so, describe. **No**

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **None**

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? If so, specifically describe. **Unknown**

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. **Unknown**

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.
None

- 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. **None**

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.

Materials would be transported on Highway 19 and Highway 20 and turn onto Mill Road for delivery to the mill.

- 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? **No**
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? **None**
- 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). **No**
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. **No**
- 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?
On account of more incoming raw materials, about 4 trucks per day increase in present traffic could be expected. This estimate is based on the expected change in OCC production and the average tonnage capacity per truck.
- 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. **No**
- h. Proposed measures to reduce or control transportation impacts, if any:
None

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. **No**

b. Proposed measures to reduce or control direct impacts on public services, if any. **None**

16. Utilities [help]

a. Circle utilities currently available at the site:

Electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____

This project will result in the generation of up to 44% more landfill waste which is generated from the non-burnable OCC rejects. Based on 2017 rates, this would equal 4,412 additional wet tons of OCC non-burnable rejects. This waste stream is mainly composed of tape and plastics that are separated from the OCC.

c. 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.

Utilities will be unchanged. PTPC will continue to purchase electricity from BPA and Jefferson PUD

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 _____

Darren Wilson

Position and Agency/Organization _____

Environmental Manager - PTPC

Date Submitted: _____

1/28/2019

D. Supplemental sheet for nonproject actions [HELP]

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or

at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.