

AIR QUALITY PERMIT

Issued To: Champion International Corp.
Libby Operations
P.O. Box 1570
Libby, MT 59923

Permit #2627-M
Notification of Permit
Modification: 7/10/91
Date of Final Modifi-
cation: 7/25/91

SECTION I: Permitted Facilities

An air quality permit is hereby granted to the above-named permittee, hereinafter referred to as recipient, pursuant to Section 75-2-204 and 211, MCA, as amended, and Subchapter 11, PERMIT, CONSTRUCTION AND OPERATION OF AIR CONTAMINANT SOURCES, ARM 16.8.1101 through 16.8.1118 as amended, for the entire mill site located at P. O. Box 1570, Libby, MT, including the following:

- A. The No. 7 boiler with a multiclone control and a slip stream scrubber, design capacity of 132 million Btu/hr.
- B. The No. 8 boiler with a full stream wet scrubber, design capacity of 200 million Btu/hr.
- C. The No. 9 boiler with a full stream wet scrubber, design capacity of 256 million Btu/hr.
- D. Fugitive dust from mill vehicles and log yard activity.
- E. Veneer dryers.
- F. Wood waste cyclones and baghouses.

SECTION II: Limitations and Conditions

- A. Boiler No. 7
 1. Total particulate emissions shall be limited to 29.7 lbs/hr, and 130 tons per year.
 2. PM-10 emissions shall be limited to 20.8 lbs/hr, and 91 tons per year.
 3. Total particulate emissions shall be limited as per ARM 16.8.1402.
 4. Visible air contaminants shall be limited to 20% opacity, as measured by Method 9, 40 CFR Part 60, Appendix A.
 5. A stack test shall be required to determine compliance with the total particulate limitation, and to determine what steam production rate can be achieved while meeting the total

particulate and PM-10 limitations of Conditions A.1 and A.2. This test shall be performed prior to December 31, 1991, and is required annually for three years. The testing frequency will be re-evaluated after that time. The test methods shall conform to 40 CFR Part 51, Appendix M, for PM-10 and 40 CFR Part 60, Appendix A, for total particulate. Any exceedance of this steam production limitation will be considered an exceedance of Conditions A.1 and A.2.

6. For all stack tests, a pretest conference shall be held between the applicant, the testing firm and the department at least 30 days prior to the test. The department may require a written test protocol, including quality assurance procedures, prior to the pretest conference.
7. Champion shall maintain steam flow charts showing the firing rate of Boiler No. 7. A monthly report shall be submitted to the department showing the average daily steam flow from No. 7, and the highest hourly steam flow for that day. If records show that hourly steam flow exceeds the steam flow limit associated with the emission limits established in Conditions A.1 and A.2., it shall be considered a violation of this permit. The steam flow limit shall be established as per Condition A.5.
8. Champion may operate Boiler No. 7 at emission levels higher than the limits set in Conditions A.1 and A.2. above provided either Boiler No. 8 or No. 9 is down for maintenance. Emissions from Boiler No. 7 are limited to $0.391 \text{ lb}/10^6 \text{ Btu}$ fired during this time. At no time will the combined particulate emissions from all three boilers exceed 93.5 lbs/hr . During periods of elevated ambient particulate levels, such as air pollution alerts, the department may rescind Condition A.8 for this boiler.
9. Champion shall measure the Btu, moisture and fuel input to the boiler during the stack tests required in Condition A.5.

B. Boiler No. 8

1. Total particulate emissions shall be limited to 0.14 lbs per million Btu fired, and 28 lbs/hr , and 123 tons per year.
2. PM-10 emissions shall be limited to $0.14 \text{ lbs}/10^6 \text{ Btu}$ fired, and 28 lbs/hr , and 123 tons/yr .
3. Nitrogen oxide emissions shall be limited to $0.3 \text{ lbs}/10^6 \text{ Btu}$ fired, and 60 lbs/hr , and 263 tons/yr .
4. Carbon monoxide emissions shall be limited to $4 \text{ lbs}/10^6 \text{ Btu}$ fired, and 800 lbs/hr , and 3504 tons/yr .

5. Visible air contaminants shall be limited to 20% opacity, averaged over six consecutive minutes, as specified by 40 CFR Part 60, Appendix A, Method 9.
6. Every three years, a stack test shall be required to verify Conditions B.1, B.3, and B.4. These tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 10, for total particulate, NO_x and CO. The department reserves the right to require additional testing in accordance with the provisions of ARM 16.8.704 as it deems necessary to inventory air pollution emissions or to verify compliance with this permit or any other air quality rule.
7. For all stack tests, a pretest conference shall be held between the applicant, the testing firm and the department at least 30 days prior to the test. The department may require a written test protocol, including quality assurance procedures, prior to the pretest conference.
8. The scrubber shall include a measuring device to measure the pressure drop across the scrubber. A graph of pressure drop versus boiler steam load shall be developed to check on scrubber operation. A liquid level gauge to measure scrubber liquid levels shall be installed. A record of pressure drop and scrubber liquid levels shall be recorded once per hour. This record shall be available for review by the department when requested.
9. Champion shall measure the Btu, moisture and fuel input to the boiler during the stack test required in Condition B.6.

C. Boiler No. 9

1. Total particulate emissions shall be limited to 0.14 lbs/10⁶ Btu fired, and 35.8 lbs/hr, and 157 tons/year.
2. PM-10 emissions shall be limited to 0.14 lbs/10⁶ Btu fired, and 35.8 lbs/hr, and 157 tons/year.
3. Nitrogen oxide emissions shall be limited to 0.3 lb/10⁶ Btu fired, and 76.8 lbs/hr, and 336 tons/year.
4. Carbon monoxide emissions shall be limited to 1.9 lbs/10⁶ Btu fired, and 486 lbs/hr, and 2130 tons/year.
5. Visible air contaminants shall be limited to a maximum of twenty percent (20%) opacity, averaged over six consecutive minutes, as specified by 40 CFR Part 60, Appendix A, Method 9.
6. Every three years, a stack test shall be required to verify Conditions C.1, C.3, and C.4. These tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1

through 10 for total particulate, NOx, and CO. The first test is required by October 21, 1991, in accordance with the consent decree and letter authorizing the extension. The department reserves the right to require additional testing in accordance with the provisions of ARM 16.8.704 as it deems necessary to inventory air pollution emissions or to verify compliance with this permit or any other air quality rule. A one-time PM-10 test is required for this boiler for the purpose of inventorying actual PM-10 in the airshed. The PM-10 test shall conform to 40 CFR Part 51, Appendix M.

7. For all stack tests, a pretest conference shall be held between the applicant, the testing firm and the department at least 30 days prior to the test. The department may require a written test protocol, including quality assurance procedures, prior to the pretest conference.
8. The scrubber shall include a measuring device to measure the pressure drop across the scrubber. A graph of pressure drop versus boiler steam load shall be developed to check on scrubber performance. A liquid level gauge to measure scrubber liquid levels shall be installed. A record of pressure drop and scrubber liquid levels shall be recorded once per hour. This record shall be available for review by the department when requested.
9. Champion shall measure the Btu, moisture and fuel input to the boiler during the stack test required in Condition C.6.

D. Fugitive Dust Controls

1. Chemical dust suppressant shall be applied to the major haul routes throughout the plant to control fugitive dust from haul trucks. The application schedule shall be not less than once per year. If the opacity of the haul road dust emissions exceeds 15% at any time, reapplication of the dust suppressant shall be required.
2. Chemical dust suppressant shall be applied to the major roads on the log yard to control fugitive dust from all log handling equipment. The application schedule shall be no less than once per year. Water sprays shall be used as necessary to control dust emissions on active areas of the log yard. If the opacity of the log yard dust emissions exceeds 15% at any time, reapplication of the dust suppressant shall be required.

E. Veneer Dryers

1. PM-10 emissions shall be limited to the following:
Large dryer (15000 sq-ft/hr) - 16.85 lb/hr, and 74 TPY;
small dryer (10500 sq-ft/hr) - 13.27 lb/hr, and 58 TPY.

2. Visible air contaminants shall be limited to a maximum of 20% opacity averaged over six consecutive minutes as specified by 40 CFR Part 60, Appendix A, Method 9.

F. Wood Waste Cyclones and Baghouses

1. PM-10 emissions shall be limited to:

Cyc#	Description	SCFM	Allowable lbs/hr	TPY
4	Ply Sand Bghs	36000	0.6	3
5	Ply Hog, T&G Saw cyc	28000	3.7	16
6	Ply #1 cyc	15000	2.0	9
7	Ply #2 cyc	22500	2.9	12
8	Ply #3 cyc	20000	2.7	12
9a	Ply chp load cyc	5000	.7	3
9b	Std chp ld cyc	9000	1.2	5
9c	Saw chp ld cyc	9200	1.2	5
10	Ply hgfuel to fuel cyc	6000	.8	4
12	Stud Plnr#1 cyc	16300	2.1	9
13	Stud Plnr#2 cyc	30000	3.9	17
15	Stud trk bn cyc	9000	1.2	5
19	Saw shvg bn cyc	6000	.8	4
20	Saw plnr shvg cyc #8	38000	4.9	21
21a	Plnr trim saw cyc	16500	2.1	9
21b	Plnr hog cyc	10700	1.4	6
21c	Saw plnr cyc #7	27000	3.5	15
22	Finger Jointer	10000	1.3	6
29	Lily pad chp cyc	2500	.4	2
30	Pwrhs cyc	10000	1.3	6
31	Stud trm cyc	20000	2.7	12
32	Stud salv & Gn chp cyc	9200	1.2	5
37	Stractan Bghs	10000	.2	<u>1</u>
Total Cyclone Allowable Emissions				187

2. Visible air contaminants shall be limited to a maximum of 20% opacity averaged over six consecutive minutes as specified by 40 CFR Part 60, Appendix A, Method 9.

G. Recipient shall comply with all other applicable state, federal and local rules.

SECTION III: Monitoring and Reporting

No ambient monitoring will be required at this time.

SECTION IV: General

A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting all necessary functions related to this permit.

B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.

C. Compliance with Statutes and Regulations - Specific listing of requirements, limitations, and conditions contained herein does not relieve the applicant from compliance with all applicable statutes and administrative regulations including amendments thereto, nor waive the right of the department to require compliance with all applicable statutes and administrative regulations, including amendments thereto.

D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 et seq., MCA.

E. Appeals - Champion may request, within fifteen (15) days after the department issues its "Notification of Permit Modification," upon affidavit, setting forth the grounds therefore, a hearing before the Board. A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the permit modification is not final unless fifteen (15) days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board.

Permit Analysis

Champion-Libby Permit Modification - Libby Mill

A. Introduction

Champion International Corporation currently operates a stud sawmill and planer, finger jointer, stractan, and plywood mill in Libby, Montana. Prior to this permit modification only boilers #8 (#2380) and #9 (#2627) were subject to an air quality permit. All other emission points at the Champion mill predated the Montana permit requirements and were not required to obtain a permit unless a modification of the source occurred, or a standard changed affecting the facility.

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new ambient air quality standards for particulate matter with an aerodynamic diameter of 10 microns or less (PM-10). The annual standard is $50 \mu\text{g}/\text{m}^3$ and the 24-hour standard is $150 \mu\text{g}/\text{m}^3$. These standards were in turn adopted by the Montana Board of Health and Environmental Sciences on April 15, 1988. On August 7, 1987, EPA designated Libby as a PM-10 Group I area, due to numerous violations of both the annual and the 24-hour PM-10 standards. On November 15, 1990, the 1990 amendments to the Federal Clean Air Act designated the Libby Group I area as a PM-10 nonattainment area. As a result of these designations, the department was required to develop a PM-10 emission control program as part of the State Implementation Plan (SIP) to bring the Libby area into compliance with the PM-10 standards and demonstrate maintenance of the standards.

In order to identify the emission sources which were contributing to the violations of the PM-10 standards, the department conducted a chemical mass balance study (CMB). The only Champion International emission points which were identified as contributors in the CMB study were the three boilers. Specifically, the contributions from the boilers to the PM-10 annual and the exceedance day ambient levels were 1.6% ($1.1 \mu\text{g}/\text{m}^3$) and 0.7% ($1.4 \mu\text{g}/\text{m}^3$), respectively.

Since the sources contributing to the violations of the PM-10 standards have been identified, control plans are being developed for each source or source category (wood stove control programs, sanding material specifications, and street sweeping) including industrial sources (Champion International Corp.). Since the SIP must also demonstrate maintenance of the standards, the control plans must also contain enforceable limits on emission points which were not identified as contributing to the problem (Champions veneer dryers, wood transfer cyclones, and fugitive dust) but could contribute if their emissions were allowed to substantially increase over what they were during the CMB study period. Therefore, this permit not only reduces allowable emissions for the boilers, but also establishes enforceable allowable emission limits on the veneer dryers, wood waste transfer cyclones and baghouse, and fugitive dust.

This permit modification serves as the legal basis to reduce the allowable emissions at the boilers and establish allowable emissions on other emission points which were unpermitted in the past. Specifically this permit reduces the allowable emissions on boiler #8, incorporates a recently issued permit to install a new high efficiency scrubber on boiler #9 and thereby reduce both the actual and allowable emissions, reduces the allowable emissions from boiler #7 by restricting its operating level, and establishes allowable emission limits on all other Champion emission points.

Using the CMB study period (10/87 through 11/88) as the base year, this permit will result in a 55% reduction in allowable emissions from the boilers.

B. Process Description

Raw logs are received by truck and rail and unloaded at the plant. Log handlers sort the logs and transport them to various log decks. Additional log handlers transport the logs to the studmill, sawmill or plywood mill.

Upon arrival at the mills the logs are debarked and processed through the headrig (saw) and several resaws until the logs are converted to raw lumber. The raw lumber is transported by forklifts to various storage areas where it will remain until it is again transported by forklift to the kilns for drying. The slabs which are generated at the sawmill are chipped and transported by a high pressure air system to the chip storage bins and subsequent loadout to chip trucks destined for other wood product facilities. The sawdust and bark are also transported by a high pressure air system conveyor to the hogged fuel pile to be used as fuel for boilers #7, #8, and #9.

The dried lumber is transported by forklift to the planer mill for planing. The planer shavings are transported by a high pressure air system to the hogged fuel pile or truck bins for loadout to other facilities. The finished lumber is stored on the mill site until it is loaded on commercial trucks or railroad cars for transport to wholesale markets.

Raw logs also enter the plywood mill where the lathe turns the log in to thin pieces of veneer. The veneer is dried in the veneer dryers and conveyed on to the plywood press where glue is applied and various sheets of veneer are pressed into plywood. The 4' by 8' sheets of plywood are sanded to produce a smooth surface and transported to covered storage areas for subsequent shipment to wholesale outlets by commercial truck or railroad car.

The boilers serve as a source of steam for the drying kilns, veneer dryers, and turbine generators producing electricity for mill use or sale on the utility grid as a cogenerator.

Since this permit primarily deals with tightening allowable emission limits, establishing allowable emission limits, and combining all existing permits (including the permit for the new scrubber on boiler #9) into one permit, the only physical change which will occur at the mill as a result of this permit is to limit the steam production on boiler #7 in order to reduce the overall boiler emissions.

C. Applicable Regulations

1. ARM 16.8.821 Ambient Standards for PM-10. Champion International Corp. must demonstrate compliance with the applicable ambient air quality standards. The preliminary SIP demonstration of attainment performed by the department indicates that the emission limitations contained in this permit, along with control measures applied to other sources, will bring Libby into compliance with the PM-10 standards.
2. ARM 16.8.1113(a) Modification of Permit. The department is allowed to modify Champion International Corporations' permit due to a change in an applicable standard (PM-10) adopted by the Board of Health and Environmental Sciences. Champion may appeal the departments modification to the Board.
3. ARM 16.8.1115 Inspection of Permit. Champion must maintain a copy of their air quality permit at the mill site and make that copy available for inspection by department personnel upon request.
4. ARM 16.8.1117 Compliance with Other Statues and Rules. Champion International Corporation must comply with all other applicable state, federal, and local laws and regulations.
5. ARM 16.8.1401 Particulate Matter, Airborne. This section requires reasonable precautions for fugitive emissions sources and Reasonably Available Control Technology (RACT) for existing fugitive sources located in a nonattainment area. The department, in consultation with EPA, has determined that the use of chemical stabilization on major haul roads and as needed on major roads in the log decks, in conjunction with watering, will satisfy these requirements.
6. ARM 16.8.1402 Particulate Matter, Fuel Burning Equipment. Boiler #7 must meet the requirements of this rule. However, the more stringent limits contained in this permit supersede this rule for boilers #8 and #9.
7. ARM 16.8.1403 Particulate Matter, Industrial Process. The requirements of this rule are superseded by the stricter emission limits established in the permit, except that this rule requires an emission limit of 16.85 lbs/hr on the large veneer dryer and 13.27 lbs/hr on the small dryer.
8. ARM 16.8.1404 Visible Air Contaminants. The requirements of this permit either supersede this rule because they are more stringent or they are equivalent.
9. Libby RACT Analysis
 - a. No. 7 Boiler

This is an old wood-fired boiler which has air emission controls consisting of multiclones and a side stream scrubber. The side stream scrubber was added in 1976 to comply with the Montana fuel burning rule. EPA policy has indicated that multiclones are not to be given credit as RACT for SIP purposes in nonattainment areas. Therefore, an emission limit was imposed on the boiler by the SIP process which, when added to other emission reductions in the area, will show attainment with federal and state PM-10 regulations. The new boiler limit will be met by de-rating the boiler with source tests to show compliance. This emission reduction is equivalent to the reduction which is attainable with a qualified RACT scrubber.

b. No. 8 Boiler

This is an old wood-fired boiler which has recently been updated by adding an automatic stoker and feed controls, and installation of a new full stream wet scrubber. This scrubber was determined to be BACT in the permitting process and, therefore, meets the requirements for RACT.

c. No. 9 Boiler

This is an old wood-fired stoker boiler which is currently undergoing an upgrade. A new full stream wet scrubber is being installed during the summer of 1991, and this scrubber has also been determined to meet BACT requirements in the permit process. Therefore, it also meets the requirements of RACT.

d. Veneer Dryers

These two dryers are existing units which were installed prior to 1968. These sources were not identified in the CMB study as contributing to the PM-10 nonattainment area. Therefore, these sources are included in the emission inventory and no control is credited to the PM-10 SIP. A new opacity limitation of 20% has been placed on this source to comply with RACT guidelines. It is also noted that EPA RACT guidelines do not require control of all sources if they are not shown to be a part of the problem.

e. Cyclones and Baghouses

These sources were not covered under permit in the past. The SIP inventory asked for all emission sources down to 1 ton per year. These have been inventoried and new emission limits have been included on the permit. The CMB did not identify these sources as contributing to the problem and were not included in the SIP compliance plan.

f. Fugitive Dust

Emission limits for this source are also included in the new permit with chemical stabilization required as control. This is acknowledged as best available work practice in the mining industry, and meets RACT for the plywood industry also.

D. Department Review of Modification

1. Existing Air Quality

The Libby area is currently a nonattainment area for PM-10 standards. The department has determined, based on its preliminary demonstration of attainment, that the emission limitations contained in this permit, along with control measures applied to other sources, will bring Libby into compliance with the PM-10 standards.

2. Emission Inventory

<u>Summary of Allowable Emissions</u>		<u>Existing</u>	<u>Proposed</u>
No. 7 Boiler	Total Particulate	.391 lb/mmBtu	.391 lb/mmBtu
		51.6 lb/hr	29.7 lb/hr
		226 TPY	130 TPY
	PM-10	51.6 lb/hr	20.8 lb/hr
		226 TPY	91 TPY
No. 8 Boiler	Total Particulate and PM-10	.23 lb/mmBtu	.14 lb/mmBtu
		46 lb/hr	28 lb/hr
		201 TPY	123 TPY
	NOx	*	0.3 lb/mmBtu
		*	60 lb/hr
		*	263 TPY
	CO	*	4 lb/mmBtu
	*	800 lb/hr	
	*	3504 TPY	

*These limits have been adjusted based on information from stack tests conducted in 1989 and 1990.

No. 9 Boiler	Total Particulate and PM-10	.351 lb/mmBtu	.14 lb/mmBtu
		89.7 lb/hr	35.8 lb/hr
		393 TPY	157 TPY
NOx		--	0.3 lb/mmBtu
		--	76.8 lb/hr
		--	336 TPY
CO		--	1.9 lb/mmBtu
		--	486 lb/hr
		--	2130 TPY

Veneer Dryers PM-10

Large Dryer	16.85 lb/hr 74 TPY	16.85 lb/hr 74 TPY
Small Dryer	13.27 lb/hr 58 TPY	13.27 lb/hr 58 TPY
Cyclones and Baghouses*	187 TPY	187 TPY

*NOTE: These emission limits were established by multiplying the maximum emissions which could be emitted considering an AP-42 PM-10 emission factor and continuous operation by 1.25. Since these emission factors have an error band and because these emission points never had an emission limit in the past, the department chose to multiply the maximum emissions by 1.25. This assures the source and the department that compliance can be maintained. Baghouse emissions are based on an emission factor of 0.002 gr/dscf. This was derived from a cyclone factor of 0.16 gr/dscf (AP-42, 10.4.1) and 99% control.

3. Impact Analysis

No modeling has been required for this permit because it is a modification of previous permits with a reduction in allowable emissions. This permit modification is necessary to achieve emission reductions at the boilers and cap the emissions from other Champion emission points. These reductions, in conjunction with reductions at other sources, will provide the emission reduction necessary to bring Libby into compliance with the PM-10 standards.

4. Analysis of Permit Limitation No. 8 for the #7 Boiler, Champion, Libby

Champion has requested to operate the #7 boiler at full load when either #8 or #9 are down for maintenance. The allowable emission rate for the #7 boiler at full load has been established at 51.6 lb/hr by the fuel burning rule. This emission rate plus the emission from either #8 or #9 still falls below the 93.5 lb/hr allowable determined as acceptable by the SIP process.

If No. 9 is down:	No. 7 - 51.6 lb/hr
	<u>No. 8 - 28.0 lb/hr</u>
	Total - 79.6 lb/hr

If No. 8 is down:	No. 7 - 51.6 lb/hr
	<u>No. 9 - 35.8 lb/hr</u>
	Total - 87.4 lb/hr

Therefore, the SIP-based permit limitation of 93.5 lb/hr is protected at all times. Compliance is demonstrated by source tests and scrubber monitoring on a regularly scheduled basis.

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
Air Quality Bureau
Cogswell Building, Helena, Montana 59620
(406) 444-3454

ENVIRONMENTAL ASSESSMENT (EA)

Project or Application: Modification of Champion International Corporation permits #2380 and #2627.

Description of Project: This permit modification will reduce Champion's allowable emissions to a level where compliance with the PM-10 standards can be demonstrated. This is part of a control plan developed by the department to bring the Libby area into compliance with the ambient PM-10 standards, and is required as part of the State Implementation Plan (SIP).

Benefits and Purpose of Proposal: This modification will reduce Champion's allowable emissions and, in conjunction with control plans for other sources, bring the Libby PM-10 nonattainment area into compliance with the ambient PM-10 standards.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: No reasonable alternatives were available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A complete listing of enforceable permit conditions and a permit analysis is contained in permit #2627M. Further information is contained in the Libby SIP.

Recommendation: No EIS is required.

If an EIS is needed, and if appropriate, explain the reasons for preparing the EA:

If an EIS is not required, explain why the EA is an appropriate level of analysis: This modification will reduce allowable particulate emissions from Champion.

Other groups or agencies contacted or which may have overlapping jurisdiction: None.

Individuals or groups contributing to this EA: AQB staff.

EA prepared by: Warren Norton

Date: May 7, 1991

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN COMMENTS
ATTACHED

1. TERRESTRIAL AND ACQUATIC LIFE AND HABITATS
2. WATER QUALITY, QUANTITY AND DISTRIBUTION
3. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE
4. VEGETATION COVER, QUANTITY AND QUALITY
5. AESTHETICS
6. AIR QUALITY
7. UNIQUE ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCE
8. DEMANDS ON ENVIRONMENTAL RESOURCE OF WATER, AIR AND ENERGY
9. HISTORICAL AND ARCHAEOLOGICAL SITES
10. CUMULATIVE AND SECONDARY IMPACTS

	MAJOR	MODERATE	MINOR	NONE	UNKNOWN	COMMENTS ATTACHED
1.			X			
2.			X			
3.			X			
4.			X			
5.			X			
6.		X				X
7.			X			
8.			X			
9.					X	
10.			X			

POTENTIAL IMPACTS ON HUMAN ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN COMMENTS
ATTACHED

1. SOCIAL STRUCTURES AND MORE
2. CULTURAL UNIQUENESS AND DIVERSITY
3. LOCAL AND STATE TAX BASE AND TAX REVENUE
4. AGRICULTURAL OR INDUSTRIAL PRODUCTION
5. HUMAN HEALTH
6. ACCESS TO AND QUALITY OR RECREATIONAL & WILDERNESS ACTIVITIES
7. QUANTITY AND DISTRIBUTION OF EMPLOYMENT
8. DISTRIBUTION OF POPULATION
9. DEMANDS FOR GOVERNMENTAL SERVICES
10. INDUSTRIAL AND COMMERCIAL ACTIVITY
11. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS
12. CUMULATIVE AND SECONDARY IMPACTS

	MAJOR	MODERATE	MINOR	NONE	UNKNOWN	COMMENTS ATTACHED
1.				X		
2.				X		
3.			X			
4.			X			
5.			X			X
6.			X			
7.			X			
8.			X			
9.			X			
10.			X			X
11.			X			
12.			X			

Potential Impact on Physical Environment

6. Air Quality - This permit modification will have a moderate impact on air quality in that it is part of the overall control strategy to bring the Libby area into compliance with the ambient PM-10 standards. Allowable emissions from the boilers will be reduced 55% as a result of this permit. This permit will also establish allowable emission limits for other emission points within the Champion facility which did not have emission limits in the past.

Potential Impacts on Human Environment

5. Human Health - This permit modification will have a small but positive impact on human health. The permit modification is part of the control strategy to bring the Libby area into compliance with the ambient PM-10 standards. Compliance with this standard should have a positive effect on the health of the citizens of Libby.

10. Industrial Commercial Activity - While this modification will have only a minor effect on the current level of industrial activity at Champion, their allowable operating rate for boiler #7, under this permit modification, will be limited to less than their previous allowable operating rate. Champion could, however, increase the allowable operating rate for boiler #7 contained in this permit modification if additional emission controls beyond those controls contained in this permit modification are applied to the boiler or to other sources in the area. The overall mill production levels could also be increased if substantive process changes occur which lower the emissions or the control strategy applied in Libby lowers ambient PM-10 levels below the standard and the area is designated attainment for the particulate standards. Any such change must be approved by the department as a permit modification.

If this modification were not imposed, the department would not be able to show compliance with the PM-10 standard. Libby would then be subjected to EPA penalties such as withholding of highway funds and emission offsets for new industry. This would have far more serious consequences for the industrial sector and commercial activity in Libby.