



SWCAA

Southwest Clean Air Agency

5101 NE 82nd Ave., Ste. 102, Vancouver, WA 98662
Ph: (360) 574-3058

SEPA ENVIRONMENTAL CHECKLIST

WAIT – You may not need to fill out the attached checklist.
Please read and check the following:

The State Environmental Policy Act (SEPA) requires that the SEPA process be completed for every project which requires an Air Discharge Permit unless the project is specifically exempted under WAC 197-11-800 Categorical Exemptions. The SEPA process needs to be completed only once per project. The SEPA process/determination is to be completed by the Lead Agency for the project. If a SEPA determination has been made by an Agency other than the Southwest Clean Air Agency (SWCAA) for this project, respond to the following questions.

If you can answer "yes" to either of the following questions with respect to the action being proposed, the attached checklist need not be completed.

1. I have obtained a State, City or County Permit and filled out an environmental checklist.

Yes

No

If you answered "yes", list the State, City or County Department and date below and attach a copy of the checklist.

N/A

State, City or County DepartmentDate

2. An environmental checklist or assessment has previously been filled out for another agency.

Yes

No

If "yes", give agency and date, and attach a copy of the checklist.

N/A

Agency NameDate

If your answer to both of the above questions was "No", you must fill out the attached SEPA Environmental Checklist.

Prepared by:

Wayne E. Wooster

Signature

Wayne Wooster

Print Name

Environmental & Sustainability Manager

Title



SWCAA
Southwest Clean Air Agency

SEPA environmental checklist

updated March 2015

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.



SWCAA
Southwest Clean Air Agency

SEPA Environmental Checklist

A. BACKGROUND

1.	Name of proposed project, if applicable: Voluntary Limit on Hydrogen Peroxide Bleach Consumption
2.	Name of applicant: North Pacific Paper Company, LLC (NORPAC)
3.	Address and phone number of applicant and contact person: NORPAC, c/o Wayne Wooster, Environmental & Sustainability Manager (360) 636-7062 3001 Industrial Way Longview, WA 98632
4.	Date checklist prepared: 17 January 2025
5.	Agency requesting checklist: Southwest Clean Air Agency (SWCAA)
6.	Proposed timing or schedule (including phasing, if applicable): Upon permit issuance, ~1Q25
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.

See response to Section B.2(a) - Environmental Elements, Air

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.

No other relevant government applications or approvals are pending, aside from an Air Discharge Permit (ADP) application submitted to SWCAA, January 2025 (see response to Section A.10 below).

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

NORPAC has applied to SWCAA for a regulatory order that establishes a limit on the mass of hydrogen peroxide (peroxide, or H₂O₂) consumed in the thermomechanical pulping (TMP) process. No other government approvals or permits are known to be needed.

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.)

NORPAC proposes to reduce the maximum peroxide injection rate by 20%, to 64,059 dry tons of peroxide, during any consecutive 12-month period. The proposal is administrative and involves no change to the physical configuration of the site, methods of production, or related equipment. Adoption of the limit on peroxide consumption will not facilitate an increase or substantive change in production.

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.

Peroxide is stored just east of the TMP Mill at three 13,000-gallon tanks in the center of the property. Most of NORPAC's peroxide is used at the TMP Mill and Chip Pre-Treatment (CPT), located just south of the tanks. There is no change to locations of peroxide use or storage.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site

Flat Rolling Hilly Steep slopes Mountainous Other (specify below)

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

The site is relatively level ground, with few slopes exceeding 2%.

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.

The surface is sand.

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

No indication of unstable soils on the site.

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.

N/A [No impacts / No land disturbance].

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

N/A [No impacts / No land disturbance].

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

~100% [No impacts / No land disturbance].

Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

N/A [No impacts / No land disturbance].

2. Air

- 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.

The proposal will reduce the CO potential to emit by about 30 tons per year. The limit on peroxide consumption will not change existing operations or increase emissions of other pollutants.

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

No

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

N/A. [Capping peroxide consumption should generally reduce or otherwise control emissions].

3. Water

- 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.

The Columbia River borders NORPAC's property on the south.

- (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

- (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.

N/A [No land (or water) disturbance]

- (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.

N/A [The proposal is administrative only.]

(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.

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.

The proposal will cause neither withdrawal of groundwater nor discharge of water to groundwater.

(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.

N/A [No discharge]

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.

N/A [No runoff]

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

No

(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:

N/A [No impacts].

4. Plants

a. Check the types of vegetation found on the site:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Deciduous trees: alder, maple, aspen, other | <input checked="" type="checkbox"/> Wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other |
| <input checked="" type="checkbox"/> Evergreen trees: fir, cedar, pine, other | <input type="checkbox"/> Water plants: water lily, eelgrass, milfoil, other |
| <input checked="" type="checkbox"/> Shrubs | <input type="checkbox"/> Orchards, vineyards or other permanent crops. |
| <input checked="" type="checkbox"/> Grass | <input type="checkbox"/> Other types of vegetation (list below) |
| <input type="checkbox"/> Pasture | |
| <input type="checkbox"/> Crop or grain | |

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

N/A [No vegetation will be removed or altered.]

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

No threatened or endangered plants have been found living on the site.

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.

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

5. Animals

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. Examples include:

birds: <input checked="" type="checkbox"/> hawk <input type="checkbox"/> heron <input checked="" type="checkbox"/> eagle <input checked="" type="checkbox"/> songbirds <input checked="" type="checkbox"/> other:	osprey, ducks
mammals: <input checked="" type="checkbox"/> deer <input type="checkbox"/> bear <input type="checkbox"/> elk <input type="checkbox"/> beaver <input checked="" type="checkbox"/> other:	nutria
fish: <input checked="" type="checkbox"/> bass <input checked="" type="checkbox"/> salmon <input checked="" type="checkbox"/> trout <input type="checkbox"/> herring <input checked="" type="checkbox"/> shellfish, other	steelhead, sturgeon, pike minnow

b. List any threatened and endangered species known to be on or near the site.
 The WA Dept. Fish and Wildlife's (WDFW's) Priority Habitats and Species (PHS) dataset did not contain information for parcels associated with and adjacent to the site. The Columbia River is known to support endangered, threatened, and candidate species; but per Section B.3 above, the project has no impact.

c. Is the site part of a migration route? If so, explain.
 The project is under the Pacific Water Fowl migration route.

d. Proposed measures to preserve or enhance wildlife, if any:
 N/A [No impacts. The project is administrative only.]

e. List any invasive animal species known to be on or near the site.
 No invasive animal species known to be on the site.

6. Energy and Natural Resources

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.
 N/A [No impacts. No material change to the mill's current energy demand and sources.]

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:
 N/A

7. Environmental Health

- 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.

There is no known contamination on the site from past or present uses.

- (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.

N/A. [No impact. No change. NORPAC, receives peroxide via a short pipeline.]

- (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.

N/A [No impact. No change. H₂O₂ is the simplest peroxide (i.e., it has a single oxygen-oxygen bond). It decomposes slowly into water and oxygen when exposed to light, and rapidly in the presence of organic or reactive compounds. H₂O₂ is used as an oxidizer, an antiseptic, or at NORPAC, to brighten pulp.]

- (4) Describe special emergency services that might be required.

N/A [No impact. No change. NORPAC has an emergency response plan, operating procedures, and actively trained emergency response teams.]

- (5) Proposed measures to reduce or control environmental health hazards, if any:

N/A. [No change]

b. Noise

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

N/A [The proposal is administrative only. Existing noise has no affect on the proposal; and, the proposal will neither alter existing noise or create new noise.]

- (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.

None

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

N/A

8. Land and Shoreline Use

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.

Current site use is heavy industrial. Neighboring properties to the east, west, and north are also heavy industrial. The shoreline designation is high intensity. The proposal will not affect land uses on nearby or adjacent properties.

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 non-farm or non-forest use?

The site has been heavy industrial since the 1920's. Land use will not change, and the project will not affect current land uses on nearby and adjacent properties. A critical aquifer recharge area is nearby, but the project is not expected to impact the area.

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.

There are a variety of industrial processing equipment structures, warehousing, maintenance facilities, and office buildings.

d. Will any structures be demolished? If so, what?

No

e. What is the current zoning classification of the site?

The current zoning classification of the site is Heavy Manufacturing / Heavy Industrial (HM / HI)

f. What is the current comprehensive plan designation of the site?

The current Cowlitz County Comprehensive Plan designates the site as Heavy Manufacturing / Heavy Industrial (HM / HI)

<p>g. If applicable, what is the current shoreline master program designation of the site?</p> <p>The current shoreline master program designation of the site is Urban.</p>
<p>h. Has any part of the site been classified as a critical area by the city or county? If so, specify.</p> <p>No</p>
<p>i. Approximately how many people would reside or work in the completed project?</p> <p>NORPAC employs about 500 people and no people reside onsite. The proposal does not affect this.</p>
<p>j. Approximately how many people would the completed project displace?</p> <p>None</p>
<p>k. Proposed measures to avoid or reduce displacement impacts, if any:</p> <p>N/A</p>
<p>l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:</p> <p>The project will not affect existing or projected land uses and plans.</p>
<p>m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:</p> <p>The project will not affect nearby agricultural and forest lands of long-term commercial significance.</p>

9. Housing

<p>a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.</p> <p>N/A</p>
<p>b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.</p> <p>N/A</p>

c. Proposed measures to reduce or control housing impacts, if any:

N/A

10. Aesthetics

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

N/A [The project involves no physical change to the site]

b. What views in the immediate vicinity would be altered or obstructed?

N/A

c. Proposed measures to reduce or control aesthetic impacts, if any:

N/A

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

N/A [The proposal involves no lighting or glare-inducing change to the site]

b. Could light or glare from the finished project be a safety hazard or interfere with views?

N/A

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

<p>a. What designated and informal recreational opportunities are in the immediate vicinity? Recreational activities on the Columbia River include fishing, boating, canoeing / kayaking, water skiing, jet skiing, etc..</p>
<p>b. Would the proposed project displace any existing recreational uses? If so, describe. No</p>
<p>c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: N/A [No impacts to mitigate]</p>

13. Historic and Cultural Preservation

<p>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. NORPAC was founded in 1979. Some buildings, structures, or sites on or near the facility are over 45-years old but none are listed in or eligible for listing in national, state, or local preservation registers.</p>
<p>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. There are no known landmarks, features, or evidence of Indian or historic uses or occupation on the NORPAC site. The Mt. Coffin footprint is approximately 1600 feet away.</p>
<p>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. N/A [The project involves no land disturbance or physical change to the facility.]</p>
<p>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. N/A</p>

14. Transportation

- 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.

The primary site access point is the Nippon Dynawave Packaging Main Gate, located at the intersection of WA State Route 432 (Industrial Way) and Washington Way.

- 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?

The site is not served by public transit; however, the nearest public transit stop is at Beech Street and 19th Avenue, approximately 1.3 miles away.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposal will not impact parking.

- 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.

NORPAC has a dock and rail; but, the project has no transportation component or impact.

- 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?

None. The proposal will have no impact on vehicular trips.

- 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:

N/A

15. Public Services

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. N/A

16. Utilities

a. Utilities currently available at the site: <input checked="" type="checkbox"/> electricity <input checked="" type="checkbox"/> water <input checked="" type="checkbox"/> telephone <input type="checkbox"/> septic system <input checked="" type="checkbox"/> natural gas <input checked="" type="checkbox"/> refuse service <input checked="" type="checkbox"/> sanitary sewer <input checked="" type="checkbox"/> other (list below)
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. None

C. Signature

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:

Position and Agency Organization:

Date Signed:

Wayne Wooster
Environmental & Sustainability Manager / North Pacific Paper Company, LLC

D. Supplemental Sheet for Nonproject Actions

(IT IS NOT NECESSARY to use the Supplemental 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?

The proposal will not increase discharges to water, emissions to air, the production, storage, or release of toxic or hazardous substances, or the generation of noise.

Proposed measures to avoid or reduce such increases are:

N/A

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

No impact

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

N/A

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

No impact

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

N/A

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?

No impact

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

N/A

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?

No impact

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

N/A

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

No impact

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

N/A

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

The proposal has no known conflicts with local, state, or federal laws or requirements intended to protect the environment.