Summary
Novus Pacific, LLC, proposes to modify the design of their biogas anaerobic digestion facility located in Boardman, Morrow County, Oregon to allow for an increase in the amount of biogas produced. An Environmental Assessment (EA) was prepared in 2015 (USDA 2015), describing the proposed project and identifying potential impacts related to the construction of the facility.

The United States Department of Agriculture, Rural Business-Cooperative Service (USDA RBS) has determined that the proposed changes in the project description, as overviewed in this EA Supplement, will result in no significant impact to the human environment and that the Finding of No Significant Impact (FONSI) for the original EA is valid. Below is a description of this analysis.

Figure 1. Location of Novus Pacific, LLC’s biogas anaerobic digestion facility within the Port of Morrow, Boardman, Oregon.
**Revised Project Description**

Novus Pacific is proposing to expand the original design of their facility to process 90 tons of onion residue, 5000 gallons of dairy manure, 200 tons of waste solids, and 100,000 gallons of wastewater from a potato flake plant per day to produce over 2.4 million ft$^3$ of natural gas, 350 gallons of fertilizer, and 11.2 tons of soil amendment per day.

The proposed plant has not yet been constructed. The site is approximately 5 acres in size, and is currently an empty lot covered in grasses. The proposed revised project will not require a larger footprint than the originally approved project, therefore no additional ground disturbance will occur.

**Transportation**

This proposed modification will increase the number of truckloads delivering raw materials to the site from 5 truckloads per day to 8. Therefore, this modification proposes a cumulative increase of 6 trips (or 3 round trips) per day from the original project. Transportation to and from the project site would occur along existing roads and infrastructure, with the exception of a service road that is being constructed by the Port of Morrow.

This modification proposes a cumulative increase of 6 one way trips per day along existing state highways and roads/infrastructure, within areas that are already operating in an industrial use. This increased amount of traffic is not expected to have a significant impact on traffic patterns and is not expected to have a significant impact to air quality from the additional expenditure of fossil fuels and exhaust generation.

**Air Quality**

The project site is not within an air quality non-attainment zone. Prior to submission of the application for the original project, Novus Pacific received a Simple Air Containment Discharge Permit (ACDP) in 2013 pursuant to Oregon Revised Statutes 468.A and Oregon Administrative Rules Chapter 340, Division 216-0010 through 216-0100. The permit was issued after a review of the proposed operations and regulates the emissions of Particulate Matter, SO$_2$, NO$_x$, Volatile Organic Compounds (VOC) and Greenhouse Gas Emissions (GHG) from the facility’s boilers, gas upgrading system, and waste gas flare. The permit allowed greater than necessary emission levels for the original project (1320 tons per day), and the emissions for the proposed expanded facility will still remain within the allowed limits (750 tons, up from 325 tons per day expected to be produced by the original project).

Additional emissions will be created by the addition of 3 truck deliveries per day to deliver raw materials. However, the additional emissions created by this expansion will be offset by the use of the additional 1.5 million ft$^3$ in biogas to be produced by the plant in lieu of the burning of fossil fuels.

**Land Use/Biological Resources**
This modification in the project proposes to expand the production of biogas within the previously-approved footprint of the original site. There is no additional road construction, and traffic patterns would not be significantly disrupted. There are no known biological resources located within the existing area of disturbance and no land use changes would occur with proposed project modifications. Based on lack of change to the original site footprint, the Agency has made a finding of no historic properties affected by the revised project. The site is not within the 100-year or 500-year floodplains. For these reasons the proposed modification to the original project is not expected to have a significant adverse effect to the natural environment or significantly change land use.

No solid waste will be created at the facility, as outlined in the original project, and wastewater will be directed to the Port’s sanitary wastewater treatment plant. Only minor increases in wastewater production will occur as a result of the hiring of 2 additional full-time employees.

In conclusion, USDA RBS has not identified any adverse effects to environmental resources imposed by the proposed modification to the original project outlined in this Supplemental EA.

CONCLUSIONS

- The amount of ground that will be disturbed will remain unchanged from the original project.
- Waste management practices will remain unchanged as no solid wastes will be produced and all wastewater will be transported back to the Port of Morrow’s wastewater treatment plant.
- Air emission levels will be increased, however they will remain within the levels allowed by the previously obtained Simple Air Containment Discharge Permit from the Oregon Department of Environmental Quality (ODEQ). Additionally, a portion will be offset by the replacement of the use of fossil fuels with the additional natural gas produced by the project.
- The proposed modification to the original project is not expected to have a significant adverse effect to the natural environment.

Therefore, USDA RBS has determined that this proposed modification will result in no significant impact to the human environment and that the Finding of No Significant Impact (FONSI) for the original EA is valid.

REFERENCES