



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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January 8, 2009

Tracy Hodik
Century Construction Company, Inc.
P.O. Box 739
Lewistown, MT 59457

Dear Ms. Hodik:

Air Quality Permit #2839-03 is deemed final as of January 8, 2008, by the Department of Environmental Quality (Department). This permit is for the operation of an asphalt batch plant. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Trista Glazier
Air Quality Specialist
Air Resources Management Bureau
(406) 444-3403

VW:TG
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #2839-03

Century Construction Company, Inc.
P.O. Box 739
Lewistown, MT 59457

January 8, 2009



AIR QUALITY PERMIT

Issued To: Century Construction Company, Inc. Permit #2839-03
P.O. Box 739 Application Complete: 10/15/08
Lewistown, MT 59457 Preliminary Determination Issued: 11/21/08
Department's Decision Issued: 12/23/08
Permit Final: 1/8/09
AFS #: 777-2839

An air quality permit, with conditions, is hereby granted to Century Construction Company, Inc. (Century) pursuant to Sections 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM), 17.8.740, *et seq.* as amended, for the following:

Section I: Permitted Facilities

A. Facility Location

The original location of the permitted facility was at the SW¹/₄ of Section 23, Township 32 North, Range 2 West, in Toole County, Montana. Permit #2839-03 applies while operating in any location in the state of Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program or within 10 kilometers (km) of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County.* An addendum will be required for locations in or within 10 km of certain PM₁₀ nonattainment areas. A list of the permitted equipment can be found in Section I.A. of the permit analysis.

B. Current Permit Action

On October 15, 2008, the Department received a complete application from Century requesting Permit #2839-02 be modified to include the horsepower (hp) rating of the diesel-powered engine/generators. The current permit action changes the existing engine ratings of 100 and 300 kilowatts (kW) to 192 hp and 450 hp, respectively. The emission inventory was updated to reflect these changes. The current permit action also updates the permit to reflect current permit language and rule references used by the Department.

Section II: Limitations and Conditions

A. Emission Limitations

1. Asphalt plant particulate matter emissions shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf) (ARM 17.8.340 and 40 CFR 60, Subpart I).
2. Century shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources or stacks installed or modified after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.752).
3. Century shall not cause or authorize to be discharged into the outdoor atmosphere from systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems

associated with emission control systems any visible emissions that exhibit opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).

4. Century shall not cause or authorize the use of any street, road, or parking area without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
5. Century shall treat all unpaved portions of the haul roads, access roads, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with reasonable precautions limitation in Section II.A.4 (ARM 17.8.752).
6. Century shall install and maintain a device to measure the pressure drop (magnehelic gauge, manometer, etc.) on the control device (venturi scrubber). Pressure drop shall be measured in inches of water. Century must install and maintain temperature indicators at the control device inlet and outlet (ARM 17.8.749).
7. Once a stack test is performed, Century shall limit the asphalt production rate to the average production rate during the last source test demonstrating compliance (ARM 17.8.749).
8. Asphalt plant production shall not exceed 1,050,000 tons during any rolling 12-month time period (ARM 17.8.749).
9. Century shall not operate more than two diesel-powered engines/generators at any given time and the combined maximum rated capacity shall not exceed 642 hp (ARM 17.8.749).
10. The hours of operation of the asphalt plant and associated equipment (including each of the diesel-powered generators) shall not exceed 7,000 hours during any rolling 12-month time period (ARM 17.8.1204).
11. If the permitted equipment is used in conjunction with any other equipment owned or operated by Century, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month period. Any calculation used to establish production levels shall be approved by the Department (ARM 17.8.749).
12. Century shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60, Subpart I, for the asphalt plant (ARM 17.8.340 and 40 CFR 60, Subpart I).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup, an Environmental Protection Agency (EPA) source test using Methods 1 through 5 shall be performed on the asphalt plant to demonstrate compliance with Section II.A.1. In addition, an EPA Method 9 opacity test shall be performed in conjunction with all particulate tests to demonstrate compliance with the conditions specified in Section II.A.2. A

source test performed on the plant in another state within the past 4 years may be substituted (subject to Department approval) (ARM 17.8.106, ARM 17.8.749, ARM 17.8.340, 40 CFR 60 Subpart A, General Conditions, 40 CFR 60, Subpart I).

2. An EPA Methods 1 through 5 and 9 source test must be performed on the asphalt plant on an every 4 year basis after the initial source test or according to another test schedule as may be approved by the Department to demonstrate compliance with the conditions in Sections II.A.1 and II.A.2 (ARM 17.8.106 and ARM 17.8.749).
3. Pressure drop on the control device and temperatures must be recorded during the last source test and reported as part of the test results specified in Section II.A.6 (ARM 17.8.749).
4. Since asphalt production will be limited to the average production rate during the last source test demonstrating compliance, it is suggested the source testing be performed at the highest production rate practical (ARM 17.8.749).
5. All source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
6. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this asphalt plant is moved to another location, an Intent to Transfer form must be sent to the Department. In addition, a Public Notice Form of Change of Location must be published in a newspaper of general circulation in the area to where the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).
2. Century shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. All records compiled in accordance with this permit shall be maintained by Century as a permanent business record for at least 5 years following the date of measurement, shall be available at the plant site for inspection by the Department, and shall be submitted to the Department upon request (ARM 17.8.749).
3. Century shall supply the Department with annual production information for all emission points, as required by the Department in the annual emissions inventory request. The request will include, but is not limited to, all sources of emissions identified in Section I of the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in units as required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

4. Century shall notify the Department of any construction or improvement project

conducted pursuant to ARM 17.8.705(1)(r) that would include *the addition of a new emissions unit*, a change in the control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emissions unit. This notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745 (1)(d) (ARM 17.8.745).

5. Century shall document, by month, the asphalt production of the facility. By the 25th day of each month, Century shall total the asphalt production of the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.8. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Century shall document, by month, the hours of operation of the asphalt plant. By the 25th day of each month, Century shall total the hours of operation of the asphalt plant for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.10. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
7. Century shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information.

Section III: General Conditions

- A. Inspection – Century shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, 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 Century fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Century of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq.* (ARM 17.8.756)
- 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 – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its

decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Century may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Construction Commencement – Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (ARM 17.8.762).
- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Century shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program or areas considered tribal lands.

PERMIT ANALYSIS
Century Construction Company, Inc.
Permit #2839-03

I. Introduction/Process Description

A. Permitted Equipment

- 1994 Al Mix drum mix asphalt plant (150 tons per hour (TPH));
- 1994 Al Mix venturi scrubber 22,000 cubic feet per minute (cfm) high-pressure with automatic damper control;
- 1996 Caterpillar diesel generator (192 horsepower (hp));
- 1985 Detroit diesel generator (450 hp); and
- Associated equipment.

B. Source Description

This asphalt plant and associated equipment produces asphalt for use in construction, repair, and maintenance of roads and highways. The asphalt production process begins with virgin aggregate material loaded into three 8' X 10' bins. The material is fed onto a 24" conveyor, weighed, and then transferred to a slinger conveyor via a receiving hopper. As the aggregate is fed into the drum dryer from the slinger conveyor, hot asphalt oil that is stored in an electrically heated 15,000-gallon storage tank is added and mixed with the aggregate. After the oil and aggregate are completely mixed, a drag slat conveyor moves the asphalt to a 40-ton asphalt storage silo. Finally, the finished product is dumped into trucks to be transported to market.

C. Permit History

On August 11, 1994, Century Construction Company, Inc. (Century) submitted a permit application to operate a portable 1994 Al Mix drum mix asphalt plant (150 TPH) and associated equipment. Emissions from the drum mixer are controlled by a 1994 Al Mix venturi scrubber. **Permit #2839-00** was issued on November 4, 1994.

In 1999, EPA informed the Department of Environmental Quality (Department) that any condition in an air quality preconstruction permit would be considered a federally enforceable condition. However, there are certain state rules that were never intended to be federally enforceable. The Department notified all facilities holding preconstruction permits that they could request deletion of those conditions based on ARM 17.8.717 and 17.8.315. The removal of either of these conditions did not relieve the facility from complying with the rule upon which the permit condition was based; removal only ensured that enforcement of the condition remained solely with the Department. The current permit action removed the condition, based on ARM 17.8.717, from Century's permit. **Permit #2839-01** replaced Permit #2839-00.

On December 16, 2002, Century submitted a complete air quality permit application to the Department to add a portable 100 kilowatt (kW) diesel generator. This new equipment provided additional power for the asphalt plant, conveyors, and associated equipment. Permit #2839-02 was updated to reflect current permit language and rule references used by the Department. **Permit #2839-02** replaced Permit #2839-01.

D. Current Permit Action

On October 15, 2008, the Department received a complete application from Century requesting Permit #2839-02 be modified to include the hp rating of the diesel-powered engine/generators. The current permit action changes the existing engine ratings of 100 and 300 kW to 192 hp and 450 hp, respectively. The emission inventory was updated to reflect these changes. The current permit action also updates the permit to reflect current permit language and rule references used by the Department.

Permit #2839-03 replaces Permit #2839-02.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminants into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment, including instruments and sensing devices, and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Montana Clean Air Act, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Century shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. The Department must be notified promptly, by telephone, whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to:

The following ambient air quality standards or requirements may apply, including, but not limited to:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀.

Century must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibits an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. This rule requires an opacity limitation of 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter.
3. ARM 17.8.310 Particulate Matter, Industrial Processes. This rule requires that no person shall cause, allow, or permit to be discharged into the outdoor atmosphere particulate matter in excess of the amount set forth in this rule.
4. ARM 17.8.322 Sulfur Oxide Emissions, Sulfur in Fuel. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel-containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.
5. ARM 17.8.340 Standards of Performance for New Stationary Sources. The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, shall comply with the standards and provisions of 40 CFR Part 60. Based on the information submitted by Century, the portable asphalt plant and associated equipment is an NSPS (40 CFR 60, Subpart A, General Provisions, and Subpart I, Standards of Performance for Hot Mix Asphalt Facilities) affected source.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete

until the proper application fee is paid to the Department. However, in this case, the Department waived the permit application fee because the Department requested that the facility update their equipment specifications of previously permitted equipment (that changed overall facility emissions) and modify their permit.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit, issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter, or use any asphalt plant, crusher or screen that has the potential to emit (PTE) greater than 15 tons per year of any pollutant. Century has the potential to emit more than 15 tons per year of particulate matter (PM), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), nitrogen oxides (NO_x), volatile organic compounds (VOC), carbon monoxide (CO), and sulfur oxides (SO_x) from their asphalt plant; therefore, a permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. Century submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Century submitted an affidavit of publication of public notice in the October 8, 2008, issue of the *Glasgow Courier*. A newspaper of general circulation in the Town of Glasgow in Valley County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Century of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of intent to transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications-- Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the Federal Clean Air Act (FCAA) that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source since it is not a listed source and the facility's potential to emit is less than 250 tons per year or more of any air pollutant (excluding fugitive emissions).

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tons/year of any pollutant;
 - b. PTE >10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule, or
 - c. PTE > 70 tons/year of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #2839-03 for Century, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons/year for all criteria pollutants.
 - b. The facility's PTE is less than 10 tons/year of any one HAP and less than 25 tons/year of all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This source is subject to a current NSPS (40 CFR 60, Subpart I).

- e. This facility is not subject to any current NESHAP standards.
- f. This source is not a Title IV affected source nor a solid waste combustion unit.
- g. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that Century will be a minor source of emissions as defined under Title V because Century requested to take federally enforceable limitations to keep them out of the Title V Operating Permit Program. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Century will be required to obtain a Title V Operating Permit.

- h. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's PTE.
 - i. In applying for an exemption under this section the owner or operator of the facility shall certify to the Department that the source's PTE does not require the source to obtain an air quality operating permit.
 - ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.
- 3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal by ARM 17.8.1204(3) shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. Emissions Inventory

Source	Tons/Year					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
Drum Mix Asphalt Plant Dryer	16.71	23.63	28.88	68.25	16.80	30.45
Drum Mix Plant Load-Out	0.27	0.18	0.00	0.71	2.18	0.00
Asphalt Product Silo Filling	0.31	0.13	0.00	0.62	6.40	0.00
Cold Aggregate Screens and Storage Bins	11.34	6.93	0.00	0.00	0.00	0.00
Cold Aggregate Handling/Conveyors	9.45	3.47	0.00	0.00	0.00	0.00
Cold Aggregate Storage Piles	5.21	2.47	0.00	0.00	0.00	0.00
Diesel Generator (up to 450 hp)	3.47	3.47	48.83	10.52	3.89	3.23
Diesel Generator (up to 192 hp)	1.48	1.48	20.83	4.49	1.66	1.38
Haul Roads/Vehicle Traffic	10.15	2.88	0.00	0.00	0.00	0.00
Total	58.38	44.63	98.53	84.59	30.93	35.06

Operating Parameters:

Operating Hours: 7000 hr/yr (Permit Limit)
 Plant Elevation 3000 ft. (Department Information)
 Actual Pressure 26.8 in. Hg (Department Information)

Standard Pressure 29.92 in. Hg
 Flowrate 22,000 acfm (Company Information)
 Std. Temp: 25 C 77 F 537 R
 Assumed Stack Temp. 149 C 300 F 760 R
 Correction Equation: $V_1 = V_2 (P_2/P_1) (T_1/T_2)$
 Corr. Flowrate 22000 acfm * (26.8 in. Hg / 29.92 in. Hg) * (537 R / 760 R) = 13924 dscfm
 Process Rate: 150 ton/hr (Company Information)

Drum Mix Asphalt Plant Dryer

PM Emissions

Emission Factor: 0.04 gr/dscf (permit limit)
 Calculations: 0.04 gr/dscf * 13924 dscfm * 1 lb/7000 gr * 60 m/hr = 4.77 lb/hr
 11.92 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 16.71 ton/yr

PM₁₀ Emissions

Emission Factor: 0.045 lb/ton (AP-42, Section 11.1, Table 11.1-3, Drum Mix, Venturi Scrubber Control, 3/04)
 Calculations: 0.045 lb/ton * 150 ton/hr = 6.75 lb/hr
 6.75 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 23.63 ton/yr

NO_x Emissions

Emission Factor: 0.055 lb/ton (AP-42, Section 11.1, Table 11.1-7, Drum Mix, worst-case fuel excluding coal, 3/04)
 Calculations: 0.055 lb/ton * 150 ton/hr = 8.25 lb/hr
 8.25 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 28.88 ton/yr

CO Emissions

Emission Factor: 0.13 lb/ton (AP-42, Section 11.1, Table 11.1-7, Drum Mix, worst-case fuel excluding coal, 3/04)
 Calculations: 0.13 lb/ton * 150 ton/hr = 19.50 lb/hr
 19.5 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 68.25 ton/yr

VOC Emissions

Emission Factor: 0.032 lb/ton (AP-42, Section 11.1, Table 11.1-8, worst-case fuel, 3/04)
 Calculations: 0.032 lb/ton * 150 ton/hr = 4.80 lb/hr
 4.8 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 16.80 ton/yr

SO_x Emissions

Emission Factor: 0.058 lb/ton (AP-42, Section 11.1, Table 11.1-7, Drum Mix, worst-case fuel excluding coal, 3/04)
 Calculations: 0.058 lb/ton * 150 ton/hr = 8.70 lb/hr
 8.7 lb/hr * 7000 hr/yr * 0.0005 ton/lb = 30.45 ton/yr

Drum Mix Plant Load-Out

Process Rate: 150 ton/hr (Company Information)
 Hours of Operation: 7000 hr/yr (Annual Capacity)

PM Emissions

Emission Factor: 0.00052 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)
 Calculations: 0.00052 lb/ton * 150 ton/hr * 7000 hr/yr * 0.0005 ton/lb = 0.27 ton/yr

PM₁₀ Emissions

Emission Factor: 0.00034 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)
 Calculations: 0.00034 lb/ton * 150 ton/hr * 7000 hr/yr * 0.0005 ton/lb = 0.18 ton/yr

CO Emissions

Emission Factor: 0.00135 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.00135 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.71 \text{ ton/yr}$ **VOC Emissions**

Emission Factor: 0.00416 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.00416 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 2.18 \text{ ton/yr}$ ***Asphalt Product Silo Filling***

Process Rate: 150 ton/hr (Company Information)

Hours of Operation: 7000 hr/yr (Annual Capacity)

PM Emissions

Emission Factor: 0.00059 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.00059 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.31 \text{ ton/yr}$ **PM₁₀ Emissions**

Emission Factor: 0.00025 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.00025 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.13 \text{ ton/yr}$ **CO Emissions**

Emission Factor: 0.00118 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.00118 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.62 \text{ ton/yr}$ **VOC Emissions**

Emission Factor: 0.01219 lb/ton (AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)

Calculations: $0.01219 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 6.40 \text{ ton/yr}$ ***Cold Aggregate Screens and Storage Bins***

Process Rate: 150 tons/hr (Company Information)

Number of Transfers: 6 Transfers (Assumed)

Hours of operation: 7000 hr/yr (Annual Capacity)

PM Emissions

Emission Factor: 0.0036 lbs/ton (AP-42, Section 11.19, Table 11.19.2-2, Fines Screening, Controlled, 8/04)

Calculations: $0.0036 \text{ lbs/ton} * 150 \text{ tons/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 6 \text{ Transfers} = 11.34 \text{ ton/yr}$ **PM₁₀ Emissions:**

Emission Factor: 0.0022 lbs/ton (AP-42, Section 11.19, Table 11.19.2-2, Fines Screening, Controlled, 8/04)

Calculations: $0.0022 \text{ lbs/ton} * 150 \text{ tons/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 6 \text{ Transfers} = 6.93 \text{ ton/yr}$ ***Cold Aggregate Handling/Conveyors***

Process Rate: 150 tons/hr (Company Information)

Number of Transfers: 6 Transfers (Assumed)

Hours of operation: 7000 hr/yr (Annual Capacity)

PM Emissions

Emission Factor: 0.003 lb/ton (AP-42, Section 11.19, Table 11.19.2-2, Conveyor Transfer, Controlled, 8/04)

Calculations: $0.003 \text{ lb/ton} * 150 \text{ tons/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 6 \text{ Transfers} = 9.45 \text{ ton/yr}$

PM10 Emissions

Emission Factor: 0.0011 lb/ton (AP-42, Section 11.19, Table 11.19.2-2, Conveyor Transfer, Controlled, 8/04)

Calculations: $0.0011 \text{ lb/ton} * 150 \text{ tons/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 6 \text{ Transfers} = 3.47 \text{ ton/yr}$

Cold Aggregate Storage Piles

Process Rate: 150 ton/hr (Company Information)

Number of Piles: 3 Piles (Assumed)

Hours of Operation: 7000 hr/yr (Annual Capacity)

PM Emissions

Emission Factor: 0.00331 lb/ton (AP-42, Section 13.2.4, Table 13.2.4.3, see predictive emission factor equation at end of inventory, 11/06)

Calculations: $0.00331 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ Piles} = 5.21 \text{ ton/yr}$

PM₁₀ Emissions

Emission Factor: 0.00157 lb/ton (AP-42, Section 13.2.4, Table 13.2.4.3, see predictive emission factor equation at end of inventory, 11/06)

Calculations: $0.00157 \text{ lb/ton} * 150 \text{ ton/hr} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ Piles} = 2.47 \text{ ton/yr}$

Diesel Generator (up to 192 hp)

Generator Size: 192.0 hp

Hours of Operation: 7000 hrs/yr

PM Emissions

Emission Factor: 0.0022 lbs/hp-hr (AP-42 Table 3.3-1, 7/95)

Calculations: $0.0022 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.48 \text{ ton/yr}$

PM₁₀ Emissions

Emission Factor: 0.0022 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)

Calculations: $0.0022 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.48 \text{ ton/yr}$

NO_x Emissions

Emission Factor: 0.0310 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)

Calculations: $0.031 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 20.83 \text{ ton/yr}$

CO Emissions

Emission Factor: 0.00668 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)

Calculations: $0.00668 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 4.49 \text{ ton/yr}$

VOC Emissions

Emission Factor: 0.00247 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)

Calculations: $0.00247 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.66 \text{ ton/yr}$

SO_x Emissions

Emission Factor: 0.00205 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)

Calculations: $0.00205 \text{ lbs/hp-hr} * 192 \text{ hp} * 7000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.38 \text{ ton/yr}$

Diesel Generator (up to 450 hp)

Generator Size: 450.0 hp

Hours of Operation: 7000 hr/yr

PM Emissions

Emission Factor: 0.0022 lbs/hp-hr (AP-42 Table 3.3-1, 7/95)
 Calculations: 0.0022 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 3.47 ton/yr

PM₁₀ Emissions

Emission Factor: 0.0022 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)
 Calculations: 0.0022 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 3.47 ton/yr

NO_x Emissions

Emission Factor: 0.0310 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)
 Calculations: 0.031 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 48.83 ton/yr

CO Emissions

Emission Factor: 0.00668 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)
 Calculations: 0.00668 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 10.52 ton/yr

VOC Emissions

Emission Factor: 0.00247 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)
 Calculations: 0.00247 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 3.89 ton/yr

SO_x Emissions

Emission Factor: 0.00205 lbs/hp-hr (AP-42 Table 3.3-1, 10/96)
 Calculations: 0.00205 lbs/hp-hr * 450 hp * 7000 hr/yr * 0.0005 ton/lb = 3.23 ton/yr

Haul Roads/Vehicle Traffic

Vehicle miles traveled: 5 VMT/day (Estimated)
 Days Per Year: 365 days/year
 Operation: 19.2 hours/day

PM Emissions

Emission Factor: 13.90 lb/VMT (AP-42, Section 13.2.2, Controlled Emissions, 12/03)
 Calculation: 13.9 lb/VMT*5 VMT/day*365 days/year*(19.2hr/24hr)*0.0005 ton/lb = 10.15 ton/yr

PM₁₀ Emissions

Emission Factor: 3.95 lb/VMT (AP-42, Section 13.2.2, Controlled Emissions, 12/03)
 Calculation: 3.95 lb/VMT*5 VMT/day*365 days/year*(19.2 hr/24 hrs)*0.0005 ton/lb = 2.88 ton/yr

PREDICTIVE EMISSION FACTOR DEVELOPMENT EQUATIONS**Drum or Batch Mix Asphalt Plant Load-Out Emission Factor Development**

(AP-42, Section 11.1, Table 11.1-14, Plant Load-Out, 3/04)

PM Emission Factor

Emission Factor = $0.000181 + 0.00141(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00052 \text{ lb/ton}$
 Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

PM₁₀ Emission Factor

Emission Factor = $0.00141(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00034 \text{ lb/ton}$
 Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

VOC Emission Factor

$$\text{Emission Factor} = 0.0172(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00416 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

CO Emission Factor

$$\text{Emission Factor} = 0.00558(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00135 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

Asphalt Product Silo Filling*(AP-42, Section 11.1, Table 11.1-14, Silo Filling, 3/04)***PM Emission Factor**

$$\text{Emission Factor} = 0.00032 + 0.00105(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00059 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

PM₁₀ Emission Factor

$$\text{Emission Factor} = 0.00105(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00025 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

VOC Emission Factor

$$\text{Emission Factor} = 0.0504(-V)e^{((0.0251(T + 460) - 20.43)} = 0.01219 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

CO Emission Factor

$$\text{Emission Factor} = 0.00488(-V)e^{((0.0251(T + 460) - 20.43)} = 0.00118 \text{ lb/ton}$$

Where: V = -0.5 (assume default value provided in AP-42)
 T = 325 Fahrenheit (assume default value provided in AP-42)

Cold Aggregate Storage Pile Fugitive Dust Emission Factor Development (AP-42, Section 13.2.4, Table 13.2.4.3, Predictive Equations, 11/06)**PM Emission Factor**

$$\text{Emission Factor} = k(0.0032) ((U/5)^{1.3} / (M/2)^{1.4}) = 0.00331 \text{ lb/ton}$$

Where: k = Particle Size Multiplier (dimensionless) (assume PM < 30 microns = 0.74)
 U = Mean Wind Speed (mph) (assume 10 mph)
 M = Material Moisture Content (percent) (assume 3.0%)

PM₁₀ Emission Factor

$$\text{Emission Factor} = k(0.0032) ((U/5)^{1.3} / (M/2)^{1.4}) = 0.00157 \text{ lb/ton}$$

Where: k = Particle Size Multiplier (dimensionless) (assume PM < 10 microns = 0.35)
 U = Mean Wind Speed (mph) (assume 10 mph)
 M = Material Moisture Content (percent) (assume 3.0%)

IV. BACT Determination

A BACT determination is required for each new or altered source. Century shall install on the new or altered source the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized.

The current permit action is to modify the permit to add the hp rating of existing engines/generators to Permit #2839-03. Because of the limited amount of emissions produced by the diesel engines and the lack of readily available, cost effective add-on controls; add-on controls would be cost prohibitive. Therefore, the Department determined that proper operation and maintenance with no additional controls would constitute BACT for the diesel engines/generators.

V. Existing Air Quality and Impacts

Permit #2839-03 is issued for the operation of a portable hot mix asphalt plant to be originally located in the SW¼ of Section 23, Township 32 North, Range 2 West, in Toole County, Montana. Permit #2839-03 will cover the plant while operating at any location within Montana, excluding those counties that have a Department approved permitting program. In the view of the Department, the amount of controlled emissions generated by this facility will not exceed any set ambient standard. In addition, this source is portable and any air quality impacts will be minimal.

VI. Taking and Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined that there are no taking and damaging implications.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

VII. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
1520 East 6th Avenue
P.O. Box 200901
Helena, Montana 59620-0901
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Century Construction Company, Inc.
P.O. Box 739
Lewistown, MT 59457

Air Quality Permit Number: 2839-03

Preliminary Determination Issued: November 21, 2008

Department Decision Issued: December 22, 2008

Permit Final: January 8, 2009

1. *Legal Description of Site:* The asphalt plant would initially operate at the SW¼ of Section 23, Township 32 North, Range 2 West, in Toole County, Montana. However, Permit #2839-03 would also apply while operating at any location in Montana, except within those areas having a Department approved permitting program or those areas in or within 10 km of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*
2. *Description of Project:* Century submitted a complete permit application to add the horsepower ratings for the previously permitted generators.
3. *Objectives of Project:* In an effort to update the facility's permitted equipment and more accurately determine the facility's potential to emit, Century requested to add the horsepower rating of existing equipment to the existing asphalt plant.
4. *Alternatives Considered:* In addition to the proposed action, the Department also considered the "no-action" alternative. The "no-action" alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Century has demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a BACT determination, would be included in Permit #2839-03.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and would not unduly restrict private property rights.

7. The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Terrestrial and Aquatic Life and Habitats			X			Yes
B	Water Quality, Quantity, and Distribution			X			Yes
C	Geology and Soil Quality, Stability and Moisture			X			Yes
D	Vegetation Cover, Quantity, and Quality			X			Yes
E	Aesthetics			X			Yes
F	Air Quality			X			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources				X		Yes
H	Demands on Environmental Resource of Water, Air and Energy			X			Yes
I	Historical and Archaeological Sites				X		Yes
J	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Emissions from the diesel-powered generators/engines would have only minor impacts upon the terrestrial and aquatic life and habitats in areas where the generators/engines may operate. Although air pollutant deposition would occur in the areas where the generators/engines operate, the size and temporary nature of the operation, dispersion characteristics of pollutants, and conditions placed in Permit #2839-03 would result in minor impacts. In addition, the generators/engines would be relatively small and located at previously disturbed sites. Therefore, the operation of the generators/engines would present only minor impacts to the terrestrial and aquatic life and habitats in areas of potential operation.

B. Water Quality, Quantity and Distribution

There would only be minor impacts on the water quality, quantity, and distribution because of the relatively small size and temporary nature of the operation. While deposition of pollutants would occur, the Department determined that any impacts from deposition of pollutants would be minor. As described in 7.F. of the EA, due to the conditions placed in Permit #2839-03 and the size a nature of the facility, the maximum

impacts from the air emissions from this facility would be minor. Therefore, the diesel-powered generators/engines would have only minor impacts to water quality, quantity, and distribution in the proposed area of operation.

C. Geology and Soil Quality, Stability and Moisture

As a result of the operation of the portable diesel-powered generators/engines, there would be minor impacts to the geology and soil quality, stability, and moisture near the equipment's operational area because of the increased vehicle traffic and deposition of pollutants from portable generator operations. As explained in Section 7.F. of this EA, the facility's size, operational requirements, temporary nature of the operation, and conditions placed in Permit #2839-03 would minimize the impacts from deposition. In addition, the generators/engines would be relatively small in size and located at previously disturbed sites, which would also reduce the potential impact to the local geology and soil quality, stability, and moisture.

D. Vegetation Cover, Quantity, and Quality

Because small amounts of pollutant deposition would occur on the surrounding vegetation, there would be minor impacts on the local vegetative cover, quantity, and quality. The generators/engines would also be relatively small in size and located at previously disturbed sites. As explained in Section 7.F. of this EA, the Department determined that, as a result of the size and temporary nature of the operation and conditions placed in Permit #2839-03, any impacts on vegetative cover, quantity, and quality from the deposition of pollutants would be minor.

E. Aesthetics

The diesel-powered generators/engines would be visible and may create some additional noise in the area of operation. However, Permit #2839-03 would include conditions to control emissions, including visible emissions, from the plant generator. The generators/engines would be relatively small and temporary and would be used to power the portable asphalt facility at previously disturbed sites. Therefore, any aesthetic impact to a given area would be minor and temporary.

F. Air Quality

The air quality emission impacts from the diesel-powered generators/engines would be minor because Permit #2839-03 would include conditions limiting the visible emissions (or opacity) from the equipment. In addition, the facility's potential emissions would be limited by Permit #2839-03 to less than 100 tons per year for any pollutant, resulting in the facility not requiring a Title V Operating Permit. Because of the size and temporary nature of the operation and conditions placed in Permit #2839-03, impacts from the deposition of pollutants would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts, previously contacted the Montana Natural Heritage Program (MNHP) to identify any species of special concern associated with the proposed site location. Search results indicated that there are no such environmental resources in the area. Area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer. The initial location has been identified by Century as the SW¹/₄, of Section 23, Township 32 North, Range 2

West, in Toole County, Montana. The proposed project would have no impact on any unique endangered, fragile, or limited environmental resources because there are no such resources in the area.

H. Demands on Environmental Resource of Water, Air, and Energy

The operation of the generators/engines would require only small demands on water, air, and energy as a result of the relatively small size and temporary nature of the facility. While small amounts of water would be used for dust control on the surrounding roadways and job site, no water would be needed to operate the generator.

Furthermore, as described in Section 7.F. of this EA, pollutant emissions generated from the facility would have minimal impacts on air quality in the immediate and surrounding area. Energy would be generated from the use of an existing generators/engines, so no other sources of power would be necessary to operate the facility. The generators/engines would consume energy in the form of diesel fuel, a non-renewable resource. Overall, the equipment is relatively small and would have operational restrictions placed in Permit #2839-03. Because the facility operations would be seasonal and temporary, demands and impacts to the environmental resource of air and energy would be minor.

I. Historical and Archaeological Sites

The Department previously contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the proposed area of construction/operation. According to the response from SHPO, there are no previously recorded historical or archeological sites within the designated search locale. Additionally, the generator would be located within a previously disturbed industrial site typically used for portable asphalt operations. According to past correspondence from the Montana State Historic Preservation Office, there is low likelihood of adverse disturbance to any archaeological or historic site, given previous industrial disturbance within an area. Therefore, the operation of the generator would not impact on any known historical or archeological sites.

J. Cumulative and Secondary Impacts

The diesel-powered generators/engines would cause minor impacts on the physical and biological environment because the generator would result in emissions of particulate matter (PM), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), nitrogen oxides (NO_x), volatile organic compounds (VOC), carbon monoxide (CO), and sulfur oxides (SO_x). Additional noise impacts from the generators/engines would also be minor. As a result of the temporary or seasonal nature of the facility and conditions and limitations contained within Permit #2839-03, impacts would be minimized. There is potential for other operations to locate at this site; however, any operations would have to apply for and receive the appropriate permits from the Department prior to operation. These permits would address the environmental impacts associated with the operations at the site.

8. *The following table summarizes the potential economic and social effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Social Structures and Mores				X		Yes
B	Cultural Uniqueness and Diversity				X		Yes
C	Local and State Tax Base and Tax Revenue			X			Yes
D	Agricultural or Industrial Production			X			Yes
E	Human Health			X			Yes
F	Access to and Quality of Recreational and Wilderness Activities			X			Yes
G	Quantity and Distribution of Employment				X		Yes
H	Distribution of Population				X		Yes
I	Demands for Government Services				X		Yes
J	Industrial and Commercial Activity			X			Yes
K	Locally Adopted Environmental Plans and Goals				X		Yes
L	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The operation of the portable diesel-powered generators/engines would not alter or disrupt any local lifestyles or communities (social structures or mores) in the area of operation because the generator would be relatively small, would operate intermittently, and would be used with the existing permitted equipment at a previously disturbed site. Therefore, the existing social structures and mores would not be affected as a result of this permit action.

B. Cultural Uniqueness and Diversity

In the view of the Department, it would be unlikely that the portable generators/engines would have any impact on the cultural uniqueness and diversity of the proposed area of operation because the generator/engine operations would be temporary and would take place in a previously disturbed industrial area.

C. Local and State Tax Base and Tax Revenue

The operation of portable diesel-powered generators/engines would have little or no impact on the local and state tax base and tax revenue. The facility would be a temporary and seasonal source and would not remain at a site for an extended period of time. No full time

or permanent employees would be added as a result of issuing Permit #2839-03. Furthermore, any revenue created through the use of the generator would be for a relatively short time period.

D. Agricultural or Industrial Production

The generators/engines would be used at previously disturbed industrial areas; therefore, the Department does not expect that the permitted operation would impact or displace agricultural production. Furthermore, only minor impacts on any local industrial production would be expected because the operation of the facility (and generators/engines) would be temporary and would be relatively small in size.

E. Human Health

Permit #2839-03 would incorporate conditions to ensure that the generator/engine operations would be operated in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 7.F. of this EA, the air emissions from these generators/engines would be minimized opacity limitations established in Permit #2839-03. Therefore, any associated impacts to human health would be minor.

F. Access to and Quality of Recreational and Wilderness Activities

This facility would be located on previously disturbed property and would not impact access to recreational and wilderness activities. However, minor impact on the quality of recreational activities might be created by the noise from the generators/engines. Emissions from these generators/engines would be minimized as a result of limitations placed in Permit #2839-03 and the temporary and portable nature of the operation

G. Quantity and Distribution of Employment

As a result of the relatively small size and temporary nature of the operation, the quantity and distribution of employment in the area would not be impacted. No full time, permanent employees would be employed as a result of issuing Permit #2839-03 for the addition of the portable diesel generator.

H. Distribution of Population

Given the relatively small size and portable nature of the operation and the surrounding land usage, the normal population distribution in the area would not be affected.

I. Demands for Government Services

Although minor increases would be observed in the local traffic on existing roads in the area where the facility operates, the operation of the diesel-powered generators/engines to the existing operations would not result in a need for new, altered, or additional government services.

J. Industrial and Commercial Activity

The operation of the generators/engines would represent only a minor increase in the industrial activity in any given area because of the small size and the portable and temporary nature of the facility; therefore, only minor additional industrial or commercial activity would result from the generator operations.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals that would be affected by issuing this permit. The applicable state and federal standards would protect the environment surrounding the site.

L. Cumulative and Secondary Impacts

The generators/engines would cause only minor cumulative and secondary impacts to the social and economic aspects of the human environment because of the potential air emissions from the generator and increase in local traffic in the immediate area. Further, because the asphalt production facility is relatively small and operates temporarily, only minor social and economic impacts to the local economy could be expected from the operation of the facility. New businesses would not be drawn to any areas and permanent jobs would not be created or lost as result of the proposed project. Because no new employees would be hired, there would be no economic impacts from new employees. Thus, the operation of the generators/engines would result in only minor cumulative and secondary impacts would result to the social and economic environment.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from the proposed project are minor; therefore, an EIS is not required. Since the operation of the diesel generator would be seasonal and temporary and operate according to the limitations and conditions in Permit #2839-03, no significant impacts would be expected from this project. Permit #2839-03 includes conditions and limitations to safeguard any potential environmental threat created by the proposed project.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality - Permitting and Compliance Division (Air Resources Management Bureau and Industrial and Energy Minerals Bureau); Montana Natural Heritage Program; and the State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality (Air Resources Management Bureau and Industrial and Energy Minerals Bureau); Montana Natural Heritage Program; and the State Historic Preservation Office (Montana Historical Society).

EA prepared by: Trista Glazier

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