

AIR QUALITY PERMIT

Issued To: LHC, Incorporated Permit #2985-04
P.O. Box 7338 Modification Request Received: 12/03/01
1179 Stillwater Road Department Decision on Modification: 12/27/01
Kalispell, MT 59904-0338 Permit Final: 01/12/02
AFS #777-2985

An air quality permit, with conditions, is hereby granted to LHC, Incorporated (LHC), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. Location

LHC operates a portable drum mix asphalt plant at various locations throughout the State of Montana. Permit #2985-04 applies while operating at any location within the State of Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* A list of the permitted equipment is contained in the permit analysis.

B. Current Permit Action

On December 3, 2001, LHC requested that Permit #2985-03 be modified to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season (October 1, through March 31). In addition, LHC also requested to operate the permitted facility in or within 10 km of other PM₁₀ nonattainment areas in the State of Montana during the summer season (April 1 through September 30). The current permit action modifies Permit #2985-03 to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season. The current permit action also modifies Permit #2985-03 to allow the permitted facility to operate during the summer season in or within 10 km of certain PM₁₀ nonattainment areas, including, but not limited to Libby, Kalispell, Columbia Falls, Whitefish, Thompson Falls, and Butte.

Section II: Limitations and Conditions

A. Emission Limitations

1. Asphalt plant particulate matter emissions shall be limited to 0.04 gr/dscf (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60, Subpart I).
2. LHC shall not cause or authorize to be discharged into the atmosphere from the asphalt plant, stack emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60, Subpart I).
3. LHC shall not cause or authorize to be discharged into the 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 an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60, Subpart I).

4. LHC shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308 and ARM 17.8.715).
5. LHC 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 the reasonable precautions limitation in Section II.A.4 (ARM 17.8.715).
6. A wet scrubber for air pollution control, with a device to measure the pressure drop (magnehelic gauge, manometer, etc.), must be installed and maintained. Pressure drop must be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained (ARM 17.8.710).
7. Once a stack test is performed, the asphalt production rate shall be limited to the average production rate during the last source test demonstrating compliance (ARM 17.8.710).
8. LHC 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).
9. Total particulate emissions from this asphalt plant, in conjunction with the total particulate emissions from any additional equipment at any individual site, shall be less than 250 tons per year during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.710).

B. Emission Testing

1. Within 60 days after achieving the maximum production rate, but no later than 180 days after initial start up, an EPA Methods 1-5 source test shall be performed on the asphalt plant to demonstrate compliance with Section II.A.1 and an EPA Method 9 opacity test shall be performed in conjunction with all particulate tests to demonstrate compliance with the conditions specified in Sections II.A.2 and II.A.3 (ARM 17.8.105 and ARM 17.8.710).
2. An EPA Methods 1-5 and 9 source test must be performed on the asphalt plant every 4-years after the initial source test or according to another

testing/monitoring schedule as may be approved by the Department to demonstrate compliance with the conditions specified in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.105 and ARM 17.8.710).

3. Pressure drop on the control device and temperature must be recorded daily and kept on site according to Section II.C.2 (ARM 17.8.710).
4. Pressure drop on the control device and temperatures must be recorded during the test and reported as part of the test results (ARM 17.8.710).
5. Since asphalt production will be limited to the average production rate during the test, it is suggested the test be performed at the highest production rate practical (ARM 17.8.710).
6. LHC may retest at any time in order to test at a higher production rate (ARM 17.8.710).
7. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
8. The Department may require further testing (ARM 17.8.105).

C. 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 for Change of Location must be published in a newspaper of general circulation in the area 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 upon request (ARM 17.8.734).
2. LHC shall maintain on-site records showing daily hours of operation, daily production rates, and daily pressure drop and temperature readings for the last 12 months. The records compiled in accordance with this permit shall be maintained by LHC as a permanent business record for at least 5 years following the date of the measurement, shall be submitted to the Department upon request, and shall be available at the plant for inspection by the Department (ARM 17.8.710).
3. LHC shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources identified in the most recent emission inventory report and sources identified in Section I.A 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 the units required by the

Department (ARM 17.8.505).

4. LHC shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.705(1)(r) that would include a change in 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 emission unit. The 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 17.8.705(1)(r)(iv) (ARM 17.8.705).

Section III: Addendum

LHC shall comply with this permit and all conditions in Addendum 4 to this permit as appropriate (ARM 17.8.710).

Section IV: General Conditions

- A. Inspection - The recipient 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 the recipient fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving the permittee of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, *et seq.* (ARM 17.8.717).
- 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 Department's decision on the application is not final unless 15 days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the Department's decision until the conclusion of the hearing and issuance of a final decision by the Board.

- F. Permit Inspection - As required by ARM 17.8.716, 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. 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.
- H. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, the continuing validity of this permit is conditional upon the payment by the permittee of an annual operation fee, as required by that Section and rules adopted thereunder by the Board.
- 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. LHC shall comply with the conditions contained in this permit while operating at any location in the State of Montana, except within those areas having a Department approved permitting program.

Permit Analysis
LHC, Incorporated
Permit #2985-04

I. Introduction/Process Description

A. Permitted Equipment

LHC, Incorporated (LHC) operates a portable 1974 Aedco Drum Mix Asphalt Plant (maximum capacity 100 TPH) with a wet scrubber and associated equipment.

B. Process Description

A typical operation for the hot mix asphalt plant begins by loading gravel into a cold feed bin. The gravel is then conveyed to the hot asphalt plant. The gravel is mixed with hot oil in the asphalt plant to create asphalt. Hot asphalt then exits the plant and is transported to the current project site.

C. Permit History

On July 10, 1997, Paradise Rock, Inc. submitted a complete permit application to operate a portable 1974 Aedco Drum Mix Asphalt Plant, (maximum production rate of 60 TPH) serial #1261; a 60 KW Detroit Diesel generator; a 20 KW Delco AC generator; and associated equipment. The facility originally operated at the NW $\frac{1}{4}$ of the NE $\frac{1}{4}$ of Section 14, Township 21N, Range 29W of Sanders County, Montana. Permit #2985-00 was issued as final on September 3, 1997.

On August 18, 1999, LHC submitted a complete permit application to alter Permit #2985-00. The alteration involved a transfer of ownership from Paradise Rock, Inc., to LHC, Inc.; the addition of a Venturi wet scrubber; the addition of a 40-ton storage silo; an increased production rate for the Aedco asphalt plant from 60 ton/hr to 100 ton/hr; and removal of two generators from the existing equipment (60kW and 20kW) covered under Permit #2985-00. The resulting permitted equipment included a portable 1974 Aedco drum mix asphalt plant (100 TPH), with a Venturi wet scrubber, a 40-ton storage silo, and associated equipment.

LHC was originally permitted at their Kalispell home pit located approximately 5 km north of Kalispell and 1 km west of Highway 93 in Section 25 and Section 26, Township 29 North, Range 22 West, in Flathead County, Montana. LHC also proposed operation within Section 13, Township 21 North, Range 29 West, in Sanders County. The Kalispell home pit is located within the Kalispell PM₁₀ non-attainment area (NAA) and the Sanders County pit is located within the Thompson Falls PM₁₀ NAA. Because LHC proposed operation at the above sites at various times throughout the year, including during the winter months of October 1, 1999, through March 31, 2000, the operation of the plant required site-specific conditions established using SCREEN3 modeling. Permit **#2985-01** replaced Permit #2985-00 and **Addendum 1** was established.

On October 29, 1999, LHC was issued a modification that increased plant production

by applying the correct emission factors in remodeling the source with SCREEN3. During the analysis of the previous permit action, to allow for winter operation at the previously cited locations in or within 10 km of the Kalispell and Thompson Falls PM₁₀ non-attainment areas, the Department of Environmental Quality (Department) used incorrect emission factors to establish production limits through SCREEN3 modeling. Use of the improper emission factors resulted in decreased allowable production. The allowable production limit found in Addendum 1 to Permit #2985-01 was 378 tons per any rolling 24-hour time period. Using the correct PM₁₀ emission factor increased the allowable production to 462 tons per any rolling 24-hour time period. Therefore, the permit action modified condition A.6 of Addendum 1 to Permit #2985-01, to reflect the increased allowable production. Permit #2985-02 replaced Permit #2985-01 and **Addendum 2** replaced Addendum 1.

On February 26, 2001, LHC requested that Permit #2985-02 and Addendum 2 be modified to allow the permitted facility to operate in or within 10 km of certain PM₁₀ nonattainment areas during the summer months (April 1, 2001, through September 30, 2001). The Department agreed to the change and modified **Permit #2985-03** replaced Permit #2985-02 and **Addendum 3** replaced Addendum 2.

D. Current Permit Action:

On December 3, 2001, LHC requested that Permit #2985-03 be modified to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season (October 1 through March 31). In addition, LHC also requested to operate the permitted facility in or within 10 km of other PM₁₀ nonattainment areas in the State of Montana during the summer season (April 1 through September 30). The current permit action modifies Permit #2985-03 to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season. The current permit action also modifies Permit #2985-03 to allow the permitted facility to operate during the summer season in or within 10 km of certain PM₁₀ nonattainment areas, including, but not limited to Libby, Kalispell, Columbia Falls, Whitefish, Thompson Falls, and Butte. **Permit #2985-04** replaces Permit #2985-03 and **Addendum 4** replaces Addendum 3.

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 permit 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, Sub-Chapter 1, General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific sub-chapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant 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 Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

LHC 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. (2) 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 which, 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 that a public nuisance is created.

B. ARM 17.8, Sub-Chapter 2, Ambient Air Quality, 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; and
5. ARM 17.8.223 Ambient Standard for PM₁₀.

LHC shall maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8, Sub-Chapter 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 exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
 2. ARM 17.8.308 Particulate Matter, Airborne. Under this section, LHC shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
 3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
 4. ARM 17.8.310 Particulate Matter, Industrial Process. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
 5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. 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.
 6. ARM 17.8.340 Standard of Performance for New Stationary Sources. The owner and 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. This plant consists of a portable 1974 Aedco Drum Mix Asphalt Plant (maximum production rate 100 TPH) and associated equipment; therefore, NSPS (40 CFR Part 60, Subpart A, General Provisions, and Subpart I, Hot Mix Asphalt Facilities) applies to the facility.
- D. ARM 17.8, Sub-Chapter 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. LHC shall 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. LHC was not required to submit a permit application fee for the current permit action.
 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. This operation fee is based on the actual or estimated actual 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, Sub-Chapter 7, Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.704 General Procedures for Air Quality Preconstruction Permitting. An air quality preconstruction permit shall contain requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
2. ARM 17.8.705 When Permit Required--Exclusions. Permits are required for asphalt plants that have the potential to emit greater than 5 tons per year of any pollutant. LHC has the potential to emit more than 5 tons per year of particulate matter, PM₁₀, NO_x, CO, and VOC; therefore, a permit is required.
3. ARM 17.8.706 New or Altered Sources and Stacks--Permit Application Requirements. This rule requires that an application for an air quality permit be submitted for a new or altered source or stack. The current permit action does not involve permitting any new or altered sources of emissions; therefore, a permit application is not required.
4. ARM 17.8.710 Conditions for Issuance of Permit. This rule requires that the source demonstrate compliance with applicable rules and standards before a permit can be issued. Also, a permit may be issued with such conditions as are necessary to assure compliance with all applicable rules and standards. LHC demonstrated compliance with applicable rules and standards as required for permit issuance.
5. ARM 17.8.715 Emission Control Requirements. LHC is required to install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized. The BACT analysis is included in Section IV of the permit analysis.
6. ARM 17.8.716 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.

7. ARM 17.8.717 Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving LHC of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, *et seq.*
8. ARM 17.8.720 Public Review of Permit Applications. This rule requires that LHC notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. The current permit action is considered an administrative permit action and does not require public notice.
9. ARM 17.8.731 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this sub-chapter, 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.
10. ARM 17.8.733 Modification of Permit. An air quality permit may be modified for changes in any applicable rules or 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 in emissions because of those changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
11. ARM 17.8.734 Transfer of Permit. (1) An air quality permit may be transferred from one location to another if written notice of Intent to Transfer is sent to the Department. (2) An air quality permit may be transferred from one person to another if a written notice of Intent to Transfer, including the names of the transferor and transferee, is sent to the Department.

F. ARM 17.8, Sub-Chapter 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 sub-chapter.
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 sub-chapter would otherwise allow. This facility is not a major stationary source, because it is not a listed source and does not have the potential to emit more than 250 tons per year (excluding fugitive emissions) or more of any air pollutant. Therefore, the

LHC facility is not subject to the Prevention of Significant Deterioration (PSD) program at this time.

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 source having:
 - a. Potential to emit (PTE) > 100 ton/year of any pollutant;
 - b. PTE > 10 ton/year of any one Hazardous Air Pollutant (HAP), PTE > 25 ton/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. Sources with the PTE > 70 ton/year of PM₁₀ in a serious PM₁₀ non-attainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) 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 #2985-07 for LHC, the following conclusions were made.

- a. The facility's PTE is less than 100 ton/year for any pollutant;
- b. The facility's PTE is less than 10 ton/year for any one HAP and less than 25 ton/ year of all HAPs;
- c. This source is not located in a serious PM₁₀ non-attainment area;
- d. This facility is subject to two current NSPS: 40 CFR Part 60, Subpart A and 40 CFR Part 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; and
- g. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that the LHC asphalt plant is a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a title V Operating Permit, LHC will be required to obtain an operating permit.

III. Emission Inventory

Ton/Year

Source	TSP	PM ₁₀	NO _x	VOC	CO	SO _x
1974 Acedo Drum Mix Asphalt Plant w/ Wet Scrubber	1.67	1.34	32.85	30.22	15.77	24.53
Elevator, Screens, Bins, and Mixer	16.43	13.14				
Cold Aggregate Handling	21.90	17.52				
Haul Roads	2.74	1.23				
Total	42.74	33.23	32.85	30.22	15.77	24.53

- A complete emission inventory for Permit #2985-04 is on file with the Department.

IV. BACT Determination

The current permit action is an administrative modification and does not involve permitting any new or altered sources; therefore, a BACT analysis is not required.

Addendum 4
LHC, Incorporated
Permit #2985-04

An addendum to air quality Permit #2985-04 is issued to LHC, Incorporated (LHC) pursuant to Sections 75-2-204 and 75-2-211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.734, as amended, for the following:

I. Permitted Equipment:

On December 3, 2001, LHC applied for Addendum 4 to Permit #2985-04 for the operation of a portable 1974 Aedco Drum Mix Asphalt Plant (maximum production capacity of 100 TPH) with a Venturi wet scrubber, and associated equipment in or within 10 km of the following PM₁₀ nonattainment areas: Libby; Kalispell; Columbia Falls; Whitefish; Thompson Falls; and Butte.

II. Seasonal and Site Restrictions

Addendum 4 applies to the LHC facility while operating at any location in or within 10 km of certain PM₁₀ nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1-March 31) - The only locations in or within 10 km of a PM₁₀ nonattainment area where LHC may operate are: Sections 25 and 26, Township 29 North, Range 22 West, in Flathead County, Montana and Section 13, Township 21 North, Range 29 West, in Sanders County, Montana.
- B. During the summer season (April 1-September 30) – LHC may operate at any location in or within 10 kilometers of certain PM₁₀ nonattainment areas, (Libby, Thompson Falls, Kalispell, Whitefish, Columbia Falls, and Butte).
- C. LHC shall comply with the limitations and conditions contained in Addendum 4 to Permit #2985-04 while operating in or within 10 km of any of the previously listed PM₁₀ nonattainment areas. Addendum 4 shall be valid until revoked or modified. The Department of Environmental Quality (Department) reserves the authority to modify Addendum 4 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

The Department conducted Screen View air dispersion modeling, an Environmental Protection Agency (EPA) approved modeling program, to determine the maximum allowable plant production rate that would maintain compliance with the National Ambient Air Quality Standards (NAAQS) and the Montana Ambient Air Quality Standards (MAAQS) for PM₁₀. The NAAQS and MAAQS are designed to be protective of human health and public welfare. The Department established production limits in Addendum 4 based on the modeling analysis

- A. Operational

1. Asphalt plant particulate matter emissions shall be limited to 0.04 gr/dscf (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60, Subpart I).
2. All visible emissions from the asphalt plant stack shall not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.710).
3. LHC shall not cause or authorize to be discharged into the 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 an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.710).
4. LHC shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant, as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.710).
5. Asphalt plant production shall be limited to 576 tons per any rolling 24-hour time period (ARM 17.8.710).

B. Reporting Requirements

1. LHC shall provide the Department with written notification of job completion within 10 working days of job completion (ARM 17.8.710).
2. LHC shall provide written notice of relocation of the permitted equipment at least 15 days prior to the physical transfer of equipment (ARM 17.8.734).
3. Production information for the site(s) covered by this addendum must be submitted to the Department within 30 days of completion of the project or expiration of Addendum 4. The information shall include (ARM 17.8.710):
 - a. Daily tons of asphalt produced;
 - b. Daily hours of operation;
 - c. Type and amount of fuel used for the plant; and
 - d. Fugitive dust information consisting of a listing of all plant vehicles, including the following for each vehicle type:
 - i. Number of vehicles;
 - ii. Vehicle type;
 - iii. Average vehicle weight;

- iv. Number of tires on vehicle;
 - v. Annual on-site vehicle miles traveled;
 - vi. Average on-site vehicle speed; and
 - vii. Vehicle fuel usage (gasoline or diesel) annual total
- e. Fugitive dust control for haul roads and general plant area:
- i. Hours of operation of water trucks; and
 - ii. Application schedule for chemical dust suppressant, if applicable.

Addendum 4 Analysis
LHC, Incorporated
Permit #2985-04

I. Permitted Equipment

LHC, Incorporated (LHC) operates a portable 1974 Aedco Drum Mix Asphalt Plant (maximum production rate of 100 TPH) with a Venturi wet scrubber and associated equipment.

II. Permit History

On August 18, 1999, LHC submitted a complete permit application to alter Permit #2985-00. The alteration involved a transfer of ownership from Paradise Rock, Inc., to LHC, Inc.; the addition of a Venturi wet scrubber; the addition of a 40-ton storage silo; an increased production rate for the Aedco asphalt plant from 60 ton/hr to 100 ton/hr; and removal of two generators from the existing equipment (60kW and 20kW) covered under Permit #2985-00. The resulting permitted equipment included a portable 1974 Aedco drum mix asphalt plant (100 TPH), with a Venturi wet scrubber, a 40-ton storage silo, and associated equipment.

LHC was originally permitted at their Kalispell home pit located approximately 5 km north of Kalispell and 1 km west of Highway 93 in Section 25 and Section 26, Township 29 North, Range 22 West, in Flathead County, Montana. LHC also proposed operation within Section 13, Township 21 North, Range 29 West, in Sanders County. The Kalispell home pit is located within the Kalispell PM₁₀ non-attainment area (NAA) and the Sanders County pit is located within the Thompson Falls PM₁₀ NAA. Because LHC proposed operation at the above sites at various times throughout the year, including during the winter months of October 1, 1999, through March 31, 2000, the operation of the plant required site-specific conditions established using SCREEN3 modeling. Permit **#2985-01** replaced Permit #2985-00 and **Addendum 1** was established.

On October 29, 1999, LHC was issued a modification that increased plant production by applying the correct emission factors in remodeling the source with SCREEN3. During the analysis of the previous permit action, to allow for winter operation at the previously cited locations in or within 10 km of the Kalispell and Thompson Falls PM₁₀ non-attainment areas, the Department of Environmental Quality (Department) used incorrect emission factors to establish production limits through SCREEN3 modeling. Use of the improper emission factors resulted in decreased allowable production. The allowable production limit found in Addendum 1 to Permit #2985-01 was 378 tons per any rolling 24-hour time period. Using the correct PM₁₀ emission factor increased the allowable production to 462 tons per any rolling 24-hour time period. Therefore, the permit action modified condition A.6 of Addendum 1 to Permit #2985-01, to reflect the increased allowable production. Permit **#2985-02** replaced Permit #2985-01 and **Addendum 2** replaced Addendum 1.

On February 26, 2001, LHC requested that Permit #2985-02 be modified to allow the permitted facility to operate in or within 10 km of certain PM₁₀ nonattainment areas during the summer months (April 1, 2001, through September 30, 2001). The Department agreed to the change and modified the permit. **Permit #2985-03** replaced Permit #2985-02 and **Addendum 3** replaced Addendum 2.

III. Current Permit Action

On December 3, 2001, LHC requested that Permit #2985-03 be modified to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season (October 1 through March 31). In addition, LHC also requested to operate the permitted facility in or within 10 km of other PM₁₀ nonattainment areas in the State of Montana during the summer season (April 1 through September 30). The current permit action modifies Permit #2985-03 to allow the permitted facility to operate in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas during the winter season. The current permit action also modifies Permit #2985-03 to allow the permitted facility to operate during the summer season in or within 10 km of certain PM₁₀ nonattainment areas, including, but not limited to Libby, Kalispell, Columbia Falls, Whitefish, Thompson Falls, and Butte. **Permit #2985-04** replaces Permit #2985-03 and **Addendum 4** replaces Addendum 3.

IV. Applicable Rules and Regulations

The following are partial quotations 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.

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

- A. ARM 17.8.710 Conditions for Issuance of Permit. This rule requires that the source demonstrate compliance with applicable rules and standards before a permit can be issued. Also, a permit may be issued with such conditions as are necessary to ensure compliance with all applicable rules and standards. The source demonstrated compliance with all applicable rules and standards as required for permit issuance.
- B. ARM 17.8.733 Modification of Permit. An air quality permit may be modified for changes in any applicable rules and standards adopted by the Board of Environmental Quality (Board) or changed conditions of operation at a source or stack that do not result in an increase in emissions because of the changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.734 Transfer of Permit. An air quality permit may be transferred from one location to another if:
 1. Written notice of Intent to Transfer location and public notice is sent to the Department;

2. The source will operate in the new location for a period of less than 1 year; and
3. The source will not have any significant impact on any nonattainment area or any Class I area.

LHC will have to submit proof of compliance with the transfer and public notice requirements when they transfer to any of the locations covered by this addendum and will only be allowed to stay in the new location for a period of less than 1 year. Also, the conditions and limitations in Addendum 4 to Permit #2985-04 will keep LHC from having a significant impact on certain PM₁₀ nonattainment areas.

V. Emission Inventory

Source	Lb/Day					
	TSP	PM ₁₀	NO _x	VOC	CO	SO _x
1974 Acedo Drum Mix Asphalt Plant w/ Wet Scrubber	9.17	7.34	43.2	39.74	20.74	32.26
Elevator, Sceens, Bins, and Mixer	21.60	17.28				
Cold Aggregate Handling	28.80	23.04				
Haul Roads	15.00	6.75				
Total	74.57	54.41	43.2	39.74	20.74	32.26

- A complete emission inventory for Addendum 4 is on file with the Department.

VI. Existing Air Quality Impacts

This permit is for a portable asphalt plant to be located in various locations around the State of Montana. In the view of the Department, the amount of controlled particulate emissions generated by this project will not cause concentrations of PM₁₀ in the ambient air that exceed the set standard. In addition, Addendum 4 to Permit #2985-04 sets more stringent limits on plant operation at proposed locations in or within 10 km of certain PM₁₀ non-attainment areas.

VII. Taking or Damaging Implication Analysis

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

VIII. 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
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: LHC, Inc.
P.O. Box 7338
Kalispell, MT 59904-0338

Air Quality Permit Number: 2985-04
Department Decision on Modification: 12/27/01
Permit Final: 01/12/02

1. *Legal Description of Site:* During the winter season (October 1 through March 31) any location in or within 10 km of the Kalispell and Thompson Falls PM₁₀ nonattainment areas. During the summer season (April 1 through September 30), any location, including locations in or within 10 km of certain PM₁₀ nonattainment areas (Libby, Kalispell, Columbia Falls, Whitefish, Thompson Falls, and Butte).
2. *Description of Project:* This permit would allow the operation of a portable asphalt plant in or within 10 kilometers of the following PM₁₀ non-attainment areas: Libby, Kalispell, Whitefish, Columbia Falls, Thompson Falls, and Butte.
3. *Objectives of Project:* The proposed permit change would provide increased business and revenue for the company. The plant would continue to produce asphalt during the winter season. The asphalt would be used for construction, repair, and maintenance of roads and highways.
4. *Alternatives Considered:* The "no-action" alternative consists of not issuing the permit and was considered, but dismissed given that the current permit action, as proposed, would comply with all applicable rules and standards.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a Best Available Control Technology (BACT) analysis, would be contained in Permit #2985-04. More stringent operational limitations, applicable to operation in or within 10 km of certain PM₁₀ non-attainment areas, would be contained in Addendum 4.
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 are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do 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.

Potential Physical and Biological Effects							
		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 Resource			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

Terrestrials would use the areas in which the asphalt operations would occur. Aquatic life may also be present in areas that the asphalt operations utilize. Deposition of particles would occur in the areas where the asphalt plant operates. However, as explained in Section 7.F of this EA, due to the relatively small size and temporary nature of the operation, dispersion characteristics of particles, and conditions placed in Permit #2985-04 and Addendum 4, any impacts from the deposition of particles would be minor. Therefore, the asphalt plant would present only minor impacts to the terrestrial and aquatic life and habitats in the areas of operation.

B. Water Quality, Quantity, and Distribution

Although there would be an increase in air emissions in the areas where the asphalt plant operates, there would be little, if any, impacts on the water quality, quantity, and distribution because of the relatively small size and temporary nature of the operation. While deposition of particles would occur, the Department determined that, due to dispersion characteristics and conditions placed in Permit #2985-04 and Addendum 4, any impacts from the deposition of particles would be minor.

Water would also be used as air pollution control. No surface water or ground water quality problems would result from using water for pollution control because any accidental spills or leaks from equipment would be handled according to the appropriate environmental regulations in an effort to minimize any potential impacts on the immediate and surrounding area. Overall, the asphalt plant would have only minor impacts to water quality, quantity, and distribution.

C. Geology and Soil Quality, Stability, and Moisture

There would be minor impacts on the geology and soil quality, stability, and moisture near asphalt operations due to the increased vehicle traffic, the use of water to control dust, and deposition of particles from the asphalt plant. Any impacts to the geology and soil quality, stability, and moisture would be minor. As explained in Section 7.F of this EA, the relatively small size and temporary nature of the operation, dispersion characteristics, and conditions placed in Permit #2985-04 and Addendum 4, would minimize the impacts from deposition.

D. Vegetation Cover, Quantity, and Quality

There would be minor impacts on the vegetation cover, quantity, and quality because small amounts of vegetation would likely be disturbed for the asphalt operation. In addition, particle deposition would occur on the surrounding vegetation; however, as explained in Section 7.F. of this EA, the Department determined that, due to the relatively small size and temporary nature of the operation, dispersion characteristics, and conditions placed in Permit #2985-04 and Addendum 4, any impacts from the deposition of particles would be minor.

E. Aesthetics

The asphalt operations would be visible and would create additional noise in the area. Permit #2985-04 would include conditions to control emissions (including visible emissions) from the plant. Since the asphalt operations are small and temporary, any aesthetic impact would be minor.

F. Air Quality

The air emissions from the asphalt plant would cause minor air quality impacts because of the of the air emissions from the facility. However, air emissions from the asphalt plant would be minimized by the relatively small size and temporary nature of the operation, dispersion characteristics, and conditions placed in Permit #2985-04 and Addendum 4. Permit #2985-04 would include conditions limiting the opacity from the plant, as well as requiring a Venturi wet scrubber and other means to control air pollution. In addition, Addendum 4 to Permit #2985-04 would include more stringent limitations for any operations taking place in or within 10 km of certain PM₁₀ non-attainment areas in Montana. Furthermore, the Department conducted Screen View air dispersion modeling, an Environmental Protection Agency (EPA) approved modeling program, to determine the maximum allowable plant production rate that would maintain compliance with the National Ambient Air Quality Standards (NAAQS) and the Montana Ambient Air Quality

Standards (MAAQS) for PM₁₀. The NAAQS and MAAQS are designed to be protective of human health and public welfare. The Department established production limits in Addendum 4 based on the modeling analysis.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The current permit action is in response to a request for modification to operate the permitted asphalt plant in or within 10 km of certain PM₁₀ non-attainment areas during both the summer season (April 1 through September 30) and the winter season (October 1 through March 31). Deposition of particles would occur in the areas the asphalt plant would operate; however, as explained in Section 7.F of this EA, the relatively small size and temporary nature of the operation, dispersion characteristics, and conditions placed in Permit #2985-04 and Addendum 4, any impacts to unique endangered, fragile, or limited environmental resources from the deposition of particles would be minor.

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

The asphalt operations would only demand small quantities of water, air, and energy for proper operation because asphalt operations are generally seasonal, which results in smaller demands on the environmental resources.

I. Historical and Archaeological Sites

Asphalt operations typically take place within a previously disturbed industrial location such as an open cut pit. According to previous correspondence with the Montana State Historic Preservation Office, there is low likelihood of disturbance to any known archaeological or historic site given any previous industrial disturbance in the area. Therefore, it is unlikely that the asphalt operation would have an effect on any known historic or archaeological site.

J. Cumulative and Secondary Impacts

The asphalt operations would cause minor physical and biological effects. There is potential for other operations to locate at these sites. 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 proposed site. The asphalt operations would be limited by Permit #2985-04 to total particulate emissions of 250 tons per year or less from non-fugitive asphalt operations and any other additional equipment used at any given site.

In addition, Addendum 4 to Permit #2985-04 would outline specific conditions and restrictions applicable to operation in or within 10 km of certain PM₁₀ non-attainment areas.

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.

Potential Economic and Social Effects							
		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 asphalt operation would cause no disruption to native or traditional lifestyles or communities (Social Structures and Mores) of any potential site or area of operation because asphalt plants are not new to Montana and are generally an accepted method for constructing, repairing, and maintaining Montana roads and highways.

B. Cultural Uniqueness and Diversity

The asphalt operation would have no impact on the cultural uniqueness and diversity of any proposed area of operation. Asphalt plants are not new to Montana and are generally an accepted method for constructing, repairing, and maintaining Montana roads and highways.

C. Local and State Tax Base and Tax Revenue

The proposed asphalt operations would have little, if any effects on local and state tax base and tax revenue. The facility is a relatively small and temporary source and, therefore, would not remain at any site for any extended period of time. No full time permanent employment would be expected as a result of issuing Permit #2985-04 and any revenue created by the asphalt plant operating in a particular area would be for a relatively short time period.

D. Agricultural or Industrial Production

Under normal circumstances, the asphalt operations would take place in a previously disturbed industrial area. Therefore, the Department does not expect that the permitted operation would affect or displace any agricultural land. Further, the asphalt operations are small by industrial standards and, therefore, would have only a minor impact on any local industrial production.

E. Human Health

Permit #2985-04 and Addendum 4 would incorporate conditions to ensure that the asphalt operations would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health. Deposition of particles would occur in the areas the asphalt plant would operate; however, as explained in Section 7.F of this EA, the relatively small size and temporary nature of the operation, dispersion characteristics, and conditions placed in Permit #2985-04 and Addendum 4, any impacts to unique endangered, fragile, or limited environmental resources from the deposition of particles would be minor.

F. Access to and Quality of Recreational and Wilderness Activities

The asphalt operations would not affect any access to recreational and wilderness activities. However, minor affects to the quality of recreational activities would possibly be created by the noise from the site. Any impacts from the asphalt plant would be temporary, due to the portable nature of the asphalt operations.

G. Quantity and Distribution of Employment

Given the relatively small size and temporary nature of the operation, the quantity and distribution of employment in the area would not be affected. No full time permanent employment would be expected as a result of issuing Permit #2985-04.

H. Distribution of Population

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

I. Demands of Government Services

Minor increases would be seen in traffic on existing roads in the area while the asphalt operations are in progress. In addition, government services would be required for acquiring the appropriate permits from government agencies. Demands for government services would be minor.

J. Industrial and Commercial Activity

The asphalt operations would represent only a minor increase in the industrial activity in any given area. No additional industrial or commercial activity would result from the asphalt operations.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans or goals that would be affected by the asphalt plant. The MAAQS would protect the proposed site and the environment surrounding the site.

L. Cumulative and Secondary Impacts

Overall, the social and economic cumulative and secondary impacts from the asphalt plant would be minor because asphalt plants are not new to Montana and are generally an accepted method for constructing, repairing, and maintaining Montana roads and highways. New businesses would not be drawn to the area and permanent jobs would not be created or lost due to the proposed project. Because no new employees would be hired for the proposed project, there would be no economic impacts from new employees.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: Because this plant is a portable source, is relatively small, and would be required to comply with Permit #2985-04. None of the impacts from the asphalt plant would be significant. Permit #2985-04 and Addendum 4 include conditions and limitations, which, if properly applied, will safeguard any potential environmental threat created by the proposed asphalt operation.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Natural Heritage Program, State Historic Preservation Office (Montana Historical Society), and Industrial and Energy Minerals Bureau.

Individuals or groups contributing to this EA: Department of Environmental Quality Permitting and Compliance Division (Air and Waste Management Bureau and Industrial and Energy Minerals Bureau), Montana Natural Heritage Program, State Historic Preservation Office.

EA prepared by: Dave Aguirre

Date: December 19, 2001