Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

November 13, 2008

Maribel Crespin
MillerCoors LLC
Barley Processing Facility
P.O. Box 4030 – BC505
Golden, CO 80401

Dear Ms. Crespin:

Air Quality Permit #3106-01 is deemed final as of November 13, 2008, by the Department of Environmental Quality (Department). This permit is for a barley processing facility. 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) 444-3490

Brent Lignell
Environmental Engineer
Air Resources Management Bureau
(406) 444-5311

VW:BL
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #3106-01

MillerCoors LLC
Barley Processing Facility
P.O. Box 4030 – BC505
Golden, CO 80401

November 13, 2008

AIR QUALITY PERMIT

Issued to: MillerCoors LLC
Barley Processing Facility
P.O. Box 4030 – BC505
Golden, CO 80401

Permit: #3106-01
Administrative Amendment (AA) Request
Received: September 19, 2008
Department Decision on AA: October 27, 2008
Final Permit Issued: November 13, 2008
AFS #: 111-0019

An air quality permit, with conditions, is hereby granted to MillerCoors LLC (MillerCoors), pursuant to Sections 75-2-204 and 211 of the 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. Plant Location:

MillerCoors operates a barley processing facility located on Road 4 South, approximately 12 miles northeast of Huntley, Montana. The legal location of the facility is Section 19, Township 2 North, Range 38 East, Yellowstone County, Montana. The mailing address is P.O. Box 188, Huntley, Montana 59037.

The facility includes a grain elevator that serves as a storage elevator for barley purchased by MillerCoors for use in beer production. The facility has a storage capacity of 3.674 million bushels. A list of permitted equipment is included in the permit analysis.

B. Current Permit Action:

On July 7, 2008, the Montana Department of Environmental Quality (Department) received a letter regarding a change of ownership and control of Coors Brewing Company to a new entity named MillerCoors. On August 11, 2008, the Department received a letter from MillerCoors regarding a de minimis change notification concerning the addition of new grain receiving pit and associated conveyors. On September 19, 2008, the Department received a letter from MillerCoors regarding a de minimis change notification concerning the addition of two new storage bins to increase facility storage capacity. The current permit action is an administrative amendment pursuant to ARM 17.8.764 that changes the permittee name as requested, accounts for the new equipment, and also updates the rule references, permit format, and the emissions inventory.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. MillerCoors 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).

2. MillerCoors shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.1 (ARM 17.8.749).

3. Emissions of airborne particulate matter from any process emission source shall not exceed an opacity of 0% (ARM 17.8.749, ARM 17.8.340, and 40 CFR 60.302).

4. MillerCoors shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any individual truck unloading station, railcar unloading station, or any railcar loading station, which exhibits greater than 5% opacity (ARM 17.8.749, ARM 17.8.340, and 40 CFR 60.302).

5. MillerCoors shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any grain handling operation which exhibit an opacity greater than 0% (ARM 17.8.749, ARM 17.8.340, and 40 CFR 60.302).

6. MillerCoors shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any truck loading station that exhibit an opacity of 10% or greater (ARM 17.8.749, ARM 17.8.340, and 40 CFR 60.302).

7. MillerCoors shall operate and maintain the baghouse which controls the grain receiving, cleaning, conveyance, and transfer operations (ARM 17.8.749).

8. MillerCoors shall operate and maintain the baghouse which controls the grain conveying operations (ARM 17.8.749).

9. MillerCoors shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60, Subpart DD as it applies to the barley processing facility (ARM 17.8.340 and 40 CFR 60, Subpart DD).

10. MillerCoors shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any non-NSPS sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

2. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. MillerCoors 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 of emissions identified in the emission inventory contained in 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. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. MillerCoors shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include the addition of a new emissions unit, 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. The notice must be submitted to the Department, in writing, 10 days prior to startup 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(l)(d) (ARM 17.8.745).

3. All records compiled in accordance with this permit must be maintained by MillerCoors as a permanent business record for at least five years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

SECTION III: General Conditions

A. Inspection – MillerCoors shall allow the Department's representatives access to the source at all times for the purpose of making inspections and 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 MillerCoors fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving MillerCoors 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.* (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 the Department at the location of the 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 MillerCoors 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).

Permit Analysis
MillerCoors LLC – Barley Processing Facility
Permit #3106-01

I. Introduction/Process Description

MillerCoors LLC (MillerCoors) owns and operates a barley processing facility located on Road 4 South, approximately 12 miles northeast of Huntley, Montana. The legal location of the facility is Section 19, Township 2 North, Range 38 East, Yellowstone County, Montana. The mailing address is P.O. Box 188, Huntley, Montana 59037.

A. Permitted Equipment

Equipment used at this facility includes, but is not limited to, the following:

1. Grain Receiving Pits and Conveyors
2. Grain Cleaning
3. Headhouse – Internal Operations
4. Barley Loadout
5. Trash Barley Loadout

B. Source Description

The facility includes a grain elevator that serves as a storage elevator for barley purchased by MillerCoors Brewing Company for use in beer production. The facility has a storage capacity of 3.674 million bushels. The facility receives barley by truck or railcar. The process includes grain receiving, cleaning, storage, and loadout.

C. Permit History

On June 10, 2000, permit authority for the Coors Brewing Company (Coors) facility was transferred from Yellowstone County to the State of Montana. The facility did not change its operation or configuration, but the existing Yellowstone County permit was re-issued as a state permit. Permit #3106-00 replaced all Yellowstone County and any other air quality permits held by the Coors grain elevator located in Huntley, Montana.

D. Current Permit Action

On July 7, 2008, the Montana Department of Environmental Quality (Department) received a letter regarding a change of ownership and control of Coors to a new entity named MillerCoors. On August 11, 2008, the Department received a letter from MillerCoors regarding a de minimis change notification concerning the addition of new grain receiving pit and associated conveyors. On September 19, 2008, the Department received a letter from MillerCoors regarding a de minimis change notification concerning the addition of two new storage bins to increase facility storage capacity. The current permit action is an administrative amendment pursuant to Administrative Rules of Montana, (ARM) 17.8.764 that changes the permittee name as requested, accounts for the new equipment, and also updates the rule references, permit format, and the emissions inventory.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations which apply to the facility. The complete rules are stated in the ARM and are available upon request from the Department. Upon request, the Department will provide references for location 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 section 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 emissions 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).

   MillerCoors shall comply with the 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 which 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, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring;
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide;
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide;
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide;
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone;
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide;
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter;
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility;
9. ARM 17.8.222, Ambient Air Quality Standard for Lead;
10. ARM 17.8.223, Ambient Air Quality Standard for PM_{10}.; and
11. ARM 17.8.230, Fluoride in Forage.

MillerCoors 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 an 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. (1) This rule requires an opacity limitation of less than 20% for all fugitive emissions sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, MillerCoors 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 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This section incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). MillerCoors is considered an NSPS affected facility under 40 CFR Part 60 and is subject to the requirements of the following subparts.

   a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:

   b. 40 CRF 60, Subpart DD – Standards of Performance for Grain Elevators. This subpart indicates that grain terminal elevators that have a storage capacity of more than 2.5 million U.S. bushels are subject to the requirements of this subpart. The MillerCoors LLC's Huntley Barley Processing Facility has a permanent storage capacity of 2.7 million bushels. Therefore, NSPS Subpart DD applies to this facility.

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. There is no application fee associated with this action because it is an administrative amendment.

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 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 that prorate 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 air contaminant sources that have the potential to emit (PTE) greater than 25 tons per year of any pollutant. MillerCoors has a PTE greater than 25 tons per year of particulate matter (PM); therefore, an air quality 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. MillerCoors is not required to submit an application because the current action is an administrative amendment. (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. MillerCoors is not required to submit a public notice because the current action is an administrative amendment.

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 Best Available Control Technology (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 Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving MillerCoors 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 17.8.760 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.

12. 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.

13. 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).

14. 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.

15. ARM 17.8.765 Transfer of Permit. This rule states 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 FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because this facility is not a listed source and the facility's PTE is below 250 tons per year of any 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 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 particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (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 #3106-01 for MillerCoors, the following conclusions were made:

a. The facility's PTE is less than 100 tons/year for any pollutant.

b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for all HAPs.

c. This source is not located in a serious PM_{10} nonattainment area.

d. This facility is subject to a current NSPS standard (40 CFR 60, Subpart DD – Standards of Performance for Grain Elevators).

e. This facility is not subject to any current NESHAP standards.

f. This source is not a Title IV affected source, or a solid waste combustion unit.

g. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that MillerCoors will be 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, MillerCoors will be required to obtain a Title V Operating Permit.

III. BACT Determination

A BACT determination is required for any new or altered source. MillerCoors shall 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 used. This permitting action does not constitute a new or modified source because it is an administrative amendment; therefore, BACT is not required.

IV. Emission Inventory

CONTROLLED	**tons/year**					
Emission Source	**PM**	**PM_{10}**	**NO_x**	**CO**	**VOC**	**SO_2**
Grain Receiving	0.10	0.08	--	--	--	--
Grain Cleaning	0.55	0.35	--	--	--	--
Headhouse - Internal Operations	0.03	0.05	--	--	--	--
Storage Bins	6.81	1.72				
Loading	0.015	0.003	--	--	--	--
Trash Loading	2.34	0.79	--	--	--	--
Total Emissions	**9.85**	**2.99**	**0.00**	**0.00**	**0.00**	**0.00**

Grain Receiving – SCC 3-02-005-51
Maximum Process Rate = 545,000 ton/yr

PM Emissions:
Emission Factor = 0.18 lb/ton (AP-42 Table 9.9.1-1, straight truck, uncontrolled, 3/03)
PM Control Efficiency = 99.8% (Baghouse)
Calculation: (545,000 ton/yr) * (0.18 lb/ton) * (ton/2000 lb) * (1 - 99.8/100) = 0.10 ton/yr

PM_{10} Emissions:
Emission Factor = 0.059 lb/ton (AP-42 Table 9.9.1-1, straight truck, uncontrolled, 3/03)
PM Control Efficiency = 99.5% (Baghouse)
Calculation: (545,000 ton/yr) * (0.059 lb/ton) * (ton/2000 lb) * (1 - 99.5/100) = 0.08 ton/yr

Grain Cleaning – SCC 3-02-005-37
Maximum Process Rate = 545,000 ton/yr
Number of Cleaning Cycles = 2 cycles (one received, one loadout)

PM Emissions:
Emission Factor: Per AP-42, Table 9.9.1-1, 3/03, the emission factor using cyclone control is 0.075 lbs/ton. The project does not use cyclone control, so this cyclone effect was mathematically removed from the emission factor by assuming the cyclone contributed to 85% of the emissions control. This can be expressed by saying that 0.075 lbs/ton is 15% (i.e., the remaining percentage after 85% removal) of the total PM emissions, or 0.075 lbs/ton = 0.15 X, where X is total PM emissions. Solving, X = 0.5 lbs/ton.
PM Control Efficiency = 99.8% (Baghouse)
Calculation: (2) * (545,000 ton/yr) * (0.5 lb/ton) * (ton/2000 lb) * (1 - 99.8/100) = 0.55 ton/yr

PM_{10} Emissions:
Emission Factor: Per AP-42, Table 9.9.1-1, 3/03, the emission factor using cyclone control is 0.019 lbs/ton. The project does not use cyclone control, so this cyclone effect was mathematically removed from the emission factor by assuming the cyclone contributed to 85% of the emissions control. This can be expressed by saying that 0.019 lbs/ton is 15% (i.e., the remaining percentage after 85% removal) of the total PM emissions, or 0.019 lbs/ton = 0.15 X, where X is total PM emissions. Solving, X = 0.127 lbs/ton.
PM Control Efficiency = 99.5% (Baghouse)
Calculation: (2) * (545,000 ton/yr) * (0.127 lb/ton) * (ton/2000 lb) * (1 - 99.5/100) = 0.35 ton/yr

Headhouse – Internal Operations SCC 3-02-005-30
Maximum Process Rate = 545,000 ton/yr

PM Emissions:
Emission Factor = 0.061 lb/ton (AP-42 Table 9.9.1-1, uncontrolled, 3/03)
PM Control Efficiency = 99.8% (Baghouse)
Calculation: (545,000 ton/yr) * (0.061 lb/ton) * (ton/2000 lb) * (1 - 99.8/100) = 0.03 ton/yr

PM_{10} Emissions:
Emission Factor = 0.034 lb/ton (AP-42 Table 9.9.1-1, uncontrolled, 3/03)
PM Control Efficiency = 99.5% (Baghouse)
Calculation: (545,000 ton/yr) * (0.034 lb/ton) * (ton/2000 lb) * (1 - 99.5/100) = 0.05 ton/yr

Storage Bins – SCC 3-02-005-40
Maximum Process Rate = 545,000 ton/yr

PM Emissions:
Emission Factor = 0.025 lb/ton (AP-42 Table 9.9.1-1, uncontrolled, 3/03)
PM Control Efficiency = 0%
Calculation: (545,000 ton/yr) * (0.025 lb/ton) * (ton/2000 lb) * (1 - 0/100) = 6.81 ton/yr

PM_{10} Emissions:
Emission Factor = 0.0063 lb/ton (AP-42 Table 9.9.1-1, straight truck, uncontrolled, 3/03)
PM Control Efficiency = 0%
Calculation: (545,000 ton/yr) * (0.0063 lb/ton) * (ton/2000 lb) * (1 - 0/100) = 1.72 ton/yr

Loading – SCC 3-02-005-63
Maximum Process Rate = 545,000 ton/yr

PM Emissions:
Emission Factor = 0.027 lb/ton (AP-42 Table 9.9.1-1, railcar, uncontrolled, 3/03)
PM Control Efficiency = 99.8% (Baghouse)
Calculation: (545,000 ton/yr) * (0.027 lb/ton) * (ton/2000 lb) * (1 - 99.8/100) = 0.015 ton/yr

PM_{10} Emissions:
Emission Factor = 0.0022 lb/ton (AP-42 Table 9.9.1-1, railcar, uncontrolled, 3/03)
PM Control Efficiency = 99.5% (Baghouse)
Calculation: (545,000 ton/yr) * (0.0022 lb/ton) * (ton/2000 lb) * (1 - 99.5/100) = 0.003 ton/yr

Trash Loading – SCC 3-02-005-60
Maximum Process Rate = 54,500 ton/yr (Assume trash is 10% of throughput)

PM Emissions:
Emission Factor = 0.086 lb/ton (AP-42 Table 9.9.1-1, truck, uncontrolled, 3/03)
PM Control Efficiency = 0%
Calculation: (54,500 ton/yr) * (0.086 lb/ton) * (ton/2000 lb) * (1 - 0/100) = 2.34 ton/yr

PM_{10} Emissions:
Emission Factor = 0.029 lb/ton (AP-42 Table 9.9.1-1, truck, uncontrolled, 3/03)
PM Control Efficiency = 0%
Calculation: (54,500 ton/yr) * (0.029 lb/ton) * (ton/2000 lb) * (1 - 0/100) = 0.79 ton/yr

V. Existing Air Quality

The area surrounding the MillerCoors facility is mainly industrial and considered unclassified/attainment with respect to National Ambient Air Quality Standards (NAAQS). In the view of the Department, the amount of controlled emissions from this facility will not cause an exceedance of any ambient air quality standard.

VI. Ambient Air Impact Analysis

The area surrounding the MillerCoors facility is mainly industrial. In the view of the Department, the amount of controlled emissions from this facility will not cause an exceedance of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

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)].
X		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
X		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)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

VIII. Environmental Assessment

The current action is an administrative amendment and therefore does not require an environmental assessment.

Analysis prepared by: Brent Lignell
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