

AIR QUALITY PERMIT

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

Permit #3197-01
Administrative Amendment Request Received: 2/14/03
Administrative Amendment Issued: 03/12/03
Permit Final: 03/28/03
AFS #: 777-3197

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

Section I: Permitted Facilities

- A. Permitted Equipment: LHC operates a portable concrete batch plant. A complete list of the permitted equipment can be found in Section I.A of the permit analysis.
- B. Current Permit Action: On February 14, 2003, LHC submitted a request for an administrative amendment to update the addendum to include wintertime operations in or within 10 km of certain PM₁₀ (particulate matter with an aerodynamic diameter of 10 microns or less) nonattainment areas.

Section II: Limitations and Conditions

- A. Emission Control Requirements and Limitations
 1. LHC shall install, operate, and maintain the fabric filter vents and a rubber boot load-out spout as specified in their Montana Air Quality Permit and all supporting documentation (ARM 17.8.749):
 - a. LHC shall install, operate and maintain the fabric filter on the cement silo and cement supplement silo; and
 - b. LHC shall maintain the rubber boot load-out spout at their concrete plant for product loadout.
 2. LHC shall not cause or authorize to be discharged into the atmosphere from the ready mix plant:
 - a. Any vent emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.752).
 - b. Any fugitive emissions from the source, or from any material transfer operations, including, but not limited to, truck loading or unloading, which exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).
 3. 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).

4. LHC shall treat all unpaved portions of the haul roads, access roads, parking lots, 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.3 (ARM 17.8.752).
5. Total plant production shall be limited to 200,000 cubic yards of concrete during any rolling 12-month time period (ARM 17.8.749).
6. If the permitted equipment is used in conjunction with any other equipment owned or operated by LHC, at the same site, production shall be limited to correspond with an emissions level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department of Environmental Quality (Department) (ARM 17.8.749).

B. Emissions Monitoring

1. LHC shall inspect the baghouse vents on the silo every 6 months of operation to ensure that each collector is operating at the optimum efficiency recommended by the manufacturer. Records of inspections, repairs, and maintenance shall be kept for a minimum of 5 years (ARM 17.8.749).
2. LHC shall maintain on-site records of inspections, repairs, and maintenance. All 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 site for inspection by the Department (ARM 17.8.749).

C. Testing Requirements

1. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The Department may require testing (ARM 17.8.105).

D. Operational Reporting Requirements

1. If this concrete batch 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 to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).
2. LHC shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. All records compiled in accordance with this permit shall be maintained by 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 site for inspection by the Department (ARM 17.8.749).

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 units as required by the Department (ARM 17.8.505).

4. LHC shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, 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 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).

5. LHC shall document, by month, the total concrete plant production. By the 25th day of each month, LHC shall total the plant production during the previous 12 months to verify compliance with the limitation in Section II.A.5. A written report of the compliance verification shall be submitted annually to the Department along with the annual emission inventory (ARM 17.8.749).

Section III: Addendum

LHC shall comply with all conditions in Addendum 2 to this permit, as appropriate (ARM 17.8.749).

Section IV: General Conditions

- A. Inspection - LHC 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 LHC fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this 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 17.8.740, *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 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 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. 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 LHC 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 conditions contained in this permit while operating at any location in Montana, except within those areas having a Department approved permitting program.

Permit Analysis
LHC, Inc.
Permit #3197-01

I. Introduction

A. Permitted Equipment

LHC, Inc (LHC) operates a portable ready mix concrete batch plant, which includes a 2002 Ready Mix Concrete Batch Plant (Maximum Capacity of 291.5 cubic yards/hour) and associated equipment. Particulate emissions from the cement silo and the cement supplement silo are controlled by a 2002 Vince Hagan Co. Pulse Jet fabric filter vent. Particulate emissions from the cement batcher are controlled by a rubber boot load-out spout.

B. Process Description

Washed aggregate materials are loaded by a front-end loader into a bin that feeds a covered radial stacker. The radial stacker feeds a 3-compartment aggregate storage bin, which supplies aggregate to an aggregate batcher, and drops the materials onto a conveyor. Aggregates are conveyed to a rubber boot load-out spout and loaded into a mixer truck. Cement and cement supplement are also loaded into the cement truck through the rubber boot load-out spout. The cement and cement supplement are both pneumatically loaded into silos (using fabric filters to control particulate emissions). The cement supplement is screw fed to the cement batcher and the cement is gravity fed into the cement batcher and into the mixer truck. Water is also loaded into the truck mixer. Materials are then mixed and are ready to be transported as cement to the construction site.

C. Permit History

On July 25, 2002, LHC was issued Permit #3197-00 to operate a portable ready mix concrete batch plant to initially be located at the NE $\frac{1}{4}$ of Section 26 and the NW $\frac{1}{4}$ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana. The facility would also be allowed to operate at various other locations throughout Montana, including summer operations (April 1-September 30) in or within 10 kilometers (km) of certain PM₁₀ nonattainment areas.

D. Current Permit Action

On February 14, 2003, LHC submitted a request for an administrative amendment to update the addendum to include wintertime operations in or within 10 km of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas. Permit **#3197-01** will replace Permit #3197-00 and **Addendum 2** will replace Addendum 1.

E. Additional Information

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

II. Applicable Rules and Regulations

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

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

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air 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 Montana Clean Air Act, 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 that, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

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

1. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
2. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

LHC must comply with the applicable ambient air quality standards.

- C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that 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 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, 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 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
 4. ARM 17.8.340 Standards of Performance for New Stationary Sources. The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, shall comply with the standards and provisions of 40 CFR Part 60. This plant consists of a 2002 Ready Mix Plant and associated equipment; therefore, NSPS (40 CFR Part 60, General Provisions and Subpart F, Portland Cement Plants) does not apply because the ready mix plant does not meet the definition of an affected 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. 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 because this permit action reflects an administrative permit action to update the addendum to include wintertime operations within certain PM₁₀ nonattainment areas.
 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, as described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 - Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a facility to obtain an air quality permit or permit alteration if they construct, alter or use any air contaminant sources that have the potential to emit greater than 15 tons per year of any pollutant. LHC has the potential to emit more than 15 tons per year of particulate matter and PM₁₀; 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 are not subject to the Montana Air Quality Permit Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. This rule requires that a permit application be submitted prior to installation, alteration or use of a source. LHC submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. LHC was not required to submit a permit application for the current permit action because no new or altered sources are being permitted at this time.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section IV of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving LHC of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of LHC, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

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

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modification-- 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 it is not listed and does not have the potential to emit more than 250 tons per year (excluding fugitive emissions) of any air pollutant.

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is

defined as any stationary source having:

- a. Potential to Emit (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 a lesser quantity as the Department may establish by rule, or
 - c. PTE > 70 tons/year of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (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 #3197-01 for LHC, the following conclusions were made:
- a. The facility's PTE is less than 100 tons/year for any air pollutant.
 - b. The facility's PTE is less than 10 tons/year of any one HAP and less than 25 tons/year of all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NSPS.
 - e. This facility is not subject to any current NESHAP standards.
 - f. This source is not a Title IV affected source nor a solid waste combustion unit.
 - g. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that LHC will be a minor source of emissions as defined under Title V.

III. Emission Inventory

Source	Tons/Year					
	PM	PM ₁₀	NOx	VOC	CO	SOx
Dumping of Sand/ Aggregate on Stock Piles	0.82	0.33				
Aggregate Transfer to Hopper	0.32	0.15				
Aggregate Transfer to Stacker	0.32	0.15				
Aggregate Transfer to 3-Bin Hopper	0.32	0.15				
Aggregate Transfer to Aggregate Batcher	0.32	0.15				
Aggregate Transfer to Conveyor	0.32	0.15				
Sand Transfer to Hopper	0.07	0.04				
Sand Transfer to Stacker	0.07	0.04				
Sand Transfer to 3-Bin Hopper	0.07	0.04				
Sand Transfer to Aggregate Batcher	0.07	0.04				
Sand Transfer to Conveyor	0.07	0.04				
Cement Unloading to Storage Silo	0.01	0.01				
Cement Supplement Unloading to Storage Silo	0.01	0.00				
Truck Mixer Loading of Mix	0.85	0.21				
Haul Roads	2.74	1.23				
Total	6.38	2.72	0.00	0.00	0.00	0.00

- A complete emission inventory for Permit #3197-01 is on file with the Department. The emissions inventory is based upon LHC's requested production limit of 200,000 cubic yards per year of concrete.

IV. BACT Determination

A BACT determination is required for any new or altered source. LHC shall install on the new or altered source the maximum air pollution control capability that is technologically practicable and economically feasible, except that BACT shall be used. A BACT analysis was not required for this permit action because the change to the permit reflects an administrative amendment with no new sources or physical alterations to existing sources being permitted at this time.

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM₁₀. Due to exceedances of the national standards for PM₁₀, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls have been designated by EPA as nonattainment for PM₁₀. As a result of this designation, the EPA required the Department and the City-County Health Departments to submit PM₁₀ State Implementation Plans (SIPs). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors to PM₁₀ emissions.

Addendum 2 sets conditions and limitations that allow for this portable crushing/screening plant to be located in or within 10 km of certain PM₁₀ nonattainment areas during the summer months (April 1 through September 30) and within the Kalispell PM₁₀ nonattainment area at the NE¹/₄ of Section 26 and the NW¹/₄ of Section 25, Township 29 North, Range 22 West, in Flathead County, during the winter months (October 1 through March 31). These conditions and limitations ensure that this portable ready mix concrete batch plant will not significantly impact any PM₁₀ nonattainment areas. This permit will also cover the operations at various other locations throughout Montana. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

VI. Ambient Air Quality Impacts

Permit #3197-01 will cover the operations of a portable ready mix concrete batch plant to be located at various locations throughout Montana. Addendum 1 to Permit #3197-01 sets conditions and limitations that allow for this portable ready mix concrete batch plant to operate within the Kalispell PM₁₀ nonattainment area at the NE¹/₄ of Section 26 and the NW¹/₄ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana, during the winter months (October 1 through March 31) and at certain PM₁₀ nonattainment areas during the summer months (April 1 through September 30). Based on the information provided, the amount of controlled emissions generated by this facility will not exceed any set ambient air quality standard.

Addendum 2
LHC, Inc.
Permit #3197-01

An addendum to air quality Permit #3197-01, with conditions, is hereby granted to LHC, Inc. (LHC) pursuant to Section 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.765, *et seq.*, as amended, for the following:

I. Permitted Equipment

The facility includes a 2002 Ready Mix Concrete Batch Plant (Maximum Capacity of 291.5 cubic yards/hour) and associated equipment. Particulate emissions from the cement silo and the cement supplement silo are controlled by a 2002 Vince Hagan Co. Pulse Jet fabric filter vent. Particulate emissions from the cement batcher are controlled by a rubber boot load-out spout.

II. Seasonal and Site Restrictions

Addendum 2 applies to the LHC facility while operating at any location in or within 10 kilometers of certain PM₁₀ nonattainment areas. Seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1 - March 31) - LHC would be allowed to operate at the NE¹/₄ of Section 26 and the NW¹/₄ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana.
- B. During the summer season (April 1-September 30) – LHC may operate at any location in or within 10 km of certain PM₁₀ NAAs, including, but not limited to: Libby, Thompson Falls, Kalispell, Whitefish, Columbia Falls, and Butte.
- C. LHC shall comply with the limitations and conditions contained in Addendum 2 to Permit #3197-02 while operating at any location in or within 10 km of any of the previously listed PM₁₀ NAAs. Addendum 2 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum 2 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

A. Operational

- 1. LHC shall not cause or authorize to be discharged into the atmosphere from the facility any vent emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- 2. LHC shall not cause or authorize to be discharged into the atmosphere from the facility any fugitive emissions, including, but not limited to, truck loading or unloading and material transfer operations, which exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- 3. All visible emissions from the cement and cement supplement silos shall be limited to 10% opacity (ARM 17.8.749).

4. Emissions from the access roads, parking lots, and general plant area shall be limited to 10% opacity (ARM 17.8.749).
5. 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 reasonable precaution limitation (ARM 17.8.749).
6. Total concrete plant production shall be limited to 528 cubic yards during any rolling 24-hour time period (ARM 17.8.749).

B. Operational Reporting Requirements

1. LHC shall provide the Department with written notification of job completion within 10 working days of job completion (ARM 17.8.749).
2. LHC shall provide written notice of relocation of the permitted equipment at least 15 days prior to the physical transfer of equipment (ARM 17.8.765).
3. Production information for the site(s) covered by this addendum shall be submitted to the Department within 30 days of completion of the project or expiration of Addendum 2. The information shall include (ARM 17.8.749):
 - a. Cubic yards of concrete produced at each site
 - b. Hours of operation at each site
 - c. 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. Vehicle weight, loaded
 - iv. Vehicle weight, unloaded
 - v. Number of tires on vehicle
 - vi. Average trip length
 - vii. Number of trips per day per vehicle
 - viii. Average vehicle speed
 - ix. Area of activity
 - x. Vehicle fuel usage (gasoline or diesel) annual total
 - d. Fugitive dust control for haul roads and general plant area:
 - i. Hours of operation of water trucks
 - ii. Application schedule for chemical dust suppressant, if applicable
4. LHC shall document, by day, the total plant production. By the 25th day of each month, LHC shall total the production for each day during the previous month to verify compliance with the limitation in Section II.A.6. A written report of the compliance verification shall be submitted annually to the Department and may be submitted along with the annual emission inventory (ARM 17.8.749).

Addendum 2 Analysis
LHC, Inc.
Permit #3197-01

I. Permitted Equipment

LHC, Inc. (LHC) operates a 2002 Ready Mix Concrete Batch Plant (Maximum Capacity of 291.5 cubic yards/hour) and associated equipment. Particulate emissions from the cement silo and the cement supplement silo are controlled by a 2002 Vince Hagan Co. Pulse Jet fabric filter vent. Particulate emissions from the cement batcher are controlled by a rubber boot load-out spout.

II. Process Description

Washed aggregate materials are loaded by a front-end loader into a bin that feeds a covered radial stacker. The radial stacker feeds a 3-compartment aggregate storage bin, which supplies aggregate to an aggregate batcher and drops the materials onto a conveyor. Aggregates are conveyed to a rubber boot load-out spout and loaded into a mixer truck. Cement and cement supplement are also loaded into the cement truck, through the rubber boot load-out spout. The cement and cement supplement are both pneumatically loaded into silos (using fabric filters to control particulate emissions). The cement supplement is screw fed to the cement batcher and the cement is gravity fed into the cement batcher and in to the mixer truck. Water will also be loaded into the truck mixer. Then, materials are mixed and are ready to be transported as cement to the construction site.

III. 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 of Environmental Quality (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 17.8.749 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.
- B. 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. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one person 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.
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 the location 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 controls of this addendum will keep LHC from having a significant impact on any PM₁₀ Nonattainment Areas (NAAs) covered by this permit.

IV. Emission Inventory

Source	Lb/Day					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
Dumping of Sand/ Aggregate on Stock Piles	2.64	1.06				
Aggregate Transfer to Hopper	1.03	0.49				
Aggregate Transfer to Stacker	1.03	0.49				
Aggregate Transfer to 3-Bin Hopper	1.03	0.49				
Aggregate Transfer to Aggregate Batcher	1.03	0.49				
Aggregate Transfer to Conveyor	1.03	0.49				
Sand Transfer to Hopper	0.24	0.11				
Sand Transfer to Stacker	0.24	0.11				
Sand Transfer to 3-Bin Hopper	0.24	0.11				
Sand Transfer to Aggregate Batcher	0.24	0.11				
Sand Transfer to Conveyor	0.24	0.11				
Cement Unloading to Storage Silo	0.06	0.04				
Cement Supplement Unloading to Storage Silo	0.00	0.01				
Truck Mixer Loading of Mix	5.51	1.36				
Haul Roads	15.00	6.75				
Total	29.56	12.22	0.00	0.00	0.00	0.00

- A complete emission inventory for Addendum 2 to Permit #3197-01 is on file with the Department. The emissions inventory is based upon LHC's request for wintertime operations and the use of Screen View modeling to quantify the production limit for such operations.

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM₁₀. Due to exceedances of the national standards for PM₁₀, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM₁₀. As a result of this designation, the EPA required the Department and the City-County Health Departments to submit PM₁₀ State Implementation Plans (SIPs). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors to PM₁₀ emissions.

Addendum 2 to Permit #3197-01 sets conditions and limitations that allow for this portable concrete batch plant to be located in or within 10 km of certain PM₁₀ NAAs during the summer months (April 1-September 30) and wintertime operations at the NE¼ of Section 26 and the NW¼ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana.

VI. 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.

VII. Environmental Assessment

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

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
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: 3197-01

Administrative Amendment Issued: March 10, 2003

Permit Final: March 28, 2003

1. *Legal Description of Site:* This permit is for the operation of a portable concrete batch plant to be initially located at the NE $\frac{1}{4}$ of Section 26 and the NW $\frac{1}{4}$ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana. The facility will be allowed to operate at this location, which is located in or within 10 km of the Kalispell PM₁₀ nonattainment, during the winter months (October 1 through March 31) and at any location in or within 10 kilometers (km) of the following NAAs: Libby, Kalispell, Whitefish, Columbia Falls, Thompson Falls, and Butte during the summer months (April 1 through September 30).
2. *Description of Project:* LHC requested to update the Addendum to allow for operation of a portable concrete batch plant in or within 10 km of the Kalispell PM₁₀ nonattainment area during the winter months in addition to the following PM₁₀ nonattainment areas (NAAs): Libby, Kalispell, Whitefish, Columbia Falls, Thompson Falls, and Butte during the summer month months (April 1 through September 30). The facility will initially locate at the NE $\frac{1}{4}$ of Section 26 and the NW $\frac{1}{4}$ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana. The issuance of Permit #3197-01 and Addendum 1 would allow LHC to operate the portable concrete batch plant at various locations throughout Montana, including the proposed initial site location and sites in or within 10 km of certain PM₁₀ nonattainment areas.
3. *Objectives of the Project:* This concrete batch plant would be used to supply wet mix concrete to various construction projects. The proposal would increase business and revenue for the company by allowing operations to be conducted during the winter months.
4. *Additional Project Site Information:* In many cases, the concrete batch plant operation may move to a general site location, or open cut pit, which has been previously permitted through Industrial and Energy Minerals Bureau (IEMB). If this were the case, a more extensive EA would have been conducted and would be found in the Mined Land Reclamation Permit for that specific site.
5. *Alternatives Considered:* In addition to the proposed action, the Department also considered the "no-action" alternative. The "no-action" alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because LHC demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

6. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a BACT analysis, would be contained in Permit #3197-01. More stringent operational limitations, applicable to operation in or within 10 km of certain PM₁₀ NAAs, would be contained in Addendum 2.
7. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.
8. *The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The “no action alternative” was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			X			yes
B.	Water Quality, Quantity, and Distribution			X			yes
C.	Geology and Soil Quality, Stability, and Moisture			X			yes
D.	Vegetation Cover, Quantity, and Quality			X			yes
E.	Aesthetics			X			yes
F.	Air Quality			X			yes
G.	Unique Endangered, Fragile, or Limited Environmental 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 same areas as the proposed operations. Aquatic life is also present in the area, but effects upon the surrounding environment and terrestrial and aquatic habitat would be minor. The operations are small and would be limited to a daily production limit, under Addendum 2, while operating at the proposed site location during the winter months. Deposition of pollutants would occur in the area where the concrete batch plant operates. However, as explained in Section 8.F of this EA, due to the relatively small size and temporary nature of the operation, dispersion characteristics of pollutants, and conditions placed in Permit #3197-01 and Addendum 2, any impacts from the deposition of pollutants would be minor.

B. Water Quality, Quantity, and Distribution

Although there would be an increase in air emissions in the area of the concrete batch operations, there would be little, if any impacts on water quality, quantity, and distribution because of the relatively small size and temporary nature of the operation and limitations established in Addendum 2 to Permit #3197-01. Additionally, the Department determined that any impacts from deposition of pollutants would be minor, as described in Section 8.F of this EA. Further, while water would be required for dust suppression, it would only cause a minor disturbance to the area. Thus, no surface water or ground water quality problems would result from using water for pollution control because only small amounts of water would be needed to maintain compliance with the applicable opacity

requirements and dust suppression requirements at the proposed wintertime operational site location.

C. Geology and Soil Quality, Stability and Moisture

There would be minor impacts to the geology and soil quality, stability, and moisture near the plant's operational area due to facility construction, increased vehicle traffic, the use of water to control dust, and deposition of pollutants from concrete batch operations. As explained in Section 8.F of this EA, the relatively small size and temporary nature of the operation and conditions placed in Permit #3197-01 and Addendum 2 would minimize the impacts from pollutant deposition.

D. Vegetation Cover, Quantity, and Quality

There would be minor impacts on the vegetative cover, quantity, and quality because small amounts of vegetation would likely be disturbed for the surrounding area from the concrete batch operation. In addition, particle deposition would occur on the surrounding vegetation. However, in Section 8.F of this EA, the Department determined that, due to the relatively small size and temporary nature of the operation and conditions placed in Permit #3197-01 and Addendum 2, any impacts from the deposition of pollutants would be minor. Also, because the water usage would be minimal (as described in Section 8.B of this EA) and the associated soil disturbance would be minor (as described in Section 8.C of this EA) corresponding vegetative impacts would also be minor.

E. Aesthetics

The concrete batch operations would be visible and would create additional noise in the area of operation. Permit #3197-01 and Addendum 2 would include conditions to control emissions, including visible emissions, from the plant. Additionally, operations in this area would be further restricted and would include a daily operational limit that would be established through the use of Screen View modeling analysis. Pollution control devices, including a rubber boot load-out spout and fabric filters, would be used to control visible emissions from the plant. Since the concrete batch operations are small and temporary in nature, any aesthetic impact to this area would be minor.

F. Air Quality

The air quality emission impacts from the concrete batch operations would be minor because Permit #3197-01 would include conditions limiting the opacity from the plant, as well as requiring fabric filters for the cement and cement supplement silos, a rubber boot load-out spout on the cement batcher, and other means to control air pollution. Furthermore, the operations would be limited by Permit #3197-01 to total emissions of 250 tons/year or less from non-fugitive sources at the plant, in addition to any other equipment at the site. The facility's potential emissions would be below 100 tons/year for any pollutant generated.

In addition, Addendum 2 to Permit #3197-01 would include more stringent limitations for any operations taking place in or within 10 km of certain PM₁₀ NAAs in Montana, including wintertime operations for the proposed site location. Plant emissions and emissions from the operational site would be limited to 10 % opacity while operating in or within 10 km of the previously identified PM₁₀ NAAs. Also, the Department established a production limit for Addendum 2, through the application of Screen View modeling analysis (applicable to the State Implementation Plan (SIP)). Furthermore, the production and opacity limits within Addendum 2 would be protective of air quality. Therefore, the National Ambient Air Quality Standards (NAAQS) and Montana Ambient Air Quality Standards (MAAQS) PM₁₀ would also be protected.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department previously contacted the Montana Natural Heritage Program (MNHP) in an effort to identify any species of special concern associated with the proposed site location. The site location identified by LHC in their permit application is the NE¼ of Section 26 and the NW¼ of Section 25, Township 29 North, Range 22 West, in Flathead County, Montana. Search results concluded there are three known unique, endangered, fragile, or limited environmental resources documented on file for the area. Area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer. The species of concern are the Bull Trout, Black Tern, and the Bald Eagle.

The Bull Trout would not be affected by the concrete batch operations, since the emissions would be minor and operations would take place more than 1/2 mile away from the Stillwater River, where the Bull Trout lives. A typical buffering zone, as identified by MNHP, is 100 meters. Therefore, the Bull Trout would not be affected by the proposed operations.

The Black Tern has been identified as occupying an area outside the 1-mile radius of the proposed project site. This facility is also a minor source of air emissions, is temporary in nature, with seasonal and intermittent operations. Therefore, the proposed facility would not likely affect the Black Tern.

The Bald Eagle has been identified farther than 2.5 miles from the proposed project site, a distance beyond which would be considered the species home range (1994 Bald Eagle Management Plan). This facility is also a minor source of air emissions, is temporary in nature, with seasonal and intermittent operations. Therefore, the operations of this proposed facility would not likely affect the Bald Eagle.

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

The concrete batch plant operations would require only small quantities of water, air, and energy for proper operation, due to the relatively small size of the facility. Small amounts of water would be used as part of the concrete mixture for dust control on the surrounding roadways and for dust suppression within the associated job site. Further, as described in Section 8.F. of this EA, pollutant emissions generated from the facility would have minimal impacts on air quality in the immediate and surrounding area. Energy demands to operate the facility would be minor because the operation would consist of relatively small equipment with operational restrictions and intermittent operations. Generally, the operations are seasonal, which results in smaller demands on the environmental resources. Any impacts would be minor.

I. Historical and Archaeological Sites

Portable concrete batch operations typically take place within a previously disturbed industrial location such as an open cut pit. Previous correspondence from the Montana State Historic Preservation Office indicates there is low likelihood of disturbance to any known archaeological or historic site given any previous industrial disturbance in the area. Therefore, the Department determined that it is unlikely that the concrete batch operation would have an effect on any known historic or archaeological site, but any such incidental disturbances would be minor.

J. Cumulative and Secondary Impacts

The concrete batch operations would cause minor effects on both the physical and biological aspects of the human environment because the facility would generate minor emissions of particulate matter and PM₁₀. Noise impacts would be minor due to the relatively small size of the operation. Such effects would be seasonal and intermittent, as the source is a portable and temporary in nature. Air pollution would be controlled by the limitations established in Permit #3197-01 and Addendum 2, which includes restrictions on the production from the facility. The production limitation would limit ambient air emissions and pollutant deposition on the surrounding environment and would result in only minor effects on the physical and biological aspects of the human environment.

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

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

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

A. Social Structures and Mores

The concrete batch operation would cause no disruption to the social structures and mores because the facility would operate in a previously permitted and utilized industrial area. The facility would now be allowed to operate during the winter months. However, the facility would be required to operate under limitations established in Addendum 2, in response to applying Screen View modeling analysis. Therefore, the facility would still operate on a seasonal, intermittent, and temporary basis and would not be increasing its annual production above its previously permitted limits. Therefore, no increases in emissions or changes in associated impacts (including impacts to social structures and mores) would result.

B. Cultural Uniqueness and Diversity

No changes in cultural uniqueness and diversity are expected as a result of allowing the facility to operate during the winter months at the proposed site location. The facility would operate in a previously disturbed industrial area already used for such operations. The facility would also

operate on a seasonal, intermittent, and temporary basis. Therefore, no changes to the cultural uniqueness and diversity of the area would result.

C. Local and State Tax Base and Tax Revenue

The proposed concrete batch operations would have little, if any, effects on local and state tax base and tax revenue. The facility would be a portable source, with seasonal and intermittent operations. Further, no additional full time or permanent employees are expected to be added as a result of issuing Permit #3197-01 and Addendum 2. Therefore, any revenue created by the concrete batch operation in a particular area would be relatively small and intermittent in nature.

D. Agricultural or Industrial Production

The concrete batch 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, as a result of wintertime operations. Further, the concrete batch operations are small by industrial standards and would, therefore, have only a minor impact on any local industrial production.

E. Human Health

Permit #3197-01 and Addendum 2 would incorporate conditions to ensure that the concrete batch operations would be operated in compliance with all applicable rules and standards (which are designed to be protective of human health). As described in Section 8.F of this EA, the air emissions from this facility would be minimized by pollution controls and opacity limitations for the facility and surrounding operational area. Further, wintertime operations would be limited (as outlined in Addendum 2) and Screen View modeling result would also apply, to correlate a production limit applicable with non-exceedance of the ambient air quality standards. These rules and standards are designed to be protective of human health. While minor amounts of emissions would be generated and pollutant deposition would occur, any impacts would be minimal because pollutant dispersion would also occur. Therefore, any impacts to human health would be minor.

F. Access to and Quality of Recreational and Wilderness Activities

The concrete batch operations would not affect any access to recreational and wilderness activities because the facility would be operating in an existing industrial pit. However, minor effects on the quality of recreational activities might be created by noise from equipment operations. Such impacts from wintertime operations would be minor and short-lived as a result of this facility, which is portable and temporary in nature, with seasonal and intermittent 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 this area would not be affected. No full time, permanent employees would be needed as a result of issuing Permit #3197-01 and Addendum 1

H. Distribution of Population

The facility would not be hiring any additional employees to operate the equipment, and any operations would be temporary, intermittent, and seasonal. Therefore, given the relatively small size and temporary nature of the operation, the normal population distribution in this or any other given area and operation would not be affected.

I. Demands of Government Services

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

J. Industrial and Commercial Activity

The concrete batch operations would represent only a minor increase in the industrial activity in this area. No additional industrial or commercial activity would result solely from the concrete batch operations, but some of the product may be supplied to industrial and commercial sources. Any impacts to industrial and commercial activities of a given area of operation would be minor.

K. Locally Adopted Environmental Plans and Goals

The Department would include an addendum and an addendum analysis with Permit #3197-01. Additional emission limitations and conditions would be included in the permit and addendum to allow operations in or within 10 km of certain PM₁₀ NAAs. The emissions limitations and conditions in the addendum would be established at a level that would be protective of the ambient air quality in the NAAs. Thus, the goal of protecting air quality in or within 10 km of these PM₁₀ NAAs would be met.

L. Cumulative and Secondary Impacts

The concrete batch operations would have a minor effect on the social and economic environment. Any social and economic impacts would be minor since the project would be operating on a seasonal, intermittent, and temporary basis. Therefore, any economic impacts would be temporary and short-lived. Also, no additional employees would be added as a result of issuing Permit #3197-01 and Addendum 2 to the facility. Thus, only minor changes to traffic flow in the immediate areas of operation and minor economic increases to the local economy from operating the facility would occur.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: Because this plant is a relatively small portable source and must use pollution controls and reasonable precautions to control emissions, there would be no significant impacts and an EIS is not required. Permit #3197-01 and Addendum 2 include conditions and limitations, which, if properly applied, would safeguard any potential environmental impact created by the proposed concrete batch 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, Montana Historical Society.

EA prepared by: Ron Lowney
Date: March 7, 2003