Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
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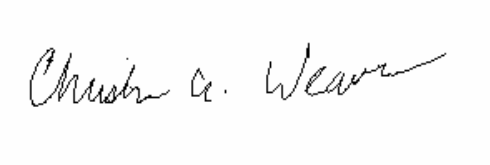
June 13, 2008

Jon Berger
Concrete Placing Company, Inc.
6451 W. Gowen Road
Boise, ID 83709

Dear Mr. Berger:

Air Quality Permit #3319-02 is deemed final as of June 13, 2008, by the Department of Environmental Quality (Department). This permit is for a portable central mix concrete batch plant. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,



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VW:cw: vs
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #3319-02

Concrete Placing Company, Inc.
6451 W. Gowen Road
Boise, ID 83709

June 13, 2008

AIR QUALITY PERMIT

Issued To: Concrete Placing Co., Inc.
6451 West Gowen Road
Boise, ID 83709

Permit #3319-02
Application Complete: 4/7/08
Preliminary Determination Issued: 5/9/08
Department's Decision Issued: 5/28/08
Permit Final: 6/13/08
AFS #: 777-3319

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

SECTION I: Permitted Facilities

A. Plant Location

Concrete Placing operates a portable central mix concrete batch plant at various locations throughout Montana. Permit #3319-02 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program or those areas considered tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Addendum 3 and Permit #3319-02 apply to the Concrete Placing facility while operating at specific locations in or within 10 kilometers (km) of certain particulate matter less than 10 microns (PM_{10}) nonattainment areas during the winter months, as approved by the Department, and at any location in or within 10 km of any PM_{10} nonattainment areas during the summer months. A list of permitted equipment is included in Section I.A of the Permit Analysis.

B. Current Permit Action

On April 7, 2008, the Department received a request from Concrete Placing for a permit modification, in order to add two diesel engines, each rated at a maximum of 99 horsepower (hp). In addition, the current location was updated from the originally permitted location in Flathead County to the current location in Hill County.

SECTION II: Conditions and Limitations

A. Emission Control Requirements

1. Concrete Placing shall install, operate, and maintain the baghouse as specified in their Montana Air Quality Permit Application and all supporting documentation. Therefore, Concrete Placing shall install, operate, and maintain the baghouse on the weigh hopper, cement silo, and cement supplement silo (ARM 17.8.752).

2. Concrete Placing shall not cause or authorize to be discharged into the atmosphere from the ready mix plant and general plant operations:

   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. Concrete Placing 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 (PM) (ARM 17.8.308 and ARM 17.8.752).

4. Concrete Placing 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 3,066,000 cubic yards of concrete during any rolling 12-month time period (ARM 17.8.749).

6. Concrete Placing shall operate no more than three diesel-fired engines/generators, with a total maximum rated design capacity of 737 hp (ARM 17.8.749).

7. If the permitted equipment is used in conjunction with any other equipment owned or operated by Concrete Placing, 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 (ARM 17.8.749).

8. Concrete Placing shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart IIII; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Emissions Monitoring

1. Concrete Placing shall inspect the baghouse and its vents, which are used for controlling emissions from the silos and weigh hopper, every 6 months of operation to ensure that each collector is operating at the optimum efficiency. Records of baghouse inspections, repairs, and maintenance shall be kept for a minimum of 5 years (ARM 17.8.749).

2. Concrete Placing shall maintain on-site records of plant inspections, repairs, and maintenance. All records compiled in accordance with this permit shall be maintained by Concrete Placing 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 portable central mix concrete batch plant is moved to another location, an Intent to Transfer form must be sent to the Department and 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 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 17.8.749 and ARM 17.8.765).

2. Concrete Placing 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 not be 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).

3. Concrete Placing 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).

4. Concrete Placing shall maintain on-site records showing daily hours of operation and daily production rates, and temperature and pressure drop readings, for the last 12 months. All records compiled in accordance with this permit must be maintained by Concrete Placing as a permanent business record for at least 5 years following the date of the measurement, must be submitted to the Department upon request, and must be available at the plant site for inspection by the Department (ARM 17.8.749).

5. Concrete Placing shall document, by month, the total concrete plant production from the facility. By the 25th day of each month, Concrete Placing shall calculate the concrete plant production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.7. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

SECTION III: General Conditions

A. Inspection – Concrete Placing 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 Concrete Placing fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Concrete Placing of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq*. (ARM 17.8.756)

D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq*., MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.

G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Concrete Placing may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Construction Commencement – Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (ARM 17.8.762).

I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.

J. Concrete Placing shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program.

Permit Analysis
Concrete Placing Co., Inc.
Permit #3319-02

I. Introduction

A. Permitted Equipment

Concrete Placing Co., Inc. (Concrete Placing) operates a portable central mix concrete batch plant, which includes:

- A 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour). Particulate emissions from the weigh hopper, cement silo, and cement supplement silo are controlled by a fabric filter dust collector,
- A diesel generator (engine rated up to 539 horsepower (hp) at full power),
- Two diesel engines (each rated up to 99 hp at standby), and associated equipment.

B. Process Description

Concrete Placing proposes to use this concrete batch plant to produce wet mix concrete for use in various construction operations. For a typical operational setup, aggregate materials are loaded into a hopper, transferred to a conveyor, loaded into a storage bin, transferred to a scale, appropriately metered and fed to a conveyor, and loaded into a mixer. The cementatious material is pneumatically loaded into a cement silo (using fabric filters to control particulate emissions) and appropriately metered onto an enclosed scale and loaded into a central mixer. Aggregate, cementatious material, and water are funneled into the mixer. Materials are mixed, loaded into a truck mixer, and are transported (as cement) to the construction site.

C. Permit History

On May 27, 2004, Concrete Placing was issued **Permit #3319-00** to operate a portable central mix concrete batch plant, which includes a 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour), a diesel generator (up to 365 kilowatts (kW)), and associated equipment. Particulate emissions from the weigh hopper, cement silo, and cement supplement silo are controlled by a fabric filter dust collector. Additionally, **Addendum 1** was established to allow this equipment to operate in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) during the summer months.

On September 13, 2004, Concrete Placing requested an administrative amendment to Permit #3319-00 to update Addendum 1 and allow for wintertime operations in or within 10 km of the Kalispell PM_{10} nonattainment area. SCREEN3 VIEW modeling was applied to allow for wintertime operations. **Permit #3319-01** replaced Permit #3319-00 and **Addendum 2** replaced Addendum 1.

D. Current Permit Action

On April 7, 2008, the Department of Environmental Quality (Department) received a request from Concrete Placing for a permit modification, in order to add two diesel engines, each rated at a maximum of 99 hp. In addition, the current location was updated from the originally permitted location in Flathead County to the current location in Hill County. The addendum was also updated to reflect the new diesel engine capacity.

Since the restricted Wintertime PM_{10} emissions are less than 82 pounds per day (lbs/day), SCREEN3 modeling was not required, as per the Department's Guidance Statement of November 5, 2005. **Permit #3319-02** replaces Permit #3319-01 and **Addendum 3** replaces Addendum 2.

E. Additional Information

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

II. Applicable Rules and Regulations

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

A. ARM 17.8, 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).

4. Concrete Placing 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.

5. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs, which can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.

6. 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 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

Concrete Placing 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 less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter (PM). (2) Under this rule, Concrete Placing shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne PM.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere PM caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere PM in excess of the amount set forth in this rule.

5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standards of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS), including 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 CFR 60, Subpart F, Portland Cement Plants does not apply because the central mix plant does not meet the definition of an affected facility.

c. 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), indicates that NSPS requirements apply to owners or operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE is manufactured after April 1, 2005, and is not a fire pump engine. This NSPS will apply if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year.

The two proposed diesel engines are CI ICE manufactured after April 1, 2005. However, if the proposed engines are transported from this location within a year, then they are considered "nonroad engines" and this NSPS would not apply.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:

a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a Maximum Achievable Control Technology (MACT) Subpart as listed below:

b. 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). As an area source, any diesel RICE engine operated by Concrete Placing that is new or reconstructed after June 12, 2006, will be subject to this MACT standard if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year.

The proposed diesel engines are CI ICE manufactured after June 12, 2006. However, if the proposed engines are transported from this location within a year, then they are considered "nonroad engines" and this MACT would not apply.

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 Concrete Placing 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. Concrete Placing submitted the appropriate permit application fee for the current permit action.

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

calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, 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 that pro-rate the required fee amount.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits—When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter or use any asphalt plant, crusher or screen that has the Potential to Emit (PTE) greater than 15 tons per year (TPY) of any pollutant. Concrete Placing has a PTE greater than 15 TPY of total PM, PM_{10}, carbon monoxide (CO), and oxides of nitrogen (NO_x); therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits—General Exclusions. This rule identifies the activities that do not require a permit and 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, modification, or use of a source. Concrete Placing 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. Concrete Placing submitted an affidavit of publication of public notice for the April 4, 2008, issue of *The Havre Daily News*, a newspaper of general circulation in the City of Havre in Hill County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this Permit Analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Concrete Placing 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 Concrete Placing, 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 contained in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

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

transferor and the transferee, is sent to the Department.

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

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major 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 a PTE or greater than 250 TPY (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. 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 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 #3319-02 for Concrete Placing, 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 PM_{10} nonattainment area.

d. This facility is subject to a current NSPS standard (40 CFR 60, Subpart IIII).

e. This facility is subject to an area source provision of a current NESHAP standard (40 CFR 63, Subpart ZZZZ).

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.

Concrete Placing is not a major source and, thus a Title V operating permit is not required. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Concrete Placing will be required to obtain a Title V Operating Permit.

III. BACT Determination

A BACT determination is required for any new or altered source. Concrete Placing 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. The two 99-hp diesel-fired engines are the only newly permitted pieces of equipment for this site, and therefore the only ones reviewed for conformance with BACT under this permit action.

For the diesel-fired engines, firing low sulfur diesel fuel with less than 500 parts per million (ppm) sulfur constitutes BACT for oxides of sulfur (SO_x). Due to the relatively small amount of PM, PM_{10}, NO_x, CO, volatile organic compounds (VOC), and SO_x emissions produced by the two engines, add-on controls would be cost prohibitive. Thus, the Department determined that no additional control would constitute BACT for the generator. This determination is similar to other recently permitted similar sources.

IV. Emission Inventory

	TPY					
Source	**PM**	**PM_{10}**	**NO_x**	**VOC**	**CO**	**SO_x**
Aggregate Delivery to Ground Storage	9.81	4.77				
Sand Delivery to Ground Storage	2.32	1.10				
Aggregate Transfer to Conveyor	9.81	4.77				
Sand Transfer to Conveyor	2.32	1.10				
Aggregate Transfer to Storage Bin	9.81	4.77				
Sand Transfer to Storage Bin	2.32	1.10				
Cement Delivery to Storage Silo	0.31	0.18				
Cement Supplement Unloading to Storage Silo	0.48	0.31				
Weigh Hopper Loading of Sand/Aggregate	12.13	5.83				
Central Mixer Loading	7.49	2.06				
Diesel Generator (up to 539 hp)	5.12	5.12	72.84	5.96	15.68	4.77
Diesel Engines (2 @ up to 99 hp each)	1.84	1.84	26.64	2.20	5.78	1.76
Haul Roads	12.68	3.60				
Total	**76.44**	**36.55**	**99.48**	**8.16**	**21.46**	**6.53**

- A complete emission inventory for Permit #3319-02 is on file with the Department. The emissions inventory is based upon a production rate of 350 cubic yards per hour and no hourly operational limit placed upon the generators.

V. Existing Air Quality

Permit #3319-02 is issued for the operation of a portable central mix concrete batch plant. The initial site location was identified as the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana. The current location is the NE ¼ of Section 4, Township 32 North, Range 16 East, in Hill County, Montana. Permit #3319-02 applies while operating at any location within Montana, except within those areas having a Department-approved permitting program or those areas considered to be tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* The Department determined that the amount of controlled emissions generated by this facility will not exceed any set ambient air

quality standard. In addition, this source is portable and will operate on an intermittent and temporary basis at any given location, so any air quality impacts will be minimal.
Addendum 3 of Permit #3319-02 would apply to the Concrete Placing facility while operating at specific locations in or within 10 km of certain PM_{10} nonattainment areas during the winter months, as approved by the Department, and at any location in or within 10 km of any PM_{10} nonattainment areas during the summer months.

VI. Air Quality Impacts

Based on the information provided and the conditions established in Permit #3319-02, the amount of controlled emissions generated by this facility will not exceed any set ambient air quality standards. Thus, the limitations and conditions established in Addendum 3 would further reduce emissions in these areas and would be protective of the ambient air quality standards. In addition, this source is portable and any air quality impacts will be minimal. The conditions in Permit #3319-02 will be protective of air quality while operating at locations not located in or within 10 km of certain PM_{10} nonattainment areas.

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)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the pubic generally?
		7a. Is the impact of government action direct, peculiar, and significant?
		7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
		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

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

Addendum 3
Concrete Placing Co., Inc.
Permit #3319-02

An addendum to Air Quality Permit #3319-02 is issued to Concrete Placing Co., Inc. (Concrete Placing), 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

Concrete Placing owns and operates a portable concrete central mix batch plant. Equipment used at the facility includes:

- A 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour). Particulate emissions from the weigh hopper, cement, and cement supplement silo are controlled by a fabric filter dust collector,
- A diesel-fired generator (engine rated up to 539 horsepower (hp) at full power),
- Two diesel-fired engines (each rated up to 99 hp at standby), and
- Associated equipment.

II. Seasonal and Site Restrictions

Addendum 3 applies to the Concrete Placing facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas (NAA). Seasonal and site restrictions apply to the facility as follows:

A. During the **winter season** (October 1 through March 31) Concrete Placing may operate at any site that may be approved by the Department of Environmental Quality (Department), in writing.

B. During the **summer season** (April 1-September 30) – Concrete Placing may operate at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM_{10} NAA.

C. Concrete Placing shall comply with the limitations and conditions contained in Addendum 3 to Permit #3319-02 while operating at any location in or within 10 km of any of the previously listed PM_{10} NAA. Addendum 3 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum 3 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 Limitations and Conditions: **Summer Season (April 1 through September 30)**

1. Concrete Placing 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. Concrete Placing 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 averaged over 6 consecutive minutes (ARM 17.8.749).

4. Emissions from the access roads, parking lots, and general plant area shall be limited to 10% opacity averaged over 6 consecutive minutes (ARM 17.8.749).

5. Concrete Placing 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. During the summer season, total concrete plant production shall not exceed 8400 cubic yards per day (ARM 17.8.749).

B. Operational Limitations and Conditions: **Winter Season (October 1 through March 31)**

1. Concrete Placing 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. Concrete Placing 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 averaged over 6 consecutive minutes (ARM 17.8.749).

4. Emissions from the access roads, parking lots, and general plant area shall be limited to 10% opacity averaged over 6 consecutive minutes (ARM 17.8.749).

5. Concrete Placing 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. During the winter season, total concrete plant production shall not exceed 2450 cubic yards per day (ARM 17.8.749).

7. During the winter season, each diesel-fired engine/generator shall be operated no more than 12 hours per day (ARM 17.8.749).

C. Operational Reporting Requirements (**Winter and Summer Seasons**)

1. Concrete Placing 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).

2. During the summer season, Concrete Placing shall document the daily plant concrete production. The daily information will be used to verify compliance with the limitation in Section III.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).

3. During the winter season, Concrete Placing shall document the daily plant concrete production and the daily hours of operation for each diesel-fired engine/generator. The daily information will be used to verify compliance with the limitation in Section III.B.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).

4. Production information for the site(s) covered by this addendum shall be maintained for 5 years. The information shall include (ARM 17.8.749):

    a. Cubic yards of concrete produced on a daily basis, at each site.

    b. During the winter season, hours of operation for each diesel-fired engine/generator on a daily basis, at each site.

    c. Fugitive dust information consisting of the total miles driven on unpaved roads for all plant vehicles.

    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

Addendum 3 Analysis
Concrete Placing Co., Inc.
Permit #3319-02

I. Permitted Equipment

Concrete Placing Co., Inc. (Concrete Placing) owns and operates a portable concrete central mix batch plant. Equipment used at the facility includes:

- A 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour). Particulate emissions from the weigh hopper, cement, and cement supplement silo are controlled by a fabric filter dust collector,
- A diesel-fired generator (engine rated up to 539 horsepower (hp) at full power),
- Two diesel-fired engines (each rated up to 99 hp at standby), and
- Associated equipment.

II. Process Description

For a typical operational setup, aggregate materials are loaded into a hopper, transferred to a conveyor, loaded into a storage bin, transferred to a scale, appropriately metered and fed to a conveyor, and loaded into a mixer. The cementatious material is pneumatically loaded into a silo (using fabric filters to control particulate emissions) and appropriately metered onto an enclosed scale and loaded into a central mixer. Aggregate, cementatious material, and water are funneled into the mixer. Materials are mixed, loaded into a truck mixer, and are 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:

1. 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.

2. 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.

3. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one person to another if:

   a. Written notice of intent to transfer location and public notice is sent to the Department.

   b. The source will operate in the new location for a period of less than 1 year.

   c. The source will not have any significant impact on any nonattainment area or any Class I area.

   Concrete Placing 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 Concrete Placing from having a significant impact on any particulate matter less than 10 microns (PM_{10}) Nonattainment Areas (NAA) covered by this permit.

IV. Emission Inventory

Summer Season (not restricted)

	Lbs/Day					
Source	**PM**	**PM_{10}**	**NO_x**	**VOC**	**CO**	**SO_x**
Aggregate Delivery to Ground Storage	53.76	26.16				
Sand Delivery to Ground Storage	12.72	6.00				
Aggregate Transfer to Conveyor	53.76	26.16				
Sand Transfer to Conveyor	12.72	6.00				
Aggregate Transfer to Storage Bin	53.76	26.16				
Sand Transfer to Storage Bin	12.72	6.00				
Cement Delivery to Storage Silo	1.68	0.96				
Cement Supplement Unloading to Storage Silo	2.64	1.68				
Weigh Hopper Loading of Sand/Aggregate	66.48	31.92				
Central Mixer Loading	41.04	11.28				
Diesel Generator (up to 539 hp)	28.08	28.08	399.12	32.64	85.92	26.16
Diesel Engines (2 @ up to 99 hp each)	10.08	10.08	145.92	12.00	31.68	9.60
Haul Roads	69.60	19.68				
Total	**419.04**	**200.16**	**545.04**	**44.64**	**117.60**	**35.76**

- A complete emission inventory for Addendum 3 to Permit #3319-02 is on file with the Department. The summertime emissions inventory is based upon a maximum of 8,400 cubic yards per day concrete production.

Winter Season (restricted)

Source	Lbs/Day PM	PM_{10}	NO_x	VOC	CO	SO_x
Aggregate Delivery to Ground Storage	15.68	7.63				
Sand Delivery to Ground Storage	3.71	1.75				
Aggregate Transfer to Conveyor	15.68	7.63				
Sand Transfer to Conveyor	3.71	1.75				
Aggregate Transfer to Storage Bin	15.68	7.63				
Sand Transfer to Storage Bin	3.71	1.75				
Cement Delivery to Storage Silo	0.49	0.28				
Cement Supplement Unloading to Storage Silo	0.77	0.49				
Weigh Hopper Loading of Sand/Aggregate	19.39	9.31				
Central Mixer Loading	11.97	3.29				
Diesel Generator (up to 539 hp)	14.04	14.04	199.56	16.32	42.96	13.08
Diesel Engines (2 @ up to 99 hp each)	5.04	5.04	72.96	6.00	15.84	4.80
Haul Roads	69.60	19.68				
Total	**179.47**	**80.27**	**272.52**	**22.32**	**58.80**	**17.88**

- A complete emission inventory for Addendum 3 to Permit #3319-02 is on file with the Department. The wintertime emissions inventory is based upon a maximum of 2,450 cubic yards per day concrete production and a limit of 12 hours per day for each diesel-fired engine/generator.

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM_{10}. Due to exceedances of the national standards for PM_{10}, 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 PM_{10}. As a result of this designation, EPA required the Department and the City-County Health Departments to submit PM_{10} State Implementation Plans (SIP). 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 PM_{10} emissions.

Addendum 3 to Permit #3319-02 sets conditions and limitations that allow for this portable concrete batch plant to be located in or within 10 kilometers (km) of certain PM_{10} NAAs during the summer months (April 1-September 30). Further**,** the facility would also be allowed to operate in or within 10 km of certain PM_{10} nonattainment areas during the winter months (October 1 through March 31). Permit #3319-02 would also cover this facility while operating in areas classified as attainment or unclassified for ambient air quality standards.

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 Resources Management Bureau
1520 East Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Concrete Placing Co., Inc.
Havre, MT 59501

Permit Number: #3319-02

Preliminary Determination Issued: 05/09/08
Department Decision Issued: 05/28/08
Permit Final: 6/13/08

1. *Legal Description of Site*: This permit is for the operation of a portable concrete central mix batch plant originally located in the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana. The current location is the NE ¼ of Section 4, Township 32 North, Range 16 East, in Hill County, Montana. Permit #3319-02 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program or those areas considered to be tribal lands. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* Addendum 3 to this air quality permit applies for locations in or within 10 km of certain PM_{10} nonattainment areas.

2. *Description of Project*: The permit application proposes the addition of two 99-hp diesel engines.

3. *Objectives of Project*: The object of the project would be to add the two diesel engines for the production of energy to supply portable blowers for pneumatic conveyance systems.

4. *Additional Project Site Information*: In many cases, this operation may move to a general site location or open cut pit, which has been previously permitted through the Industrial and Energy Minerals Bureau (IEMB). If this were the case, additional information for the site would be found in the Mined Land Reclamation Permit for that specific site.

5. *Alternatives Considered*: In addition to the proposed action, the Department 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 Concrete Placing 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 listing of the enforceable permit conditions and a permit analysis, including a BACT analysis, would be contained in Permit #3319-02.

7. *Regulatory Effects on Private Property Rights*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and would 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 area as the two 99-hp diesel engines. Impacts on terrestrial and aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor, as the engines would be considered a minor source of emissions and would have intermittent and seasonal operations. Furthermore, air emissions from the engines would have only minor effects on terrestrial and aquatic life because facility emissions would have good pollutant dispersion in the area of operations (see Section 8.F).

Concrete Placing is currently located in the Bill Baltrusch pit in Havre. Although the pit is located within 500 feet of the Milk River, the Concrete Placing plant is located on the far end of the pit, approximately ½ mile from the river. The project site is fairly flat, and there is no surface water or drainage in the immediate vicinity, so there is low risk of adverse impact. Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected from the proposed operation.

B. Water Quality, Quantity, and Distribution

No additional water would be required for dust suppression on the surrounding roadways and areas of operation due to the addition of the two 99-hp engines. However, increased pollutant deposition could cause minor, if any, impacts to water resources in these areas because the facility is small (see Section 8.F of this EA). Further the site is relatively flat and minimal water runoff would be expected to occur as discussed in 8.A. Therefore**,** only minor surface and groundwater quality impacts would be expected.

C. Geology and Soil Quality, Stability, and Moisture

The addition of two 99-hp engines would have only minor impacts on geology and soil quality, stability, and moisture of soils. Only minor impacts from deposition of air pollutants on soils would result (as described in Section 8.F of this EA) and only minor amounts of water would be used for pollution control. Thus, only minimal water runoff would occur (as described in Section 8.B of this EA). Since only minor amounts of pollution would be generated and corresponding emissions would be widely dispersed before settling upon vegetation and surrounding soils (as described in Section 8.D of this EA), impacts would be minor. Therefore, any effects upon geology and soil quality, stability, and moisture at this proposed operational site would be minor.

D. Vegetation Cover, Quantity, and Quality

Minor impacts would occur on vegetative cover, quality, and quantity because the facility would operate in an area where vegetation has been previously disturbed and the facility would be a small industrial operation. The two 99-hp diesel engines would be a relatively minor source of emissions and the pollutants would be greatly dispersed (as described in Section 8.F); therefore, deposition on vegetation from the proposed project would be minor. Also, because there will be no additional water usage (as described in Section 8.B) and the associated soil disturbance from the application of water and water runoff would be minimal (as described in Section 8.C), corresponding vegetative impacts would be minor.

E. Aesthetics

The two 99-hp diesel engines would be visible and would create additional noise while operating at this proposed site. However, Permit #3319-02 would include conditions to control emissions, including visible emissions, from the plant. Further, the operation would be portable, would operate on an intermittent and seasonal basis, and would be a small industrial source. Therefore, any visual aesthetic impacts would be minor.

F. Air Quality

Air quality impacts from the proposed project would be minor because the facility would be relatively small, would operate on an intermittent and temporary basis, and would locate in a previously disturbed site. Permit #3319-02 would include conditions limiting the facility's opacity and total engine/generator horsepower. Permit #3319-02 would also limit total emissions from the facility and any additional Concrete Placing equipment operated at the site to 250 TPY or less, excluding fugitive emissions.

Further, the Department determined that the facility would be a minor source of emissions as defined under the Title V Operating Permit Program because the source's PTE is below the major source threshold level of 100 TPY for any regulated pollutant. Pollutant deposition from the facility would be minimal because the pollutants emitted would be well controlled, widely dispersed (from factors such as wind speed and wind direction), and would have minimal deposition (due to site topography and minimal vegetative cover) on the surrounding area.

Therefore, air quality impacts from operating the equipment in this area would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department contacted the Montana Natural Heritage Program (MNHP) to identify any species of concern associated with the proposed site in the NE ¼ of Section 4, Township 32 North, Range 16 East, in Hill County, Montana. The search results concluded there are three species of special concern within a 1 mile of the site: the Lark Bunting, the Chestnut-collared Longspur, and the Sauger. However, based on the small size and temporary nature of equipment operations and the minimal disturbance to the environment (water, air, and soils) that would occur in the area of operation, the Department determined that only minor impacts to any unique endangered, fragile, or limited environmental resources would be expected to occur.

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

Due to the relatively small size of the facility, the two 99-hp diesel engines would only require small quantities of air and energy for proper operation. No additional water would be required for dust suppression of emissions being generated at the site beyond what is currently permitted. In addition, impacts to air resources would be minor because the engines are a small industrial source of emissions, with intermittent and seasonal operations, and because air pollutants generated by the engines would be widely dispersed as described in Section 8.F of this EA. Energy requirements would also be small. Overall, any impacts to water, air, and energy resources would be minor.

I. Historical and Archaeological Sites

The Department contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the proposed area of construction/operation. Search results concluded that there are no previously recorded historical or archaeological resources of concern within the area proposed for initial operations. Therefore, no impacts upon historical or archaeological sites would be expected as a result of operating the proposed plant.

J. Cumulative and Secondary Impacts

The addition of two 99-hp diesel engines would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would generate relatively small amounts of emissions of PM, PM_{10}, NO_x, VOC, CO, and SO_x. Emissions and noise generated from the equipment would, at most, only result in minor impacts to the area of operations because the plant would be relatively small, seasonal, and temporary. The site is moderately remote, since it is ¼ miles from the nearest residence (trailer park).

Further, no other sources are expected to operate as a result of permitting this equipment. Additionally, this facility, in combination with other emissions from Concrete Placing equipment operations would not be permitted to exceed 250 tons per year of non-fugitive emissions. Overall, cumulative and secondary impacts to the physical and biological aspects of the human environment would be minor.

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

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

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

A. Social Structures and Mores

The addition of two 99-hp diesel engines would cause no disruption to the social structures and mores in the area because the source would be a minor industrial source of emissions, would be separated from the general population, and would only have temporary and intermittent operations. Further, the facility would be required to operate according to the conditions that would be placed in Permit #3319-02, which would limit the effects to social structures and mores.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of this area would not be impacted by the proposed operation because the project will occur within an existing gravel pit, and the facility is a portable source with seasonal and intermittent operations. The predominant use of the surrounding area would not change as a result of this operation. Therefore, the cultural uniqueness and diversity of the area would not be affected.

C. Local and State Tax Base and Tax Revenue

The addition of two 99-hp diesel engines would have little, if any, impact on the local and state tax base and tax revenue because the project is a very small addition to an existing relatively small industrial source, which has seasonal and intermittent operations. Furthermore, the impacts to local tax base and revenue would be minor because the source would be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The addition of two 99-hp engines would have only a minor impact on local industrial production. Therefore, because minimal deposition of air pollutants would occur on the surrounding land (as described in Section 8.F of this EA), only minor and temporary effects on the surrounding vegetation (i.e. agricultural production) would occur. In addition, the facility operations would be small and temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation, as described in Section 8.D of this EA.

E. Human Health

Permit #3319-02 would incorporate conditions to ensure that the facility would be operated in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 8.F. of this EA, the air emissions from this facility would be minimized by process limits that would be required by Permit #3319-02. Also, the facility would be operating on a temporary basis and pollutants would disperse from the ventilation of emissions at this site (see Section 8.F of this EA). Therefore, only minor impacts would be expected on human health from the proposed facility.

F. Access to and Quality of Recreational and Wilderness Activities

Noise from the facility would be minor because the two 99-hp engines are a small part of the operations and would operate in an area within an active gravel pit, removed from the general population**.** Also, the facility would operate on a seasonal and intermittent basis on private land and would be a relatively minor industrial source of emissions. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at this site would be expected to be minor and intermittent.

G. Quantity and Distribution of Employment
H. Distribution of Population

No individuals would be expected to permanently relocate to this area of operation as a result of operating the facility, and the changes to the facility would not disrupt the normal population distribution.

I. Demands of Government Services

Government services would be required for acquiring the appropriate permits for the proposed project and to verify compliance with the permits that would be issued. However, demands for government services would be minor, due to the relatively small size and seasonal nature of the facility.

J. Industrial and Commercial Activity

The addition of two 99-hp engines would not increase in the industrial activity in the proposed area of operation because the source would be a relatively small industrial source that would be portable and temporary in nature. No additional industrial or commercial activity would be expected as a result of the proposed operation.

K. Locally Adopted Environmental Plans and Goals

Permit #3319-02 would contain limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards, as a locally adopted environmental plan or goal for operating at this proposed site. Because the facility would be a small and portable source and would have intermittent and seasonal operations, any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The addition of two 99-hp diesel engines would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area of operation because the source would be a portable and temporary source. Further, no other industrial operations are expected to result from the permitting of this facility. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Further, this facility may be operated in conjunction with other equipment owned and operated by Concrete Placing, but any cumulative impacts upon the social and economic aspects of the human environment would be minor and short-lived. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: An Environmental Impact Statement (EIS) is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from construction and operation of the proposed facility are minor; therefore, an EIS is not required.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Natural Heritage Program; and the State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality (Air Resources Management Bureau), Montana State Historic Preservation Office (Montana Historical Society).

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Date: April 17, 2008