

AIR QUALITY PERMIT

Issued To: Fiberglass Structures, Inc. Permit #3343-01
Main Building Administrative Amendment (AA)
P.O. Box 206 Request Received: 4/17/06
Laurel, MT 59044 Application Complete: 9/28/06
Department Decision on AA: 10/19/06
Permit Final: 11/04/06
AFS #111-0034

An air quality permit, with conditions, is hereby granted to Fiberglass Structures, Inc. (FSI) for their Main Plant, 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

FSI operates a manufacturing facility that produces tanks and other products made from fiberglass. FSI's Main Plant is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County. The physical address is 119 South Washington Avenue, in Laurel, Montana. A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Current Permit Action

On April 17, 2006, the Department of Environmental Quality (Department) received an application to amend the permit for FSI's Main Plant, to reflect the removal of equipment and lower potential emissions. On May 26, 2006, FSI requested that the Department wait until the FSI's Tank Division permit was finalized prior to amending the permit. The Tank Division permit went final on September 28, 2006. The Department modified the permit to reflect the current operating conditions and to update the regulatory references. Permit #3343-01 replaces permit #3343-00.

Section II: Conditions and Limitations

A. Emission Limitations

1. The Volatile Organic Compound (VOC) emissions from the facility shall be limited to 37 tons during any rolling 12-month time period (ARM 17.8.749).
2. FSI shall not exceed the applicable organic Hazardous Air Pollutant (HAP) emission limit listed in Table 3 of 40 CFR 63 Subpart WWWW on a rolling 12-month basis. For operations characterized as open molding (corrosion resistant and/or high strength), the following limits apply during any 12-month time period (ARM 17.8.342, 40 CFR 63 Subpart WWWW):
 - a. Mechanical resin application 112 pounds HAP/ton resin (lb/ton)
 - b. Manual resin application 123 lb/ton
 - c. Gelcoat application 605 lb/ton

3. FSI shall comply with all applicable standards and limitations contained in 40 CFR 63, Subpart WWWW, including work practice standards specified in Table 4 (ARM 17.8.342, 40 CFR 63 Subpart WWWW).
4. FSI shall not cause or authorize to be discharged into the atmosphere from any sources, stack emissions that exhibit 20% opacity or greater averaged over six consecutive minutes (ARM 17.8.304).
5. FSI 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).
6. FSI shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).

B. Testing Requirements

1. All compliance source tests must 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).

C. Operational Reporting Requirements

1. FSI shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

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

2. FSI 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 start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
3. FSI shall document, by month, the VOC and HAP emissions from the facility. By the 25th day of each month, FSI shall total the VOC and HAP emissions from the facility during the previous 12 months to verify compliance with the limitations in Section II.A.1 and Section II.A.2.

For the fiberglass resin applications, the calculation of VOC and HAP emissions

shall be based on the amount of each resin used, and the percentage of VOC and HAP in each resin. The emissions for the fiberglass process are to be calculated in accordance with the requirements of 40 CFR 63 Subpart WWWW.

For painting or other processes emitting VOCs and HAPs, the emissions will be based on the amount of raw material used (such as paint and thinner) and the percent VOC and HAP in each raw material.

Section III: General Conditions

- A. Inspection - FSI 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 FSI fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving FSI 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 therefor, 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 FSI 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.

Permit Analysis
Fiberglass Structures, Inc.
Permit #3343-01

I. Introduction/Process Description

A. Permitted Equipment

Fiberglass Structures, Inc. (FSI) owns and operates a fiberglass manufacturing facility known as the “Main Plant”. FSI’s Main Plant is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County, Montana. The physical address is 119 South Washington Avenue, in Laurel, Montana. Equipment used at the facility includes, but is not limited to the following:

- One Multi-Color System One Gelcoat Unit
- Four Venus Chopper Guns
- Spray Painting
- 9 Overhead Infra-Red Natural-Gas-fired heaters
- Associated Equipment

B. Source Description

Fiberglass Structure’s Main Plant includes a process building where fiberglass tanks and other fiberglass reinforced plastic (FRP) products are produced. The manufacture of FRP at FSI utilizes thermoset resins that contain styrene. Volatile Organic Compound (VOC) emissions, primarily styrene, result from the product manufacturing process. Styrene is a listed Hazardous Air Pollutant (HAP). FSI is a major source due to its potential to emit over 10 tons per year (tpy) of a HAP.

All materials/products produced at FSI were determined to be characterized as “corrosion-resistant and/or high strength” due to properties required for each product. The resins are non-suppressed. Operation at FSI is “open mold” type production. The first step is fabrication of a plug, typically from wood. After generating the rough shape, the plug is coated with primer. A mold release compound (wax) is applied by hand. To make the mold, laminate (polyester resin, catalyst, and glass fibers) is then applied to the plug. The plug is removed, and the mold is then prepared for production by waxing the surface with the mold release wax.

To produce the tanks or other fiberglass products, laminate is applied to the mold. FSI conducts mostly mechanical applications, although manual applications are occasionally used.

The Gel Coat unit is the MVE-1400-4-1 Multi-Color System One Gelcoat Unit. It is an external mix gun that mixes polyester gel coat and catalyst outside the gun using a “high volume/low pressure” (HVLP) spray system to ensure that gel coat materials do not atomize. The primary chemicals used in polyester gel coats are styrene monomer, silicon dioxide, methyl methacrylate, and unsaturated polyester resin. Typical cure time is 15-25 minutes.

The Chopper Guns are HVLP non-atomizing units, used for a variety of smaller products. They spray a shaped stream of resin and catalyst, mixing externally with glass fibers fed through a chopper wheel. Depending upon the resin type and the product, the laminate is allowed to cure for 30 minutes to 24 hours before removal from the mold.

Acetone, which is not a VOC, is used for cleaning the application equipment.

C. Permit History

On June 24, 2004, the Department of Environmental Quality (Department) received a complete Montana Air Quality Permit Application for the operation of FSI's Main Plant. **Permit #3343-00** became final and effective on August 10, 2004.

D. Current Permit Action

On April 17, 2006, the Department received an application to amend the permit for FSI's Main Plant. Specifically, FSI requested removal of the Venus Automatic Chop Hoop Winder from FSI's Main Plant permit, since it was recently moved to FSI's Tank Division (Permit #3821-00). In addition, FSI requested correction of the potential emissions from the remaining equipment to reflect more accurate emission estimates. The facility-wide emissions decreased from 90 tpy to 37 tpy of VOC, which is almost all styrene (a HAP).

The Main Plant remains a major Title V source due to the potential to emit over 10 tpy of a HAP. As a major source, it is subject to the Maximum Achievable Control Technology (MACT) standard 40 CFR 63 Subpart WWWW.

On May 26, 2006, FSI requested that the Department wait until the FSI's Tank Division permit was finalized prior to amending the permit. The Tank Division permit went final on September 28, 2006. The Department modified the permit to reflect the current operating conditions and updated the regulatory references to the MACT standard 40 CFR 63 Subpart WWWW. **Permit #3343-01** replaces permit #3343-00.

E. Additional Information

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

II. Applicable Rules and Regulations

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

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

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

101, *et seq.*, Montana Code Annotated (MCA).

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

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of 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 PM₁₀

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

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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over six 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. (2) Under this rule, FSI shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This 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.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

6. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of any NSPS subpart defined in 40 CFR Part 60.
7. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR 63, shall comply with the requirements of 40 CFR 63, as listed below:

40 CFR 63, Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Owners or operators of facilities that use thermoset resins and/or gel coats that contain styrene, and that are a major source of HAPs, as defined and applied in 40 CFR Part 63, shall comply with the standards and provisions of 40 CFR 63, Subpart WWWW. Based on the information submitted by FSI, the facility is subject to the provisions of 40 CFR 63, Subpart WWWW because the facility uses thermoset resins and/or gel coats that contain styrene and is a major source of HAPs.

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. FSI was not required to submit an application fee for the current permit action because the current permit action was administrative.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that 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 (PTE) greater than 25 tons per year of any pollutant. FSI has a PTE greater than 25 tons per year of VOCs; therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration or use of a source. FSI was not required to submit an application for the current permit action because the current permit action is administrative. (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. FSI was not required to submit an affidavit of publication because the current permit action is administrative.

5. 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.
6. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
7. 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.
8. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving FSI 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.*
9. 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.
10. 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.

11. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
12. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
13. 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 since it is not a listed source and the facility's PTE is less than 250 tons per year of any pollutant (excluding fugitive emissions).

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tons/year of any pollutant;
 - b. PTE > 10 tons/year of any one HAP, PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tons/year of PM₁₀ in a serious PM₁₀ nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (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 #3343-01 for FSI, the following conclusions were made:
- a. The facility's PTE is less than 100 tons/year for any pollutant.
 - b. The facility's PTE is greater than 10 tons/year for any one HAP and greater 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 a current NSPS.
 - e. This facility is subject to a 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.

FSI's Main Plant is subject to Title V Operating Permit requirements because the source's potential HAP emissions are above the major source threshold. FSI must obtain a Title V operating permit from the Department.

III. BACT Determination

A BACT determination is required for each new or altered source. FSI shall install on the new or altered source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized. However, the current permit action was an administrative action, therefore a BACT analysis is not required.

IV. Emission Inventory

Source	Tons/Year	
	VOC	HAP
System One Gelcoat Unit	8.45	8.45
Venus Chopper Gun	5.34-	5.34-
Venus Chopper Gun	5.34	5.34-
Venus Chopper Gun	5.34	5.34-
Venus Chopper Gun	5.34	5.34-
Manual Application	6.80	6.80
Paint & Thinner	0.27	
Mold Release	0.03	
Total	36.9-	36.6

System One Gelcoat Unit

VOC Emissions (assume 100% is HAP)

Emission Factor: 1.93 lb/hr (Company Information)

Calculations: 1.93 lb/hr * 8760 hr/hr * 0.0005 ton/lb = 8.45 ton/yr

Venus Chopper Gun (4)

VOC Emissions (assume 100% is HAP)

Emission Factor: 1.22 lb/hr (Each Gun, Company Information)

Calculations: 1.22 lb/hr * 8760 hr/hr * 0.0005 ton/lb = 5.34 ton/yr

Manual Application

Estimated at 22.8% of the facility's total mechanical application use

Paint & Thinner

60 gallons of paint and 10 gallons of thinner was determined to be the maximum annual amount required at FSI's Main Plant

60 gallons x 7.6 lbs VOC/gallon	= 456 lbs
10 gallons x 7.6 lbs VOC/gallon	= 76 lbs
TOTAL PTE	= 532 lbs or 0.27 ton/yr

Mold Release

Estimated at 144-11oz wax x 60% VOC = 59.4 lb/yr = 0.03 tpy VOC (Company Information)

V. Ambient Air Impact Analysis

The Department determined that the impact from this permitting action will be minor. The Department believes the facility will not cause or contribute to a violation of any ambient air quality standard.

VI. Taking or Damaging Implication Analysis

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

VII. Environmental Assessment

An environmental assessment was not required for the current permit action because the current permit action was administrative.

Permit Analysis prepared by: Christine Weaver

Date: 10/12/06