AIR QUALITY PERMIT

Issued To: Coleman Construction, Inc.
2600 Webster Lane
Dillon, MT 59825

Permit #3361-00
Complete Application Submitted: 10/27/04
Preliminary Determination Issued: 11/10/04
Department Decision Issued: 12/13/04
Permit Final: 12/29/04
AFS #777-3361

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

Section I: Permitted Facilities

A. Permitted Equipment

Coleman operates a portable screening facility at various locations throughout Montana. A complete list of the permitted equipment is contained in Section I.A of the Permit Analysis.

B. Plant Location

Coleman operates a portable screening operation that will originally locate in Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana. However, Permit #3361-00 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Addendum 1 applies to the Coleman facility while operating at any location in or within 10 km of certain PM_{10} nonattainment areas, including the proposed site location. A complete list of the permitted equipment is contained in Section I.A of the Permit Analysis.

Section II: Limitations and Conditions

A. Operational Limitations and Conditions

1. Coleman shall not cause or authorize to be discharged into the atmosphere, from any non-New Source Performance Standard (NSPS) affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.752).

2. Water and spray bars shall be available and used, as necessary, to maintain compliance with the opacity limitations in Section II.A.1 (ARM 17.8.752).

3. Coleman shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).

4. Coleman shall treat all unpaved portions of the haul roads, access roads, parking lots, or 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. Coleman shall not operate more than one screen at any given time and the maximum rated design capacity of the screen shall not exceed 210 tons per hour (TPH) (ARM 17.8.749).

6. Total screen production from the facility shall be limited to 1,839,600 tons during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).

7. The hours of operation for the diesel generator/engine shall not exceed 8,700 hours during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).

8. The diesel generator/engine used with this facility shall not have a capacity greater than 550 kilowatts (kW) (ARM 17.8.749).

9. If the permitted equipment is used in conjunction with any other equipment owned or operated by Coleman, at the same site, production shall be limited to correspond with an emission 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).

B. Testing Requirements

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

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

C. Operational Reporting Requirements

1. If this portable screening plant is moved to another location, an Intent to Transfer Form must be sent to the Department. In addition, a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).

2. Coleman shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. All records compiled in accordance with this permit shall be maintained by Coleman 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).

3. Coleman 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 most recent emission inventory report and sources identified in Section I.A of the Permit Analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in units, as required by the Department. 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).

4. Coleman 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).

5. Coleman shall document, by month, the total screening production for the facility. By the 25th day of each month, Coleman shall calculate the screening production for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.6. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

6. Coleman shall document, by month, the total hours of operation for the diesel generator/engine. By the 25th day of each month, Coleman shall calculate the total hours of operation for the diesel generator/engine 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).

7. Coleman shall annually certify that its actual emissions are less than those that would require the source to obtain an Air Quality Operating Permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted with the annual emissions inventory information (ARM 17.8.1204).

Section III: General Conditions

A. Inspection – Coleman 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 Coleman fails to appeal as indicated below.

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

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

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

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

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

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

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

J. Coleman shall comply with the conditions contained in this permit while operating at any location in Montana, except within those areas having a Department approved permitting program.

PERMIT ANALYSIS
Coleman Construction, Inc.
Permit #3361-00

I. Introduction/Process Description

A. Permitted Equipment

Coleman Construction, Inc. (Coleman), operates a portable diesel generator/engine (up to 550 kilowatt (kW)), a 1981 EL Russ (6'x20') two-deck screen (up to 210 ton per hour (TPH)), 8 conveyors, and associated equipment. Permit #3361-00 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana*. Addendum 1 applies to the Coleman facility while operating at any location in or within 10 km of certain PM_{10} nonattainment areas, including the proposed site location. The proposed initial site location has been identified as Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana.

B. Process Description

Coleman proposes to use this screening plant to crush and sort sand and gravel materials for use in various construction operations. For a typical operational setup, unprocessed materials are loaded into the screening plant by a hopper and transferred by conveyor to the screen. Materials are screened and separated, with the properly sorted materials conveyed on to stockpile and the other materials conveyed back to the screen for further processing.

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 Clean Air Act of Montana, 75-2-101, *et seq*., Montana Code Annotated (MCA).

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

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

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, 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 Standards for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standards for PM_{10}

Coleman must comply with the applicable ambient air quality standards.

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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Coleman 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 (PM) caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Processes. This rule requires that no person shall cause or allow 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 Code of Federal Regulations (CFR) 60, Standards of Performance for New Stationary Sources (NSPS). The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, NSPS, shall comply with the standards and provisions of 40 CFR Part 60.

   In order for a crushing/screening plant to be subject to NSPS requirements, two specific criteria must be met. First, the crushing/screening plant must meet the definition of an affected facility, and second, the equipment in question must have been constructed, reconstructed, or modified after August 31, 1983. Based on the information submitted by Coleman, the screening equipment to be used under Permit #3361-00 is not subject to NSPS requirements because the facility is a stand alone screening operation and was manufactured prior to August 31, 1983 (40 CFR Part 60, Subpart A General Provisions, and Subpart OOO, Non-Metallic Mineral Processing Plants).

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 Coleman 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. Coleman submitted the appropriate permit application fee as required for the current permit action.

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

   An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert, into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions 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 to construct, alter, or use any asphalt plant, crusher, or screen that has the Potential to Emit (PTE) greater than 15 tons per year of any pollutant. Coleman has the PTE greater than 15 tons per year of total PM, PM_{10}, oxides of nitrogen (NO_x), and carbon monoxide (CO); 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 Permit--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that are not subject to the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Coleman 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. Coleman submitted an affidavit of publication of public notice for the October 14, 2004, issue of the *Montana Standard*, a newspaper of general circulation in the Town of Butte in Silver Bow 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 Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section IV of this Permit Analysis.

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

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Coleman of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an Environmental Impact Statement.

11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of Coleman, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. 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.

14. 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 Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source since it is not a listed source and the facility's potential to emit (PTE) is less than 250 tons per year (excluding fugitive emissions) of any air pollutant.

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:

   a. 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 #3361-00 for the Coleman facility, the following conclusions were made:

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

   b. The facility's PTE is less than 10 tons/year 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 not subject to any current NESHAP standards.

   e. This facility is subject to current NSPS standards (40 CFR 60, Subpart A General Provisions, and Subpart OOO, Non-Metallic Mineral Processing Plants OOO).

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

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

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

   h. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an Air Quality Operating Permit by establishing federally enforceable limitations, which limit that source's PTE.

      i. In applying for an exemption under this section, the owner or operator of the source shall certify to the Department that the source's PTE does not require the source to obtain an Air Quality Operating Permit.

      ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an Air Quality Operating

Permit.

The Department has determined that the annual reporting requirements contained in the permit are sufficient to satisfy this requirement.

3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal required by ARM 17.8.1204(3) shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. Emission Inventory

	Tons/Year					
Source	**PM**	**PM_{10}**	**NO_x**	**VOC**	**CO**	**SO_x**
Screen (up to 210 TPH)	14.49	6.90				
Material Transfer (8 Transfers)	10.67	5.15				
Pile Forming (2 Piles)	7.73	3.68				
Bulk Loading (1 Load)	3.86	1.84				
Diesel Generator (up to 550 kW)	7.06	7.06	99.46	7.92	21.43	6.58
Haul Roads	2.74	1.23				
Total	46.55	25.86	99.46	7.92	21.43	6.58

- A complete Emission Inventory for Permit #3361-00 is on file with the Department. The production limit for the screen was limited to 210 TPH. Hours of operation for the diesel generator/engine was limited to 8,700 hours per rolling 12-month time period.

IV. BACT Determination

A BACT determination is required for any new or altered source. Coleman shall install on the new or altered source the maximum air pollution control capability that is technologically practicable and economically feasible, except that BACT shall be used.

A. Area Source Fugitive Emissions and Screening Emissions

Two types of emissions controls are readily available and used for dust suppression of fugitive emissions at the site, fugitive emissions for the surrounding area of operations, and for equipment emissions from the screening operation. These two control methods are water and chemical dust suppressant. Chemical dust suppressant can be used for dust suppression on the area surrounding the screening operation and for emissions from the screening operation. However, because water is more readily available, more cost effective, equally effective as chemical dust suppressant, and more environmentally friendly, water has been identified as the most appropriate method of pollution control of particulate emissions for the general plant area. In addition, water suppression has been required for recently permitted similar sources. However, Coleman may use chemical dust suppressant in addition to water to assist in controlling particulate emissions.

Coleman shall not cause or authorize to be discharged into the atmosphere from any non-NSPS affected equipment any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. Coleman must also take reasonable precautions to limit the fugitive emissions of airborne particulate matter from haul roads, access roads, parking areas, and the general area of operation. Coleman is required to use water spray bars, water, and dust suppressant, as necessary, to maintain compliance with the opacity

and reasonable precautions limitations. The Department determined that using water spray bars, water, and/or chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precautions limitations constitutes BACT for the screening operation.

B. Diesel Generator/Engine

Due to the limited amount of emissions produced by the diesel generator/engine and the lack of readily available/cost effective add-on controls, add-on controls would be cost prohibitive. The source is a minor source of emissions that would be required to comply with Sections II.A.7 and II.A.8 of Permit #3361-00. Therefore, the Department determined that proper operation and maintenance with no additional controls would constitute BACT for the diesel generator/engine. The control options required for both the proposed diesel generator/engine and the proposed screening facility are similar to other recently permitted sources.

V. Existing Air Quality

Addendum 1 of Permit #3361-00 would cover this portable screening plant while operating in or within 10 km of certain PM_{10} nonattainment areas during the summer months (April 1 through 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), including the initial site location (the Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana). Permit #3361-00 would also cover this facility while operating in areas classified as attainment or unclassified for ambient air quality standards.

VI. Ambient Air Quality Impact Analysis

Based on the information provided and the conditions established in Permit #3361-00, 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 1 would further reduce emissions in the nonattainment 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 #3361-00 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 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VIII. Environmental Assessment

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

Addendum 1
Coleman Construction, Inc.
Permit #3361-00

An addendum to Air Quality Permit #3361-00 is issued to Coleman Construction, Inc. (Coleman), pursuant to Sections 75-2-204 and 75-2-211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.765, as amended, for the following:

I. Permitted Equipment

Coleman applied for Addendum 1 to Permit #3361-00 for the operation of a portable screening operation in or within 10 kilometers (km) of the following particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas: Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish.

II. Seasonal and Site Restrictions

Addendum 1 applies to the Coleman facility while operating at any location in or within 10 km of certain PM_{10} nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

A. During the winter season (October 1-March 31) – The only location in or within 10 km of a PM_{10} nonattainment area where Coleman may operate is in Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana.

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

C. Coleman shall comply with the limitations and conditions contained in Addendum 1 to Permit #3361-00 while operating in or within 10 km of any of the previously listed PM_{10} nonattainment areas. Addendum 1 shall be valid until revoked or modified. The Department of Environmental Quality (Department) reserves the authority to modify Addendum 1 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

A. Operational

1. Water spray bars must be available and operated, as necessary**,** on the crushers, screens, and all transfer points whenever the screening plant is operating (ARM 17.8.749).

2. Coleman shall not cause or authorize to be discharged into the atmosphere from any equipment, such as screens or transfer points, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).

3. Coleman shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).

4. Coleman shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).

5. The total screening production for the screen shall not exceed 1,728 tons during any rolling 24-hour time period (ARM 17.8.749).

6. The hours of operation of the diesel generator shall not exceed 23 hours during any rolling 24-hour time period (ARM 17.8.749).

B. Operational Reporting Requirements

1. Coleman shall provide the Department with written notification of job completion within 10 working days of job completion (ARM 17.8.749).

2. Coleman shall provide the Department with written notice of relocation of the permitted equipment within 15 working days before the physical transfer of equipment (ARM 17.8.765).

3. Production information for the sites covered by this addendum must be submitted to the Department with the annual emissions inventory or within 30 days of completion of the project. The information must include (ARM 17.8.749):

   a. Tons of material crushed by each crusher at each site,

   b. Tons of material screened by each screen at each site,

   c. Tons of bulk material loaded at each site,

   d. Daily hours of operation at each site,

   e. Gallons of diesel used by the generator at each site,

   f. Fugitive dust information consisting of all plant vehicles, including the following:

      i. Number of vehicles
      ii. Vehicle type
      iii. Vehicle weight, loaded
      iv. Vehicle weight, unloaded
      v. Number of tires on vehicle
      vi. Average trip length
      vii. Number of trips per day per vehicle
      viii. Average vehicle speed
      ix. Area of activity
      x. Vehicle fuel usage (gasoline and diesel) annual total

   g. Fugitive dust control for haul roads and the general plant area:

      i. Hours of operation of water trucks
      ii. Application schedule for chemical dust suppressant, if applicable

4. Coleman shall document, by day, the total combined screening production. Coleman shall sum the total screening production during the previous 24 hours to verify compliance with the limitation in Section III.A.5. A written report of compliance and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted and may be submitted along with the annual emissions inventory (ARM 17.8.752).

5. Coleman shall document, by day, the total hours of operation of the diesel generator. Coleman shall sum the total hours of operation of the diesel generator, during the previous 24 hours, to verify compliance with the limitation in Section III.A.6. A written report of compliance and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted and may be submitted along with the annual emissions inventory (ARM 17.8.752).

Addendum 1 Analysis
Coleman Construction, Inc.
Permit #3361-00

I. Permitted Equipment

Coleman Construction, Inc. (Coleman), owns and operates a portable screening facility consisting of portable diesel generator/engine (up to 550 kilowatt (kW)), a 1981 EL Russ (6'x20') two-deck screen (up to 210 ton per hour (TPH)), 8 conveyors, and associated equipment.

II. Source Description

Coleman proposes to use this screening plant and associated equipment to sort sand and gravel materials for use in various construction operations. For a typical operational setup, unprocessed materials are loaded into the screening plant by a hopper and transferred by conveyor to the screen. Materials are screened and separated, with the properly sorted materials conveyed on to stockpile and the other materials conveyed back to the screen for further processing.

III. Applicable Rules and Regulations

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

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

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

B. ARM 17.8.764 Modification of Permit. An air quality permit may be modified 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 which do not result in an increase in emissions because of the changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.

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

1. Written notice of Intent to Transfer location and proof of public notice are sent to the Department;

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

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

Coleman must submit proof of compliance with the transfer and public notice requirements when Coleman transfers to any of the locations covered by this addendum and will only be allowed to stay in the new location for a period of less than 1 year. Also, compliance with the conditions and limitations in Addendum 1 to Permit #3361-00 minimizes the impact on certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas.

IV. Emission Inventory

	Lb/Day					
Source	**PM**	**PM_{10}**	**NO_x**	**VOC**	**CO**	**SO_x**
Screen (up to 210 TPH)	27.22	12.96				
Material Transfer (8 Transfers)	20.04	9.68				
Pile Forming (2 Piles)	14.52	6.91				
Bulk Loading (1 Load)	7.26	3.46				
Diesel Generator (up to 550 kW)	38.68	38.68	544.98	43.42	117.43	36.04
Haul Roads	15.00	6.75				
Total	122.72	78.44	544.98	43.42	117.43	36.04

- A complete emissions inventory for Permit #3361-00 is on file with the Department. In applying SCREEN VIEW modeling, production limitations were placed upon the screen at 1,728 tons per rolling 24-hour time period and a limit of 23 hours per rolling 24-hour time period for the diesel 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 1 to Permit #3346-00 is for a portable screening plant to be located at sites in or within 10 kilometers (km) of certain PM_{10} nonattainment areas during the summer season (April 1 through September 30) and winter season (October 1 through March 31). Summer season operations may include locations in or within 10 km of certain PM_{10} nonattainment areas, including, but not limited to Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish. Winter season operations are for Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana.

VI. Air Quality Impacts

Coleman applied for an air quality permit to operate a portable screening plant to be located at various locations throughout Montana. Permit #3361-00 and Addendum 1 will cover the Coleman screening plant while operating at any location within Montana, excluding those counties that have a Department approved permitting program and those areas considered tribal lands. Based on the information provided, the amount of controlled emissions generated by this facility will not exceed any ambient air quality standard. In addition, this source is portable and any air quality impacts will be minimal.

VII. 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 there are no taking or damaging implications.

VIII. Environmental Assessment

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

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
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P.O. Box 200901
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(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Coleman Construction, Inc.
2600 Webster Lane
Dillon, MT 59825

Permit Number: #3361-00

Preliminary Determination Issued: November 10, 2004
Department Decision Issued: December 13, 2004
Permit Final: December 29, 2004

1. *Legal Description of Site*: Coleman submitted an application to operate a portable screening plant at Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana. Permit #3361-00 would apply while operating at any location in Montana, except within those areas having a Department approved permitting program. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* An addendum to this air quality permit is included with this permit when Coleman operates in or within 10 km of certain PM_{10} nonattainment areas.

2. *Description of Project*: The permit application proposes the construction and operation of a portable screening plant and associated equipment. For a typical operational setup, unprocessed materials are loaded into the screening plant by a hopper and transferred by conveyor to the screen. Materials are screened and separated, with the properly sorted materials conveyed on to stockpile and the other materials conveyed back to the screen for further processing**.**

3. *Objectives of Project*: Coleman, in an effort to produce business and revenue for the company, submitted a complete permit application for the portable screening plant. The issuance of Permit #3361-00 would allow Coleman to operate the portable screening plant at various locations throughout Montana, including the proposed initial site location.

4. *Additional Project Site Information*: In many cases, this portable screening plant may move to a general site location or open cut pit, which has been previously permitted through IEMB. If this were the case, a more extensive EA would have been conducted for the site and would be found in the Mined Land Reclamation Permit for that specific site.

5. *Alternatives Considered*: In addition to the proposed action, the Department 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 Coleman 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 #3361-00.

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 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 screening plant operations. The screening plant operations would be considered a minor source of emissions, by industrial standards, with intermittent and seasonal operations. Additionally, the facility would be locating in or within 10 km of a PM_{10} nonattainment area, where the more stringent operational conditions in Addendum 1 would apply. This would include limitations on daily production, hours of operation, and visible emissions. Further, the area in question is semi-desert land with little vegetation and terrestrial life. Therefore, only minor effects on terrestrial life would be expected as a result of equipment operations or from pollutant deposition.

Only minor amounts of water would be used for pollution control on the surrounding area, so little impact is expected upon aquatic life. At the initial site location, the nearest surface water is Silver Bow Creek, which is approximately 0.50 of a mile away. Further, Highway I-90 is between the facility and the creek. Therefore, any impacts to the terrestrial and aquatic life and habitat would be minor.

B. Water Quality, Quantity, and Distribution

Water would be used for dust suppression on the surrounding roadways and areas of operation and for pollution control for equipment operations. However, water use would only cause a minor disturbance to the area since only relatively small amounts of water would be needed. Any impacts from this proposed project would be minor as a result of using water for dust suppression and equipment operations, because only small amounts of water would be required and the project would be temporary and intermittent in nature.

Further, equipment operations would result in the emissions of air pollutants, which would disperse to surrounding water resources. However, as previously stated, emissions from the facility would be relatively minor, intermittent, and short-lived. Additionally, water resources at or near the site are limited. Therefore, any impacts from pollutant deposition or from equipment operations on the water resources would be minor.

C. Geology and Soil Quality, Stability, and Moisture

The soils in the proposed site locations would be impacted by the screening plant operations due to the construction and use of the screening plant. Minimal disturbance to soil would occur as a result of construction and use of the facility, because the facility would be operating on an intermittent and temporary basis, and pollutant deposition upon the surrounding soils would be minimal. Also, considering the facility's relatively small size (by industrial standards), portable and temporary nature, the area's current use, and dispersion of pollutants, any effects (upon geology and soil quality, stability, and moisture) from operating this facility would be minor.

D. Vegetation Cover, Quantity, and Quality

As described in Section 8.F of this EA, the impacts from the air emissions of this facility would be minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor. Also, equipment construction and operations would result in only minor soil and water disturbance (as described in Sections 8.B and 8.C). Therefore, because the facility would locate in an area where pollutant dispersion would occur, would locate in an area where little vegetation would be effected, and would be a minor source of emissions and temporary in nature, impacts from the emissions of the screening plant would be minor. So, corresponding vegetative impacts would also be minimal.

E. Aesthetics

The screening plant operations would be visible and would create additional noise in the area. Permit #3361-00 and Addendum 1 would include conditions to control emissions, including visible emissions, from the plant. Since the screening plant operations would have a minor amount of emissions, would be portable, would have seasonal and intermittent operations, and would locate within an area having little agricultural or recreational value and locate near an existing highway, any visual and noise impacts would be minor.

F. Air Quality

The air quality impacts from the screening plant operations would be minor because Permit #3361-00 and Addendum 1 would include conditions limiting the opacity from the plant, as well as requiring water, water spray bars, and other means to control air pollution. Additionally, the facility is considered a minor source of air pollution by industrial standards and would be located in an area where good air pollutant dispersion would occur. Therefore, the air impacts would be minor.

The operations would be limited, by Permit #3361-00, to total emissions of 250 tons/year or less of any regulated pollutant from non-fugitive sources at the plant, including any additional equipment operated at the site. Furthermore, the facility emissions would be subject to BACT. For example, the plant would be required to use water to reduce emissions from equipment operations, storage piles, and haul roads. Also, the operation would have temporary and intermittent use, thereby further reducing potential air quality impacts from the facility. Therefore, air quality impacts would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to any unique endangered, fragile, or limited environmental resources in the initial proposed area of operation, contacted the Montana Natural Heritage Program (MNHP). Search results concluded there is one such environmental resource found within the defined area. The defined area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer.

The species has been identified as the Preble's Shrew and has been identified as having the potential to occupy this area. However, this resource is included within many miles of potential habitat and due to the proximity of the proposed location to an existing freeway, the lack of vegetative cover within the area, the surrounding land usage, and the portable and temporary nature of the facility, any impacts upon the identified resource would be minor and short-lived.

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

Due to the size of the facility, the screening plant operations would only require small quantities of water, air, and energy for proper operation. Small quantities of water would be used for dust suppression and would control emissions being generated at the site. Energy requirements would also be small because the facility is small by industrial standards and would be powered by one industrial diesel generator, with seasonal and intermittent operations. In addition, impacts to air resources would be minor because the source is small by industrial standards, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed. Furthermore, the particulate emissions would be controlled. Therefore, 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. According to correspondence from the Montana State Historic Preservation Office, given the previous industrial disturbance in the area, there would be a low likelihood of adverse disturbance to any known archaeological or historic site. Therefore, no impacts upon historical or archaeological sites would be expected as a result of the proposed asphalt plant operations.

J. Cumulative and Secondary Impacts

The screening plant operations would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would have seasonal and intermittent use and because the facility is considered a minor source of air pollutants by industrial standards. The facility would also have additional restrictions while operating at the initial site location, due to Addendum 1, which would further control pollutant

emissions. The facility would generate emissions of PM, PM_{10}, NO_x, VOC, CO, and SO_x. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance, due to the site location. Additionally, this facility, in combination with the other emissions from the site would not be permitted to exceed 250 tons per year of non-fugitive emissions.

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 Department has prepared the following comments.

A. Social Structures and Mores

The screening plant operation would cause no disruption to the social structures and mores in the area because the source is a minor source of emissions and temporary in nature. Additionally, the equipment would be located adjacent to a high traffic area but separated from residential populations by the existing highway. Also, the facility would be a minor source of air pollution and would be required to operate under the conditions in Permit #3361-00 and Addendum 1. Thus, no native or traditional communities would be affected by the proposed project operations and no impacts upon social structures or mores would result. The predominant use of the surrounding area would not change as a result of this project.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of the area would not be impacted by the proposed screening plant operations because the site is separated from the general population. Additionally, the facility would be considered a portable/temporary source with seasonal and

intermittent operations. The predominant use of the surrounding area would not change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The screening plant operations would have little, if any, impact on the local and state tax base and tax revenue because the facility would be a temporary source and small by industrial standards. The facility operations would require the use of only four new employees. Thus, only minor impacts to the local and state tax base and revenue could be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue are expected to be minor because the source would be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The screening plant operations would have only a minor impact on local industrial production since the facility is small by industrial standards and would locate in an industrial use area. No anticipated effects to agricultural land are expected to occur because the facility would initially operate in an arid area with no agricultural usage and because the facility is a temporary source with minor amounts of emissions. As described in Section 8.D, impacts to vegetation would be minimal. Also, pollution control would be utilized on equipment operations and operational limits would be established (in Addendum 1) to protect the surrounding environment. Therefore, any effects upon agricultural or industrial production would be minor and short-lived.

E. Human Health

Permit #3361-00 and Addendum 1 would incorporate conditions to ensure that the screening plant 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., the air emissions from this facility would be minimized by the use of water, water spray bars, and emission limits established in Permit #3361-00 and Addendum 1. Therefore, only minor impacts would be expected upon human health from the proposed screening plant.

F. Access to and Quality of Recreational and Wilderness Activities

The screening plant would be operated at a site approximately 0.20 of a mile north of the town of Rocker and Highway I-90. The facility would generally have a minor impact upon the access to and quality of recreational and wilderness activities. For the initially proposed site, operations would not affect access to recreational and wilderness activities in the area because the site is private property that has little wilderness or recreational value, since it is near an existing highway and in an arid area that contains mostly weeds and sagebrush for vegetative material. Thus, no changes to recreational and wilderness activities, or access to those activities, are expected from the operation of the asphalt plant. Additionally, noise impacts from the facility would be minimal because the facility would operate near Highway I-90 and the Rocker truck stop would only add to the existing noise. Also, the facility would be a temporary source, with minor amounts of emissions. Thus, any changes in the quality of recreational and wilderness activities from noise, created by operating the equipment at the site, would be minor and intermittent.

G. Quantity and Distribution of Employment

The screening plant is a small and temporary source, which would have only minor effects on the quantity and distribution of employment in the area because Coleman would use only four new employees for the project. Thus, because only four employees would be needed for such

operations, any effect on the quantity and distribution of employment in the area would be minor and short-lived.

H. Distribution of Population

The screening operation is a minor source (relatively small by industrial standards) and only four new employees would be expected for the operation of the facility. Also, no individuals are expected to permanently relocate to the area as a result of operating the screening plant. Therefore, the screening plant operations would not impact the normal population distribution in the initial area of operation or any future operating site.

I. Demands of Government Services

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

J. Industrial and Commercial Activity

The screening plant operations would represent only a minor increase in the industrial activity in the given area because of the size of the operations (relatively small by industrial standards) and the portable and temporary nature of the facility. No additional industrial or commercial activity would be expected as a result of the proposed operations.

K. Locally Adopted Environmental Plans and Goals

Coleman would be allowed, by permit, to operate in areas designated by EPA as attainment unclassified, and both summertime and wintertime operations in or within 10 km of certain PM_{10} nonattainment areas, including the initial site location (Section 16, Township 3 North, Range 8 West, in Silver Bow County, Montana). Permit #3361-00 would contain limits, which would be protective of air quality and the ambient air quality standards while the facility is operating in these designated areas, as a locally adopted environmental plan or goal. Additionally, because the facility is a relatively small (by industrial standards) and portable source that will operate at multiple sites, on an intermittent and temporary basis, the Department believes that any impacts to existing air quality in these areas of operation would be minor and short-lived.

L. Cumulative and Secondary Impacts

The screening plant would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area because the source is a portable, temporary source. Minor increases in traffic would have minor effects on local traffic in the immediate area, thus, having a direct effect on the social environment. Because the source is relatively small (by industrial standards) and temporary, only minor economic impacts to the local economy could be expected from the operation of the facility. Thus, minor and temporary cumulative effects would result to the local economy.

Recommendation: An 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: Department of Environmental Quality – Permitting and Compliance Division (Energy Minerals Bureau); 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 and Industrial and Energy Minerals Bureau), Montana Natural Heritage Program, and State Historic Preservation Office (Montana Historical Society).

EA prepared by: Ron Lowney
Date: October 25, 2004