



Montana Department of  
**ENVIRONMENTAL QUALITY**

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May 3, 2013

Randy Weimer  
Stillwater Mining Company  
2562 Nye Road  
Nye, MT 59061

Dear Mr. Weimer:

Montana Air Quality Permit #2459-16 is deemed final as of April 30, 2013, by the Department of Environmental Quality (Department). This permit is for an Underground metallic mineral mining and processing operation and associated equipment. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Julie Merkel  
Air Permitting Program Supervisor  
Air Resources Management Bureau  
(406) 444-3626

Doug Kuenzli  
Environmental Science Specialist  
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JM:DCK  
Enclosure

Montana Department of Environmental Quality  
Permitting and Compliance Division

Montana Air Quality Permit #2459-16

Stillwater Mining Company  
2562 Nye Road  
Nye, MT 59061

April 30, 2013



## MONTANA AIR QUALITY PERMIT

Issued To: Stillwater Mining Company  
2562 Nye Road  
Nye, MT 59061

MAQP: #2459-16  
Application Complete: 01/29/2013  
Preliminary Determination Issued: 02/25/2013  
Department's Decision Issued: 04/12/2013  
Permit Final: 4/30/2013  
AFS: 095-0001

A Montana Air Quality Permit (MAQP) is hereby granted to the Stillwater Mining Company – Nye Facility (Stillwater Mining) 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

Stillwater Mining operates an underground platinum/palladium mine, ore processing plant, and tailings disposal at the Nye facility. The facility is located approximately 6 miles south of Nye. The legal description of the mine site is Sections 1, 2, 10, 11, 15, 16, 21, and 23, Township 5 South, Range 15 East, in Stillwater County, Montana.

#### B. Current Permit Action

On September 5, 2012, the Department of Environmental Quality (Department) received an application for modification of the Nye facility's air quality permit from Bison Engineering, Inc. (Bison) on behalf of Stillwater Mining. The application proposed an expansion of Stillwater Mining's operations through two surface access projects identified as the Blitz and Benbow expansions. The Blitz expansion will occur using the existing access portal on the 5000 East level. The Benbow expansion will occur via a new access portal to the east of the current surface activities. Each project will require up to an additional 3.0 megawatts (MW) of electrical supply to be provided by diesel fired-generator sets. Additionally, Stillwater Mining requested a modification to the permit limit for propane consumption and to correct the capacity rating for a previously permitted portal heater. See Section I.D of the permit analysis for a comprehensive description of proposed changes.

### Section II. Conditions and Limitations

#### A. Emission Limitations

1. Metallic mineral process fugitive emissions are subject to an opacity limitation of 10% (ARM 17.8.340 and 40 Code of Federal Regulations (CFR) 60, Subpart LL).
2. If the Department determines it to be necessary, Stillwater Mining shall install a sprinkler system or provide equivalent mitigative measures to control wind-blown emissions from the tailings facilities. The Department shall determine the necessity of the above control measures based on personal observation, complaints, or any combination of the above (ARM 17.8.752).

3. Stillwater Mining shall utilize a dust suppression program on all dirt roads. The necessity for additional measures on other portions of the road or the entire road will be determined by the Department through on-site inspections, complaints, or any combination of the above (ARM 17.8.749).
4. Mine production and milling rates shall not exceed 1,825,000 tons during any rolling 12-month time period or 5,000 tons per day (ARM 17.8.749).
5. Compliance with emission and opacity standards and testing requirements shall be as specified in 40 CFR Part 60, where applicable (ARM 17.8.749).
6. If the Department determines it to be necessary, Stillwater Mining shall provide mitigative measures to control wind-blown emissions from the east-side waste rock disposal area. The Department shall determine the necessity of the control measures above on the basis of personal observation, complaints, or any combination of the above (ARM 17.8.752).
7. Stillwater Mining shall not cause or authorize to be discharged into the atmosphere from any surface crushing operation, and associated material handling systems, any stack emissions that (ARM 17.8.340 and 17.8.752):
  - a. Contain particulate matter in excess of 0.05 grams per dry standard cubic meter (g/dscm) or 0.022 grains per dry standard cubic foot (gr/dscf); and
  - b. Exhibit greater than 7% opacity.
8. Stillwater Mining 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 and ARM 17.8.749).
9. Stillwater Mining shall treat all unpaved portions of the haul roads, access roads, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.8 (ARM 17.8.749).
10. The Paste Plant Emergency Flush Pump Diesel Engine shall be used for emergency or back-up operations only and shall be limited to 500 hours of operation during any rolling 12-month time period. Preventative maintenance activities shall be included in the 500 hours of operation during any rolling 12-month time period (ARM 17.8.749).
11. The Shaft Emergency Diesel Generator shall be used for emergency or back-up operations only and shall be limited to 500 hours of operation during any rolling 12-month time period. Preventative maintenance activities shall be included in the 500 hours of operation during any rolling 12-month time period (ARM 17.8.749).
12. Stillwater Mining may operate the following generator set(s) in support the Blitz Operation;
  - a. One or more diesel-fired generator set(s), where the combined maximum rated design capacity of the generator engine(s) shall not exceed 4,022 brake-horsepower (bhp) (ARM 17.8.749).

- b. At a minimum, generator engine(s) shall be certified to the United States Environmental Protection Agency's (USEPA) Interim Tier 4 exhaust emission standard for generator sets with a maximum engine power rating greater than 900 kilowatts (kW) as specified within 40 CFR 1039.102, Table 7 (ARM 17.8.752).
  - c. Generator set engines shall have a minimum exhaust stack height of 3.048 meters (m) from ground level (ARM 17.8.749).
  - d. All generator set engines shall be located not more than 200 m from the location sited in the modeling analysis (ARM 17.8.749).
13. Stillwater Mining may operate the following generator sets in support the Benbow Operation;
- a. One or more diesel-fired generator set(s), where the combined maximum rated design capacity of the generator engine(s) shall not exceed 4,022 brake-horsepower (bhp) (ARM 17.8.749).
  - b. At a minimum, the generator engine(s) shall be certified to the United States Environmental Protection Agency's (USEPA) Interim Tier 4 exhaust emission standard for generator sets with a maximum engine power rating greater than 900 kilowatts (kW) as specified within 40 CFR 1039.102, Table 7 (ARM 17.8.752).
  - c. Generator set engines shall have a minimum exhaust stack height of 3.048 meters (m) from ground level (ARM 17.8.749).
  - d. All generator set engines shall be located not more than 200 m from the location sited in the modeling analysis and no generator set engine can be located closer than 145 m northeast to the mine boundary point with a coordinate of -109.770269° longitude and 45.381019° latitude (NAD83) (ARM 17.8.749).
14. Stillwater Mining shall only burn diesel fuel for the engines defined under Section II.A.13 and II.A.14, that is compliant with 40 CFR 80.510(b) having a sulfur content no greater than 0.0015% (15 parts per million) by weight (ARM 17.8.752).
15. The surface Nordberg cone crusher shall utilize a fabric filter baghouse to control particulate emissions (ARM 17.8.749).
16. The cement silo associated with the cement batch plant operation shall be enclosed with fabric filtration to control particulate emissions in the exhaust air (ARM 17.8.749).
17. Stillwater Mining shall not cause or authorize to be discharged into the atmosphere, from any sources associated with the concrete batch plant operation, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).
18. Water and/or chemical dust suppressant shall be available on site and used, as necessary, to maintain compliance with the opacity limitations in Section II.A.3 and Section II.A.17 (ARM 17.8.752).

19. The total propane consumption by all combustion sources at the facility shall be limited to 3,000,000 gallons per any 12-month rolling period (ARM 17.8.749).
20. The propane-fired portal heater at the 5000 East Portal shall be properly operated and maintained in a manner that satisfies the manufacture's terms for the guarantee of pollutant emission rates (ARM 17.8.752).
21. Stillwater Mining shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 60, Subpart LL, *Standards of Performance for Metallic Mineral Processing Plants* (ARM 17.8.340 and 40 CFR Part 60, Subpart LL).
22. Stillwater Mining shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart III; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but not later than 180 days after initial start-up, a USEPA Method(s) 1-5 and Method 9 opacity source test must be performed on any 40 CFR 60, Subpart LL, affected equipment at the facility, as appropriate. After the initial source test, additional source testing shall be conducted as required by the Department or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105; ARM 17.8.340; 40 CFR Part 60, General Provisions; and 40 CFR 60, Subpart LL).
2. Stillwater Mining shall conduct performance testing on the Blitz and Benbow generator set engines as follows (ARM 17.8.105; ARM 17.8.749; ARM 17.8.340 and 40 CFR Part 60, Subpart III):
  - a. Generator set engines with a displacement of less than 30 Liter (L) per cylinder
    - i. Within 180 day after initial start-up, Stillwater Mining shall conduct initial performance testing to demonstrate compliance with nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), non-methane hydrocarbon (NMHC), and particulate matter emission standards in accordance with to the requirements specified in 40 CFR 60.4212.
    - ii. After initial testing, Stillwater Mining shall conduct performance testing to demonstrate compliance with the CO emission standard every 2 years. Testing shall be in accordance to the requirements specified in 40 CFR 60.4212.
  - b. Generator set engines with a displacement of greater than or equal to 30 L per cylinder shall be performance tested initially and annually thereafter in accordance with the requirements of 40 CFR 60.4211 and 60.4213 to demonstrate compliance with the emission standards.

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

C. Operational Reporting Requirement

1. Stillwater Mining 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 to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505). Stillwater Mining shall submit the following information annually to the Department by March 1st of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

- a. The amount of ore and waste handled;
  - b. A description of any dust suppression program. With respect to the dust suppression program, the information shall include the areas of application, frequency of application, and amount;
  - c. Fuel consumption (Gasoline, diesel, and propane);
  - d. The total hours of operation for the Paste Plant Emergency Flush Pump Diesel Engine for the previous year;
  - e. The total hours of operation for the Shaft Emergency Diesel Generator Engine for the previous year;
  - f. The total hours of operation for each diesel generator engine operated in support of the Blitz and Benbow operations for the previous year;
  - g. A summary report listing the reasons for operation of the Paste Plant Emergency Flush Pump for each time the emergency diesel engine was in operation;
  - h. A summary report listing the reasons for operation of the Shaft Emergency Diesel Generator Engine for each time the emergency diesel engine was in operation; and
  - i. Any other related information the Department may request.
2. Stillwater Mining shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745 that would include ***the addition of new emissions unit***, change in the 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. Stillwater Mining shall document, by month, the total ore production at the facility. By the 25<sup>th</sup> day of each month, Stillwater Mining shall total ore production during the previous 12-months to verify compliance with the limitation in Section II.A.4. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
4. Stillwater Mining shall document, by month, the total hours of operation of the Paste Plant Emergency Flush Pump Diesel Engine. By the 25<sup>th</sup> day of each month, Stillwater Mining shall total the hours of operation of the Paste Plant Emergency Flush Pump Diesel Engine during the previous 12 months to verify compliance with the limitation in Section II.A.10. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
5. Stillwater Mining shall document, by month, the total hours of operation of the Shaft Emergency Diesel Generator Engine. By the 25<sup>th</sup> day of each month, Stillwater Mining shall total the hours of operation of the Shaft Emergency Diesel Generator Engine during the previous 12 months to verify compliance with the limitation in Section II.A.11. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
6. Stillwater Mining shall document, by month, the total consumption of propane within Portal Heaters, Space Heaters, Line Heaters and other combustion sources (EU016). By the 25<sup>th</sup> day of each month, Stillwater Mining shall total the propane consumption during the previous 12 months to verify compliance with the limitation in Section II.A.19. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).

#### D. Notification

1. Stillwater Mining shall provide the Department with written notification of the following dates within the specified time periods as required for 40 CFR Part 60, Subpart LL, affected facilities (ARM 17.8.340 and 40 CFR 60, Subpart LL), as appropriate:
  - a. Commencement of construction within 30 days after commencement of construction;
  - b. Anticipated start-up date between 30 and 60 days prior to anticipated start-up date; and
  - c. Actual start-up date within 15 days after the actual start-up date.
2. Stillwater Mining shall provide the Department with written notification of the actual start-up (including engine replacement) date for each engine within 15 days after engine start-up.

Section III. General Conditions

- A. Inspection – Stillwater Mining 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 (such as continuous emission monitoring systems (CEMS) and continuous emission rate monitoring systems (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 Stillwater Mining fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Stillwater Mining 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. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Stillwater may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit - Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis  
 Stillwater Mining Company – Nye Facility  
 MAQP #2459-16

I. Introduction/Process Description

A. Permitted Equipment

Emitting Unit ID	Name
EU001	Mine Ventilation Exhaust
EU002	Crushing Ore (Surface)
EU003	Load & Dump: Coarse Ore into Crusher Hopper
EU004	Load & Dump: Coarse Ore into Mill Hopper
EU005	Conveying System Transfer Points
EU006	Load & Dump Waste Rock onto Tailings Embankment/Storage
EU007	Disturbed Areas
EU008	Haul Roads
EU009	Diesel Use
EU010	Unleaded Gasoline Use (65,000 gallons per year (gal/yr))
EU011	Paste Plant Emergency Flush Pump Emergency Diesel Engine (225 brake-horsepower (bhp))
EU012	Concrete Batch Plant Operations
EU015	Soda Ash Silo
EU016	Propane Combustion from Portal Heaters, Space Heaters, Line Heaters and Other Combustion Sources
EU017	Shaft Emergency Diesel Generator Engine (947 bhp)
EU018	Blitz Diesel Generator Engine(s) (up to 4,022 bhp)
EU019	Benbow Diesel Generator Engine(s) (up to 4,022 bhp)
IEU01	Grinding Mills (wet process)
IEU02	Cycloning (wet process)
IEU03	Flotation Circuit (wet process)
IEU04	Thickener (wet process)
IEU05	Vacuum filter (wet process)
IEU06	Paste Plant Operations
IEU07	Open Burning
IEU08	Above Ground Fuel Storage

B. Source Description

The Stillwater Mining Company's (Stillwater Mining) Nye Mine is located in Stillwater County near Nye, Montana. The legal description of the mine site is Sections 1, 2, 10, 11, 15, 16, 21, and 23, Township 5 South, Range 15 East, Stillwater County, Montana. The facility is an underground platinum/palladium (platinum group metals) mine. The operation includes ore and waste excavation, surface and underground crushing, conveying, grinding, flotation concentration, tailings disposal, a concrete batch operation, and a paste plant operation. The concentrate extracted from the Nye mine is trucked to the Stillwater Mining Company Metallurgical Complex (smelter and refinery) for further refining and processing.

### C. Permit History

(NOTE: Administrative Rules of Montana (ARM) references in this Permit History section reflect the rule numbers as they existed at the time of that permit action.)

**MAQP #2459** was issued for the Stillwater Mine on March 29, 1988, to Stillwater Mining. The permit was based on 1000 tons per day (TPD) of ore production.

**MAQP #2459A** was an alteration issued October 21, 1988, to extend mining to the east side of the Stillwater River with no increase in ore production, but a slight increase in particulate emissions.

**MAQP #2459A-2** was issued March 11, 1991, to clarify language relative to the annual production limitation.

**MAQP #2459-03** was issued August 14, 1992, to increase the ore production rate from 1000 to 3500 TPD and from 365,000 to 730,000 tons per year (TPY).

**MAQP #2459-04** was a modification issued on April 27, 1993.

**MAQP #2459-05** was a modification to clarify the performance testing requirement on the wet scrubber controlling emissions from the concentrate dryer. The permit was also updated to include a more specific listing of applicable regulations.

**MAQP #2459-06** was an alteration issued October 18, 1995, to replace the concentrate dryer wet scrubber with a fabric filter collector (baghouse). Notification and testing requirements, relative to the baghouse, were also added.

**MAQP #2549-07** was a modification issued on April 17, 1997, to add crushing, screening, and hauling of bedding material to the emission inventory in the permit analysis. It had been inadvertently taken out of the emission inventory in a previous permitting action. Permit number citations in the permit and analysis were also updated.

**MAQP #2459-08** was issued on October 25, 1998. Stillwater Mining requested a production limit increase from 730,000 TPY or 3,500 TPD to 1,825,000 TPY or 5,000 TPD. The increased activity at the mine resulted in an increase in Particulate Matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) emissions of approximately 48 TPY. A New Source Review/Prevention of Significant Deterioration (PSD) review was not required for the proposed production increase because the facility is not a listed source and the facility's potential to emit (excluding fugitive emissions) does not exceed 250 TPY of any pollutant.

In addition, Stillwater Mining planned to construct and operate a new tailings impoundment located approximately 7 miles northeast of the mine site (2 miles northeast of Nye), install a pipeline system along Stillwater County Road 420 and reclaim the resulting surface disturbance, and expand the waste rock storage area located on the east side of the Stillwater River at the mine site.

Further, the language in Section II.A.1 was revised to remove the language requiring dryer emission testing every 4 years. Testing was required when the dryer's process rate increased above the process rate that the dryer was functioning at during the last performance test. For example, if the dryer process rate increased above the level it was operating at during the particulate test performed on October 21, 1996, an emissions test would be required. Also, the Department of Environmental Quality (Department) removed

the requirement for Stillwater Mining to move the downwind PM<sub>10</sub> sampler within 90 days after MAQP #2459-08 was final. The permit did specify that Stillwater Mining would move the sampling site to a different location, approved by the Department, at such time as the east-side waste rock storage encroached on the current location. Stillwater Mining was required to request the Department's approval of the new downwind PM<sub>10</sub> sampler at least 90 days prior to moving to a new site.

Finally, the Department added crushing, screening, and hauling of bedding material to the emission inventory in the Permit Analysis. This activity was listed in MAQP #2459-07. Controlled emissions from this activity were 2.32 TPY. **MAQP #2459-08** replaced MAQP #2459-07.

Stillwater Mining submitted an application on January 20, 2000, for the alteration of MAQP #2459-08. The alteration included the installation and operation of a new surface jaw crusher and conveying system. The new system was determined to be subject to 40 Code of Federal Regulations (CFR) 60, Subpart LL, New Source Performance Standards for Metallic Mineral Processing. **MAQP #2549-09** replaced MAQP #2459-08.

On April 11, 2001, the Department received a letter from Stillwater Mining requesting a need for permit determination for the addition of an emergency generator at the Hertzler Pump Station, a Nordberg cone crusher (maximum capacity 70 tons per hour (TPH)), and associated material handling equipment. Because the potential uncontrolled emissions from the proposed changes did not exceed the de minimis threshold of 15 TPY, the permit action was accomplished under the ARM 17.8.705(1)(r). The crushing system was determined to be subject to 40 CFR 60, Subpart LL, New Source Performance Standards for Metallic Mineral Processing. **MAQP #2459-10** was issued to update the permit with the new equipment and replaced MAQP #2459-09.

On December 27, 2001, Stillwater Mining submitted a complete permit application for the alteration of air quality Preconstruction MAQP #2459-10. The alteration involved the addition of an existing but not-permitted cement batch plant including conveyors and material silos and the modification of the existing Nordberg cone crusher. Further, the permit action incorporated an existing, but not-permitted, paste plant and associated cement silo in accordance with ARM 17.8.705(1)(r).

The above cited cement batch and paste plant operations were added to the facility as separate and distinct projects in the past but were not permitted at the time of construction. Potential emissions from the paste plant operation were less than the de minimis threshold of 15 TPY so the plant was added to the permit under ARM 17.8.705(1)(r).

On October 11, 2001, Stillwater Mining submitted information requesting a de minimis determination for the cement batch plant operation. Based on the information submitted, the Department determined that the concrete batch plant operations did not meet the definition of a de minimis source of emissions as defined in the ARM 17.8.705(1)(r).

Emission inventory calculations submitted by Stillwater Mining indicated that the cement batch plant potential to emit (PTE) is less than the de minimis threshold of 15 TPY. However, the calculations submitted to the Department included control credit for several emission points within the cement batch system. Control credit cannot be used when determining a source's PTE for a de minimis determination. Without control credit applied, the concrete batch operations exceed the de minimis threshold; therefore, a permit alteration was required.

Further, as part of this permit action Stillwater Mining proposed to modify the existing Nordberg cone crusher, permitted under MAQP #2459-10, to increase the crusher production capacity from 70 TPH to 150 TPH. Potential uncontrolled emissions from the Nordberg crushing operation and associated equipment exceed the de minimis threshold and, therefore, modifying the crusher to increase capacity required a permit alteration. The Nordberg cone crusher and all associated material transfer points are subject to the requirements of 40 CFR Part 60, Subpart LL, Metallic Mineral Processing Plants. Total potential controlled and uncontrolled emissions for the permit action were included in the emission inventory, Section IV.

Finally, in accordance with MAQP #2459-10, as of October 1, 2001, the downwind PM<sub>10</sub> air sampler was relocated to the Stillwater Valley Ranch (Stillwater North). Attachment 1, Ambient Air Monitoring Plan – Stillwater Mining Company, to air quality **MAQP #2459-11** incorporated the changed downwind PM<sub>10</sub> monitoring location as well as the changes previously identified. MAQP #2459-11 replaced MAQP #2459-10.

On March 19, 2002, the Department received a letter from Stillwater Mining requesting a modification to MAQP #2459-11. The modification included removing the Hertzler Pump Station emergency diesel generator from the list of permitted equipment and adding an emergency diesel generator (Paste Plant Emergency Flush Pump) to the Paste Plant facility. Stillwater Mining developed an alternative method of clearing the Hertzler tailings pipeline during power outages. The alternative method uses a combination of high pressure water and pigging of the line. Because Stillwater Mining developed the previously described new method of clearing the Hertzler tailings pipeline the Hertzler Pump Station emergency diesel generator was no longer required.

The Paste Plant Emergency Flush Pump is used only during power outages to flush the paste line to avoid plugging. Because potential uncontrolled emissions from the proposed Paste Plant Emergency Flush Pump, operating under 500 hours authorized by the permit, did not exceed the de minimis threshold of 15 TPY, the permit action was completed in accordance with ARM 17.8.705(1)(r). **MAQP #2459-12** replaced MAQP #2459-11.

On May 1, 2002, the Department received a permit application for proposed changes at the Stillwater Mining facility. The proposed changes included the addition of two 1500 cubic feet per minute (cfm) 400 kilowatt (kW) diesel air compressor engines (compressors #1 and #2) and the removal of emergency/back-up status requirements for the existing 2000 kW Caterpillar diesel powered electric generator (shaft generator). After initial review, the Department determined that the application was incomplete for lack of equipment specific information and nitrogen oxides (NO<sub>x</sub>) air dispersion modeling. Stillwater Mining was sent a letter of incompleteness indicating the previously cited application deficiencies. On September 3, 2002, the Department received the requested incomplete information from Stillwater Mining. However, after review of the information submitted, the Department again determined that the application was incomplete and sent Stillwater Mining a letter indicating application deficiencies. Subsequently, on November 15, 2002, the Department received a letter from Stillwater Mining including the requested incomplete information and withdrawing the request to remove emergency/back-up status for the shaft generator. The application for the addition of compressors #1 and #2 was deemed complete on November 15, 2002.

Further, on May 21, 2002, the Department received a request from Stillwater Mining to relax or discontinue ambient air monitoring requirements for their facility. When determining if permitted ambient monitoring requirements can be relaxed or discontinued

the Department uses the Department Monitoring Requirements Guidance Statement established October 9, 1998. The guidance statement provides an ambient air monitoring decision matrix to be used for determining the need for ambient monitoring.

Since 1988, Stillwater Mining had operated ambient air samplers on a once-every-6-day schedule from November through April and on a once-every-3-day schedule from May through October. Based on actual sampling data from the period of 1997 through 2000 and using the Department's ambient air monitoring decision matrix, the Department determined, with a high level of confidence, that discontinuation of ambient monitoring was appropriate for the Stillwater Mining facility. As stated in a letter to Stillwater Mining dated June 10, 2002, effective at the end of June 2002, Stillwater Mining is no longer subject to ambient air monitoring requirements. Under this permit action, Attachment 1, Ambient Air Monitoring Plan, was removed. Finally, the Department updated various sections of the permit to reflect current permit language and requirements. **MAQP #2459-13** replaced MAQP #2459-12.

On November 4, 2011, the Department received an MAQP modification application from Bison Engineering, Incorporated (Bison) on behalf of Stillwater Mining to install a new 28 million British Thermal Units per hour (MMBtu/hr) propane-fired portal heater at the 5000 East Portal to provide additional warm air to the underground mining operations during the winter months. In addition, Stillwater Mining proposed to increase the underground ventilation capacity to 2,000,000 cubic feet per minute (cfm) to meet Mine Safety and Health Administration (MSHA) standards as the total underground area expands. A propane-fired concentrate dryer was decommissioned and replaced with a hydraulic system that does not generate air emissions; therefore, Stillwater Mining requested that this dryer be removed from the MAQP.

On November 30, 2011, the Department received an email correspondence from Stillwater Mining with an updated list of permitted equipment. The updated list indicated that the two 400 kW diesel compressor engines that were permitted in MAQP #2459-13 were never installed and could be removed from the list of permitted equipment. This correspondence also indicated that Stillwater Mining would prefer for all of the propane-fired portal and space heaters to be grouped together as a single emitting unit referred to as Propane Usage rather than listing each unit individually. This Propane Usage unit would include the new 28 MMBtu/hr portal heater.

The Department incorporated into the MAQP emitting units that were approved in accordance with the ARM 17.8.745 de minimis rule that had occurred since the issuance of MAQP #2459-13. These actions are listed below.

- On October 14, 2003, the Department approved the addition of two 2.5 MMBtu/hr propane-fired heated make-up air units for providing air exchange within the mill building.
- On January 2, 2004, the Department approved the addition of a 1.0 MMBtu/hr natural gas-fired heated make-up air unit and 50 cubic yard per day (yd<sup>3</sup>/day) concrete batch plant. A November 30, 2011 email correspondence from Stillwater Mining stated that the natural gas-fired heater does not exist at the facility; therefore, it was not included as a permitted emitting unit. The 50 yd<sup>3</sup>/day concrete batch plant was added to the MAQP.

- Stillwater Mining notified the Department via correspondence dated January 27, 2004 of the installation of a 1.65 MMBtu/hr propane-fired heated make-up air unit to provide air exchange within the emissions testing bay. The correspondence demonstrated that this action was in accordance with de minimis requirements.
- On August 5, 2004, the Department approved the addition of two 0.120 MMBtu/hr propane-fired heaters for use in the administrative building and the installation of a 50 ton capacity soda ash silo.
- Stillwater Mining requested a de minimis determination in a May 1, 2006 letter for the temporary use of a 1.5 megawatt (MW) diesel generator. Stillwater Mining confirmed in a November 11, 2011 email that this unit was only required for temporary use and is not currently located on site; therefore, it was not included as a permitted emitting unit.
- On May 2, 2008, the Department approved the temporary use of three 400 kW diesel generators. Stillwater Mining confirmed in a November 11, 2011 email that these units were only required for temporary use and are not currently located on site; therefore, they were not included as permitted emitting units.
- On June 22, 2011, the Department approved the temporary use of three 689 bhp diesel generator engines. Stillwater Mining confirmed in a November 11, 2011 email that these units were only required for temporary use and are not currently located on site; therefore, they were not included as permitted emitting units.

This permit action added the new portal heater, removed the concentrate dryer, incorporated the de minimis actions that have been approved since the previous permit issuance, updated the emission inventory to reflect the new equipment and ventilation capacity, and updated permit language and rule references to current Department practices. **MAQP #2459-14** replaced MAQP #2459-13.

On January 13, 2012, the Department issued the final version of MAQP #2459-14 to Stillwater Mining. Stillwater Mining submitted comments on the Preliminary Determination of MAQP #2459-14 which were received within the designated public comment period; however, these comments were not addressed in the Department's Decision, because the submitted comments were not properly relayed to the permit writer. As the Department is obligated to address the permittee's comments, the Department issued an AA to address Stillwater Mining's initial comments on the Preliminary Determination of MAQP #2459-14. The Department reviewed the comments and incorporated the following changes:

- De minimis request for the addition of a 2 MMBtu/hr propane-fired space heater and proposal to include a 149 MMBtu/hr maximum combined heat input capacity limit to address all propane fired-combustion sources.
- Corrected the potential emissions from the concrete batch plant.
- Added applicability statements for 40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ.
- Included an annual hourly limit with recordkeeping and reporting requirements for the Shaft Emergency Diesel Generator Engine.

- Updated the facility's potential gasoline combustion capacity; and includes a new and complete version of the facility-wide emission inventory.

**MAQP #2459-15** replaced MAQP #2459-14.

D. Current Permit Action

On September 5, 2012, the Department received an application for modification of MAQP #2549-15 from Bison on behalf of Stillwater Mining. The application proposed the following modifications:

- Stillwater Mining will expand its operations through two projects identified as the Blitz and Benbow expansions. The Blitz expansion will occur using the existing access portal located on the 5000 East level. The Benbow expansion will occur via a new access portal to the east of current mining operations. No additional mine production was proposed through the expansion projects.
- Installation of up to 3.0 MW of electrical generation at each the Blitz and Benbow expansion sites to be provided by diesel-fired generator sets of up to 4,022 bhp at each location. Stillwater Mining requested the permit modification be written de minimis friendly with respect to the diesel generator sets to allow the operation of one or more diesel generator engines at each location that meets or exceeds U.S. Environmental Protection Agency's (USEPA) Interim Tier 4 standard for generator sets greater than 900 kW, as detailed within 40 CFR Part 1039.102, Table 7.
- Modify the permit limit for propane combustion sources from a heat input capacity of 149 MMBtu to a rolling-12 month consumption limit of 3,000,000 gallons for sources identified under emission unit EU016 Propane Combustion from Portal Heaters, Space heaters, and Line Heaters. Previously, the emission inventory for sources within this emission category was generated through the application of AP-42, Chapter 1.5 for Liquefied Petroleum Gas Combustion.

However, the manufacturer's guaranteed emission rate of CO for the 5000 East Portal Heater exceeds the equivalent AP-42 emission factor. In order to minimize recordkeeping and avoid the installation of an additional method of fuel monitoring, Stillwater Mining opted to employ the higher CO emission factor from the 5000 East Portal Heater for all propane combustion units under EU016. This presents a conservative or worst-case approach and avoids the need for separate emission limits and fuel consumption recordkeeping requirements for the portal heater.

- Change the name of emission unit EU016 to "Propane Combustion from Portal Heaters, Space Heaters, Line Heaters, and Other Combustion Sources," to comprehensively address all propane fueled equipment.
- Categorization of particulate emissions from the mine ventilation exhaust (EU001) as fugitive emissions similar to the gaseous emissions from this source. With issuance of MAQP #2459-13 the emission inventory changed categorization of gaseous emissions from non-fugitive to fugitive, while categorization of particulate matter remained non-fugitive. At the time of this permit action, all underground equipment are considered fugitive. The Department has revised the emission inventory of underground equipment and categorized said equipment accordingly, based on fugitive or non-fugitive.

- Revise potential emission calculations of the mine ventilation exhaust (EU001) for particulate emissions from the current 1999 Title V permit application based method to an emission estimate based on 2010 emission testing. Similar to the action which revised the gaseous emission inventory. With issuance of MAQP #2459-14 the emission inventory calculated gaseous emissions based on the results of source testing permit performed on July 20, 2010 through July 22, 2010. The Department was concerned that an estimate based on the 2010 source test would not represent the potential to emit of this source. Therefore, the Department updated the emission inventory of the mine ventilation exhaust based on an emission estimate of the actual equipment operating within the underground portion of the mine.
- Correction to the heat input capacity rating of the propane-fired portal heater at the 5000 East Portal from 28 MMBtu/hr to the actual maximum heat input capacity rating of 21 MMBtu/hr. This update was based on manufacturer's data which indicated that the portal heater was only capable of firing three of the 7,000 MMBtu/hr burners at any given time, effectively limiting the maximum potential firing rating to 21 MMBtu/hr. In turn, this reduction in rated heat output decreased the maximum potential hourly CO, NO<sub>x</sub>, and volatile organic compounds (VOC) emission rates of this unit; as previous emission estimates were based on the firing of four burners.

**MAQP #2459-16** replaces MAQP #2459-15.

D. Response to Public Comments

Person/Group Commenting	Permit Reference	Comment	Department Response
Stillwater Mining Co.	MAQP Section I.B - Current Permit Action	Stillwater requested that the current permit action description be changed to eliminate potential confusion about the access portals and to clarify electrical generation requirements.	The Department agreed to the request.
	MAQP Analysis Section I.D - Current Permit Action	In line with the above comment, Stillwater requested the current permit action description be changed in the permit analysis.	The Department agreed to the request.
	MAQP Section II.A.10 & 11 – Conditions and Limitations	Stillwater requested the permit conditions for the Past Plant Flush Pump Emergency Engine and Shaft Emergency Generator be updated so that language is consistent with corresponding Operating Permit conditions.	The Department agreed to the request.
	MAQP Analysis Section I.A - Permitted Equipment	Stillwater requested that the permitted equipment description for EU018 and EU019 within the table be changed to reflect Stillwater's ability to operate more than one diesel generator set under each emitting unit.	The Department agreed to the request.
	MAQP Analysis Section I.D - Current Permit Action	In the initial application for modification Stillwater Mining requested particulate emissions from the Mine Ventilation Exhaust (EU001) be changed from non-	The Department agreed to the request and altered the paragraph to clarify change.

Person/Group Commenting	Permit Reference	Comment	Department Response
		fugitive to fugitive. Stillwater Mining requested clarification of the discussion within the current Stillwater permit action as it pertains to the categorization of particulate emissions from this source.	
	MAQP Analysis Section IV - Emission Inventory	Stillwater requested the emission inventory and calculations summaries be changed to accurately reflect the facility's potential emissions. Emission calculations for Load & Dump Waste Rock onto Tailings Embankment (EU006) were provided in the analysis, but inadvertently missing from the non-fugitive summary table. Stillwater requested inclusion of the omitted emissions within the emission inventory summary table.	The Department updated emission inventory table, including emission totals, to account for emissions from the Load & Dump Waste Rock onto Tailings Embankment/Storage emitting source.
	MAQP Analysis Section IV - Emission Inventory	Stillwater requested the emission inventory and calculations summaries be changed to accurately reflect the facility's potential emissions. The maximum production rate from Underground Primary Crushing (EU001b) overstated the sources potential production capacity. Stillwater requested correction to the emitting unit's potential production capacity.	The Department inadvertently attributed crushing production from above ground sources to the underground primary crushing source. The Department updated the emission inventory to reflect the source maximum capacity at 912,500 tons per year.
	MAQP Section II.A.20 - Conditions and Limitations	Stillwater requested correction of a typographical error.	The Department made the appropriate correction.
	MAQP Analysis Section II.C.5 - Emission Standards	Stillwater indicated that mistaken numbers were included within the regulatory reference for ARM 17.8.322 and requested a correction.	The numbers reference specific paragraphs cited within ARM 17.8.322 and are appropriate general conditions included within most MAQP analyses. The Department did not change the reference.
	MAQP Analysis Section III - BACT Determination	Stillwater requested correction of typographical errors.	The Department made the appropriate corrections.

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 operation. The complete rules are stated in the 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 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, including instruments and sensing devices, and shall conduct tests, emission or ambient, for such periods of time as may be necessary, using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Montana Clean Air Act, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

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

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant 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 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide (SO<sub>2</sub>)
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide (NO<sub>2</sub>)
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide (CO)
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone (O<sub>3</sub>)
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide (H<sub>2</sub>S)
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter (PM)
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility

9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Stillwater Mining 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. This rule requires that no person shall cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emission of airborne particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, suffer, allow or permit 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 Processes. This rule requires that no person shall cause, suffer, allow, or permit to be discharged into the outdoor atmosphere from any operation, process or activity, particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.322 Sulfur Oxide Emissions -- Sulfur in Fuel. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (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 60, Standards of Performance for New Stationary Sources (NSPS). Stillwater Mining is considered an affected facility under 40 CFR 60 and is subject to the requirements of the following subpart:
  - a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
  - b. 40 CFR 60, Subpart LL – Standards of Performance for Metallic Mineral Processing Plants - requires an opacity limitation of 10% for metallic mineral process fugitive emissions, a stack emission limitation of 0.05 grams per dry standard cubic meter (0.022 grains per dry standard cubic foot), and a stack opacity limitation of 7%. The surface mining operations at Stillwater Mining are subject to 40 CFR 60, Subpart LL.
  - c. 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE). Owners and operators of stationary CI ICE that

commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines, and owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005, are subject to this subpart. Based on the information submitted by Stillwater Mining, the existing CI ICE equipment are not currently subject to this subpart because the engines commenced construction prior to the applicability dates; however, modification or replacement of these engines could trigger applicability. The Benbow and Blitz engines proposed under this current permit action (modification) are subject to the provisions of Subpart III.

7. ARM 17.8.341 Emission Standards for Hazardous Air Pollutants. The owner or operator of any existing or new stationary source, as defined and applied in 40 CFR Part 61, shall comply with the standards and provisions of 40 CFR Part 61.
  8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR 63, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
    - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to an NESHAP Subpart as listed below:
    - b. 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. The proposed portal heater does not meet the definition of a process heater per this subpart, nor is the facility a major source of hazardous air pollutants (HAP). Therefore, this subpart is not triggered as part of this permit action.
    - c. 40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Stillwater Mining has two emergency diesel RICE units and two generator sets at the Nye facility which are affected sources under this subpart.
- D. ARM 17.8, Subchapter 4 – Stack Height and Dispersion Techniques, including, but not limited to:
1. ARM 17.8.401 Definitions. This rule includes a list of definitions used in this chapter, unless indicated otherwise in a specific subchapter.
  2. ARM 17.8.402 Requirements. Stillwater Mining must demonstrate compliance with the ambient air quality standards with a stack height that does not exceed Good Engineering Practices (GEP). The proposed heights of all stacks for the Benbow and Blitz engines are below the allowable 65-meter GEP stack height.

E. 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. Stillwater Mining submitted the appropriate fee for the current permit action.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department. 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.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the PTE greater than 25 TPY of any pollutant. Stillwater Mining has the PTE greater than 25 TPY of PM, PM<sub>10</sub>, PM with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>), NO<sub>x</sub>, CO, and VOC; therefore, a permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Stillwater 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. Stillwater Mining submitted an affidavit of publication of public notice for the September 7, 2012, issue of the *Billings Gazette*, a newspaper of general circulation in the Town of Billings, MT in Yellowstone County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Stillwater 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 modified 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 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).
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(1) 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. 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.
- G. 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 Stillwater Mining facility is not a major stationary source because it is not listed and it does not have the potential to emit more than 250 TPY (excluding fugitive emissions) of any pollutant.
- H. ARM 17.8, Subchapter 12 – Operating Permit Program, 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 TPY of any pollutant.
    - b. PTE > 10 TPY of a single HAP, or PTE > 25 TPY of combined HAPs, or a lesser quantity as the Department may establish by rule.
    - c. Sources with PTE > 70 TPY of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.
  2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. 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 MAQP #2459-16 for Stillwater, the following conclusions were made:
    - a. The facility's PTE is greater than 100 TPY for CO
    - b. The facility's PTE is less than 10 TPY for any single HAP and less than 25 TPY of combined HAPs.
    - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
    - d. This facility is subject to a current NSPS (40 CFR 60, Subpart LL an Subpart IIII)
    - e. This facility is subject to a current NESHAP standard (40 CFR 60, Subpart ZZZZ).
    - f. This source is not a Title IV affected source, nor a solid waste combustion unit.
    - g. This source is not an EPA designated Title V source.

Based on the preceding information, Stillwater Mining is subject to the Title V Operating Permit program. Operating Permit #OP2459-04 was issued final and effective on June 30, 2007. Stillwater Mining has submitted a Title V Renewal application received on December 23, 2011, which is to be issued final by the Department no later than June 23, 2013.

### III. BACT Determination

A BACT determination is required for each new or modified source. Stillwater shall install on the new or modified source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was submitted by Bison, on behalf of Stillwater Mining, within the application for modification of MAQP #2459-15, addressing available methods of controlling PM<sub>10</sub>, NO<sub>x</sub>, CO, VOC, and SO<sub>2</sub> emissions from the Benbow and Blitz diesel-fired generator set engines. The Department reviewed these methods, as well as previous BACT determinations at similar sources. The following control options have been reviewed by the Department in order to make the following BACT determination.

#### A. Interim Tier 4 Engines

Stillwater Mining proposed the utilization of engines certified to EPA's Interim Tier 4 exhaust emission standards for non-road engines as promulgated under 40 CFR, Part 1039.102, Table 7 for generator sets greater than 900 kW. Operation of a Tier 4 Engine provides significant reduction in PM<sub>10</sub>, NO<sub>x</sub>, CO and VOC and presents the most stringent engine exhaust control standards currently applicable.

#### B. Engine Design and Good Combustion Practice

The use of engine design and good combustion practice was proposed as BACT; in lieu of post manufacture add-on controls. With the proposed use of generator sets meeting the Interim Tier 4 exhaust emission standards, Stillwater Mining, will employ generator engines meeting the highest design standards presently available. Manufacturers' meeting the Interim Tier 4 Standard integrate advanced emission control mechanisms as a design component of the generator engine. Typical these advanced emission control components would include oxidation catalyst for PM control, selective catalytic reduction SCR, and air-to-fuel ratio control. Additionally, these engines will be required to comply with the National Emissions Standards for Hazardous Air Pollutant Sources for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), as well as, the Standard of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) which specify work practice and monitoring standards to ensure engines are maintained and operated in manner consistent with good air pollution control practice for minimizing emissions.

#### C. Fuel Requirements

Stillwater Mining proposed the use of ultra-low sulfur diesel (ULSD) as fuel to fire the generator set engines as BACT for SO<sub>2</sub> control.

The Department concurred with the control options selected as BACT for the diesel engines and that these selected BACT elements are consistent with other recently permitted similar sources. Therefore, compliance with relevant emission control standards, engine design and good combustion practice, as well as, fuel use requirements were determined to constitute BACT for the Blitz and Benbow diesel engines.

#### IV. Emission Inventory

##### Facility Fugitive and Non-Fugitive Sources:

Unit #	Source	Emissions TPY [PTE]						
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	VOC	SO <sub>2</sub>
EU001	Mine Ventilation Exhaust	79.93	32.71	11.71	100.60	66.89	ND	4.44
EU002	Crushing Ore (Surface)	18.71	8.40	2.87				
EU003	Load & Dump: Coarse Ore into Crusher Hopper	36.50	14.60	5.48				
EU004	Load & Dump: Coarse Ore into Mill Hopper	36.50	14.60	5.48				
EU005	Conveying System Transfer Points	16.43	6.57	2.46				
EU006	Load & Dump Waste Rock onto Tailings Embankment/Storage	21.90	8.76	3.29				
EU007	Disturbed Areas (from MDEQ Annual EI)	10.41	5.21	0.57				
EU008	Haul Roads	158.89	41.50	4.15				
EU009	Diesel Use	7.86	7.86	7.86	111.77	24.08	9.12	7.35
EU010	Unleaded Gasoline Use (65,000 gallons per year (gal/yr))	0.42	0.42	0.42	6.89	4.18	12.80	0.35
EU011	Paste Plant Emergency Flush Pump Emergency Diesel Engine (225 horsepower (bhp))	0.12	0.12	0.12	1.74	0.38	0.14	0.12
EU012	Concrete Batch Plant	0.41	0.32	0.25				
EU015	Soda Ash Silo	0.01	0.01	0.01				
EU016	Propane Combustion from Portal Heaters, Space Heaters, Line Heaters, and Other Combustion Sources	1.05	1.05	1.05	19.50	40.98	1.20	2.25
EU017	Shaft Emergency Diesel Generator Engine (947 bhp)	0.17	0.17	0.17	5.68	1.30	0.15	0.10
EU018	Blitz Generator Sets (≤ 4022 bhp)	2.90	2.90	2.90	19.41	101.39	11.59	0.19
EU019	Benbow Generator Sets (≤ 4022 bhp)	2.90	2.90	2.90	19.41	101.39	11.59	0.19
IEU01	Grinding Mills (wet process)							
IEU02	Cycloning (wet process)							
IEU03	Flotation Circuit (wet process)							
IEU04	Thickener (wet process)							
IEU05	Vacuum filter (wet process)							
IEU06	Paste Plant Operations	1.61	1.03	0.24				
IEU07	Open Burning	0.34	0.34	0.34		2.80	0.38	
IEU08	Above Ground Fuel Storage						0.62	
<b>EMISSION TOTALS ►</b>		<b>397.06</b>	<b>149.47</b>	<b>52.27</b>	<b>285.00</b>	<b>343.39</b>	<b>47.59</b>	<b>14.99</b>

##### Facility Non-Fugitive Sources:

Unit #	Source	Emissions TPY [PTE]						
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	VOC	SO <sub>2</sub>
EU002	Crushing Ore (Surface)	18.71	8.40	2.87				
EU011	Paste Plant Emergency Flush Pump Emergency Diesel Engine (225 horsepower (bhp))	0.12	0.12	0.12	1.74	0.38	0.14	0.12
EU012	Concrete Batch Plant Operations	0.41	0.32	0.25				
EU015	Soda Ash Silo	0.01	0.01	0.01				
EU016	Propane Combustion from Portal Heaters, Space Heaters, Line Heaters, and Other Combustion Sources	1.05	1.05	1.05	19.50	40.98	1.20	2.25
EU017	Shaft Emergency Diesel Generator Engine (947 bhp)	0.17	0.17	0.17	5.68	1.30	0.15	0.10

EU018	Blitz Generator Sets (≤ 4022 bhp)	2.90	2.90	2.90	19.41	101.39	11.59	0.19
EU019	Benbow Generator Sets (≤ 4022 bhp)	2.90	2.90	2.90	19.41	101.39	11.59	0.19
<b>EMISSION TOTALS ►</b>		<b>26.26</b>	<b>15.87</b>	<b>10.27</b>	<b>65.74</b>	<b>245.44</b>	<b>24.67</b>	<b>2.85</b>

**Notes:**

- Wet Processes are considered to have negligible emissions.
- Empty cells are equivalent to zero potential emissions
- Gaseous mine ventilation exhaust emissions result from explosive detonation and mobile diesel sources only and are considered fugitive or non-regulated emissions. All underground stationary point sources are electrically powered.

awcfm, actual wet cubic feet per minute	PTE, Potential To Emit
bhp, brake-horsepower	PM, particulate matter
Btu, British Thermal Units	PM <sub>COND</sub> , condensable particulate matter
CO, carbon monoxide	PM <sub>10</sub> , particulate matter with an aerodynamic diameter of 10 microns or less
dscfm, dry standard cubic feet per minute	PM <sub>2.5</sub> , particulate matter with an aerodynamic diameter of 2.5 microns or less [Sum of condensable and filterable]
ft <sup>2</sup> , square foot	SCC, source code classification
g, gram	scf, standard cubic feet
gr, grains	SO <sub>2</sub> , oxides of sulfur
Hg, mercury	TPH, tons per hour
lb, pound	TPY, tons per year
MMBtu, million British Thermal Units	VMT, vehicle miles travelled
MMscf, million standard cubic feet	VOC, volatile organic compounds
NMHC, non-methane hydrocarbons	
NO <sub>x</sub> , oxides of nitrogen	

**EU001 Mine Ventilation Exhaust:**

**EU001a – Underground Gaseous Emissions:**

Stack Parameters:

Exhaust Flow Rate: 2000000.00 awcfm  
1531654.959 dscfm (Calculated)  
Moisture: 2.42 % (EEMC Source Test)  
Temperature: 68 °Fahrenheit (EEMC Source Test)  
528 °Rankine  
Absolute Pressure: 25.2 inches Hg (EEMC Source Test)

Basis:

Portal 5150 Upper West - Source Test Data, EEMC; July 20, 2010 - July 22, 2010  
Standard Conditions → 32°F at 29.92 inches Hg [volume/mole = 359 scf/lb-mole]  
Operating Hours: 8760 hours/year

**NO<sub>x</sub> Emissions:**

Emission Factor = 1.95 ppmv [EEMC Source Test Data]

Calculation:

$$(1.95 \text{ ppmv}/1000000 \text{ ppmv}) * (46.01 \text{ lb}/1 \text{ lb-mol}) * (1 \text{ lb-mol}/359 \text{ scf}) * (1,531,655 \text{ scf}/1 \text{ min}) * (60 \text{ min}/1 \text{ hr}) = 22.97 \text{ lbs/hr}$$

$$(22.97 \text{ lbs/hr}) * (8760 \text{ hrs/yr}) * (0.0005 \text{ ton/lb}) = 100.60 \text{ tons/yr}$$

**CO Emissions:**

Emission Factor = 2.13 ppmv [EEMC Source Test Data]

Calculation:

$$(2.13 \text{ ppmv}/1000000 \text{ ppmv}) * (28.01 \text{ lb}/1 \text{ lb-mol}) * (1 \text{ lb-mol}/359 \text{ scf}) * (1,531,655 \text{ scf}/1 \text{ min}) * (60 \text{ min}/1 \text{ hr}) = 15.27 \text{ lbs/hr}$$

$$(15.27 \text{ lbs/hr}) * (8760 \text{ hrs/yr}) * (0.0005 \text{ ton/lb}) = 66.89 \text{ tons/yr}$$

**SO<sub>2</sub> Emissions:**

Emission Factor = 0.05 ppmv [EEMC Source Test Data]

Calculation:

$$(0.05 \text{ ppmv}/1000000 \text{ ppmv}) * (64.01 \text{ lb}/1 \text{ lb-mol}) * (1 \text{ lb-mol}/359 \text{ scf}) * (1,531,655 \text{ scf}/1 \text{ min}) * (60 \text{ min}/1 \text{ hr}) = 0.82 \text{ lbs/hr}$$

$$(0.82 \text{ lbs/hr}) * (8760 \text{ hrs/yr}) * (0.0005 \text{ ton/lb}) = 3.59 \text{ tons/yr}$$

**EU001b – Underground Primary Crushing - Jaw Crusher [SCC 3-03-024-05]:**

Maximum Process Rate = 912,500 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

**PM Emissions:**

Emission Factor = 0.02 lb/ton (primary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.02 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 9.13 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.009 lb/ton (primary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.009 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 4.11 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.003 lb/ton (PM<sub>2.5</sub> = 15% of PM ► AP-42 Appendix B.2 - Table B.2.2, Category 3, 1/90)

Calculation:  $(912,500 \text{ ton/yr}) * (0.003 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 1.37 \text{ ton/yr}$

**EU001c – Underground Conveying System Transfer Points - West Side [SCC 3-03-024-08]:**

Maximum Process Rate = 912,500 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 9 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (1 - 0/100) * (9 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 41.06 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (1 - 0/100) * (9 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 16.43 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation:  $(912,500 \text{ ton/yr}) * (0.0015 \text{ lb/ton}) * (1 - 0/100) * (9 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 6.16 \text{ ton/yr}$

**EU001d – Underground Conveying System Transfer Points - East Side [SCC 3-03-024-08]:**

Maximum Process Rate = 912,500 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 6 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (1 - 0/100) * (6 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 27.38 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(912,500 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (1 - 0/100) * (6 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 10.95 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation: (912,500 ton/yr) \* (0.0015 lb/ton) \* (1 - 0/100) \* (6 transfers) \* (ton/2000 lb) = 4.11 ton/yr

**EU001e – Underground Blasting:**Area Per Blast: 560 ft<sup>2</sup> (historical maximum)

Blast Per Day: 70 Blast (historical maximum)

**PM Emissions:**Emission Factor (lb/blast) = 0.000014 (A)<sup>1.5</sup> (AP-42 Table 11.9-1, 7/98)(0.000014) \* (560 ft<sup>2</sup>)<sup>1.5</sup> = 0.186 lbs/blast

A, area per blast

Emission Factor = 0.186 lbs/blast

Calculation (0.186 lbs/blast) \* (70 blast/day) = 12.99 lbs/day

(12.99 lbs/day) \* (365 days/yr) \* (0.0005 ton / lb) = 2.37 tons/yr

**PM<sub>10</sub> Emissions:**Emission Factor = 0.096 lbs/blast (PM→PM<sub>10</sub> scaling factor = 0.52, AP-42 Table 11.91, 7/98)

Calculations (0.096 lbs/blast) \* (70 blast/day) = 6.75 lbs/day

(6.75 lbs/day) \* (365 days/yr) \* (0.0005 ton / lb) = 1.23 tons/yr

**PM<sub>2.5</sub> Emissions:**Emission Factor = 0.006 lbs/blast (PM→PM<sub>2.5</sub> scaling factor = 0.15, AP-42 Table 11.91, 7/98)

Calculations (0.006 lbs/blast) \* (70 blast/day) = 0.39 lbs/day

(0.39 lbs/day) \* (365 days/yr) \* (0.0005 ton / lb) = 0.07 tons/yr

**EU002 Ore Crushing (surface):****EU002a – Primary Crushing (jaw crusher) [SCC 3-03-024-05]:**

Maximum Process Rate = 1,825,000 ton/yr (Application information, maximum mine production)

Maximum Hours of Operation = 8,760 hrs/yr

**PM Emissions:**

Emission Factor = 0.02 lb/ton (primary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation: (1,825,000 ton/yr) \* (0.02 lb/ton) \* (ton/2000 lb) = 18.25 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.009 lb/ton (primary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation: (1,825,000 ton/yr) \* (0.009 lb/ton) \* (ton/2000 lb) = 8.21 ton/yr

**PM<sub>2.5</sub> Emissions:**Emission Factor = 0.003 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation: (1,825,000 ton/yr) \* (0.003 lb/ton) \* (ton/2000 lb) = 2.74 ton/yr

**EU002b – Secondary Crushing (cone crusher) [SCC 3-03-024-06]:**

Maximum Process Rate = 1,825,000 ton/yr (Application information, maximum mine production)

Maximum Hours of Operation = 8,760 hrs/yr

**PM Emissions:**

Emission Factor = 0.05 lb/ton (secondary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Control Efficiency = 99% (fabric filter)

Calculation: (1,825,000 ton/yr) \* (0.05 lb/ton) \* (1 - 99/100) \* (ton/2000 lb) = 0.46 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.02 lb/ton (secondary crushing - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Control Efficiency = 99% (fabric filter)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.02 \text{ lb/ton}) * (1 - 99/100) * (\text{ton}/2000 \text{ lb}) = 0.18 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.015 lb/ton (PM<sub>2.5</sub> = PM \* 30%, AP 42, Appendix B.2, Category 4, 9/90)

Control Efficiency = 99% (fabric filter)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.015 \text{ lb/ton}) * (1 - 99/100) * (\text{ton}/2000 \text{ lb}) = 0.14 \text{ ton/yr}$

**EU003 Load & Dump Coarse Ore/Fine Ore into Crusher Hopper [SCC 3-03-024-08]:**

Maximum Process Rate = 1,825,000 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 4 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 36.50 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 14.60 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.0015 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 5.48 \text{ ton/yr}$

**EU004 Load & Dump Fine Ore into Crusher Hopper or Coarse Ore Stockpile [SCC 3-03-024-08]:**

Maximum Process Rate = 1,825,000 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 4 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 36.50 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 14.60 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation:  $(1,825,000) * (0.0015 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 5.48 \text{ ton/yr}$

**EU005 Surface Conveying System Transfer Points [SCC 3-03-024-08]:**

Maximum Process Rate = 1,825,000 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 18 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Control Efficiency = 90% (enclosure)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (1 - 90/100) * (18 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 16.43 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Control Efficiency = 90% (enclosure)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (1 - 90/100) * (18 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 6.57 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Control Efficiency = 90% (enclosure)

Calculation:  $(1,825,000 \text{ ton/yr}) * (0.0015 \text{ lb/ton}) * (1 - 90/100) * (18 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 2.46 \text{ ton/yr}$

**EU006 Load & Dump Waste Rock onto Tailings Embankment [SCC 3-03-024-08]:**

Maximum Process Rate = 1,095,000 ton/yr (Application information, max mine production)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Transfers = 4 transfers

**PM Emissions:**

Emission Factor = 0.01 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,095,000 \text{ ton/yr}) * (0.01 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 21.90 \text{ ton/yr}$

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.004 lb/ton (Material handling & transfer (non-bauxite) - high moisture ore, AP 42, Table 11.24.2-2, 8/82)

Calculation:  $(1,095,000 \text{ ton/yr}) * (0.004 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 8.76 \text{ ton/yr}$

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0015 lb/ton (PM<sub>2.5</sub> = PM \* 15%, AP 42, Appendix B.2, Category 3, 9/90)

Calculation:  $(1,095,000 \text{ ton/yr}) * (0.0015 \text{ lb/ton}) * (4 \text{ transfers}) * (\text{ton}/2000 \text{ lb}) = 3.29 \text{ ton/yr}$

**EU008 Haul Roads:****EU008a – Ore hauled from mine to mill hopper grizzly in front end loader:**

Vehicle Miles Traveled (VMT) per Day = 5,819 VMT/yr (Application Info)

VMT per hour =  $(5,819 \text{ VMT/yr}) / (8760 \text{ hrs/yr}) = 0.66 \text{ VMT/hr}$

Hours of Operation = 8,760 hrs/yr

Number of days > 0.01 inches of rain = 120 days/yr (AP-42, Section 13.2.2, Figure 13.2.2-1, 11/06)

**PM Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 6.73 \text{ lb/VMT}$

Where: k = constant = 4.9 lbs/VMT (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 25.22 tons (Application Info)

a = constant = 0.7 (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(5,819 \text{ VMT/yr}) * (6.73 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 13.13 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(5,819 \text{ VMT/yr}) * (6.73 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 6.57 \text{ tons/yr}$  (Apply 50% control efficiency)

#### **PM<sub>10</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 1.71 \text{ lb/VMT}$

Where: k = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 25.22 tons (Application Info)

a = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(5,819 \text{ VMT/yr}) * (1.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 3.35 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(5,819 \text{ VMT/yr}) * (1.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 1.67 \text{ tons/yr}$  (Apply 50% control efficiency)

#### **PM<sub>2.5</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 0.17 \text{ lb/VMT}$

Where: k = constant = 0.15 lbs/VMT (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 25.22 tons (Application Info)

a = constant = 0.9 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(5,819 \text{ VMT/yr}) * (0.17 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 0.33 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(5,819 \text{ VMT/yr}) * (0.17 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 0.17 \text{ tons/yr}$  (Apply 50% control efficiency)

#### **EU008b – Ore from east side (above 5000 feet):**

Vehicle Miles Traveled (VMT) per Day = 7,120 VMT/yr (Application Info)

VMT per hour =  $(7,120 \text{ VMT/yr}) / (8760 \text{ hrs/yr}) = 0.81 \text{ VMT/hr}$

Hours of Operation = 8,760 hrs/yr

Number of days > 0.01 inches of rain = 120 days/yr (AP-42, Section 13.2.2, Figure 13.2.2-1, 11/06)

#### **PM Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 10.51 \text{ lb/VMT}$

Where: k = constant = 4.9 lbs/VMT (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 68 tons (Application Info)

a = constant = 0.7 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(7,120 \text{ VMT/yr}) * (10.51 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 25.11 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(7,120 \text{ VMT/yr}) * (10.51 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 12.56 \text{ tons/yr}$  (Apply 50% control efficiency)

**PM<sub>10</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

$$\text{Emission Factor} = k * (s / 12)^a * (W / 3)^b = 2.68 \text{ lb/VMT}$$

Where: k = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 68 tons (Application Info)

a = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% = (365 - 120) / 365 (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation: (7,120 VMT/yr) \* (2.68 lb/VMT) \* (67%) \* (ton/2000 lb) = 6.40 tons/yr (Uncontrolled Emissions)

Calculation: (7,120 VMT/yr) \* (2.68 lb/VMT) \* (67%) \* (ton/2000 lb) \* (1-50/100) = 3.20 tons/yr (Apply 50% control efficiency)

**PM<sub>2.5</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

$$\text{Emission Factor} = k * (s / 12)^a * (W / 3)^b = 0.27 \text{ lb/VMT}$$

Where: k = constant = 0.15 lbs/VMT (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 68 tons (Application Info)

a = constant = 0.9 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% = (365 - 120) / 365 (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation: (7,120 VMT/yr) \* (0.27 lb/VMT) \* (67%) \* (ton/2000 lb) = 0.64 tons/yr (Uncontrolled Emissions)

Calculation: (7,120 VMT/yr) \* (0.27 lb/VMT) \* (67%) \* (ton/2000 lb) \* (1-50/100) = 0.32 tons/yr (Apply 50% control efficiency)

**EU008c – Ore to coarse ore pile from west side:**

Vehicle Miles Traveled (VMT) per Day = 377 VMT/yr (Application Info)

VMT per hour = (377 VMT/yr) / (8760 hrs/yr) = 0.04 VMT/hr

Hours of Operation = 8,760 hrs/yr

Number of days > 0.01 inches of rain = 120 days/yr (AP-42, Section 13.2.2, Figure 13.2.2-1, 11/06)

**PM Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

$$\text{Emission Factor} = k * (s / 12)^a * (W / 3)^b = 10.65 \text{ lb/VMT}$$

Where: k = constant = 4.9 lbs/VMT (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 70 tons (Application Info)

a = constant = 0.7 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% = (365 - 120) / 365 (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation: (377 VMT/yr) \* (10.65 lb/VMT) \* (67%) \* (ton/2000 lb) = 1.35 tons/yr (Uncontrolled Emissions)

Calculation: (377 VMT/yr) \* (10.65 lb/VMT) \* (67%) \* (ton/2000 lb) \* (1-50/100) = 0.67 tons/yr (Apply 50% control efficiency)

**PM<sub>10</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

$$\text{Emission Factor} = k * (s / 12)^a * (W / 3)^b = 2.71 \text{ lb/VMT}$$

Where: k = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

$s$  = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)  
 $W$  = mean vehicle weight = 70 tons (Application Info)  
 $a$  = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)  
 $b$  = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)  
 Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)  
 Control Efficiency = 50% (Water spray or chemical dust suppressant)  
 Calculation:  $(377 \text{ VMT/yr}) * (2.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 0.34 \text{ tons/yr}$  (Uncontrolled Emissions)  
 Calculation:  $(377 \text{ VMT/yr}) * (2.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 0.17 \text{ tons/yr}$  (Apply 50% control efficiency)

**PM<sub>2.5</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.  
 Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 0.27 \text{ lb/VMT}$   
 Where:  $k$  = constant = 0.15 lbs/VMT (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)  
 $s$  = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)  
 $W$  = mean vehicle weight = 70 tons (Application Info)  
 $a$  = constant = 0.9 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)  
 $b$  = constant = 0.45 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)  
 Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)  
 Control Efficiency = 50% (Water spray or chemical dust suppressant)  
 Calculation:  $(377 \text{ VMT/yr}) * (0.27 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 0.03 \text{ tons/yr}$  (Uncontrolled Emissions)  
 Calculation:  $(377 \text{ VMT/yr}) * (0.27 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 0.02 \text{ tons/yr}$  (Apply 50% control efficiency)

**EU008d – Waste rock tailings to embankment/storage:**

Vehicle Miles Traveled (VMT) per Day = 56,638 VMT/yr (Application Info)  
 VMT per hour =  $(56,638 \text{ VMT/yr}) / (8760 \text{ hrs/yr}) = 6.47 \text{ VMT/hr}$   
 Hours of Operation = 8,760 hrs/yr  
 Number of days > 0.01 inches of rain = 120 days/yr (AP-42, Section 13.2.2, Figure 13.2.2-1, 11/06)

**PM Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.  
 Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 10.65 \text{ lb/VMT}$   
 Where:  $k$  = constant = 4.9 lbs/VMT (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)  
 $s$  = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)  
 $W$  = mean vehicle weight = 70 tons (Application Info)  
 $a$  = constant = 0.7 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)  
 $b$  = constant = 0.45 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)  
 Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)  
 Control Efficiency = 50% (Water spray or chemical dust suppressant)  
 Calculation:  $(56,638 \text{ VMT/yr}) * (10.65 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 202.39 \text{ tons/yr}$  (Uncontrolled Emissions)  
 Calculation:  $(56,638 \text{ VMT/yr}) * (10.65 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 101.19 \text{ tons/yr}$  (Apply 50% control efficiency)

**PM<sub>10</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.  
 Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 2.71 \text{ lb/VMT}$   
 Where:  $k$  = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)  
 $s$  = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)  
 $W$  = mean vehicle weight = 70 tons (Application Info)  
 $a$  = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)  
 $b$  = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)  
 Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(56,638 \text{ VMT/yr}) * (2.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 51.58 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(56,638 \text{ VMT/yr}) * (2.71 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 25.79 \text{ tons/yr}$  (Apply 50% control efficiency)

### **PM<sub>2.5</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (W / 3)^b = 0.27 \text{ lb/VMT}$

Where: k = constant = 0.15 lbs/VMT (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 70 tons (Application Info)

a = constant = 0.9 (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(56,638 \text{ VMT/yr}) * (0.27 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 5.16 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(56,638 \text{ VMT/yr}) * (0.27 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 2.58 \text{ tons/yr}$  (Apply 50% control efficiency)

### **EU008e – Light duty vehicle traffic on unpaved roads:**

Vehicle Miles Traveled (VMT) per Day = 250,000 VMT/yr (Application Info)

VMT per hour =  $(250,000 \text{ VMT/yr}) / (8760 \text{ hrs/yr}) = 28.54 \text{ VMT/hr}$

Hours of Operation = 8,760 hrs/yr

Number of days > 0.01 inches of rain = 120 days/yr (AP-42, Section 13.2.2, Figure 13.2.2-1, 11/06)

### **PM Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (S / 30)^d / (M/0.5)^c = 0.90 \text{ lb/VMT}$

Where: k = constant = 6 lbs/VMT (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

S = mean vehicle speed (mph) = 15 mph (Application Info)

a = constant = 1 (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

d = constant = 0.3 (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

M = surface material moisture content = 6.49% (Average value, AP 42, Table 13.2.2-3, 11/06)

c = constant = 0.3 (Value for PM<sub>30</sub>/TSP, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(250,000 \text{ VMT/yr}) * (0.90 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 75.81 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(250,000 \text{ VMT/yr}) * (0.90 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 37.90 \text{ tons/yr}$  (Apply 50% control efficiency)

### **PM<sub>10</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (S / 30)^d / (M/0.5)^c = 0.25 \text{ lb/VMT}$

Where: k = constant = 1.5 lbs/VMT (Value for PM<sub>10</sub>, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

S = mean vehicle speed (mph) = 15 mph (Application Info)

a = constant = 1 (Value for PM<sub>10</sub>, AP 42, Table 13.2.2-2, 11/06)

d = constant = 0.5 (Value for PM<sub>10</sub>, AP 42, Table 13.2.2-2, 11/06)

M = surface material moisture content = 6.49% (Average value, AP 42, Table 13.2.2-3, 11/06)

c = constant = 0.2 (Value for PM<sub>10</sub>, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(250,000 \text{ VMT/yr}) * (0.25 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 21.32 \text{ tons/yr}$  (Uncontrolled Emissions)  
Calculation:  $(250,000 \text{ VMT/yr}) * (0.25 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 10.66 \text{ tons/yr}$  (Apply 50% control efficiency)

#### **PM<sub>2.5</sub> Emissions:**

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor =  $k * (s / 12)^a * (S / 30)^d / (M/0.5)^c = 0.03 \text{ lb/VMT}$

Where: k = constant = 0.15 lbs/VMT (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 4.8 % (Mean value, sand/gravel processing, plant road, AP 42, Table 13.2.2-1, 11/06)

S = mean vehicle speed (mph) = 15 mph (Application Info)

a = constant = 1 (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

d = constant = 0.5 (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

M = surface material moisture content = 6.49% (Average value, AP 42, Table 13.2.2-3, 11/06)

c = constant = 0.2 (Value for PM<sub>2.5</sub>, AP 42, Table 13.2.2-2, 11/06)

Natural mitigation = 67% =  $(365 - 120) / 365$  (AP-42, Section 13.2.2, Equation (2), 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation:  $(250,000 \text{ VMT/yr}) * (0.03 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) = 2.13 \text{ tons/yr}$  (Uncontrolled Emissions)

Calculation:  $(250,000 \text{ VMT/yr}) * (0.03 \text{ lb/VMT}) * (67\%) * (\text{ton}/2000 \text{ lb}) * (1-50/100) = 1.07 \text{ tons/yr}$  (Apply 50% control efficiency)

#### **EU009 Diesel Use:**

Operational Capacity of Facility = 50,690 MMBtu/yr (Application Info)

#### **Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.31 lb/MMBtu (All PM < 1 mm, AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (0.31 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 7.86 \text{ ton/yr}$

#### **NO<sub>x</sub> Emissions:**

Emission Factor = 4.41 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (4.41 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 111.77 \text{ ton/yr}$

#### **CO Emissions:**

Emission Factor = 0.95 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (0.95 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 24.08 \text{ ton/yr}$

#### **VOC Emissions:**

Emission Factor = 0.36 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, TOC, Exhaust & Crankcase, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (0.36 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 9.12 \text{ ton/yr}$

#### **SO<sub>2</sub> Emissions:**

Emission Factor = 0.29 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (0.29 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 7.35 \text{ ton/yr}$

#### **CO<sub>2</sub> Emissions:**

Emission Factor = 164 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation:  $(50,690 \text{ MMBtu/yr}) * (164 \text{ lb/MMBtu}) * (\text{ton}/2000 \text{ lb}) = 4,157 \text{ ton/yr}$

#### **EU010 Gasoline Use:**

Operational Capacity of Facility = 8,450 MMBtu/yr (Application Info)

**Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.1 lb/MMBtu (All PM < 1 mm, AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (8,450 MMBtu/yr) \* (0.1 lb/MMBtu) \* (ton/2000 lb) = 0.42 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 1.63 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (8,450 MMBtu/yr) \* (1.63 lb/MMBtu) \* (ton/2000 lb) = 6.89 ton/yr

**CO Emissions:**

Emission Factor = 0.99 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (8,450 MMBtu/yr) \* (0.99 lb/MMBtu) \* (ton/2000 lb) = 4.18 ton/yr

**VOC Emissions:**

Emission Factor = 3.03 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, TOC, Exhaust & Crankcase, 10/96)

Calculation: (8,450 MMBtu/yr) \* (3.03 lb/MMBtu) \* (ton/2000 lb) = 12.80 ton/yr

**SO<sub>2</sub> Emissions:**

Emission Factor = 0.084 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (8,450 MMBtu/yr) \* (0.084 lb/MMBtu) \* (ton/2000 lb) = 0.35 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 154 lb/MMBtu (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (8,450 MMBtu/yr) \* (154 lb/MMBtu) \* (ton/2000 lb) = 651 ton/yr

**EU011 - Diesel Engine Paste Plant Flush Pump:**

Operational Capacity of Engine = 225 bhp

Hours of Operation = 500.00 hrs/yr

**Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0022 lbs/hp-hr (All PM < 1 mm, AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (0.0022 lbs/hp-hr) \* (ton/2000 lb) = 0.12 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 0.031 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (0.031 lbs/hp-hr) \* (ton/2000 lb) = 1.74 ton/yr

**CO Emissions:**

Emission Factor = 0.00668 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (0.00668 lbs/hp-hr) \* (ton/2000 lb) = 0.38 ton/yr

**VOC Emissions:**

Emission Factor = 0.00247 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (0.00247 lbs/hp-hr) \* (ton/2000 lb) = 0.14 ton/yr

**SO<sub>2</sub> Emissions:**

Emission Factor = 0.00205 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (0.00205 lbs/hp-hr) \* (ton/2000 lb) = 0.115 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 1.15 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculation: (500 hrs/yr) \* (225 bhp) \* (1.15 lbs/hp-hr) \* (ton/2000 lb) = 64.69 ton/yr

## **EU012 - Concrete Batch Plant:**

### **EU012a – Concrete Batch Plant Operations:**

Maximum Process Rate = 28 ton/day (Supplied info) aggregate

Maximum Process Rate = 32 ton/day (Supplied info) sand

Maximum Hours of Operation = 365 days/yr

Number of aggregate and sand transfers to hopper = 3 transfers (Application Info)

#### ***Aggregate Delivery to Ground Storage***

##### **Filterable PM Emissions:**

Emission Factor = 0.0069 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (28 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.0069 lb/ton) \* (ton/2000 lb) = 0.106 ton/yr

##### **Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.0033 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (28 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.0033 lb/ton) \* (ton/2000 lb) = 0.051 ton/yr

##### **Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.001035 lb/ton (AP 42, Appendix B.2, Table B.2.2, Category 3, PM<sub>2.5</sub> = 15% of PM, 09/90)

Calculation: (28 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.001035 lb/ton) \* (ton/2000 lb) = 0.016 ton/yr

#### ***Sand Delivery to Ground Storage***

##### **Filterable PM Emissions:**

Emission Factor = 0.0021 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (32 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.0021 lb/ton) \* (ton/2000 lb) = 0.037 ton/yr

##### **Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.00099 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (32 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.00099 lb/ton) \* (ton/2000 lb) = 0.017 ton/yr

##### **Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.000315 lb/ton (AP 42, Appendix B.2, Table B.2.2, Category 3, PM<sub>2.5</sub> = 15% of PM, 09/90)

Calculation: (32 ton/day) \* (3 transfers) \* (365 days/yr) \* (0.000315 lb/ton) \* (ton/2000 lb) = 0.006 ton/yr

#### ***Aggregate Transfer to Hopper***

##### **Filterable PM Emissions:**

Emission Factor = 0.0048 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (60 ton/day) \* (365 days/yr) \* (0.0048 lb/ton) \* (ton/2000 lb) = 0.053 ton/yr

##### **Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.0028 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation: (60 ton/day) \* (365 days/yr) \* (0.0028 lb/ton) \* (ton/2000 lb) = 0.031 ton/yr

**Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.00072 lb/ton (AP 42, Appendix B.2, Table B.2.2, Category 3, PM<sub>2.5</sub> = 15% of PM, 09/90)

Calculation: (60 ton/day) \* (365 days/yr) \* (0.00072 lb/ton) \* (ton/2000 lb) = 0.008 ton/yr

**EU012b – Concrete Batch Plant Silo operations:**

Maximum Process Rate = 12.00 tons/day (Supplied info)

Maximum Hours of Operation = 365 days/yr

*Soda Ash Storage/Loading*

**Filterable PM Emissions:**

Emission Factor = 0.00099 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.00099 lb/ton) \* (ton/2000 lb) = 0.002 ton/yr

**Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.00099 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.00099 lb/ton) \* (ton/2000 lb) = 0.002 ton/yr

**Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.00099 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.00099 lb/ton) \* (ton/2000 lb) = 0.002 ton/yr

*Truck Loading (truck mix)*

**Filterable PM Emissions:**

Emission Factor = 0.098 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.098 lb/ton) \* (ton/2000 lb) = 0.215 ton/yr

**Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.098 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.098 lb/ton) \* (ton/2000 lb) = 0.215 ton/yr

**Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.098 lb/ton (AP 42, Table 11.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (12 tons/day) \* (365 days/yr) \* (0.098 lb/ton) \* (ton/2000 lb) = 0.215 ton/yr

**EU015 - 50-ton Soda Ash Silo:**

Maximum Process Rate = 8.00000 tons/day (Supplied info)

Maximum Hours of Operation = 365 days/yr

*Soda Ash Storage/Loading*

**Filterable PM Emissions:**

Emission Factor = 0.0051 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0051 lb/ton) \* (ton/2000 lb) = 0.007 ton/yr

**Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.0051 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM<sub>10</sub>=PM<sub>2.5</sub>, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0051 lb/ton) \* (ton/2000 lb) = 0.007 ton/yr

**Filterable PM2.5 Emissions:**

Emission Factor = 0.0051 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM10=PM2.5, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0051 lb/ton) \* (ton/2000 lb) = 0.007 ton/yr

**Soda Ash Transfer (discharge to mill apron feeder)****Filterable PM Emissions:**

Emission Factor = 0.0002 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM10=PM2.5, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0002 lb/ton) \* (ton/2000 lb) = 0.000 ton/yr

**Filterable PM10 Emissions:**

Emission Factor = 0.0002 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM10=PM2.5, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0002 lb/ton) \* (ton/2000 lb) = 0.000 ton/yr

**Filterable PM2.5 Emissions:**

Emission Factor = 0.0002 lb/ton (AP 42, Table 8.12-2, MDEQ assumes PM=PM10=PM2.5, 07/93)

Calculation: (8 tons/day) \* (365 days/yr) \* (0.0002 lb/ton) \* (ton/2000 lb) = 0.000 ton/yr

**EU016 - Propane-fired combustion**

Maximum Process Rate = 3,000,000 gal/yr (requested permit allowable limit)

**PM Emissions:**

Emission Factor = 0.7 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, all PM<10um, 07/08)

Calculation: (0.7 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 1.05 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor = 0.7 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, all PM<10um, 07/08)

Calculation: (0.7 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 1.05 ton/yr

**PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.7 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, MDEQ assumes all PM<2.5um, 07/08)

Calculation: (0.7 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 1.05 ton/yr

**CO Emissions:**

Emission Factor = 27.32 lb/10<sup>3</sup> gal (Vendor Guarantee - 50E Portal Heater)

Calculation: (27.32 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 40.98 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 13 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, 07/08)

Calculation: (13 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 19.50 ton/yr

**SO<sub>2</sub> Emissions:**

Emission Factor = 0.10S lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, S = Sulfur content of fuel in gr/100 ft<sup>3</sup>, Commercial boiler, 07/08)

S = 15 gr/100 ft<sup>3</sup> (Based on information historically submitted by Stillwater for propane)

Emission Factor = 1.5 lb/10<sup>3</sup> gal

Calculation: (1.5 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 2.25 ton/yr

**VOC Emissions:**

Emission Factor = 0.8 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, 07/08, VOC = TOC - CH<sub>4</sub>)

Calculation: (0.8 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 1.20 ton/yr

**CH<sub>4</sub> Emissions:**

Emission Factor = 0.2 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, 07/08)

Calculation: (0.2 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 0.30 ton/yr

CO<sub>2</sub>e = (0.3 ton/yr) \* (21 GWP) = 6.3 ton/yr

**N<sub>2</sub>O Emissions:**

Emission Factor = 0.9 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, 07/08)

Calculation: (0.9 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 1.35 ton/yr

CO<sub>2</sub>e = 1.350 \* (310 GWP) = 418.500 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 12500 lb/10<sup>3</sup> gal (AP 42, Table 1.5-1, Commercial boiler, 07/08)

Calculation: (12500 lb/10<sup>3</sup> gal) \* (3000000 gal/yr) \* (0.0005 ton/lb) = 18,750.00 ton/yr

**CO<sub>2</sub>e Emissions:**

CO<sub>2</sub>e(Total) = CO<sub>2</sub> + CO<sub>2</sub>e(CH<sub>4</sub>) + CO<sub>2</sub>e(N<sub>2</sub>O)

CO<sub>2</sub>e(Total) = 18,750 + 6 + 419 = 19,175 ton/yr

**EU017 - Diesel Engine Shaft Generator:**

Operational Capacity of Engine = 947 bhp

Hours of Operation = 500.00 hours

**Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.0007 lbs/hp-hr (All PM < 1 mm, AP-42, Sec. 3.4, Table 3.4-1, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (0.0007 lbs/hp-hr) \* (ton/2000 lb) = 0.17 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 0.024 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (0.024 lbs/hp-hr) \* (ton/2000 lb) = 5.68 ton/yr

**CO Emissions:**

Emission Factor = 0.0055 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (0.0055 lbs/hp-hr) \* (ton/2000 lb) = 1.30 ton/yr

**VOC Emissions:**

Emission Factor = 0.00064155 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (0.00064155 lbs/hp-hr) \* (ton/2000 lb) = 0.15 ton/yr

**SO<sub>2</sub> Emissions:**

Emission Factor = 0.0004045 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, S=500ppm, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (0.0004045 lbs/hp-hr) \* (ton/2000 lb) = 0.096 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 1.16 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)

Calculation: (500 ton/yr) \* (947 lbs/hp-hr) \* (1.16 lbs/hp-hr) \* (ton/2000 lb) = 274.63 ton/yr

**EU018 - Blitz Generator Set [SCC 2-02-001-02]:**

Operational Capacity of Engine (USEPA Interim Tier 4 Certified Engine - Genset > 900 kW):

4,022 bhp (not to exceed)

3,000 kW

Fuel Input - Heat Capacity = 28 MMBtu/hr

Fuel Input = 205 gal/hr

Fuel Input = 1,459 lb/hr

Fuel Sulfur Content = 0 %

Hours of Operation = 8,760.00 hrs/yr

**PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.10 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)

Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.1 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 2.90 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 0.67 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)

Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.67 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 19.41 ton/yr

**CO Emissions:**

Emission Factor = 3.5 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)

Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (3.5 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 101.39 ton/yr

**VOC Emissions:**

Emission Factor = 0.4 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)

Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.4 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 11.59 ton/yr

**SO<sub>x</sub> Emissions:**

Emission Factor = (1,458.76 lb/hr) \* (0.0015%/100) \* (1 lb-mol S/32.1 lb S) \* (64.1 lb SO<sub>2</sub>/1 lb-mol SO<sub>2</sub>) = 0.044 lbs/hr

Calculation: (8,760 hrs/yr) \* (0.044 lbs/hr) \* (1 ton/2000 lb) = 0.19 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 163.0818 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)

Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (163.08 lb/MMbtu) \* (1 ton/2000 lb) = 20,110.35 ton/yr

**CH<sub>4</sub> Emissions:**

Emission Factor = 0.006615 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)

Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (0.0066 lb/MMbtu) \* (1 ton/2000 lb) = 0.82 ton/yr

**N<sub>2</sub>O Emissions:**

Emission Factor = 0.001323 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)

Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (0.0013 lb/MMbtu) \* (1 ton/2000 lb) = 0.16 ton/yr

**CO<sub>2</sub>e Emissions:**

CO<sub>2</sub>e(CH<sub>4</sub>) = 0.82ton/yr \* (21 GWP) = 164 ton/yr (USEPA 40 CFR 98, Subpart A - Table A-1)

CO<sub>2</sub>e(N<sub>2</sub>O) = 0.00 \* (310 GWP) = 20,110 ton/yr

CO<sub>2</sub>e(Total) = 20,110.35 + 0.82 + 0.16 = 20,111 ton/yr

**EU019 - Benbow Generator Set [SCC 2-02-001-02]:**

Operational Capacity of Engine (USEPA Interim Tier 4 Certified Engine - Genset > 900 kW):

4,022 bhp (not to exceed)

2,999 kW (not to exceed)

Fuel Input - Heat Capacity = 28 MMBtu/hr  
Fuel Input = 205 gal/hr  
Fuel Input = 1,459 lb/hr  
Fuel Sulfur Content = 0 %  
Hours of Operation = 8,760.00 hrs/yr

**PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.10 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)  
Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.1 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 2.90 ton/yr

**NO<sub>x</sub> Emissions:**

Emission Factor = 0.67 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)  
Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.67 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 19.41 ton/yr

**CO Emissions:**

Emission Factor = 3.5 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)  
Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (3.5 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 101.39 ton/yr

**VOC Emissions:**

Emission Factor = 0.4 g/kW-hr (USEPA 40 CFR 1039-102 - Table 7)  
Calculation: (8,760 hrs/yr) \* (2,999 kW) \* (0.4 g/kW-hr) \* (0.002205 lb/g) \* (1 ton/2000 lb) = 11.59 ton/yr

**SO<sub>x</sub> Emissions:**

Emission Factor = (1,458.76 lb/hr) \* (0.0015%/100) \* (1 lb-mol S/32.1 lb S) \* (64.1 lb SO<sub>2</sub>/1 lb-mol SO<sub>2</sub>) = 0.044 lbs/hr  
Calculation: (8,760 hrs/yr) \* (0.044 lbs/hr) \* (ton/2000 lb) = 0.19 ton/yr

**CO<sub>2</sub> Emissions:**

Emission Factor = 163.0818 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)  
Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (163.08 lb/MMbtu) \* (1 ton/2000 lb) = 20,110.35 ton/yr

**CH<sub>4</sub> Emissions:**

Emission Factor = 0.006615 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)  
Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (0.0066 lb/MMbtu) \* (1 ton/2000 lb) = 0.82 ton/yr

**N<sub>2</sub>O Emissions:**

Emission Factor = 0.001323 lb/MMbtu (USEPA 40 CFR 98, Subpart C - Table C-1)  
Calculation: (8,760 hrs/yr) \* (28.15 MMBtu/hr) \* (0.0013 lb/MMbtu) \* (1 ton/2000 lb) = 0.16 ton/yr

**CO<sub>2</sub>e Emissions:**

CO<sub>2</sub>e(CH<sub>4</sub>) = 0.82ton/yr \* (21 GWP) = 164 ton/yr (USEPA 40 CFR 98, Subpart A - Table A-1)  
CO<sub>2</sub>e(N<sub>2</sub>O) = 0.00 \* (310 GWP) = 20,110 ton/yr  
CO<sub>2</sub>e(Total) = 20,110.35 + 0.82 + 0.16 = 20,111 ton/yr

**IEU06 - Paste Plant Operations:**

Maximum Process Rate = 4,400 ton/yr (Supplied info) cement  
Maximum Hours of Operation = 365 days/yr

**Aggregate Delivery to Ground Storage**

**Filterable PM Emissions:**

Emission Factor = 0.73 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation:  $(4,400 \text{ ton/yr}) * (0.73 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 1.606 \text{ ton/yr}$

**Filterable PM<sub>10</sub> Emissions:**

Emission Factor = 0.47 lb/ton (AP 42, Table 11.12-5, 06/06)

Calculation:  $(4,400 \text{ ton/yr}) * (0.47 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 1.034 \text{ ton/yr}$

**Filterable PM<sub>2.5</sub> Emissions:**

Emission Factor = 0.1095 lb/ton (AP 42, Appendix B.2, Table B.2.2, Category 3, PM<sub>2.5</sub> = 15% of PM, 09/90)

Calculation:  $(4,400 \text{ ton/yr}) * (0.1095 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 0.241 \text{ ton/yr}$

**IEU07 - Open burning:**

Operational Capacity of Facility = 40 ton/yr (Application Info)

**Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions:**

Emission Factor = 17 lb/ton (Assume PM = PM<sub>10</sub> = PM<sub>2.5</sub>, Unspecified Forest Residue, AP-42, Sec. 2.5, Table 2.5-5, 10/92)

Calculation:  $(40 \text{ ton/yr}) * (17 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 0.34 \text{ ton/yr}$

**CO Emissions:**

Emission Factor = 140 lb/ton (Assume PM = PM<sub>10</sub> = PM<sub>2.5</sub>, Unspecified Forest Residue, AP-42, Sec. 2.5, Table 2.5-5, 10/92)

Calculation:  $(40 \text{ ton/yr}) * (140 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 2.80 \text{ ton/yr}$

**VOC Emissions:**

Emission Factor = 19 lb/ton (Assume PM = PM<sub>10</sub> = PM<sub>2.5</sub>, Unspecified Forest Residue, AP-42, Sec. 2.5, Table 2.5-5, 10/92)

Calculation:  $(40 \text{ ton/yr}) * (19 \text{ lb/ton}) * (\text{ton}/2000 \text{ lb}) = 0.38 \text{ ton/yr}$

V. Existing Air Quality

The Nye Mine is located in Sections 1, 2, 10, 11, 15, 16, 21, and 23, Township 5 South, Range 15 East, in Stillwater County, Montana. The air quality of this area is classified as unclassifiable/attainment for National Ambient Air Quality Standards (NAAQS) pollutants, including particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>).

VI. Ambient Air Quality Impact Analysis

Due to an increase in the levels of potential emissions from Stillwater Mining's expansion project it was necessary to demonstrate compliance with the ambient air quality standard via air dispersion modeling. The proposed installation of the Benbow and Blitz generator set engines result in increased potential emission rates of CO above the established significant emission rate (SER). CO was the single criteria pollutant which exceeded the pollutant specific significant emission rate. Modeling was required to determine compliance with the 1-hour and 8-hour corresponding NAAQS and Montana Ambient Air Quality Standards (MAAQS).

Bison conducted air dispersion modeling, on behalf of Stillwater Mining. Table 1 provides the point source parameters modeled during this exercise.

Table 1 – Modeled Generator Point Source Parameters.

Modeled ID	UTM NAD83 Zone 12 <sup>1</sup>		Elevation (m) <sup>4</sup>	Stack Height (m)	Stack Inside Diameter (m)	Stack Gas Exit Temperature (K) <sup>5</sup>	Stack Gas Exit Velocity (m/s) <sup>6</sup>
	(mE) <sup>2</sup>	(mN) <sup>3</sup>					
Blitz	588648.62	5026564.58	1517.38	3.048	0.1524	733.15	573.38
Benbow	596340.59	5026143.89	1975.71	3.048	0.1524	733.15	573.38

<sup>1</sup>. UTM NAD83 = Universal Transverse Mercator North American Datum 1983, zone 12.

<sup>2</sup>. mE = meters Easting.

<sup>3</sup>. mN = meters Northing.

<sup>4</sup>. m = meters.

<sup>5</sup>. K = degrees Kelvin.

<sup>6</sup>. m/s = meters per second.

Bison used the guidance found in Appendix W, 40 CFR Part 51, Revision to the Guideline on Air Quality Models, November 2005 (Guideline). The AERMOD modeling system employed included AERSURFACE (version 08009), AERMET (version 11059), AERMAP (version 11103), Building Profile Input Program for PRIME (BPIPPRM, version 04274), and AERMOD (version 12060). The Oris Solutions Bee-Line Software BEEST Suite (version 10.02) modeling manager was used which contained the following programs: AERMAP, AERMET, BPIPPRM, and AERMOD. Another AERMOD pre-processor, AERMINUTE (version 11325), was not applied to reduce the number of hours of calm winds.

The AERMOD model was used in the regulatory default mode according to the guideline; the AERMOD regulatory defaults included:

- Stack-tip downwash
- Accounted for elevated terrain
- Calm wind processing routine
- Missing meteorological data processing routines
- No exponential decay

A significant impact analysis identifies the impacts from a new project's potential emissions or emissions from a proposed modification. A significant impacts level (SIL) was used in this analysis which is considered a de minimis threshold; a modeled concentration at or above this level indicates a source may cause or contribute to a violation of a NAAQS. If the impacts are below a SIL, further analysis is unnecessary to show compliance. An individual SIL exists for each pollutant and averaging period. No background concentrations are added in this analysis. The results of the SIL analysis for CO from the Blitz and Benbow generators are shown in Table 2. The highest modeled concentration was selected for comparison to each SIL.

Table 2 – Modeled Significance Impact Levels.

Pollutant	Averaging Period	Met Year	Modeling Significant Impact Level, SIL ( $\mu\text{g}/\text{m}^3$ ) <sup>1</sup>	Maximum Conc. <sup>2</sup> ( $\mu\text{g}/\text{m}^3$ )	Percent of SIL (%)
CO	1-Hour	2010	2,000	956.5	47.8
	8-Hour	2010	500	349.6	69.9

<sup>1</sup>.  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

<sup>2</sup>. Selected concentrations were the highest-first-high concentrations.

As shown, neither the 1-hour or 8-hour SIL were exceeded so no further modeling was necessary. The location of the maximum concentration, regardless of the averaging period, was located in

the Benbow area, about 145 m (476 ft) southwest of the Benbow generator. This receptor was the closest to this generator at 596277.0 mE, 5026013.6 mN (UTM, NAD83) with a 2028.8 m (6656.1 ft) elevation.

In summary, the addition of the Blitz and Benbow generator sets, one in each mine area, will not cause or contribute to exceedance of the NAAQS or MAAQS for CO. Therefore, the Department determined, based on this ambient air quality modeling, that the impact from this permitting action will be minor.

**VII. Taking or Damaging Implication Analysis**

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

YES	NO	
✓		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	✓	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	✓	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	✓	4. Does the action deprive the owner of all economically viable uses of the property?
	✓	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	✓	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	✓	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	✓	7a. Is the impact of government action direct, peculiar, and significant?
	✓	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	✓	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	✓	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

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

**VIII. Environmental Assessment**

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

Analysis Prepared By: D. Kuenzli  
Date: January 28, 2013

**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Permitting and Compliance Division**  
**Air Resources Management Bureau**  
**P.O. Box 200901, Helena, Montana 59620**  
**(406) 444-3490**

**FINAL ENVIRONMENTAL ASSESSMENT (EA)**

*Issued To:* Stillwater Mining Company  
2562 Nye Road  
Nye, MT 59061

*Montana Air Quality Permit (MAQP):* 2459-16  
*Preliminary Determination Issued:* 02/25/2013  
*Department Decision Issued:* 04/12/2013  
*Permit Final:* 04/30/2013

1. *Legal Description of Site:* The Stillwater Mine is located in Sections 1, 2, 10, 11, 15, 16, 21, and 23, Township 5 South, Range 15 East in Stillwater County, Montana.
2. *Description of Project:* The Stillwater Mining Company (Stillwater Mining) proposed a modification of MAQP #2459-15 to allow expansion of the Nye facility through two separate projects. Projects include the installation and operation of two, 3.0 Megawatt (MW) diesel-fired generator sets and material handling activities associated with two surface access locations.
3. *Objectives of Project:* The objective of the project would be to expand Stillwater Mining's facility mine activities into different location of the mine site. No additional production or throughput capacity was proposed.
4. *Alternatives Considered:* In addition to the proposed action, the Montana Department of Environmental Quality – Air Resources Management Bureau (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 Stillwater Mining demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the “no-action” alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a Best Available Control Technology (BACT) analysis, would be included in MAQP #2459-16.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. 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.

Potential Physical and Biological Effects							
		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:

The proposed expansion would result in increased emissions from operation the internal combustion engines associated with the surface portals. Conditions requiring control mechanisms for the engines would be required within MAQP #2459-16 to ensure significant air quality impacts would not occur. Additionally, limitations established within the air quality permit would minimize air pollution. Overall, any adverse impact on terrestrial and aquatic life and habitats would be anticipated to be minor.

B. Water Quality, Quantity, and Distribution:

This permitting action would have little or no additional effect on the water quality, water quantity, and distribution, as there would be no additional point source discharge to groundwater or surface water associated with the completed project and no significant consumption of water. Minor pollutant deposition on surface waters near the project area may occur from surface disturbances and roadways. Therefore, the project would be expected to have minor impacts to water quality, quantity or distribution in the area.

C. Geology and Soil Quality, Stability, and Moisture:

This permitting action would have a minor effect on geology and soil properties with land disturbances associated with construction of the portals and associated material handling activity. Particulate matter (PM), PM less than 10 microns in aerodynamic diameter (PM<sub>10</sub>), PM less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>), emissions from this project may have a minor effect on the soil quality; however, the air quality permit associated with this project would contain limitations and conditions to minimize the effect of the emissions on the surrounding environment. The Department determined that any impacts from deposition would be expected to be minor due to dispersion characteristics of pollutants, the atmosphere, and conditions that would be placed within MAQP #2459-16.

D. Vegetation Cover, Quantity, and Quality:

The proposed project would have minor impacts on the surrounding vegetation due to construction of the surface access locations and associated roadways. The PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from this project may have a minor effect on the surrounding vegetation; further, the air quality permit associated with this project would contain limitations to minimize the impact on the surrounding environment. Overall, this project would expect to have minor effects on the vegetation cover, quantity and quality.

E. Aesthetics:

The expansion project would have minor impacts on the surrounding property from both a visual perspective, as well as noise pollution. The facility would be constructed within the current mine boundary and additional sound reducing actions were proposed to relieve noise pollution. The Department determined minor changes in the aesthetic value of the site would be experienced as the land use would be altered.

F. Air Quality:

The proposed expansion would impact the above listed physical and biological resources in the proposed project area because emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur dioxide (SO<sub>2</sub>) would increase at the facility. However, based on representative modeling results, the dispersion characteristics of pollutants and the atmosphere, and the conditions placed in MAQP #2459-16, including, but not limited to, BACT requirements discussed in Section III of the permit analysis for this permit; the Department believes that any impacts would be minor.

Further, from 1988 through June 2002, Stillwater Mining operated ambient air samplers to measure PM<sub>10</sub> in the mine area and demonstrated that PM<sub>10</sub> levels in the area fell below all applicable ambient standards. The Department believes that the minor amount of particulate emissions resulting from the proposed project would not change this impact from Stillwater Mining operations. Overall, any impact to the above listed physical and biological resources in the proposed project area would be minor as a result of the current permit action.

G. Unique Endangered, Fragile, or Limited Environmental Resources:

In an effort to identify any unique endangered, fragile, or limited environmental resources in the area, the Department contacted the Montana Natural Heritage Program, Natural Resource Information System (NRIS). In this case, the area was defined by the section, township, and range of the proposed location with an additional 1-mile buffer zone. Search results identified the following animal species of concern may be present within the search radius: the Peregrine Falcon and the Northern Goshawk. The Department determined that based on the fact that the Stillwater Mine is an existing industrial facility and that the proposed project would occur within the facility boundary, any effects on the local populations would be expected to be minor.

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

The proposed project would necessitate an increase demand in fuel usage and would result in a minor increase in energy demand in the area. However, any impact on the environmental resource of energy in the area would be minor. The proposed project would not impact the demand for the environmental resource of water in the area as no water additional would likely be used to facilitate the expansion. Further, an increase in air pollution would result from the proposed project; however, the Department believes that any impacts would be minor due to

dispersion characteristics of pollutants and the atmosphere, and conditions placed in MAQP #2459-16, including, but not limited to, BACT requirements discussed in Section III of the permit analysis for this permit.

I. Historical and Archaeological Sites:

The proposed project would take place within a previously disturbed industrial site. According to past correspondence from the Montana State Historic Preservation Office (SHPO), there would be a low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within the area. Therefore, it would be unlikely that the current permit action would impact any known historic or archaeological site.

J. Cumulative and Secondary Impacts:

Overall, cumulative and secondary impacts from the proposed project would result in minor impacts to the physical and biological environment in the immediate area because emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, VOCs, and SO<sub>2</sub> would increase from the Stillwater Mining facility. Air pollution from the facility would be controlled by Department-determined BACT, as discussed in Section III of the permit analysis, and conditions in MAQP #2459-16. The Department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in MAQP #2459-16.

8. *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.*

Potential Social and Economic Effects							
		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 proposed project would not cause disruption to any native or traditional lifestyles or communities (social structures or mores) in the area because the proposed project would be located within the existing mine boundary. Additionally, the proposed project would not change the predominant use of the surrounding area.

B. Cultural Uniqueness and Diversity:

The proposed project would not affect the cultural uniqueness and diversity of the area because the proposed project would be located within the existing mine boundary. Additionally, the proposed project would not change the predominant use of the surrounding area.

C. Local and State Tax Base and Tax Revenue:

The proposed expansion would not result in any increase in production capacity or a need for additional employees; therefore no effect on the local/state tax base or tax revenue would occur as a result of this project.

D. Agricultural or Industrial Production:

The proposed project would not displace or otherwise affect any agricultural land or practices because the compressors would be installed and operated within the existing Stillwater Mining industrial site. In addition, the proposed operations would not result in any increase in production and thus no increase in the amount of product available for further processing/refinement at the Stillwater Mine – Base Metals refinery in nearby Columbus, Montana. Overall, there would be no additional impact on agricultural or industrial production as a result of the proposed project.

E. Human Health:

The proposed project would result in a minor increase in air pollution from Stillwater Mine. However, MAQP #2459-16 would incorporate conditions including, but not limited to, the BACT requirements discussed in Section III of the permit analysis, to ensure that the operations would maintain compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health. Any impact to human health from the proposed project would be minor.

F. Access to and Quality of Recreational and Wilderness Activities:

The proposed modifications to the Stillwater Mining facility would take place within the existing facility boundary and would therefore not have any effect on any access to and quality of recreational and wilderness activities.

G. Quantity and Distribution of Employment:

The proposed project would not necessitate the hiring of additional employees, therefore no effect on the local/state tax base or tax revenue would occur as a result of the expansion

H. Distribution of Population:

The proposed project would cause no disruption to the above-listed economic and social attributes of the area of operation because the proposed project would not involve the hiring of any new employees, increase potential industrial production at the existing mine, or change the existing industrial nature of the site or any surrounding area.

I. Demands for Government Services:

Government services would be required for acquiring the appropriate permits from government agencies. Therefore, demands for government services would be minor.

J. Industrial and Commercial Activity:

The proposed project would not result in any increase in industrial or commercial activity at or near the Stillwater Mining site because there would not be an increase in ore production. Therefore, there would be no additional impacts as a result of industrial or commercial activity.

K. Locally Adopted Environmental Plans and Goals:

The Department is not aware of any locally adopted environmental plans or goals. The state standards would protect the proposed site and the environment surrounding the site.

L. Cumulative and Secondary Impacts:

Overall, cumulative and secondary impacts from this project would result in only minor impacts to the economic and social environment in the immediate area. As previously stated, the proposed project would not result in any change to Stillwater Mining personnel and would not result in any increase in ore production at the facility. The Department believes that Stillwater Mining could be expected to operate in compliance with all applicable rules and regulations as outlined in MAQP #2459-16.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permit action is for site expansion of mining activities and the installation and operation of diesel-fired generator sets to support the expansion. MAQP #2459-16 would include conditions and limitations to ensure the facility would operate in compliance with all applicable air quality rules and regulations. In addition, there would be no significant impacts associated with this proposal, as described above.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

EA prepared by: D. Kuenzli

Date: January 29, 2013