

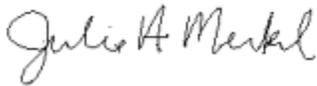
May 30, 2018

Joe Smith  
Knife River Corporation  
P.O. Box 147  
Kalispell, MT 59903

Dear Mr. Smith:

Montana Air Quality Permit #2566-08 is deemed final as of May 30, 2018, by the Department of Environmental Quality (Department). This permit is for a Portable Crushing/Screening Facility. 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 A. Merkel  
Permitting Services Section Supervisor  
Air Quality Bureau  
(406) 444-3626



John P. Proulx  
Air Quality Specialist  
Air Quality Bureau  
(406) 444-5391

JM:JPP  
Enclosure

Montana Department of Environmental Quality  
Air, Energy & Mining Division

Montana Air Quality Permit #2566-08

Knife River Corporation  
P.O. Box 147  
Kalispell, MT 59903

May 30, 2018



## MONTANA AIR QUALITY PERMIT

Issued To: Knife River Corporation  
P.O. Box 147  
Kalispell, MT 59903

MAQP: #2566-08  
Administrative Amendment (AA)  
Request Received: 5/9/2018  
Department's Decision on AA: 5/11/2018  
Permit Final: 5/30/2018  
AFS #: 777-2566

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Knife River Corporation (Knife River), pursuant to Sections 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

### Section I: Permitted Facilities

#### A. Plant Location

Knife River operates a portable crushing/screening operation at various locations throughout Montana. The plant was originally located in the NW<sup>1</sup>/<sub>4</sub> of Section 22, Township 29 North, Range 21 West and the NE <sup>1</sup>/<sub>4</sub> of the SW <sup>1</sup>/<sub>4</sub> of Section 23, Township 30 North, Range 21 West in Flathead County, Montana. However, Permit #2566-08 applies while operating in any location in Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program or areas considered tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Addendum #4 applies to the Knife River facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas during the summer months (April 1 through September 30) and at sites approved by the Department during the winter months (October 1 through March 31). A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

#### B. Current Permit Action

During a Department review, staff discovered that MAQP #2566-07 was missing a necessary administrative reference for the authority to use enforceable permit conditions to limit a source's potential emissions to below the Title V major source threshold. Because Knife River accepted limits on hourly operations for the diesel engine in its MAQP to stay below the Title V permit threshold, the Department established such limits in the MAQP. These limits were missing the required rule reference ARM 17.8.1204, which describes the Department's authority to establish limits for this purpose.

### Section II: Limitations and Conditions

#### A. Operational Limitations and Conditions

1. Knife River shall not cause or authorize to be discharged into the atmosphere from any Standards of Performance for New Stationary Sources

(NSPS) affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart OOO).

2. Knife River shall not cause or authorize to be discharged into the atmosphere from any other NSPS affected equipment, such as screens or conveyor transfers, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart OOO).
3. Knife River shall not cause or authorize to be discharged into the atmosphere, from any non-NSPS affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).
4. Water and water spray bars shall be available on site at all times and operated, as necessary, to maintain compliance with the opacity limitations in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.749).
5. Knife River shall not cause or authorize to be discharged into the atmosphere from any street, road, or parking lot any visible fugitive emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes and must take reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
6. Knife River shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).
7. Crusher production from the facility shall be limited to 5,256,000 tons during any rolling 12-month time period (ARM 17.8.749).
8. Knife River shall not operate more than two crushers at any given time and the maximum combined rated design capacity of the crushers shall not exceed 600 tons per hour (TPH) (ARM 17.8.749).
9. Total combined screen production from the facility shall be limited to 13,140,000 tons during any rolling 12-month time period (ARM 17.8.749).
10. Knife River shall not operate more than four screens at any given time and the maximum combined rated design capacity of the three screens shall not exceed 1,500 TPH (ARM 17.8.749).
11. Knife River shall not operate more than two diesel-fired/engine-powered generators at any given time and the combined maximum rated engine design capacity shall not exceed 1,369 horsepower (hp) (ARM 17.8.749).
12. Operation of the diesel-fired engines/engine-powered generators shall not exceed a sum total of 4154 hours during any rolling 12-month time period (ARM 17.8.1749 and ARM 17.8.1204).

13. If the permitted equipment is used in conjunction with any other equipment owned or operated by Knife River, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons of emissions during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
14. Knife River shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart OOO; 40 CR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (ARM 17.8.340, 40 CFR 60, Subpart IIII, ARM 17.8.342, 40 CFR 63, Subpart ZZZZ, and 40 CFR 60, Subpart OOO).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures, as specified in 40 CFR Part 60.675, must be performed on any NSPS affected equipment to demonstrate compliance with the emissions limitations contained in Sections II.A.1 and II.A.2 (ARM 17.8.340, 40 CFR 60, Subpart A and Subpart OOO).
2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this portable crushing/screening plant is moved to another location, an Intent to Transfer Form must be sent to the Department. In addition, a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765 and ARM 17.8.749).
2. Knife River shall maintain on-site records showing daily hours of operation and daily production rates for the last 12-months. All records compiled in accordance with this permit shall be maintained by Knife River as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

3. Knife River shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the most recent emission inventory report and sources identified in Section I.A of the permit analysis.

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

4. Knife River shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start-up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
5. Knife River shall document, by month, the total crushing production for the facility. By the 25th day of each month, Knife River shall calculate the total crushing production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.7. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Knife River shall document, by month, the total screening production for the facility. By the 25th day of each month, Knife River shall calculate the total screening production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.9. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
7. Knife River shall document, by month, the hours of operation of the diesel generator(s). By the 25<sup>th</sup> day of each month, Knife River shall total the hours of operation of the diesel generator(s) during the previous month. The monthly information will be used to verify compliance with rolling 12-month limitation in Section II.A.12. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
7. Knife River shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b).

The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

Section III: General Conditions

- A. Inspection - Knife River 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 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 Knife River fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving Knife River 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 Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay of the annual operation fee by Knife River 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).

- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Knife River shall comply with the conditions contained in this permit while operating at any location in Montana, except within those areas having a Department-approved permitting program or areas considered tribal lands.

Montana Air Quality Permit (MAQP) Analysis  
Knife River Corporation  
MAQP #2566-08

I. Introduction/Process Description

A. Permitted Equipment

Knife River Corporation (Knife River) owns and operates a portable crushing/screening facility consisting of two portable crushers (up to 600 tons per hour (TPH)), four screens (up to 1,500 TPH), two diesel generator/engines (up to 1,369 combined horsepower (hp)), and associated equipment.

B. Process Description

Knife River operates a portable crushing/screening plant and associated equipment to crush sand and gravel materials for use in various construction operations. For a typical operational setup, materials are loaded into the crushing/screening plant by a hopper, transferred by conveyor, and passed through the crushers. Materials are crushed by the crusher and sent to the three screens. Materials are screened, separated, and sent to stockpile for sale and use in construction operations.

C. Permit History

The Department of Environmental Quality (Department) issued **Permit #2566-00** to Empire Sand and Gravel Co. Inc. (Empire), on April 21, 1989. Permit #2566-00 allowed the operation of a portable gravel crushing plant, with conditions, consisting of a 1978 Telesmith Jaw Crusher, a 1988 Torgeson Horizontal Impact Crusher, a 1988 Barmac Rotopactor Mark III Crusher, and associated equipment.

Due to public comments received on a change of location request, the Department issued **Permit #2566A** on April 26, 1991. The modification consisted of adding three conditions to the permit that applied to the crushing/screening facility while operating in the gravel pit located in the SW<sup>1</sup>/<sub>4</sub> of Section 18, Township 1 North, Range 15 East, in Sweet Grass County, Montana. Permit #2566A replaced Permit #2566-00.

On April 14, 1995, Empire submitted a request, along with a complete permit application to alter Permit #2566A. The alteration consisted of removing the 1978 Telesmith Jaw Crusher and the 1988 Torgeson Horizontal Impact Crusher from the permit. The alteration also added a 1995 Nordberg Cone Crusher, three 1979 Pioneer Screens, a 1988 El Jay Screen, a 1979 Pioneer Conveyor, a 1970 Kolberg Conveyor, a 1970 feed conveyor, a 1972 conveyor, a 1970 transfer conveyor, a 1970 sand reject conveyor, a 1970 scale conveyor, three 1971 100 foot conveyers, and associated equipment to the permit. **Permit #2566-01** replaced Permit #2566A.

On March 30, 2001, Empire requested that Permit #2566-01 be transferred to JTL Group, Inc (JTL), as Empire was currently being managed by JTL. This permit action transfers the permit from Empire to JTL. The emission inventory was also updated with current emission factors; however, the change does not increase emissions. In addition, the permit format and rule references were updated. **Permit #2566-02** replaced Permit #2566-01.

On December 25, 2005, the Department received a request from JTL for an administrative amendment to Permit #2566-02 to include an Addendum #1 to allow for wintertime operations (October 1-March 31) at locations in or within 10 km of a certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment area and also requested that the permit be written in a de minimis friendly manner. SCREEN3 modeling was conducted in accordance with the Department's revised modeling guidance, to assist in the determination to allow for wintertime operations. Permit #2566-03 was written in a de minimis friendly manner, allowing JTL additional flexibility in facility operations while limiting facility emissions. Also, the permit was updated to reflect the current permit language and rule references used by the Department. **Permit #2566-03** replaced Permit #2566-02.

On January 30, 2006, the Department received a request from JTL for an administrative amendment to Permit #2566-03 to allow for summertime operations (April 1 – September 30) at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas. **Permit #2566-04** replaced Permit #2566-03.

On August 18, 2006, the Department received a request from JTL for a modification to Permit #2566-04 to reduce the total crusher process rate from 2,800 TPH to 600 TPH and to increase the hours of operation of the diesel generators. **Permit #2566-05** replaced Permit #2566-04 and **Addendum #2** replaced Addendum #1.

On March 14, 2007, the Department received a request from JTL for a modification to Permit #2566-05 to increase the maximum rated design capacity of the diesel generator from 1,060 kilowatts (kW) to 1,135 kW and add a two-deck screen rated at 100 TPH. **Permit #2566-06** replaces Permit #2566-05.

On January 24, 2008, the Department received a request from Knife River to change the name on Permit #2566-06 from JTL to Knife River. The current permit action transfers ownership of Permit #2566-06 from JTL to Knife River. In addition, Knife River requested that the permit be written in a de minimis-friendly manner and that the permit be updated to reflect the correct number and hp ratings of the diesel generators. This action changed the engine rating of 1135 kW to two generators not to exceed 1369 hp. The emission inventory was updated to reflect these changes. This action also updated the permit to reflect current permit language and rule references used by the Department and changed the permit to a de minimis-friendly format. **Permit #2566-07** replaced Permit #2566-06 and **Addendum #3** replaced Addendum #2.

D. Current Permit Action

During a Department review, staff discovered that MAQP #2566-08 was missing a necessary administrative reference for the authority to use enforceable permit conditions to limit a source's potential emissions to below the Title V major source threshold. Because Knife River accepted limits on hourly operations for the diesel engine as well as operational limits of asphalt production limits in its MAQP to stay below the Title V permit threshold, the Department established such limits in the MAQP. These limits were missing the required rule reference ARM 17.8.1204, which describes the Department's authority to establish limits for this purpose. MAQP #2566-08 adds this rule reference. **MAQP #2566-08** replaces MAQP #2526-07 and **Addendum #4** replaces Addendum #3.

E. Additional Information

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

II. Applicable Rules and Regulations

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

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

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Knife River shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports.

A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

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

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Knife River must maintain compliance with the applicable ambient air quality standards.

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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne Particulate Matter (PM). (2) Under this rule, Knife River shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Processes. This rule requires that no person shall cause or allow to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.

5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standards of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, NSPS, shall comply with the standards and provisions of 40 CFR Part 60.
  - 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 OOO, Standards of Performance for Nonmetallic Mineral Processing Plants, indicates that NSPS requirements apply to portable crushing/screening facilities with capacities greater than 150 tons per hour and that were constructed after August 31, 1983. The Knife River facility has a capacity in excess of 150 tons per hour and was constructed after August 31, 1983; therefore, NSPS requirements apply to the facility.
  - c. 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), indicates that NSPS requirements apply to owners or operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE is manufactured after April 1, 2006, and is not a fire pump engine. Since this permit is written in a de minimis-friendly manner, this regulation may apply to engines at the facility.
8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
  - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a National Emission Standard for Hazardous Air Pollutants (NESHAPs) Subpart as listed below:
  - b. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). As an area source, the diesel RICE at Knife River will be subject to this rule. However, although diesel RICE engines are an affected source, per 40 CFR 63.6590(b)(3) they do not have any requirements unless they are new or reconstructed

after June 12, 2006. Any diesel RICE engine operated by Knife River that is new or reconstructed after June 12, 2006 will be subject to this Maximum Available Control Technology (MACT) standard if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year. Since the permit is written in a de minimis-friendly manner, area source provisions of the MACT requirements may apply to facility engines.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A permit fee is not required for the current permit action because the permit action is considered an administrative permit change.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department. This air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter, or use any asphalt plant, crusher, or screen that has the Potential to Emit (PTE) greater than 15 tons per year of any pollutant. Knife River has a PTE greater than 15 tons per year of total PM, PM<sub>10</sub>, carbon monoxide (CO), and oxides of nitrogen (NO<sub>x</sub>); therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit Program.
4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
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. Knife River was not required to submit an application because the action is administrative. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Knife River is not required to submit an affidavit of publication of public notice for this action since the action is an Administrative Amendment.
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 Knife River of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is

commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of Knife River, 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 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of Intent to Transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

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

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

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

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
  - a. PTE > 100 tons/year of any pollutant.
  - b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule, or
  - c. PTE > 70 tons/year of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.
  
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2566-08 for the Knife River facility, the following conclusions were made:
  - a. The facility's PTE is less than 100 tons/year for any pollutant.
  - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 ton/year of all 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 A, Subpart OOO, and potentially Subpart IIII);
  - e. This facility is potentially subject to current National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart A and Subpart ZZZZ);
  - f. This source is not a Title IV affected source not a solid waste combustion unit.
  - g. This source is not an EPA designated Title V source.
  - h. This source in not a solid waste combustion unit.

Knife River's diesel generator is limited to no more than 4,154 hours of operation during any rolling 12-month time period to keep the facility below the Title V permitting threshold of 100 tons/year of NO<sub>x</sub>; therefore, the facility is not required to obtain a Title V Operating Permit. However, if minor sources subject to NSPS or NESHAP are required to obtain a Title V Operating Permit, Knife River may be required to obtain an operating permit.

- i. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations that limit that source's potential to emit.
  - i. In applying for an exemption under this rule, the owner or operator of the source shall certify to the Department that the source's potential to emit does not require the source to obtain an air quality operating permit.
  - ii. Any source that obtains a federally enforceable limit on potential to emit shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.

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

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

### III. BACT Analysis

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

### IV. Emission Inventory

| Emitting Unit                             | Controlled Emissions (ton/yr) |                  |                 |              |             |                 |
|---|-------------------------------|------------------|-----------------|--------------|-------------|-----------------|
|   | PM                            | PM <sub>10</sub> | NO <sub>x</sub> | CO           | VOC         | SO <sub>x</sub> |
| Crushers (up to 600 ton/hr (TPH))         | 3.15                          | 1.42             | 0.00            | 0.00         | 0.00        | 0.00            |
| Screens (up to 1,500 TPH)                 | 14.45                         | 3.55             | 0.00            | 0.00         | 0.00        | 0.00            |
| Material Transfer (1,500 TPH)             | 0.92                          | 0.92             | 0.00            | 0.00         | 0.00        | 0.00            |
| Pile Forming (3 Pile Forming, 1,500 TPH)  | 21.15                         | 10.05            | 0.00            | 0.00         | 0.00        | 0.00            |
| Bulk Loading (3 Bulk Loadings, 1,500 TPH) | 1.97                          | 1.97             | 0.00            | 0.00         | 0.00        | 0.00            |
| Haul Roads and Vehicle Traffic            | 12.68                         | 3.60             | 0.00            | 0.00         | 0.00        | 0.00            |
| Diesel-Fired Generator (up to 1239 hp)    | 5.66                          | 5.66             | 79.77           | 17.19        | 6.46        | 5.28            |
| Diesel-Fired Generator (up to 130 hp)     | 0.59                          | 0.59             | 8.73            | 1.80         | 0.68        | 0.55            |
| <b>Total Facility Emissions</b>           | <b>60.57</b>                  | <b>27.76</b>     | <b>88.50</b>    | <b>18.99</b> | <b>7.14</b> | <b>5.83</b>     |

### Crushers (Up to 600 ton/hr)

Process Rate: 600 TPH  
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0012 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Hourly Calculations:  $0.0012 \text{ lbs/ton} * 600 \text{ ton/hr} = 0.72 \text{ lb/hr}$   
Yearly Calculations:  $0.72 \text{ lb/hr} * 8760 \text{ hr/year} * 0.0005 \text{ ton/lb} = 3.15 \text{ ton/yr}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)  
Hourly Calculations:  $0.00054 \text{ lbs/ton} * 600 \text{ ton/hr} = 0.32 \text{ lb/hr}$   
Yearly Calculations:  $0.32 \text{ lb/hr} * 8760 \text{ hr/year} * 0.0005 \text{ ton/lb} = 1.42 \text{ ton/yr}$

### Screens (up to 1,500 ton/hr)

Process Rate: 1,500 TPH  
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0022 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Hourly Calculations:  $0.0022 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 3.30 \text{ lb/hr}$   
Yearly Calculations:  $3.30 \text{ lb/hr} * 8760 \text{ hr/year} * 0.0005 \text{ ton/lb} = 14.45 \text{ ton/yr}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)  
Hourly Calculations:  $0.00054 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.81 \text{ lb/hr}$   
Yearly Calculations:  $0.81 \text{ lb/hr} * 8760 \text{ hr/year} * 0.0005 \text{ ton/lb} = 3.55 \text{ ton/yr}$

### Material Transfer

Process Rate: 1,500 ton/hr  
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Calculations:  $0.00014 \text{ lbs/ton} * 1,500 \text{ tons/hr} = 0.21 \text{ lb/hr}$   
 $0.21 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.92 \text{ ton/yr}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)

Calculations: 0.00014 lbs/ton \* 1,500 tons/hr = 0.21 lb/hr  
0.21 lb/hr \* 8760 hr/yr \* 0.0005 ton/lb = 0.92 ton/yr

**File Forming (3 Pile)**

Process Rate: 1,500 ton/hr  
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.00322 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)

Calculations: 0.00322 lbs/ton \* 1500 ton/hr = 4.83 lb/hr  
4.83 lbs/hr \* 8760 hr/yr \* 0.0005 ton/lb = 21.15 ton/yr

PM<sub>10</sub> Emissions:

Emission Factor: 0.00153 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)

Calculations: 0.00153 lbs/ton \* 1500 tons/hr = 2.26 lb/hr  
2.26 lb/hr \* 8760 hr/yr \* 0.0005 ton/lb = 10.05 ton/yr

**Bulk Loading**

Process Rate: 1,500 ton/hr  
Hours of operation: 8760 hr/yr  
Number of Loads: 3 load(s) (Estimated)

PM Emissions:

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)

Calculations: 0.0001 lbs/ton \* 1500 ton/hr \* 8760 hr/yr \* 3 load(s) \* 0.0005 tons/lb = 1.97 ton/yr

PM<sub>10</sub> Emissions

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)

Calculations: 0.0001 lbs/ton \* 1500 ton/hr \* 8760 hr/yr \* 3 load(s) \* 0.0005 ton/lb = 1.97 ton/yr

**Haul Roads**

Vehicle Miles Traveled (VMT): 5 VMT/day (Estimated)  
Control Efficiency: 50% watering  
Rated Load Capacity: <50 tons

PM Emissions

Emission Factor: 13.90 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)

Calculations:  $13.90 \text{ lbs/VMT} * 5 \text{ VMT/day} * 365 \text{ days/yr} * 0.0005 \text{ ton/lb} = 12.68 \text{ ton/yr}$

PM10 Emissions

Emission Factor: 3.95 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)

Calculations:  $3.95 \text{ lbs/VMT} * 5 \text{ VMT/day} * 365 \text{ day/yr} * 0.0005 \text{ tons/lb} = 3.60 \text{ ton/yr}$

**Diesel Generator (1239 hp)**

Operating Hours: 4154 hr/yr

**Note:** A limitation of 4,154 annual hours of operation per rolling 12-month time period was placed on the combined diesel engine/generator operation in order to keep emissions below the 100 tons per year threshold established for NO<sub>x</sub>.

Engine Size: 1239 hp

PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 5.66 \text{ ton/yr}$

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 5.66 \text{ ton/yr}$

NO<sub>x</sub> Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.031 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 79.77 \text{ ton/yr}$

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00251 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 6.46 \text{ ton/yr}$

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00668 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 17.19 \text{ ton/yr}$

SO<sub>x</sub> Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00205 \text{ lb/hp-hr} * 1239 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 5.28 \text{ ton/yr}$

## Diesel Generator (130 hp)

Operating Hours: 4154 hr/yr      **Note:** A limitation of 4,154 annual hours of operation per rolling 12-month time period was placed on the combined diesel engine/generator operation in order to keep emissions below the 100 tons per year threshold established for NO<sub>x</sub>.

Engine Size: 130 hp

PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.59 \text{ ton/yr}$

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.59 \text{ ton/yr}$

NO<sub>x</sub> Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.031 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 8.37 \text{ ton/yr}$

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00251 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.68 \text{ ton/yr}$

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00668 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.80 \text{ ton/yr}$

SO<sub>x</sub> Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.00205 \text{ lb/hp-hr} * 130 \text{ hp} * 4154 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.55 \text{ ton/yr}$

## V. Existing Air Quality

MAQP #2566-08 is issued for the operation of a portable crushing/screening facility to operate at various locations throughout Montana. This facility would be allowed to operate at any area designated as attainment or unclassified for all National Ambient Air Quality Standards (NAAQS); excluding those counties that have a Department-approved permitting program, those areas considered tribal lands, or those areas in or within 10 km of certain PM<sub>10</sub> nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*

Addendum #4 of MAQP #2566-08 would cover this portable crushing/screening plant while operating at specified locations in or within 10 km of a PM<sub>10</sub> nonattainment area during the winter season (October 1 through March 31). Addendum #4 of MAQP #2566-08 would also allow for summertime operations (April 1 through September 30) at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas.

VI. Air Quality Impacts

Based on the information provided and the conditions established in MAQP #2566-08, the Department believes that the amount of controlled emissions generated by this facility will not exceed any ambient air quality standard established for any of Montana’s attainment or unclassified ambient air quality areas. Additionally, the limitations and conditions established in Addendum #4 would further reduce the facility emissions generated while operating in the nonattainment areas and would also be protective of corresponding ambient air quality standards. In addition, this source is portable and any air quality impacts will be minimal. The conditions in Permit #2566-08 will be protective of air quality while operating at locations not located in or within 10 km of certain PM<sub>10</sub> nonattainment areas.

VII. Taking or Damaging Implication Analysis

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

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

|  |  |   |
|--|--|---|
|  |  | is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas) |
|--|--|---|

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

VIII. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an environmental assessment is not required.

Analysis Prepared By: John P. Proulx  
Date: May 3, 2018

Addendum #4  
Knife River Corporation  
MAQP #2566-08

An addendum to Montana Air Quality Permit (MAQP) #2566-08 is issued to Knife River Corporation (Knife River), pursuant to Sections 75-2-204 and 75-2-211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.765, as amended, for the following:

I. Permitted Equipment

Knife River owns and operates a portable crushing/screening facility consisting of two portable crushers (up to 600 tons per hour (TPH)), two diesel generator/engine (up to a combined 1,369 horsepower (hp)), four screens (up to 1,500 TPH), and associated equipment. Knife River operates at various locations throughout Montana, including in or within 10 kilometers (km) of the following certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas: Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish.

II. Seasonal and Site Restrictions

Addendum #4 applies to the Knife River facility while operating at any location in or within 10 km of certain PM<sub>10</sub> nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1 through March 31) – The only location(s) in or within 10 km of certain PM<sub>10</sub> nonattainment area where Knife River may operate is:
- NE ¼ of the SW ¼ of Section 23, Township 30 North, Range 21 West (A-1 Paving Hodgson Road Pit);
  - NE ¼ of the NE ¼ of Section 26, Township 29 North, Range 22 West (Tutvedt Pit);
  - NW ¼ of the NW ¼ of Section 22, Township 29 North, Range 21 West (A-1 Paving Pit);
  - NW ¼ of the SE ¼ of Section 36, Township 30 North, Range 21 West (County Pit);
  - SW ¼ of the SW ¼ of Section 2, Township 28 North, Range 21 West (River Pit);
  - SW ¼ of the NW ¼ of Section 2, Township 28 North, Range 21 West (River Pit); and
  - Any other site that may be approved, in writing, by the Department of Environmental Quality (Department).

- B. During the summer season (April 1 through September 30) – Knife River may operate at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas.
- C. Knife River shall comply with the limitations and conditions contained in Addendum #4 to MAQP #2566-08. Addendum #4 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum #4 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

### III. Limitations and Conditions

#### A. Operational Limitations and Conditions – **Winter Season (October 1 – March 31)**

1. Water spray bars must be operated, as necessary, on the crushers, screens, and all transfer points to maintain compliance with the opacity limitations contained in Section III.A.2 and Section III.A.3 (ARM 17.8.749).
2. All visible emissions from the crushing/screening plant may not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
3. Knife River shall not cause or authorize to be discharged into the atmosphere from any other equipment, such as transfer points, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
4. Knife River shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
5. Knife River shall treat all unpaved portions of the haul roads, access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).
6. Total combined crushing production from the two crushers shall not exceed 6,300 tons per day (ARM 17.8.749).
7. Total combined screening production from the four screens shall be limited to 15,750 tons per day (ARM 17.8.749).
8. Knife River shall not operate more than two diesel generators at any given time with a combined maximum rated engine design capacity shall not exceed 1,369 hp and shall not exceed 10.5 hours of operation per day (ARM 17.8.749).

B. Operational Limitations and Conditions – **Summer Season (April 1 – September 30)**

1. Water spray bars must be operated, as necessary, on the crushers, screens, and all transfer points to maintain compliance with the opacity limitations contained in Section III.B.2 and Section III.B.3 (ARM 17.8.749).
2. All visible emissions from the crushing/screening plant may not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
3. Knife River shall not cause or authorize to be discharged into the atmosphere from any other equipment, such as transfer points, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
4. Knife River shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
5. Knife River shall treat all unpaved portions of the haul roads, access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).
6. Total combined crushing production from the two crushers shall not exceed 14,400 tons per day (ARM 17.8.749).
7. Total combined screening production from the four screens shall be limited to 36,000 tons per day (ARM 17.8.749).
8. Knife River shall not operate more than two diesel engine/generators at any given time with a combined maximum rated engine design capacity shall not exceed 1,369 hp and shall not exceed 11.3 hours of operation per day (ARM 17.8.749).

C. Operational Reporting Requirements

1. If this crushing/screening plant is moved to another nonattainment location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Production information for the sites covered by this addendum must be maintained for five years and submitted to the Department upon request.

The information must include (ARM 17.8.749):

- a. Tons of material crushed by each crusher at each site (including amount of recirculated/rerun material),
  - b. Tons of material screened by each screen at each site (including amount of recirculated/rerun material),
  - c. Tons of bulk material loaded at each site (production),
  - d. Daily hours of operation at each site,
  - e. Gallons of diesel used by each generator at each site,
  - f. Hours of operation and sizes for each generator at each site, and
  - g. Fugitive dust information consisting of the total miles driven on unpaved roads for all plant vehicles.
3. Knife River shall document, by day, the total crushing production. Knife River shall sum the total crushing production during the previous day to verify compliance with the limitations in Sections III.A.6 and III.B.6. A written report of compliance verification and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted along with the annual emission inventory (ARM 17.8.749).
  4. Knife River shall document, by day, the combined total screening production. Knife River shall sum the combined total screening production during the previous day to verify compliance with the limitations in Sections III.A.7 and III.B.7. A written report of compliance verification and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted along with the annual emission inventory (ARM 17.8.749).
  5. Knife River shall document, by day, the hours of operation of the diesel engine/generator(s). Knife River shall total the hours of operation of the diesel engine/generator(s) during the previous day to verify compliance with the limitations in Sections III.A.8 and III.B.8. A written report of compliance verification and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted along with the annual emission inventory (ARM 17.8.749).

Addendum #4 Analysis  
Knife River Corporation  
Montana Air Quality Permit (MAQP) #2566-08

I. Permitted Equipment

Knife River Corporation (Knife River) owns and operates a portable crushing/screening facility consisting of two portable crushers (up to 600 tons per hour (TPH)), four screens (up to 1,500 TPH), two diesel generators/engines (up to 1,369 hp), and associated equipment. Knife River operates at various locations throughout Montana, including in or within 10 kilometers (km) of the following certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas: Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish.

II. Source Description

Knife River operates a portable crushing/screening plant and associated equipment to crush sand and gravel materials for use in various construction operations. For a typical operational setup, materials are loaded into the crushing/screening plant by a hopper and transferred by conveyor and passed through the crusher. Materials are crushed, by the crusher and sent to the two screens. Materials are screened, separated, and sent to stockpile for sale and use in construction operations.

III. Applicable Rules and Regulations

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

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

- A. ARM 17.8.749 Conditions for Issuance of Permit. This rule requires that the source demonstrate compliance with applicable rules and standards before a permit can be issued. Also, a permit may be issued with such conditions as are necessary to assure compliance with all applicable rules and standards. Knife River demonstrated compliance with all applicable rules and standards as required for permit issuance.
- B. ARM 17.8.764 Modification of Permit. An air quality permit may be modified for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack which do not result in an increase in emissions because of the changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one location to another if:

1. Written notice of Intent to Transfer location and proof of public notice are sent to the Department;
2. The source will operate in the new location for a period of less than 1 year; and
3. The source will not have any significant impact on any nonattainment area or any Class I area.

Knife River must submit proof of compliance with the transfer and public notice requirements when Knife River transfers to any of the locations covered by this addendum and will only be allowed to stay in the new location for a period of less than 1 year. Also, the conditions and limitations in Addendum #4 to MAQP #2566-08 will prevent Knife River from having a significant impact on PM<sub>10</sub> nonattainment areas.

#### IV. Emission Inventory

##### A. Emission inventory for winter season.

| Source                            | Lb/Day        |                  |                 |              |              |                 |
|-----------------------------------|---------------|------------------|-----------------|--------------|--------------|-----------------|
|                                   | PM            | PM <sub>10</sub> | NO <sub>x</sub> | VOC          | CO           | SO <sub>x</sub> |
| Crushers (up to 600 TPH)          | 7.56          | 3.36             |                 |              |              |                 |
| Screens (up to 1,500 TPH)         | 34.65         | 8.51             |                 |              |              |                 |
| Bulk Loading                      | 4.73          | 3.15             |                 |              |              |                 |
| Material Transfer                 | 2.21          | 2.21             |                 |              |              |                 |
| Pile Forming                      | 50.72         | 23.73            |                 |              |              |                 |
| Engine/Generator (up to 1,239 hp) | 28.62         | 28.62            | 403.29          | 32.65        | 86.90        | 26.67           |
| Engine/Generator (up to 130 hp)   | 3.00          | 3.00             | 42.32           | 3.47         | 9.12         | 2.80            |
| Haul Roads                        | 30.41         | 8.64             |                 |              |              |                 |
| <b>Total</b>                      | <b>161.90</b> | <b>81.22</b>     | <b>445.61</b>   | <b>36.12</b> | <b>96.02</b> | <b>29.47</b>    |

#### Crushers (Up to 600 ton/hr)

Maximum Process Rate: 600 TPH  
 Production Rate: 6,300 Tons per rolling 24 hours  
 Operational Hours: 10.5 hours per 24 hour rolling period

##### PM Emissions:

Emission Factor: 0.0012 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)

Hourly Calculations:  $0.0012 \text{ lbs/ton} * 600 \text{ ton/hr} = 0.72 \text{ lb/hr}$

Daly Calculations:  $0.58 \text{ lb/hr} * 10.5 \text{ hours/day} = 7.56 \text{ lb/day}$

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

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)

Hourly Calculations:  $0.00054 \text{ lbs/ton} * 600 \text{ ton/hr} = 0.32 \text{ lb/hr}$

Daly Calculations:  $0.32 \text{ lb/hr} * 10.5 \text{ hours/day} = 3.36 \text{ lbs/day}$

### Screens (up to 1,500 ton/hr)

Process Rate: 1,500 TPH  
Production Rate: 15,750 Tons per rolling 24 hours of operation:  
Operational Hours: 10.5 hours per 24 hour rolling period

#### PM Emissions:

Emission Factor: 0.0022 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Hourly Calculations:  $0.0022 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 3.30 \text{ lb/hr}$   
Daily Calculations:  $3.30 \text{ lbs/hr} * 10.5 \text{ hours/day} = 34.65 \text{ lbs/day}$

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

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)  
Hourly Calculations:  $0.00054 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.81 \text{ lb/hr}$   
Daily Calculations:  $0.81 \text{ lb/hr} * 10.5 \text{ hours/day} = 8.51 \text{ lbs/day}$

### Material Transfer

Process Rate: 1,500 ton/hr  
Hours of operation: 10.5 hr/24 hour period

#### PM Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Calculations:  $0.00014 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.21 \text{ lb/hr}$   
 $0.21 \text{ lb/hr} * 10.5 \text{ hr/day} = 2.21 \text{ lb/day}$

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

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
Calculations:  $0.00014 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.21 \text{ lb/hr}$   
 $0.21 \text{ lb/hr} * 10.5 \text{ hr/day} = 2.21 \text{ lb/day}$

### File Forming (3 Pile)

Process Rate: 1,500 ton/hr  
Hours of operation: 10.5 hr/24 hour period

#### PM Emissions:

Emission Factor: 0.00322 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)  
Calculations:  $0.00322 \text{ lbs/ton} * 1500 \text{ ton/hr} = 4.83 \text{ lb/hr}$   
 $4.83 \text{ lb/hr} * 10.5 \text{ hr/day} = 50.72 \text{ lb/day}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00153 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)

Calculations:  $0.00153 \text{ lbs/ton} * 1500 \text{ ton/hr} = 2.26 \text{ lb/hr}$   
 $2.26 \text{ lb/hr} * 10.5 \text{ hr/day} = 23.73 \text{ lb/day}$

**Bulk Loading**

Process Rate: 1,500 ton/hr  
Hours of operation: 10.5 hours per 24 hour period  
Number of Loads: 2 load(s) (Estimated)

PM Emissions:

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)

Calculations:  $0.0001 \text{ lbs/ton} * 1500 \text{ ton/hr} * 10.5 \text{ hr/day} * 2 \text{ load(s)} = 3.15 \text{ lb/day}$

PM<sub>10</sub> Emissions

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)  
Calculations:  $0.0001 \text{ lbs/ton} * 1500 \text{ ton/hr} * 10.5 \text{ hrs/day} * 2 \text{ load(s)} = 3.15 \text{ lb/day}$

**Haul Roads**

Vehicle Miles Traveled (VMT): 5 VMT/day (Estimated)  
Control Efficiency: 50% watering  
Rated Load Capacity: <50 tons  
Daly Operation: 0.4375 of one day (10.5 hours per 24 hour period)

PM Emissions

Emission Factor: 13.90 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)  
Calculations:  $13.90 \text{ lbs/VMT} * 5 \text{ VMT/day} * .4375 \text{ days/day} = 30.41 \text{ lbs/day}$

PM<sub>10</sub> Emissions

Emission Factor: 3.95 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)  
Calculations:  $3.95 \text{ lbs/VMT} * 5 \text{ VMT/day} * .4375 \text{ days/day} = 8.64 \text{ lbs/day}$

**Diesel Generator (1239 hp)**

Operating Hours: 10.5 hrs/24 hour period  
Engine Size: 1239 hp  
PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} = 28.62 \text{ lbs/day}$

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} =$   
28.62 lbs/day

NOx Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} =$   
403.29 lb/day

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00251 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} =$   
32.65 lb/day

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00668 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} =$   
86.90 lbs/day

SOx Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00205 \text{ lb/hp-hr} * 1239 \text{ hp} * 10.5 \text{ hr/day} =$   
26.67 lbs/day

**Diesel Generator (130 hp)**

Operating Hours: 10.5 hrs/24 hour period  
Engine Size: 130 hp

PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 10.5 \text{ hr/day} =$   
3.00 lbs/day

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 10.5 \text{ hr/day} =$   
3.00 lbs/day

NOx Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 130 \text{ hp} * 10.5 \text{ hr/day} =$   
42.32 lb/day

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
 Calculations: 0.00251 lb/hp-hr \* 130 hp \* 10.5 hr/day =  
 3.47 lb/day

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
 Calculations: 0.00668 lb/hp-hr \* 130 hp \* 10.5 hr/day =  
 9.12 lbs/day

SOx Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
 Calculations: 0.00205 lb/hp-hr \* 130 hp \* 10.5 hr/day =  
 2.80 lbs/day

B. Emission inventory for summer season.

| Source                            | Lb/Day |                  |                 |       |       |                 |
|-----------------------------------|--------|------------------|-----------------|-------|-------|-----------------|
|                                   | PM     | PM <sub>10</sub> | NO <sub>x</sub> | VOC   | CO    | SO <sub>x</sub> |
| Crushers (up to 600 TPH)          | 17.28  | 7.68             |                 |       |       |                 |
| Screens (up to 1,500 TPH)         | 79.20  | 19.44            |                 |       |       |                 |
| Bulk Loading                      | 10.80  | 10.80            |                 |       |       |                 |
| Material Transfer                 | 5.04   | 5.04             |                 |       |       |                 |
| Pile Forming                      | 115.92 | 54.24            |                 |       |       |                 |
| Engine/Generator (up to 1,135 kW) | 12.13  | 12.13            | 537.11          | 12.21 | 52.13 | 25.25           |
| Haul Roads                        | 69.50  | 19.75            |                 |       |       |                 |
| Total                             | 309.87 | 129.08           | 537.11          | 12.21 | 52.13 | 25.25           |

**Crushers (Up to 600 ton/hr)**

Maximum Process Rate: 600 TPH  
 Production Rate: 14,400 Tons per rolling 24 hours  
 Operational Hours: unlimited

PM Emissions:

Emission Factor: 0.0012 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)  
 Hourly Calculations: 0.0012 lbs/ton \* 7920 ton/day \* .07576 days/hour = 0.72 lb/hr  
 Daily Calculations: 0.72 lbs/hr \* 24 hours/day = 17.28 lb/day

PM<sub>10</sub> Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)  
 Hourly Calculations: 0.00054 lbs/ton \* 600 ton/hr = 0.32 lb/hr

Daily Calculations:  $0.32 \text{ lb/hr} * 24 \text{ hours/day} = 7.68 \text{ lbs/day}$   
**Screens (up to 1,500 ton/hr)**

Process Rate: 1,500 TPH  
Production Rate: 36,000 Tons per rolling 24 hours of operation:  
Operational Hours: unlimited

PM Emissions:

Emission Factor: 0.0022 lb/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)

Hourly Calculations:  $0.0022 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 3.30 \text{ lb/hr}$

Daily Calculations:  $3.30 \text{ lbs/hr} * 24 \text{ hours/day} = 79.20 \text{ lbs/day}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42, Table 11.19.2-2, Controlled Emissions, 8/04)

Hourly Calculations:  $0.00054 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.81 \text{ lb/hr}$

Daily Calculations:  $0.81 \text{ lbs/hr} * 24 \text{ hours/day} = 19.44 \text{ lbs/day}$

### Material Transfer

Process Rate: 1,500 ton/hr  
Hours of operation: unlimited

PM Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)

Calculations:  $0.00014 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.21 \text{ lb/hr}$

$0.21 \text{ lb/hr} * 24 \text{ hr/day} = 5.04 \text{ lb/day}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Table 11.19.2-2, 8/2004 - controlled)

Calculations:  $0.00014 \text{ lbs/ton} * 1,500 \text{ ton/hr} = 0.21 \text{ lb/hr}$

$0.21 \text{ lb/hr} * 24 \text{ hr/day} = 5.04 \text{ lb/day}$

### File Forming (3 Pile)

Process Rate: 1,500 ton/hr  
Hours of operation: unlimited  
PM Emissions:

Emission Factor: 0.00322 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)

Calculations:  $0.00322 \text{ lbs/ton} * 1500 \text{ ton/hr} = 4.83 \text{ lb/hr}$

$4.83 \text{ lb/hr} * 24 \text{ hr/day} = 115.92 \text{ lb/day}$

PM<sub>10</sub> Emissions:

Emission Factor: 0.00153 lbs/ton (AP-42 Section 13.2.4.3, 11/2006 - controlled)

Calculations:  $0.00153 \text{ lbs/ton} * 1500 \text{ ton/hr} = 2.26 \text{ lb/hr}$   
 $2.26 \text{ lb/hr} * 24 \text{ hr/day} = 54.24 \text{ lb/day}$

**Bulk Loading**

Process Rate: 1,500 ton/hr  
Hours of operation: unlimited  
Number of Loads: 3 load(s) (Estimated)

PM Emissions:

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)

Calculations:  $0.0001 \text{ lbs/ton} * 1500 \text{ ton/hr} * 24 \text{ hr/day} * 3 \text{ load(s)} = 10.8 \text{ lb/day}$

PM<sub>10</sub> Emissions

Emission Factor: 1.00E-04 lbs/ton (AP-42, Table 11.19.2-2, 08/2004 – controlled)

Calculations:  $0.0001 \text{ lbs/ton} * 1500 \text{ ton/hr} * 24 \text{ hrs/day} * 3 \text{ load(s)} =$

10.8 lb/day

**Haul Roads**

Vehicle Miles Traveled (VMT): 5 VMT/day (Estimated)  
Control Efficiency: 50% watering  
Rated Load Capacity: <50 tons  
Daly Operation: unlimited

PM Emissions

Emission Factor: 13.90 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)

Calculations:  $13.90 \text{ lbs/VMT} * 5 \text{ VMT/day} = 69.5 \text{ lbs/day}$

PM<sub>10</sub> Emissions

Emission Factor: 3.95 lbs/VMT (AP-42 Chapter 13.2.2, 11/2006 - controlled)

Calculations:  $3.95 \text{ lbs/VMT} * 5 \text{ VMT/day} = 19.75 \text{ lbs/day}$

**Diesel Generator (1239 hp)**

Operating Hours: 11.3 hrs/24 hour period  
Engine Size: 1239 hp

PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)

Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
30.80 lbs/day

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
30.80 lbs/day

NOx Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
434.02 lb/day

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00251 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
35.14 lb/day

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00668 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
93.52 lbs/day

SOx Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00205 \text{ lb/hp-hr} * 1239 \text{ hp} * 11.3 \text{ hr/day} =$   
28.70 lbs/day

### **Diesel Generator (130 hp)**

Operating Hours: 11.3 hrs/24 hour period

Engine Size: 130 hp

PM Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
3.23 lbs/day

PM10 Emissions:

Emission Factor: 0.0022 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
3.23 lbs/day

NOx Emissions:

Emission Factor: 0.031 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
45.54 lb/day

VOC Emissions:

Emission Factor: 0.00251 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00251 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
3.69 lb/day

CO Emissions:

Emission Factor: 0.00668 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00668 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
9.81 lbs/day

SOx Emissions:

Emission Factor: 0.00205 lb/hp-hr (AP-42, Section 3.3, Table 3.3-1, diesel fuel - 10/96)  
Calculations:  $0.00205 \text{ lb/hp-hr} * 130 \text{ hp} * 11.3 \text{ hr/day} =$   
3.01 lbs/day

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub>. Due to exceedances of the national standards for PM<sub>10</sub>, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM<sub>10</sub>. As a result of this designation, EPA required the Department and the City-County Health Departments submit PM<sub>10</sub> State Implementation Plans (SIP). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors to PM<sub>10</sub> emissions.

Addendum #4 to MAQP #2566-08 is for a portable crushing/screening plant to locate at sites in or within 10 km of certain PM<sub>10</sub> nonattainment areas during the winter season (October 1 through March 31). Winter season (October 1 through March 31) operations may include only the locations listed in Section II.A of Addendum #4.

Addendum #4 of MAQP #2566-08 would also allow for summertime operations (April 1 – September 30) at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas.

VI. Air Quality Impacts

Knife River applied for an air quality permit to operate a portable crushing/screening plant to be located at various locations throughout Montana. MAQP #2566-08 and Addendum #4 will cover the Knife River crushing/screening plant while operating at any location within Montana, excluding those counties that have a Department-approved permitting program and those areas considered tribal lands. Based on the information provided, the amount of controlled emissions generated by this facility will not exceed any ambient air

quality standard. In addition, this source is portable and any air quality impacts will be minimal.

VII. Taking or Damaging Implication Analysis

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

VIII. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an environmental assessment is not required.

Analysis Prepared By: John P. Proulx

Date: May 3, 2018