Montana Department of
ENVIRONMENTAL QUALITY

Marc Racicot, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • E-mail: www.deq.state.mt.us

September 27, 2000

James G. Carney
P.O. Box 1102
Malta, MT 59538

Dear Mr. Carney:

Air Quality Permit #2601-02 is deemed final as of September 27, 2000 by the Department of Environmental Quality. This permit is for the alteration of permit #2601-01 for the addition of various pieces of equipment (see page 1, Section I.C. Current Permit Action). 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,

David L. Klemp
Air Permitting Section Supervisor
Air & Waste Management Bureau
(406) 444-3490

DK:jw

Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #2601-02

James G. Carney
P.O. Box 1102
Malta, Montana 59538

September 27, 2000

AIR QUALITY PERMIT

Issued To: James G. Carney
P.O. Box 1102
Malta, MT 59538

Permit: #2601-02
Complete Application Received: 07/20/00
Preliminary Determination Issued: 08/24/00
Department Decision Issued: 09/11/00
Permit Final: 09/27/00
AFS: #777-2601

An air quality permit, with conditions, is granted to James G. Carney (Carney) pursuant to Section 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

Section I: Permitted Facilities/Introduction

A. Equipment: A portable crushing/screening operation. A complete equipment list is found in the permit analysis.

B. Location: Various locations throughout the State of Montana. Permit #2601-02 applies while operating in any location in the State of Montana, except within those areas that have a Department of Environmental Quality (department) approved permitting program.

C. Current Permit Action: On July 20, 2000, Carney submitted a complete application to alter permit #2601-01. The alteration involves the addition of a 1982 Symons cone crusher (140 TPH), a 1999 Diester screen, a 1972 Simplicity screen, and a 1999 shop-manufactured 24" conveyor belt to the existing equipment covered under permit #2601-01. The addition of the previously mentioned equipment increases the plant's potential emissions by greater than 15 tons per year; therefore, a permit alteration is required. Permit **#2601-02** replaces permit #2601-01.

Section II: Limitations and Conditions

A. Operational

1. All visible emissions from the 1995 Barmac impact crusher may not exhibit an opacity of 15% or greater averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR 60 Subpart OOO).

2. All visible emissions from the 1956 Pioneer jaw crusher and the 1964 Symons cone crusher may not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.710).

3. All visible emissions from any affected equipment, manufactured on or after August 31, 1983, may not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR 60 Subpart OOO).

4. All visible emissions from any associated equipment, manufactured before August 31, 1983, may not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.715).

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

6. Carney shall treat all unpaved portions of the haul roads, access roads, parking lots, or the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.715).

7. 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, II.A.3, and II.A.4 (ARM 17.8.715).

8. If the permitted equipment is used in conjunction with any other equipment owned or operated by Carney, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the department (ARM 17.8.710).

9. Carney shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60, Subpart OOO for the crushing/screening plant (ARM 17.8.340 and 40 CFR 60).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but not later than 180 days after initial start up, an EPA Method 9 opacity test and/or other methods and procedures as specified in 40 CFR Part 60.675 must be performed on the 1999 Diester screen and any other affected equipment (i.e., conveyor transfers), manufactured after August 31, 1983, to demonstrate compliance with the emission limitations contained in Sections II.A.1 and II.A.3 (ARM 17.8.340, 40 CFR Part 60, General Provisions 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. Reporting Requirements

1. If this Concrete batch plant is moved to another location, a notice of Intent to Transfer location of air quality permit 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. This Change of Location notice must be published at least 15 days prior to the move. The Intent to Transfer form and the proof of publication of the Change of Location form must be submitted to the department prior to the move. These forms are available from the department (ARM 17.8.734).

2. Carney shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. These records must be available for inspection by the department and must be submitted to the department upon request (ARM 17.8.710).

3. Carney shall retain daily production numbers for a minimum of 5 years (ARM 17.8.710).

4. Carney shall supply the department with annual production information for all emission points, as required by the department in the annual emissions 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 the units required by the department (ARM 17.8.505).

5. Carney shall notify the department of any construction or improvement project conducted pursuant to ARM 17.8.705(1)(r) 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 emissions 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 17.8.705(1)(r)(iv) (ARM 17.8.705).

Section III: General Conditions

A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.

C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving the permittee of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, *et seq.* (ARM 17.8.717).

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

E. Appeals - Any person or persons jointly or severally adversely affected by the department's decision may request, within 15 days after the department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the application is not final unless 15 days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board.

F. Permit Inspection - As required by ARM 17.8.716, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by department personnel at the location of the permitted source.

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

H. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, the continuing validity of this permit is conditional upon the payment by the permittee of an annual operation fee, as required by that Section and rules adopted thereunder by the Board.

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

J. Carney shall comply with the conditions contained in this permit while operating in any location in the State of Montana, except within those areas that have a department approved permitting program.

PERMIT ANALYSIS
James G. Carney
Permit Number 2601-02

I. Introduction/Process Description

A. Permitted Equipment:

A 1956 Pioneer jaw crusher (50TPH); a 1964 Symons cone crusher (75 TPH); a 1995 Bar-Mac model 5000 impact crusher (40 TPH); a 1982 Symons cone crusher (140 TPH); a 1999 Diester screen; a 1972 Simplicity screen; and associated equipment.

B. Process Description:

Carney proposes to use this crushing plant, consisting of the previously mentioned equipment, to crush and sort sand and gravel materials for sale and use in construction operations.

C. Permit History

On October 25, 1989, Malta Ready Mix was issued permit **#2601-00**. Permit #2601-00 was issued for the operation of a 1956 Pioneer jaw crusher and associated equipment.

On October 16, 1999, Carney was issued a modification to change the name of the plant from Malta Ready Mix to James G. Carney and to update existing equipment covered under permit #2601-00. Since issuance of permit #2601-00, Carney had added the following equipment to the plant: a 1964 Symons cone crusher; a 1995 Barmac impact crusher model 5000; a 1992 shop manufactured 30" x 60' stacking conveyor; two (2) 1992 shop-manufactured 24" x 40' conveyors; a 1998 shop-manufactured 24" x 40' conveyor; and a 1998 shop-manufactured 36" belt feeder. Addition of the previously mentioned equipment resulted in an annual increase in potential emissions less than 15 tons per year. Therefore, the permit action was considered an administrative permit modification (ARM 17.8.705(1)(r)). Permit **#2601-01** replaced permit #2601-00.

D. Current Permit Action:

On July 20, 2000, Carney submitted a complete application to alter permit #2601-01. The alteration involves the addition of a 1982 Symons cone crusher (140 TPH), a 1999 Diester screen, a 1972 Simplicity screen and a 1999 shop-manufactured 24" conveyor belt to the existing equipment covered under permit #2601-01. The addition of the previously mentioned equipment increases the plant's potential emissions by greater than 15 tons per year; therefore, a permit alteration is required. Permit **#2601-02** replaces permit #2601-01.

E. Additional Information

Additional information, such as applicable rules and regulations, a best available control technology determination (BACT), 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 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. 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, Sub-Chapter 1, General Provisions, including, but not limited to:

1. 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.

2. 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.*, MCA.

   Carney 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.

3. ARM 17.8.110 Malfunctions. 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.

4. ARM 17.8.111 Circumvention. 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 which would otherwise violate an air pollution control regulation. 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, Sub-Chapter 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, and
5. ARM 17.8.223 Ambient Air Quality Standard for PM-10.

Carney must comply with the applicable ambient air quality standards; reference Section V, Existing Air Quality.

C. ARM 17.8, Sub-Chapter 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 to an 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. Under this section, Carney 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 17.8.340 Standard of Performance for New Stationary Sources. The owner and operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, shall comply with the standards and provisions of 40 CFR Part 60. Based on the information submitted by Carney, the 1995 Bar-Mac Impactor, the 1999 Diester screen, and some of the associated equipment to be covered under permit #2601-02 are subject to NSPS requirements (40 CFR Part 60, Subpart A General Provisions, and Subpart OOO Non-Metallic Mineral Processing Plants).

D. ARM 17.8, Sub-Chapter 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. Carney shall 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. Carney has submitted the appropriate application fee for the current permit action.

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

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

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

1. ARM 17.8.704 General Procedures for Air Quality Preconstruction Permitting. An air quality preconstruction permit shall contain requirements and conditions applicable to both construction and subsequent use.

2. ARM 17.8.705 When Permit Required--Exclusions. Permits are required for crushing operations that have the potential to emit greater than 5 tons/year of any pollutant. The permitted crushing/screening plant has the potential to emit more than 5 tons per year of particulate matter, PM_{10}, NO_x, and CO; therefore, a permit is required.

3. ARM 17.8.706 New or Altered Sources and Stacks--Permit Application Requirements. This rule requires that an application for an air quality permit be submitted for a new or altered source or stack. Carney has submitted a complete application for this permitting action.

4. ARM 17.8.710 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. Carney has demonstrated compliance with applicable rules and standards as required for permit issuance.

5. ARM 17.8.715 Emission Control Requirements. Carney is required to install on a new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

6. ARM 17.8.716 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.

7. ARM 17.8.717 Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving Carney of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.101, *et seq*.

8. ARM 17.8.720 Public Review of Permit Applications. This rule requires that Carney notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Carney submitted a notarized affidavit of publication of public notice from the Glasgow Courier as part of the complete permit application for the current permit action.

9. ARM 17.8.731 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.

10. ARM 17.8.733 Modification of Permit. An air quality permit may be modified for changes in any applicable rules and standards adopted by the board or changed conditions of operation at a source or stack which do not result in an increase in emissions because of those changed conditions of operation. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.

11. ARM 17.8.734 Transfer of Permit. An air quality permit may be transferred from one location to another if written notice of intent to transfer is sent to the department.

F. ARM 17.8, Sub-Chapter 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 sub-chapter.

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 Federal Clean Air Act that it would emit, except as this sub-chapter would otherwise allow.

This facility is not a major stationary source because it is not listed and does not have the potential to emit more than 250 tons per year (excluding fugitive emissions) of any air pollutant.

III. Emission Inventory – Permit #2601-02

Source	PM	PM-10	tons/yr NO_x	VOC	CO	SO_x
1964 Symons Cone Crusher (75 TPH)	0.82	0.39	0	0	0	0
1995 BarMac Impact Crusher (30 TPH)	0.33	0.16	0	0	0	0
1956 Pioneer Jaw Crusher (50 TPH)	0.55	0.26	0	0	0	0
1982 Symons Cone Crusher (140 TPH)	1.53	0.74	0	0	0	0
1999 Diester Screen (140 TPH)	9.66	4.60	0	0	0	0
1972 Simplicity Screen (140 TPH)	9.66	4.60	0	0	0	0
Material Transfer	4.45	2.15	0	0	0	0
Pile Forming	2.58	1.23	0	0	0	0
Bulk Loading	2.58	1.23	0	0	0	0
Kato Diesel Generator (175 kw)	2.26	2.26	31.86	2.54	6.87	2.11
Haul Roads	2.74	1.23	0	0	0	0
Total	37.14	18.84	31.86	2.54	6.87	2.11

- **A complete emission inventory for permit #2601-02 is on file with the department.**

IV. Best Available Control Technology Analysis

A BACT determination is required for each new or altered source. Carney 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.

Carney submitted a BACT analysis in permit application #2601-02 addressing some available methods of controlling particulate emissions from the 1982 Symons cone crusher; the 1999 Diester screen; the 1972 Simplicity screen; and the 1999 shop-manufactured belt conveyor. The department has reviewed these methods, as well as previous BACT determinations. Carney demonstrated, and the department agrees, that water spray bars will constitute BACT for the previously mentioned new emission sources at the existing crushing/screening plant.

The control options selected contain control equipment and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

V. Existing Air Quality:

Permit #2601-02 is issued for the operation of a portable crushing/screening plant to be located in various locations throughout Montana. Permit #2601-02 will cover the operation when operating at any location within the state of Montana, excluding those counties that have a department approved permitting program. In the view of the department, the amount of controlled emissions generated by this project will not exceed any set ambient standard. In addition, this source is portable and any air quality impacts will be minimal.

VI. Takings or Damaging Implication Analysis

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

VII. Environmental Assessment

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

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
1520 East Sixth Avenue
P.O. Box 200901, Helena, Montana 59620-0901
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: James G. Carney
P.O. Box 1102
Malta, MT 59538

Permit Number: 2601-02

Preliminary Determination on Permit Issued: August 24, 2000
Department Decision on Permit Issued: September 11, 2000
Final Permit Issued: September 27, 2000

1. *Legal Description of Site*: The facility is located in the NW¼ of Section 12, Township 29 North, Range 39 East, in Phillips County, Montana.

2. *Description of Project*: The permit application is for the addition of a 1982 Symons cone crusher, a 1999 Diester screen, a 1972 Simplicity screen, and associated equipment.

3. *Benefits and Purpose of Proposal*: The proposed action would increase business and revenue for the company.

4. *Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider*: The "no action alternative" consists of not issuing the permit and was considered but dismissed, given that the current permit action, as proposed, will maintain compliance with all applicable rules and standards.

5. *A listing of mitigation, stipulations and other controls*: A listing of the enforceable permit conditions and a permit analysis, including a Best Available Control Technology analysis, are contained in permit #2601-02.

6. *Regulatory effects on private property rights*: The department has considered alternatives to the conditions imposed in this permit as part of the permit development. The department has determined 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.

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			✓			yes
B.	Water Quality, Quantity, and Distribution				✓		yes
C.	Geology and Soil Quality, Stability, and Moisture				✓		yes
D.	Vegetation Cover, Quantity, and Quality			✓			yes
E.	Aesthetics				✓		yes
F.	Air Quality			✓			yes
G.	Unique Endangered, Fragile, or Limited Environmental Resource			✓			yes
H.	Demands on Environmental Resource of Water, Air, and Energy			✓			yes
I	Historical and Archaeological Sites				✓		yes
J.	Cumulative and Secondary Impacts			✓			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

This permitting action would result in an increase in emissions at the facility. Minor impacts to the habitats of fish and wildlife may occur.

B. Water Quality, Quantity, and Distribution

Water would be used as pollution control, but would only cause a minor disturbance to the area. No surface water or ground water quality problems are expected as a result of using water for pollution control. Any accidental spills or leaks from equipment would be handled according to the appropriate environmental regulations in an effort to minimize any potential adverse impact on the immediate and surrounding area. Water usage for pollution control would be slightly increased due to the addition of the 1982 Symons cone crusher, 1999 Diester screen, 1972 Simplicity screen, and associated equipment. However, no surface or ground water quality problems are expected as a result of the permit alteration.

C. Geology and Soil Quality, Stability and Moisture

The actions addressed in this permit would not change the soil stability or geologic substructure. The proposed changes would not result in impacts to productivity or fertility at or near the site. No unique geologic or physical features would be disturbed. Therefore, no impact to geology and soil quality, stability and moisture would occur.

D. Vegetation Cover, Quantity, and Quality

The increase in regulated pollutants may result in minor impacts to the diversity, productivity or abundance of plant species.

E. Aesthetics

The proposed permit action does include the installation of new equipment at the facility. However, the additional equipment would not alter any scenic vista or create an aesthetically offensive site or effect.

F. Air Quality

Allowable emissions of the criteria pollutants would increase as result of the current permit action. However, the allowable emissions are within the National Ambient Air Quality Standards and Montana Ambient Air Quality Standards.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The current permit action would result in a minor increase in emissions, which could result in minor impacts to any existing unique endangered, fragile, or limited environmental resource in the area. However, given the temporary and portable nature of the operation, any impact would be minor and short lived.

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

The department does not anticipate that this permitting action would impact water. Additional energy may be required at the facility; therefore, minor impacts to energy would be expected. Minor demands on air resources are possible because the facility's emissions would be increasing.

I. Historical and Archaeological Sites

The proposed project is to crush and screen rock material within a previously disturbed industrial site. According to the Montana State Historic Preservation Office, there is low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within the area. Therefore, it is unlikely the crusher operation will have an adverse affect on any known historic or archaeological site.

J. Cumulative and Secondary Impacts

Overall, cumulative and secondary impacts from this project would result in minor impacts to the physical and human environment in the immediate area. Air pollution from the facility would be controlled by department-determined BACT and conditions in permit #2601-02. The department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in permit #2601-02.

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.

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

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

A. Social Structures and Mores

There would be no change in social structures or mores as a result of the proposed changes.

B. Cultural Uniqueness and Diversity

There would be no change to the cultural uniqueness and diversity of the area as a result of the proposed changes.

C. Local and State Tax Base and Tax Revenue

The proposed changes would have no affect on the local and state tax base and tax revenue.

D. Agricultural or Industrial Production

The proposed changes would not displace or otherwise affect any agricultural land or practices. In addition, the proposed operations would not impact local industrial production.

E. Human Health

There may be minor effects to human health due to the slight increase in emissions of criteria pollutants; however, permit #2601-02 incorporates conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed operations would not affect any access to or aesthetic attribute of recreational and wilderness activities in the area.

G. Quantity and Distribution of Employment

Activities from the proposed operations would not affect the quantity and distribution of employment in the area.

H. Distribution of Population

The proposed operations would not disrupt the normal population distribution in the area.

I. Demands of Government Services

Government services would be required for acquiring the appropriate permits from government agencies. Demands for government services would be minimal.

J. Industrial and Commercial Activity

No additional industrial or commercial activity is expected as a result of the proposed changes.

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 minor impacts to the physical and human environment in the immediate area. Air pollution from the facility would be controlled by department-determined BACT and conditions in permit #2601-02. The department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in permit #2601-02.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The source would be applying the Best Available Control Technology; the analyses indicate compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society, Montana Natural Heritage Program.

Individuals or groups contributing to this EA: Department of Environmental Quality - Air and Waste Management Bureau; Montana Historical Society; and the Montana Natural Heritage Program.

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