

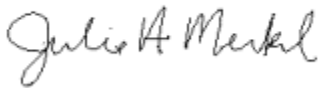
March 25, 2019

Richard Hoffman
Hoffman's R&M Service
2100 Meadowlark
Butte, Montana 59701

Dear Mr. Hoffman:

Montana Air Quality Permit #2873-07 is deemed final as of March 22, 2019, by the Department of Environmental Quality (Department). This permit is for a Portable Asphalt Plant. 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 #2873-07

Hoffman's R&M Service
2100 Meadowlark
Butte, MT 59701

March 22, 2019



MONTANA AIR QUALITY PERMIT

Issued To: Hoffman's R&M Service
2100 Meadowlark
Butte, Montana 59701

Permit: #2873-07
Administrative Amendment (AA) Request:
Received: 2/15/2019
Department's Decision on AA: 3/4/2019
Permit Final: 3/22/2019

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

SECTION I: Permitted Facilities

A. Plant Location

Hoffman operates a portable continuous flow drum mix asphalt plant in Section 25 (Tract 1), Township 3 North, Range 8 West, in Silver Bow County, Montana. MAQP #2873-07 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program and those areas considered tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* MAQP #2873-07 and Addendum #6 applies while operating in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas (NAA) during the summer months (April 1 - September 30) and at sites approved by the Department during the winter months (October 1 – March 31). A complete list of permitted equipment is included in Section I.A of the permit analysis.

B. Current Permit Action

On February 15, 2019, the Department received a Notice of Intent to Transfer Ownership of MAQP #2873 from Hollow Contracting to Hoffman's R&M Service.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. Asphalt plant particulate matter emissions shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf) (ARM 17.8.340 ARM 17.8.752, and 40 CFR 60, Subpart I).
2. Hoffman shall not cause or authorize to be discharged into the atmosphere from the asphalt plant, stack emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart I).

3. Hoffman shall not cause or authorize to be discharged into the atmosphere from systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart I).
4. Hoffman shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308 and ARM 17.8.752).
5. Hoffman 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.4 (ARM 17.8.752).
6. A baghouse for air pollution control, with a device to measure the pressure drop (magnehelic gauge, manometer, etc.), must be installed and maintained on the asphalt drum. Pressure drop must be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained (ARM 17.8.752).
7. Hoffman shall only use natural gas, propane, or fuel oil to fire the hot mix dryer (ARM 17.8.749).
8. Asphalt plant production shall be limited to 1,020,000 tons during any rolling 12-month time period (ARM 17.8.749).

Once a stack test is performed, the asphalt production rate shall be limited to the average production rate during the last source test demonstrating compliance (ARM 17.8.749).
9. Hoffman shall not operate more than two diesel-fired generators at any given time and the combined maximum rated design capacity shall not exceed 675-kW (ARM 17.8.749).
10. The combined hours of operation of the two diesel-fired generators shall not exceed 6,800 hours during any rolling 12-month time period (ARM 17.8.749).
11. If the permitted equipment is used in conjunction with any other equipment owned or operated by Hoffman, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
12. Hoffman shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60, Subpart I (ARM 17.8.340 and 40 CFR 60, Subpart I).

13. Hoffman shall comply with all appropriate standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60, Subpart IIII, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart IIII).

B. Testing Requirements

1. Within 60 days after achieving maximum production (after baghouse installation), but not later than 180 days after initial start-up (after baghouse installation), an Environmental Protection Agency (EPA) Methods 1-5 source test shall be performed on the asphalt plant to demonstrate compliance with Section II.A.1. In addition, an EPA Method 9 opacity test must be performed in conjunction with all particulate tests to demonstrate compliance with the conditions specified in Section II.A.2 (ARM 17.8.106 and ARM 17.8.749).
2. Additional EPA Methods 1-5 and 9 source tests must be performed on the asphalt plant on an every 4-year basis from the initial source test date, or according to another testing/monitoring schedule as may be approved by the Department, in order to demonstrate compliance with the conditions in Sections II.A.1 and II.A.2 (ARM 17.8.106 and ARM 17.8.749).
3. Pressure drop on the control device and temperatures must be recorded during the compliance source test and reported as part of the test results (ARM 17.8.749).
4. Hoffman may retest at any time in order to test at a higher production rate (ARM 17.8.749).
5. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
6. Since asphalt production will be limited to the average production rate during the compliance source test, it is suggested that the test be performed at the highest production rate practical (ARM 17.8.749).
7. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this asphalt plant is moved to another location, an intent to transfer form must be sent to the Department. In addition, a public notice form for change of location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The intent to transfer form and the proof of publication (affidavit) of the public notice form for change of location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).

2. Hoffman 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 not be limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

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

3. Hoffman 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 startup 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(l)(d) (ARM 17.8.745).
4. Hoffman shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. The records compiled in accordance with this permit shall be maintained by Hoffman 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).
5. Hoffman shall document, by month, the asphalt production from the facility. By the 25th day of each month, Hoffman shall calculate the asphalt 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.8. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Hoffman shall document, by month, the combined hours of operation of the diesel generators. By the 25th day of each month, Hoffman shall calculate the combined hours of operation of the generators for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.11. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

SECTION III: Addendum

Hoffman shall comply with all conditions in Addendum #6 to MAQP #2873-07, as applicable (ARM 17.8.749)

SECTION IV: General Conditions

- A. Inspection – Hoffman 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 (i.e. CEMS, CERMS), and otherwise conducting all necessary functions related to this MAQP.
- B. Waiver – The MAQP and all the terms, conditions, and matters stated herein shall be deemed accepted if Hoffman fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this MAQP shall be construed as relieving Hoffman of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for 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 MAQP 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 an MAQP 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 MAQP shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Hoffman may be grounds for revocation of this MAQP, 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 MAQP 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. Hoffman shall comply with the conditions contained in this MAQP while operating in any location in Montana, except within those areas that have a Department-approved permitting program.

Montana Air Quality Permit (MAQP) Analysis
Hoffman's R&M Service
MAQP #2873-07

I. Introduction/Process Description

A. Permitted Equipment

Hoffman's R&M Service (Hoffman) owns and operates a portable 1983 Cedar Rapids continuous flow drum mix asphalt plant with a 1990 Cedar Rapids baghouse to control particulate matter (PM)/particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) emissions, a 1983 Cedar Rapids screen conveyor, a 1983 CMI portable slat conveyor, a diesel generator up to 600-kilowatt (kW), a diesel generator up to 75-kW, and associated equipment.

B. Source Description

Hoffman will use the portable asphalt plant, screen conveyor, slat conveyor, and associated equipment to produce asphalt for use in construction, repair, and maintenance of roads and highways. The asphalt production process begins with virgin aggregate and sand material loaded into a feeder, which is continuously conveyed from the feeder to the drum dryer. In the drum dryer, the aggregate is heated and mixed with a specific amount of hot asphalt product to produce a specific grade of asphalt. After the mixing has occurred in the drum dryer, it is conveyed to an unheated storage silo and loaded into trucks for delivery to the site. Particulate emissions from the drum dryer are controlled with a baghouse.

C. Permit History

On April 24, 1995, Montana Materials L.L.C. submitted a complete Montana Air Quality Permit (MAQP) application to operate a portable 1983 Cedar Rapids continuous flow drum mix asphalt plant, portable 1983 Cedar Rapids screen conveyor, portable 1983 CMI slat conveyor, and associated equipment. On June 24, 1995, Montana Materials, L.L.C. was issued final **MAQP #2873-00** to operate the continuous flow hot mix asphalt plant and associated equipment.

On May 21, 1998, Montana Materials, L.L.C. submitted a request for an administrative amendment to MAQP #2873-00 to reflect a name change to Hollow. In addition to the name change, the permit amendment included a rule reference update. On June 18, 1998, **MAQP #2873-01** replaced MAQP #2873-00.

On April 8, 1999, Hollow requested a modification to allow for summer operation (April 1, 1999, through September 30, 1999) within the Butte area in or within 10 kilometers (km) of the Butte PM₁₀ nonattainment area (NAA) at Section 25 (Tract 1), Township 3 North, Range 8 West, in Silver Bow County, Montana. In addition, the MAQP action allowed the facility to operate in or within 10 km of the following PM₁₀ NAA's during the summer months: Libby, Kalispell, Columbia Falls, Whitefish, and Thompson Falls. On April 24, 1999, **MAQP #2873-02** replaced MAQP #2873-01 and **Addendum #1** was attached to the MAQP.

On May 31, 2000, Hollow requested a modification to allow for summer operation (April 1, 2000, through September 30, 2000) within the Butte PM₁₀ NAA. Hollow planned to initially locate at Section 25 (Tract 1), Township 3 North, and Range 8 West, in Silver Bow County, Montana. In addition to the Butte NAA, the current permit action allowed the facility to operate in or within 10 km of the following PM₁₀ NAA's during the summer months: Libby, Kalispell, Columbia Falls, Whitefish, and Thompson Falls. On July 16, 2000, **MAQP #2873-03** replaced MAQP #2873-02 and **Addendum #2** replaced Addendum #1.

On March 26, 2002, Hollow submitted a complete MAQP application to the Department of Environmental Quality (Department) to replace the portable 350-kW diesel generator with a 600-kW Cat portable diesel generator and 50-kW Ingersol Rand portable diesel generator. The new equipment provided power to the asphalt plant, conveyors, and associated equipment. In addition, the 1983 Cedar Rapids Venturi scrubber was replaced with a 1990 Cedar Rapids baghouse. The addendum was also updated to reflect the change in equipment at the facility. **MAQP #2873-04** replaced MAQP #2873-03 and **Addendum #3** replaced Addendum #2.

On October 25, 2005, Hollow requested an administrative amendment to replace the baghouse with a wet scrubber and on November 29, 2005, Hollow requested an addendum to allow operation near the Butte PM₁₀ nonattainment area. In addition, MAQP #2873-05 was updated to reflect the current permit language and rule references used by the Department. On November 1, 2006, **MAQP #2873-05** replaced MAQP #2873-04 and **Addendum #4** replaced Addendum #3.

On April 19, 2007, Hollow submitted an MAQP application for a modification to MAQP #2873-05. Specifically, Hollow requested to replace the existing particulate matter/PM₁₀ control equipment (wet scrubber) with a baghouse. In addition, Hollow requested to increase the combined generating capacity of the facility from 650-kW to 675-kW. The application was deemed complete on May 8, 2007, upon Hollow's submittal of an affidavit of publication of public notice. The permit action incorporated Hollow's requests into the MAQP, updated the permit format and language, and updates the addendum. **MAQP #2873-06** replaced MAQP #2873-05 and **Addendum #5** replaced Addendum #4.

D. Current Permit Action

On February 15, 2019, the Department received a Notice of Intent to Transfer Ownership of MAQP #2873 from Hollow Contracting to Hoffman's R&M Service. **MAQP #2873-07** replaces MAQP 2873-06 and **Addendum #6** replaces Addendum #5.

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 location of complete copies of all applicable rules and regulations or copies where appropriate.

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

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (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).

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

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

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

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide

5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀
11. ARM 17.8.230 Fluoride in Forage

Hoffman 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. (2) Under this rule, Hoffman shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.
6. ARM 17.8.324 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 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). Hoffman is considered an NSPS affected facility under 40 CFR 60 and is subject to the requirements of Subpart I and is potentially subject to the requirements of Subpart III.

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 MAQP application fee concurrent with the submittal of an MAQP application. An MAQP 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 MAQP, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an MAQP 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 MAQP 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 MAQP or MAQP modification 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. Hoffman has a PTE greater than 15 tons per year of particulate matter, PM₁₀, nitrogen oxide (NO_x), volatile organic carbon (VOC), carbon monoxide (CO), and sulfur oxides (SO_x); 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 MAQP 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 an MAQP under the MAQP Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that an MAQP application be submitted prior to installation, modification, or use of a source.

A permit application was not required for the current permit action because the permit change is considered an administrative amendment. (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. An affidavit of public notice was not required for the current permit action because the permit change is considered an administrative permit change

(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 an MAQP. An affidavit of public notice was not required for the current permit action because the permit change is considered an administrative permit change.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the MAQPs issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the MAQP and the requirements of this subchapter. This rule also requires that the MAQP 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 MAQP analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that MAQPs 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 MAQP shall be construed as relieving Hoffman 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 MAQP applications and making MAQP decisions on those MAQP applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An MAQP shall be valid until revoked or modified, as provided in this subchapter, except that an MAQP issued prior to construction of a new or altered source may contain a condition providing that the MAQP will expire unless construction is commenced within the time specified in the MAQP, which in no event may be less than one year after the MAQP is issued.

12. ARM 17.8.763 Revocation of Permit. An MAQP may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An MAQP 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.
14. The owner or operator of a facility may not increase the facility's emissions beyond MAQP limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring an MAQP, or unless the owner or operator applies for and receives another MAQP 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.
15. ARM 17.8.765 Transfer of Permit. (1) This rule states that an MAQP 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 MAQP may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.

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

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

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

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tons per year of any pollutant;
 - b. PTE > 10 tons per year of any one hazardous air pollutant (HAP), PTE greater than 25 tons per year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tons per year of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2873-07 for Hoffman, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons per year of any pollutant;
 - b. The facility's PTE is less than 10 tons per year for any one HAP and less than 25 tons per year of all HAPs;
 - c. This source is not located in a serious PM₁₀ nonattainment area;
 - d. This facility is not subject to any current NSPS;
 - e. This facility is not subject to any current NESHAP standards;
 - f. This source is neither a Title IV affected source
 - g. This source is not a solid waste combustion unit; and
 - h. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that Hoffman will be a minor source of emissions and is exempt from obtaining a Title V Operating Permit. However, in the event that the EPA makes minor sources that are subject to NSPS obtain a Title V Operating Permit, Hoffman will be required to apply for and receive a Title V Operating Permit.

III. BACT Determination

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

A BACT analysis was not required for the current permit action because the current permit action is considered an administrative permit action.

IV. Emission Inventory

Tons/Year						
Source	PM	PM ₁₀	NO _x	VOC	CO	SO _x
1983 Cedar Rapids Asphalt Plant w/Baghouse	11.40	9.12	28.05	16.32	66.30	29.58
Elevator, Screens, Bins, and Mixer	19.13	15.30	0.0	0.0	0.0	0.0
Cold Aggregate Handling	25.50	20.40	0.0	0.0	0.0	0.0
Diesel Generator (up to 600 kW)	3.01	3.01	42.40	3.38	9.14	1.09
Diesel Generator (up to 75 kW)	0.38	0.38	5.30	0.42	1.14	0.14
Haul Roads	2.74	1.23	0.0	0.0	0.0	0.0
Total	62.15	49.43	75.75	20.12	76.58	30.81
* A complete emission inventory for MAQP #2873-07 is on file with the Department.						
** 3,400 hrs/yr limits PM ₁₀ emissions less than modeling threshold (50 tons/year)						

V. Existing Air Quality

Hoffman's R&M Service is located on Section 25 (Tract 1), Township 3 North, Range 8 West, Silver Bow County, Montana. The physical address is 2100 Meadowlark, Butte, Montana. The Butte area is considered non-attainment for particulate matter with an aerodynamic diameter of 10 microns (PM₁₀). The current permit action will have no effect on existing air quality because it is considered an administrative action and will not add any additional emissions.

VI. Air Quality Impacts

MAQP #2873-07 will cover the operations of this portable drum mix asphalt plant while operating in those areas within Montana classified as being in attainment with federal ambient air quality standards, and those areas still undefined (not yet classified). Additionally, MAQP #2873-07 and Addendum #6 will cover the asphalt plant operations during the summer months (April 1 - September 30) in or within 10 km of certain PM₁₀ nonattainment areas and during the winter months at the current approved wintertime location at Section 25 (Tract 1), Township 3 North, and Range 8 West, in Silver Bow County, Montana. Any other wintertime location must be approved in writing by the Department. Based on the information provided, the amount of controlled emissions generated by this facility will not exceed any set ambient air quality standard for operations in these areas. This facility is a portable source that will operate on an intermittent and temporary basis at a given location, so any impacts to air quality will be minor and short-lived.

VII. Ambient Air Impact Analysis

This permit is for a portable drum mix asphalt plant to be located at various locations within Montana. MAQP #2873-07 and Addendum #6 contains operational conditions and limitations that will protect air quality for any given site and the surrounding area(s). Also, this facility is a portable source that will operate on an intermittent and temporary basis, so any effects to air quality will be minor and short-lived. Further, the amount of controlled particulate emissions generated by this project will not cause concentrations of PM₁₀ in the ambient air that exceed the set standard. In addition, this source is portable and any air quality impacts will be minor.

VIII. Taking or Damaging Implication Analysis

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

YES	NO	
X		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)

IX. 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: February 19, 2019

Addendum #6
Hoffman's R&M Service
Permit #2873-07

An addendum to Montana Air Quality Permit (MAQP) #2873-07 is issued to Hoffman's R&M Service (Hoffman) pursuant to Section 75-2-204 and 75-2-211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.765, as amended, for the following:

I. Permitted Equipment

Hoffman owns and operates a portable 1983 Cedar Rapids continuous flow drum mix asphalt plant with a 1990 Cedar Rapids baghouse to control particulate matter (PM)/particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) emissions, a 1983 Cedar Rapids screen conveyor, a 1983 CMI portable slat conveyor, a diesel generator up to 600-kilowatt (kW), a diesel generator up to 75-kW, and associated equipment.

II. Seasonal and Site Restrictions

MAQP #2873-07 and Addendum #6 applies to Hoffman while operating at any location in or within 10 km of certain PM₁₀ nonattainment areas (NAA). Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1-March 31) - The only location(s) in or within 10 kilometers (km) of certain PM₁₀ NAA's where Hoffman may operate is:
- Section 25 (Tract 1), Township 3 North, and Range 8 West, in Silver Bow County, Montana
 - Any other site that may be approved, in writing, by the Department of Environmental Quality (Department).
- B. During the summer season (April 1-September 30) - Hoffman may operate at any location in or within 10 km of certain PM₁₀ NAA's, including, but not limited to: Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish.
- C. Hoffman shall comply with the limitations and conditions contained in MAQP #2873-07 and Addendum #6 while operating in or within 10 km of any of the previously listed PM₁₀ nonattainment areas. Addendum #6 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum #6 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 Limitation and Conditions – **Winter Season (October 1 – March 31)**

1. Asphalt plant particulate matter emissions shall be limited to 0.04 grains per dry standard cubic feet (gr/dscf) (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart I).
2. All visible emissions from the asphalt plant stack shall not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
3. Hoffman shall not cause or authorize to be discharged into the atmosphere from any equipment, such as systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
4. Hoffman shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant area, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
5. Hoffman 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 contained in Section III.A.4 (ARM 17.8.749).
6. Asphalt plant production shall be limited to 545 tons per calendar-day (ARM 17.8.749).
7. The combined hours of operation of the two diesel fired generators shall not exceed 5 hours per calendar-day (ARM 17.8.749).

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

1. Asphalt plant particulate matter emissions shall be limited to 0.04 gr/dscf (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart I).
2. All visible emissions from the asphalt plant stack shall not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).

3. Hoffman shall not cause or authorize to be discharged into the atmosphere from any equipment, such as systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
4. Hoffman shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant area, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
5. Hoffman 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 contained in Section III.B.4 (ARM 17.8.749).
6. Asphalt plant production shall be limited to 2,796 tons per calendar-day (ARM 17.8.749).
7. The combined hours of operation of the two diesel fired generators shall not exceed 6,800 hours during any rolling 12-month time period (ARM 17.8.749).

C. Operational Reporting Requirements

1. Hoffman shall provide the Department with written notification of job completion within 10 working days of job completion (ARM 17.8.749).
2. Hoffman shall provide written notice of relocation of the permitted equipment at least 15 days prior to the physical transfer of equipment (ARM 17.8.765).
3. Production information for the sites covered by this addendum must be submitted to the Department with the annual emission inventory request or within 30 days of completion of the project. The information must include the following (ARM 17.8.749):
 - a. Tons of asphalt produced at each site;
 - b. Hours of operation at each site;
 - c. Type and amount of fuel used for the asphalt plant (hot mix dryer);
 - d. Gallons of diesel fuel used for generators at each site;
 - e. Fugitive dust information consisting of a listing of all plant vehicles including the following for each vehicle type:
 - i. Number of vehicles
 - ii. Vehicle type

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

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

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

- 4. Hoffman shall document, by day, the total asphalt plant production during the winter season to verify compliance with the limitations in Section III.A.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).
- 5. Hoffman shall document, by day, the combined hours of operations of the diesel generators during the winter season to verify compliance with the limitations in Section III.A.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).
- 6. Hoffman shall document, by day, the total asphalt plant production during the summer season to verify compliance with the limitations in Section 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).
- 7. Hoffman shall document, by day, the combined hours of operation of the diesel generators. By the 25th day of each month, Hoffman shall calculate the combined hours of operation of the generators for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section III.B.7. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

Addendum #6 Analysis
Hoffman's R&M Service MAQP #2873-07

I. Permitted Equipment

Hoffman's R&M Service (Hoffman) owns and operates a portable 1983 Cedar Rapids continuous flow drum mix asphalt plant with a 1990 Cedar Rapids baghouse to control particulate matter (PM)/particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) emissions, a 1983 Cedar Rapids screen conveyor, a 1983 CMI portable slat conveyor, a diesel generator up to 600-kilowatt (kW), a diesel generator up to 75-kW, and associated equipment.

II. Source Description

Hoffman will use the portable asphalt plant, screen conveyor, slat conveyor, and associated equipment to produce asphalt for use in construction, repair, and maintenance of roads and highways. The asphalt production process begins with virgin aggregate and sand material loaded into a feeder, which is continuously conveyed from the feeder to the drum dryer. In the drum dryer, the aggregate is heated and mixed with a specific amount of hot asphalt product to produce a specific grade of asphalt. After the mixing has occurred in the drum dryer, it is conveyed to an unheated storage silo and loaded into trucks for delivery to the site. Particulate emissions from the drum dryer are controlled with a baghouse.

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 Montana Air Quality Permits (MAQP) issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the MAQP and the requirements of this subchapter. This rule also requires that the MAQP must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
- B. ARM 17.8.764 Administrative Amendment of Permit. An MAQP 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 MAQP limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring an MAQP, or unless the owner or operator applies for and receives another MAQP 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.

- C. ARM 17.8.765 Transfer of Permit. (1) This rule states that an MAQP 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 one 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 MAQP 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.

Hoffman shall submit proof of compliance with the transfer and public notice requirements when Hoffman 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 controls of this Addendum will prevent Hoffman from having a significant impact on the PM₁₀ nonattainment areas covered by this MAQP.

IV. Emission Inventory

Winter Season-Emission Inventory

Source	Lb/day					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
1983 Cedar Rapids Asphalt Plant w/Wet Scrubber Elevator, Screens, Bins, and Mixer	33.52	26.81	29.98	17.44	70.85	31.61
Cold Aggregate Handling	20.44	16.35	0.0	0.0	0.0	0.0
Diesel Generator (up to 600 KW)	27.25	21.80	0.0	0.0	0.0	0.0
Diesel Generator (up to 75 KW)	8.85	8.85	124.71	9.94	26.87	3.22
Haul Roads	1.11	1.11	15.59	1.24	3.36	0.40
	15.00	6.75	0.0	0.0	0.0	0.0
Total	106.16	81.67	170.28	28.62	101.08	35.23
*A complete emission inventory for Addendum #6 (winter) is on file with the Department						
**Production limit = 109 ton/hr * 5 hr/day = 545 ton/day (established to limit PM ₁₀ emissions less than 82 lb/day (modeling guidance))						

Summer Season-Emission Inventory

Source	Lb/day					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
1983 Cedar Rapids Asphalt Plant w/Wet Scrubber Elevator, Screens, Bins, and Mixer	62.44	49.95	153.70	89.42	363.29	162.08
Cold Aggregate Handling	104.79	83.84	0.0	0.0	0.0	0.0
Diesel Generator (up to 600 KW)	139.73	111.78	0.0	0.0	0.0	0.0
Diesel Generator (up to 75 KW)	42.48	42.48	232.34	18.51	50.07	6.00
Haul Roads	5.31	5.31	29.04	2.31	6.26	0.75
	15.00	6.75	0.0	0.0	0.0	0.0
Total	369.76	300.11	415.08	110.25	419.61	168.83
*A complete emission inventory for Addendum #6 (winter) is on file with the Department						
** Production limit = 300 ton/hr * 9.32 hr/day = 2,796 ton/day (established to limit PM ₁₀ emissions less than 50 ton/yr (modeling threshold))						
***PM/PM10 emissions from generators based on 24 hr/day to evaluate limiting the generators to 3400 hr/yr rather than 9.32 hr/day						

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM₁₀. Due to exceedances of the NAAQS for PM₁₀, 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 PM₁₀. As a result of this designation, EPA required the Department and the City-County Health Departments to submit PM₁₀ State Implementation Plans (SIPs). 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 PM₁₀ emissions.

MAQP #2873-07 and Addendum #6 to MAQP #2873-07 sets conditions and limitations that allow for this asphalt plant to be located in or within 10 kilometers (km) of certain PM₁₀ nonattainment areas during the summer months (April through September) and the winter months (October through March). Summertime operations may include areas in or within 10 km of certain PM₁₀ nonattainment areas, including, but not limited to, Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish. The current approved wintertime location is Section 25 (Tract 1), Township 3 North, and Range 8 West, in Silver Bow County, Montana. Any other wintertime location must be approved in writing by the Department.

X. Air Quality Impacts

MAQP #2873-07 will cover the operations of this portable drum mix asphalt plant while operating in those areas within Montana classified as being in attainment with federal ambient air quality standards, and those areas still undefined (not yet classified). Additionally, MAQP #2873-07 and Addendum #6 will cover the asphalt plant operations during the summer months (April 1 - September 30) in or within 10 km of certain PM₁₀ nonattainment areas and during the winter months at the current approved wintertime location at Section 25 (Tract 1), Township 3 North, and Range 8 West, in Silver Bow County, Montana. Any other wintertime location must be approved in writing by the Department. Based on the information provided, the amount of controlled emissions generated by this facility will not exceed any set ambient air quality standard for operations in these areas. This facility is a portable source that will operate on an intermittent and temporary basis at a given location, so any impacts to air quality will be minor and short-lived.

XI. Taking or Damaging Implication Analysis

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

VII. Environmental Assessment

An Environmental Assessment was not required for the current permit action because the current permit action is considered an administrative amendment.