

AIR QUALITY PERMIT

Issued To: Missouri River Gravel Plant
P.O. Box 1690
Great Falls, MT 59403-1690

Permit # 2927-00
Application Deemed Complete: 5/9/96
Preliminary Determination Issued: 5/16/96
Department Determination Issued: 6/3/96
Permit Final: 6/19/96

An air quality permit with conditions is hereby granted to the above-named permittee, hereinafter referred to as "Missouri River," pursuant to Sections 75-2-204 and 211, MCA, as amended, and Administrative Rules of Montana (ARM), Subchapter 11, PERMIT, CONSTRUCTION AND OPERATION OF AIR CONTAMINANT SOURCES, ARM 16.8.1101, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

- A. Permitted Equipment: A 1972 Pioneer Batch Mix Asphalt Plant (300TPH), and associated equipment. Emissions from the asphalt plant are controlled by a 1972 Buell cyclone dust collector, and an Asphalt Equipment and Service Company venturi scrubber.
- B. Original Location: W $\frac{1}{2}$, NW $\frac{1}{4}$, Section 1, and E $\frac{1}{2}$, NE $\frac{1}{4}$, of Section 2, Township 19 North, Range 2 East, in Cascade County, Montana.

Section II: Limitations and Conditions

- A. Emission Limitations
 - 1. Asphalt plant particulate matter emissions shall be limited to 0.10 gr/dscf (ARM 16.8.1103).
 - 2. Missouri River 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 six consecutive minutes (ARM 16.8.1404).
 - 3. Missouri River 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 opacity of 20% or greater averaged over six consecutive minutes (ARM 16.8.1401).
 - 4. Missouri River shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 16.8.1401).

5. Missouri River shall treat all unpaved portions of the haul roads, access roads, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 16.8.1103).
6. A device to measure the pressure drop (magnehelic gauge, manometer, etc.) on the control device (wet scrubber) must be installed and maintained. Pressure drop must be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained (ARM 16.8.1109).
7. 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 16.8.1109).
8. The asphalt plant hours of operation shall be limited to 5000 hours/year (ARM 16.8.1103).

B. Emission Testing

1. Within 60 days after achieving maximum production rate, but not later than 180 days after permit issuance, an EPA Methods 1-5 source test shall be performed on the asphalt plant to demonstrate compliance with Section II.A.1 and an EPA Method 9 opacity test shall be performed in conjunction with all particulate tests to demonstrate compliance with the conditions specified in Sections II.A.2 and 3 (ARM 16.8.704 and ARM 16.8.1109).
2. An EPA Methods 1-5, and 9 source test must be performed on the asphalt plant every four years after the initial source test to demonstrate compliance with the conditions specified in Section II.A. 1 and 2 (ARM 16.8.704 and ARM 16.8.1109).
3. Pressure drop on the control device and temperatures must be recorded during the test and reported as part of the test results (ARM 16.8.1109).
4. All source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 16.8.709).
5. Since asphalt production will be limited to the average production rate during the test, it is suggested the test be performed at the highest production rate practical (ARM 16.8.1109).
6. Missouri River may retest at any time in order to test at a higher production rate (ARM 16.8.1109).
7. The department may require further testing (ARM 16.8.704).

C. Reporting Requirements

1. If this asphalt plant is moved to another location, a Notice of Intent to Transfer Location of Air Quality Permit must be published in a newspaper of general circulation in the area to which the transfer is to be made. This notice must be published at least fifteen (15) days prior to the move. Proof of publication and a change of location form must be submitted to the Montana Department of Environmental Quality prior to the move. These forms are available from the department (ARM 16.8.1114).
2. The operator shall maintain on-site records showing daily production rates for the current calendar year. These records must be available for inspection by the department and must be submitted to the department upon request (ARM 16.8.1109).
3. Missouri River shall retain daily production numbers for a minimum of five (5) years (ARM 16.8.1109).
4. Missouri River shall supply the department with annual production information for all emission points, as required by the department, in the annual emission inventory request. The request will include, but is not limited to, all sources identified in the most recent emission inventory report and sources identified in Section I.A of this permit.

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

D. Notification

Missouri River shall provide the department with written notification of the following dates within the specified time periods (ARM 16.8.1109):

1. Anticipated start-up date between 30 and 60 days prior to the actual start-up date.
2. Actual start-up date within 15 days of the actual start-up date.

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, 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 16.8.1101, *et seq.* (ARM 16.8.1117).
- 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 who are jointly or severally adversely affected by the department's decision may request, within fifteen (15) days after the department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the 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 fifteen (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 16.8.1115, 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 three years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- H. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay by the permittee of an annual operation fee may be grounds for revocation of this permit, as required by that Section and rules adopted thereunder by the Board of Environmental Review.
- 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.

Permit Analysis
Missouri River Gravel Company
Permit #2927-00

I. Introduction/Process Description

A. Introduction

On May 9, 1996, Missouri River Gravel Plant submitted a complete permit application to operate a 1972 Pioneer batch mix asphalt plant (300 TPH), and associated equipment. Emissions from the dryer are controlled by a cyclone and venturi scrubber.

This plant will operate at various locations throughout the state of Montana.

B. Process Description

Missouri River proposes to use this asphalt plant and associated equipment to produce asphalt for use in construction, repair, and maintenance of roads and highways.

At the start of the asphalt production process, processed aggregate will be fed into a hopper out of a stockpile. The material will then be conveyed to a dryer, where it is dried completely. The dried aggregate is elevated to a screen by a conveyor to remove any oversized material. After the screen, the aggregate is sent to the pugmill, where it is mixed with hot asphalt oil. From the pugmill, the asphalt product can be loaded directly into a truck or it can be stored in a storage silo to be used at a later point in time. Emissions from the dryer will be controlled by a cyclone and a venturi scrubber.

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 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 16.8.701, *et seq.* (Subchapter 7), General Provisions, including but not limited to:

1. ARM 16.8.701 Definitions. This rule is a list of applicable definitions used in this chapter unless indicated otherwise in a specific subchapter.
2. ARM 16.8.704, 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. The department has determined for the current permit action that testing every four years is necessary.
3. ARM 16.8.705 Malfunctions. The Air Quality Division of the department must be notified promptly by phone (406) 444-3454 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 16.8.707 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.
5. ARM 16.8.709 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Montana Clean Air Act, 75-2-101, *et seq.*, MCA.

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

- B. ARM 16.8.801, *et seq.* (Subchapter 8), Ambient Air Quality, including but not limited to:

The following ambient air quality standards or requirements may apply, including but not limited to:

ARM 16.8.811 Ambient Air Quality Standards for Carbon Monoxide;
ARM 16.8.816 Ambient Air Quality Standards for Nitrogen Dioxide;
ARM 16.8.818 Ambient Air Quality Standards for Settled Particulate Matter;
ARM 16.8.820 Ambient Air Quality Standards for Sulfur Dioxide; and
ARM 16.8.821 Ambient Standards for PM10.

Missouri River must comply with the applicable ambient air quality standards. See Section V, Existing Air Quality and Impacts.

- C. ARM 16.8.901, *et seq.* (Subchapter 9), Prevention of Significant Deterioration of Air Quality, including but not limited to:

1. ARM 16.8.945 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 16.8.953 Review of Major Stationary Sources and Major Modification-- Source Applicability and Exemptions. The requirements contained in ARM 16.8.954-16.8.962 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 subchapter would otherwise allow.

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

D. ARM 16.8.1101, *et seq.* (Subchapter 11), Permit, Construction and Operation of Air Contaminant Sources, including but not limited to:

1. ARM 16.8.1102 When Permit Required-Exclusions. This rule requires a facility to obtain an air quality permit or permit alteration if they construct, alter, or use an air contaminant source which has the potential to emit more than 5 tons per year of any pollutant. Missouri River has the potential to emit more than 5 tons per year of particulate matter, PM10, NOx, VOC, and CO; therefore, a permit is required.
2. ARM 16.8.1103 Emission Control Requirements. Missouri River is required to install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible. A Best Available Control Technology (BACT) review was conducted for the new or altered source and can be found in Section IV.
3. ARM 16.8.1105 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. Missouri River has submitted their application for an air quality permit as required for the construction and operation of a 1972 Pioneer batch mix asphalt plant (300 TPH) and associated equipment.
4. ARM 16.8.1109 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. The source has demonstrated compliance with applicable rules and standards as required for permit issuance.
5. ARM 16.8.1111 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 one year after the permit is issued.
6. ARM 16.8.1113 Modification of Permit An air quality permit may be modified for changes in any applicable rules or 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 the 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.

7. ARM 16.8.1114 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.
 8. ARM 16.8.1115 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the department at the location of the source.
 9. ARM 16.8.1117 Compliance with Other Statutes and Rules. This rule requires the permit holder to comply with all other applicable federal and Montana statutes, rules and standards.
 10. ARM 16.8.1118 Waivers. ARM 16.8.1105 requires the permit application be submitted 180 days before construction begins. This rule allows the department to waive this time limit. The department hereby waives this limit.
 11. ARM 16.8.1119 General Procedures for Air Quality Preconstruction Permitting. An air quality preconstruction permit shall contain requirements and conditions applicable to both construction and subsequent use.
- E. ARM 16.8.1401, *et seq.* (Subchapter 14), Emission Standards, including but not limited to:
1. ARM 16.8.1401 Particulate Matter, Airborne. This rule requires an opacity limitation of 20% for all fugitive emission sources, and that reasonable precautions be taken to control emissions of airborne particulate matter.
 2. ARM 16.8.1402 Particulate Matter, Fuel Burning Equipment. This rule requires a limitation of particulate emissions caused by the combustion of fuel which is to be discharged from any stack or chimney into the atmosphere in excess of the hourly rate outlined in this rule.
 3. ARM 16.8.1403 Particulate Matte, Industrial Process This rule requires a limitation of particulate emissions be calculated using the process weight rule. Total allowable particulate emissions shall be determined using the maximum thru-put rates supplied in the permit application.

4. ARM 16.8.1404 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 six consecutive minutes.
 5. ARM 16.8.1411 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. The commercial grade propane gas burned in the new drum dryer contains a negligible amount of sulfur compounds. Therefore, this unit will be in compliance with this rule.
 6. ARM 16.8.1423 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. This plant consists of a portable 1972 Pioneer batch mix asphalt plant (300 TPH) and associated equipment that was manufactured before 1973, so NSPS (40 CFR Part 60, Subpart A General Provisions, and Subpart I Hot Mix Asphalt Facilities) does not apply.
- F. ARM 16.8.1901, *et seq.* (Subchapter 19), Air Quality Permit Application, Operation and Open Burning Fees, including but not limited to:

ARM 16.8.1903 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; and the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

The annual assessment and collection of the air quality operation fee, as 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 prorate the required fee amount.

III. Emission Inventory--Permit #2927-00

Source	TSP	PM-10	NOX	Tons/Year		SOX			
				VOC	CO				
Asphalt Plant Drum Dryer	10.50	6.15	22.50	38.25	42.00	2.48	Elevator, Screens, Bins,	150.00	22.50
Lime Silo	4.07								
Cold Aggregate Handling	75.00	30.00							
Haul Roads	2.74	1.23							
Total	248.41	63.95	22.50	38.25	42.00	2.48			

Asphalt Plant Drum Dryer with an Asphalt Equipment & Service Co. Wet Venturi Scrubber

Maximum Process Rate: 300 tons/hr (Maximum Design) Hours of operation: 5000 hr/yr

TSP Emissions

Emission Factor: 0.01 lb/ton (AP-42, Section 11.1, table 11.1-5) Calculations: 0.014 lb/ton * 300 tons/hr = 4.20 lb/hr
 4.20 lb/hr * 5000 hr/yr * 0.0005 tons/lb = 10.5 tons/yr

PM-10 Emissions:

Emission Factor: 0.008 lb/ton (AP-42, Section 11.1, table 11.1-5) Calculations: 0.008 lb/ton * 300 tons/hr = 2.46 lb/hr
 2.46 lb/hr * 5000 hr/yr * 0.0005 tons/lb = 6.15 tons/yr

NOx Emissions:

Emission Factor: 0.03 lbs/ton (AP-42, Table 11.1-8) Calculations: 0.030 lbs/ton * 300 tons/hr = 9.00 lbs/hr
 9.00 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 22.50 tons/yr

VOC Emissions:

Emission Factor: 0.051 lbs/ton (AP-42, Table 11.1-8) Calculations: 0.051 lbs/ton * 300 tons/hr = 15.30 lbs/hr
 15.30 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 38.25 tons/yr

CO Emissions:

Emission Factor: 0.056 lbs/ton (AP-42, Table 11.1-8) Calculations: 0.056 lbs/ton * 300 tons/hr = 16.80 lbs/hr
 16.80 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 42.00 tons/yr

SOx Emissions:

<p>tons/hr = 0.99 lbs/hr Elevator, Screens, Bins, and Mixer</p>	<p>Emission Factor: 0.0033 lbs/ton (AP-42, Table 11.1-8)</p>	<p>Calculations: 0.99 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 2.48 tons/yr</p>	<p>0.003 lbs/ton * 300</p>
<p>Process Rate: 300 tons/hr (Maximum Design)</p>		<p>Hours of operation: 5000 hr/yr</p>	
TSP Emissions			
<p>lbs/hr</p>	<p>Emission Factor: 0.2 lbs/ton (AFSSCC 3-05-002-02, page 116, 3/90)</p>	<p>Calculations: 60.0 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 150.0 tons/yr</p>	<p>0.2 lbs/ton * 300 tons/hr = 60.0</p>

PM-10 Emissions:

Emission Factor: 0.03 lbs/ton (AFSSCC 3-05-002-02, page 116, 3/90) Calculations: 0.03 lbs/ton * 300 tons/hr = 9.00 lbs/hr
9.00 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 22.50 tons/yr

Lime Silo with vent filter (90% efficiency)

Process Rate: 300 tons/hr (Maximum Design)
Hours of operation: 5000 hr/yr

TSP Emissions

Emission Factor: 0.01 lbs/ton (AP-42, Section 8.23, moisture content >4% by weight, pg. 8.23-4, 8/82) Calculations: 0.01 lbs/ton * 452 tons/hr = 4.52 lbs/hr
4.52 lbs/hr * 5000 hr/yr * 0.0005 tons/lb * 90% efficiency = 10.17 tons/yr

PM-10 Emissions:

Emission Factor: 0.004 lbs/ton (AP-42, Section 8.23, moisture content >4% by weight, pg. 8.23-4, 8/82) Calculations: 0.004 lbs/ton * 452 tons/hr = 1.81 lbs/hr
1.81 lbs/hr * 5000 hr/yr * 0.0005 tons/lb * 90% efficiency = 4.07 tons/yr

Cold Aggregate Handling

Process Rate: 300 tons/hr (Maximum Design) Hours of operation: 5000 hr/yr

TSP Emissions

Emission Factor: 0.10 lbs/ton (AFSSCC 3-05-002-04, page 116, 3/90) Calculations: 0.10 lbs/ton * 300 tons/hr = 30.00 lbs/hr
30.00 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 75.00 tons/yr

PM-10 Emissions:

Emission Factor: 0.04 lbs/ton (AFSSCC 3-05-002-04, page 116, 3/90) Calculations: 0.04 lbs/ton * 300 tons/hr = 12.00 lbs/hr
12.00 lbs/hr * 5000 hr/yr * 0.0005 tons/lb = 30.00 tons/yr

Haul Roads

Vehicle miles traveled: 5 VMT/day {Estimated} Control Efficiency: 50.0%
{Watering}

TSP Emissions:

TSP Emission Factor (Rated Load Capacity <50 tons): 6 Lbs/VMT (AP-42 Section 11.2.1, 9/88) E(TSP)= (5 VMT/day) * (6 Lbs/VMT) * (1 - 0.5)

E(TSP)= 15.00 Lbs/day

or 2.74 tons/yr

PM10 Emissions:

PM10 Emission Factor (Rated Load Capacity <50 tons): 2.70 Lbs/VMT
E(PM10)= 6.75 Lbs/day

or 1.23 tons/yr

(AP-42 Section 11.2.1, 9/88) E(PM10)= (5 VMT/day) * (2.70 Lbs/VMT) * (1 - 0.50)

IV. BACT Determination

A Best Available Control Technology (BACT) determination is required for each new or altered source. Missouri River shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that best available control technology shall be utilized.

Missouri River proposes to control particulate emissions from the dryer with a cyclone dust collector and a Venturi scrubber. In addition, a source test will be required every four years to demonstrate compliance with the conditions of Section II.A. Also, reasonable precautions must be taken to limit the fugitive emissions of particulate matter from haul roads, access roads, parking areas, and general plant property. The department has determined that using a cyclone dust collector, a venturi scrubber, and water/dust suppressant to maintain compliance with the emissions limitations and reasonable precautions limitations constitutes BACT for this source.

The control options that have been selected have controls and control costs similar to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

V. Existing Air Quality and Impacts

Because the amount of controlled particulate matter emissions generated by this project is low, the department believes this project will cause minimal air quality impacts. There will be no significant emissions of toxic air pollutants. The department does not believe that construction of this source will cause a violation of any ambient standard.

If this asphalt plant moves into or near a PM-10 or CO nonattainment area, the permit may have to be modified and controls implemented before the plant can operate at the location. The modified permit conditions will keep the asphalt plant from adversely impacting a nonattainment area.

VI. Taking 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 Protection Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
P.O. Box 200901, Helena, Montana 59620
(406) 444-3454

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Missouri River Gravel Plant
P.O. Box 1690
Great Falls, MT 59403-1690

Permit Number: 2927-00

Preliminary Determination on Permit Issued: 5/16/96
Department Determination on Permit Issued: 6/3/96

Montana Environmental Policy Act (MEPA) Compliance: An environmental assessment required by the Montana Environmental Protection Act, was completed for this project as follows.

Legal Description of Site: Portable source; various locations throughout the state of Montana.

Description of Project: This is for the operation of a 1972 Pioneer batch mix asphalt plant (300 TPH), and associated equipment.

Benefits and Purpose of Proposal: This permit contains strict operational limits that allow the source to operate at the above mentioned location without adversely impacting the air quality in the areas it is operated in.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: No reasonable alternatives available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A list of federally enforceable conditions and a permit analysis containing a Best Available Control Technology analysis are contained in permit #2927-00.

Description and analysis of regulatory impacts 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 that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those applicable requirements and do not unduly restrict private property rights.

Potential Impact on Physical Environment

		Major	Moderate	Minor	None	Unknown	Comments Attached
1	Terrestrial and Aquatic Life and Habitats			X			
2	Water Quality, Quantity and Distribution			X			
3	Geology and Soil Quality, Stability and Moisture			X			
4	Vegetation Cover, Quantity and Quality			X			
5	Aesthetics			X			
6	Air Quality			X			
7	Unique Endangered, Fragile or Limited Environmental Resource					X	
8	Demands on Environmental Resource of Water, Air and Energy			X			
9	Historical and Archaeological Sites					X	
10	Cumulative and Secondary Impacts			X			

Potential Impact on Human Environment

		Major	Moderate	Minor	None	Unknown	Comments Attached
1	Social Structures and Mores				X		
2	Cultural Uniqueness and Diversity				X		
3	Local and State Tax Base and Tax Revenue			X			
4	Agricultural or Industrial Production			X			
5	Human Health			X			
6	Access to and Quality of Recreational and Wilderness Activities			X			
7	Quantity and Distribution of Employment			X			
8	Distribution of Population			X			
9	Demands for Government Services			X			
10	Industrial and Commercial Activity			X			
11	Locally Adopted Environmental Plans and Goals			X			
12	Cumulative and Secondary Impacts			X			

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: This source's impacts will be minimal. In addition, the controls contained in permit #2927-00 will further limit the emissions.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality, Reclamation Division, and Water Quality Division.

Individuals or groups contributing to this EA: Department of Environmental Quality, Air Quality Division.

EA prepared by: Jeff Bellino

Date: May 13, 1996