



Montana Department of  
**ENVIRONMENTAL QUALITY**

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May 19, 2011

Mr. Roger Works  
Century Companies, Inc.  
P.O. Box 579  
Lewistown, MT 59457

Dear Mr. Works:

Montana Air Quality Permit #3042-02 is deemed final as of May 19, 2011, 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,

Vickie Walsh  
Air Permitting Program Supervisor  
Air Resources Management Bureau  
(406) 444-9741

Ed Warner (for Shawn Juers)  
Environmental Engineer  
Air Resources Management Bureau  
(406) 444-2467

VW:EW  
Enclosure

Montana Department of Environmental Quality  
Permitting and Compliance Division

Montana Air Quality Permit #3042-02

Century Companies, Inc.  
P.O. Box 579  
Lewiston, Montana 59457

May 19, 2011



## MONTANA AIR QUALITY PERMIT

Issued To: Century Companies, Inc.  
P.O. Box 579  
Lewistown, MT 59457

MAQP: #3042-02  
Application Complete: 3/2/2011  
Preliminary Determination Issued: 3/30/2011  
Department's Decision Issued: 5/3/2011  
Permit Final: 5/19/2011  
AFS #: 777-3042

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Century Companies, Inc. (Century) 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

Century owns and operates an existing portable asphalt plant that is to be located in Section 26, Township 35 North, Range 31 East, in Phillips County, Montana. The home pit location for this operation is North 1/4, Southwest 1/4, Section 21, Township 16 North, Range 17 East, in Fergus County, Montana. A complete list of equipment is included in Section I.A of the Permit Analysis.

MAQP #3042-02 applies while operating at any location in Montana, except those areas having a Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum will be required for locations in or within 10 km of PM<sub>10</sub> nonattainment areas.

#### B. Current Permit Action

On February 23, 2011, the Department received a modification application from Century. The action permits an increase in allowable horsepower (hp) of generator engines, an increase in hours of operation, and also increases the allowable total production of asphalt. The facility previously had one 900-hp engine and one 60-hp engine. The 900-hp engine is expected to remain and the 60-hp engine will be changed out for a 145-hp engine. This modification assumes AP-42 emissions factors for the engines to keep the permit de minimis friendly. In addition to increasing the allowed diesel engine size, hours of operation, and associated asphalt plant production, the permit was also updated to reflect the current permit language and rule references used by the Department.

### 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 feet (gr/dscf) (ARM 17.8.340 and 40 CFR 60, Subpart D).
2. Century shall not cause or authorize to be discharge into the atmosphere from the asphalt plant stack, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

3. Century 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 loading, transferring, 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 17.8.749, and 40 CFR 60, Subpart I).
4. Century 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).
5. Century 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 17.8.749).
6. Water and spray bars shall be available on site at all times and operated as necessary to maintain compliance with opacity limitations (ARM 17.8.749).
7. Century shall install and maintain a baghouse to control emissions from the asphalt plant (ARM 17.8.749).
8. A device to measure the pressure drop (magnehelic gauge, manometer, etc.) must be installed, maintained and calibrated on the baghouse according to the manufacturer's instructions. Century must operate the measurement device on a continuous basis using a strip recorder. In lieu of a continuous recorder, the operator may record the flow rate or water pressure, in inches of water, at a minimum once per day for every calendar day of operation. Temperature indicators at the control device inlet and outlet must be installed and maintained, and readings will be recorded a minimum of once every calendar day (ARM 17.8.752).
9. 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).
10. Century shall use fuel oil, natural gas, or propane as fuels for the asphalt heater and drum dryer (ARM 17.8.749).
11. Total asphalt plant production shall not exceed 1,080,000 tons during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).
12. Century shall not operate, or have on-site, more than two diesel engines. The maximum rated design capacity of the engines shall not exceed 900-hp and 145-hp respectively (ARM 17.8.749).
13. Century shall properly operate and maintain the generator engines (ARM 17.8.752).
14. The maximum rated 900-hp engine shall not exceed 3,000 hours of operation during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).
15. The maximum rated 145hp engine shall not exceed 4,000 hours of operation during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).

16. If the permitted equipment is used in conjunction with any other equipment owned or operated by Century, 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 period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
17. Century shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities (ARM 17.8.340 and 40 CFR 60, Subpart I).
18. Century shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart III; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but not later than 180 days after initial start up, an initial Environmental Protection Agency (EPA) Methods 1-5 and 9 source test(s) shall be performed on any New Source Performance Standard (NSPS)-affected equipment at the asphalt plant to demonstrate compliance with the applicable emission limit(s) in Section II.A.1, Section II.A.2, and Section II.A.3. NSPS-affected equipment at the Century facility would include any combination of the following: dryers; 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, which were constructed, reconstructed, or modified after June 11, 1973 (ARM 17.8.105, ARM 17.8.340, ARM 17.8.749 and 40 CFR 60, Subpart A).
2. After the initial source test has been completed, testing shall continue on an every 4-year basis or according to another testing/monitoring schedule as may be approved by the Department in writing (ARM 17.8.105, ARM 17.8.340, ARM 17.8.749, and 40 CFR 60, Subpart A and Subpart I).
3. Pressure drop on the baghouse control device must be recorded during the compliance source test and reported as part of the test results (ARM 17.8.749).
4. Century may re-test at a higher production rate at any time in order to achieve a higher allowable production rate (ARM 17.8.749).
5. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
6. The Department may require further testing (ARM 17.8.105).

### C. Operational Reporting Requirements

1. If this portable asphalt plant is moved to another location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Century 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, and/or to verify compliance with permit limitations (ARM 17.8.505).

3. Century shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include ***the addition of a new emissions unit***, 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. 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(1)(d) (ARM 17.8.745).
4. Century 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 Century 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. Century shall document, by month, the total production from the facility. By the 25<sup>th</sup> day of each month, Century shall calculate the total production from the facility for the previous month, and calculate and record the rolling 12-month sum. 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).
6. Century shall document, by month, the hours of operation of the diesel engines/generators. By the 25<sup>th</sup> day of each month, Century shall calculate the hours of operation for each generator engine for the previous month, and calculate and record the rolling 12-month sums. The monthly information will be used to verify compliance with the rolling 12-month limitations in Sections II.A.14 and II.A.15. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

7. Century shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

### SECTION III: General Conditions

- A. Inspection – Century 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 Century fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Century 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 permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the MAQP shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Air Quality Operation Fees – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Century may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

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

Montana Air Quality Permit (MAQP) Analysis  
Century Companies, Inc.  
MAQP #3042-02

I. Introduction/Process Description

Century Companies, Inc. (Century) owns and operates a portable drum-mix asphalt plant at various locations throughout Montana.

A. Permitted Equipment

Century owns and operates a portable asphalt drum mixer with a maximum production capacity of 350 tons per hour (TPH). Other equipment or operations include: an asphalt silo; lime silo, cold aggregate handling operations; bins, mixers, conveyors; a 900-horsepower (hp) diesel engine; a 145-hp diesel engine; a fuel-fired hot oil heater; baghouse; and associated equipment and operations.

B. Source Description

For a typical operational set-up, raw materials are dumped into a three bin hopper unit. The cold aggregate is dried and mixed with the other raw material in the drum mixer and the drum mixer burner is fired with propane fuel. Oil is then introduced to the drum mixer from the portable hot oil tank. Once all raw materials have been introduced into the drum mixer they are continuously mixed and heated by the drum mixer burner. Ambient air is forced into the end of drum to assist with burning, but also to dry the mix. The air from the dryer is pulled through a baghouse and vented through a vertical stack via exhaust fans.

After heating and mixing is completed, the asphalt product is transferred from the drum mixer to the asphalt product silo via a conveyor. The asphalt remains in the asphalt silo until it is loaded into trucks for transport to a given job location.

C. Permit History

On April 1, 1999, Century was issued **MAQP #3042-00** to operate a 1998 CMI PVM 300 Drum Mix Asphalt Plant, a 1998 CMI RA 318 Baghouse and associated equipment.

On October 9, 2007, the Department of Environmental Quality (Department) received a request from Century to amend their permit to add two existing diesel engines to their equipment list and update their emission inventory. Because the permit had a federally enforceable permit condition limiting Century's operation, this permit action could not be accomplished as an amendment but rather as a modification. The Department requested additional information from Century in order to modify the permit on April 24, 2008, and May 28, 2008, and information was received from Century on June 30, 2008, July 15, 2008, July 22, 2008 and August 12, 2008. In addition to adding the diesel engines to the permit, **MAQP #3042-01** was also updated to reflect the current permit language and rule references used by the Department. MAQP #3042-01 replaced MAQP#3042-00.

D. Current Permit Action

On February 23, 2011, the Department received a modification application from Century. The action permits an increase in allowable horsepower (hp) of generator engines, an increase in hours of operation, and also increases the allowable total production of asphalt. The facility previously had one 900-hp engine and one 60-hp engine. The 900-hp engine is

expected to remain and the 60-hp engine will be changed out for a 145-hp engine. This modification assumes AP-42 emissions factors for the engines to keep the permit de minimis friendly. In addition to increasing the allowed diesel engine size, hours of operation, and associated asphalt plant production, the permit was also updated to reflect the current permit language and rule references used by the Department.

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).

Century 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 17.8.210 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 17.8.213 Ambient Air Quality Standard for Ozone
5. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
6. ARM 17.8.221 Ambient Air Quality Standard for Visibility
7. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Century 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, Century 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. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). Century is considered an NSPS affected facility under 40 CFR Part 60 and is subject to the requirements of the following subparts.
  - a. 40 CFR 60, Subpart A – General Provisions apply to the owner or operator of all equipment or facilities subject to an NSPS Subpart as listed below.

- b. 40 CFR 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities: NSPS-affected equipment at the facility would include any combination of the following: dryers; 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, which were constructed, reconstructed, or modified after June 11, 1973.
  - c. 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Internal Combustion Engines: is not applicable to the 900-hp engine at this time, because the engine was existing equipment and was not manufactured after April 1, 2006. However, the 145-hp engine is subject to this rule. Furthermore, permit conditions for this standard are included in the proposed permit to maintain the de-minimis friendly nature of the permit.
8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories. Century is considered a NESHAP-affected facility under 40 CFR Part 63 and is subject to the requirements of the following subparts.
- a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a NESHAPs Subpart as listed below.
  - b. 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants (HAPs) for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of HAP emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. Therefore, Century is subject to these standards.
- 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. A permit application is incomplete until the proper application fee is paid to the Department. Century submitted the appropriate permit 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 MAQP, excluding an open burning permit, issued by the Department.

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 permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
  2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an MAQP or permit modification to construct, modify, or use any asphalt plant, crusher or screen that has the potential to emit (PTE) greater than 15 tons per year of any pollutant. Century has a PTE greater than 15 tons per year of NO<sub>x</sub>, CO, PM, PM<sub>10</sub>, and VOC; therefore, an MAQP is required.
  3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
  4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
  5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Century submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Century submitted an affidavit of publication of public notice for the February 23, 2011, issue of the *Phillips County News*, a newspaper of general circulation in the Town of Malta in Phillips County, as proof of compliance with the public notice requirements.
  6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
  7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
  8. ARM 17.8.755 Inspection of Permit. This rule requires that 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 permit shall be construed as relieving Century of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
  10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An MAQP shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An 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. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an 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 because it is not a listed source and the facility's PTE is less than 250 tons per year of any pollutant (excluding fugitive emissions).

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
  - a. PTE > 100 tons/year of any pollutant;

- b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
  - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) in a serious PM<sub>10</sub> nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #3042-02 for Century, the following conclusions were made:
- a. The facility's PTE is less than 100 tons/year for any pollutant.
  - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.
  - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
  - d. This facility is subject to current NSPS (40 CFR 60, Subparts I and IIII)
  - e. This facility is subject to current NESHAP standards (40 CFR 63, Subpart ZZZZ)
  - f. This source is not a Title IV affected source
  - g. This source is not a solid waste combustion unit.
  - h. This source is not an EPA designated Title V source.

Century requested federally-enforceable permit limitations to remain a minor source of emissions with respect to Title V. Based on these limitations; the Department determined that this facility is not subject to the Title V Operating Permit Program. However, in the event that the EPA makes minor sources that are subject to NSPS obtain a Title V Operating Permit; this source will be subject to the Title V Operating Permit Program.

- i. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's PTE.
    - i. In applying for an exemption under this section the owner or operator of the facility shall certify to the Department that the source's PTE does not require the source to obtain an air quality operating permit.
    - ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.
3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal by ARM 17.8.1204(3) shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

### III. BACT Determination

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

#### Diesel Generator Engine:

Any new diesel engine would likely be required to comply with the federal engine emission limitations including, for example, EPA Tier emission standards for non-road engines (40 CFR Part 1039), New Source Performance Standard emission limitations for stationary compression ignition engines (40 CFR 60, Subpart IIII), or National Emissions Standards for Hazardous Air Pollutant Sources for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). Therefore, the Department has determined that compliance with applicable federal standards and proper operation and maintenance of the engines constitutes BACT for these engines.

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.

IV. Emission Inventory\*\*

Century Companies, Inc.  
 MAQP #3042-02  
 Potential to Emit

Emitting Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>
Drum Mix Asphalt Plant Dryer	18.46	12.42	2.61	29.70	70.20	17.28	5.94
Hot Oil Heater (propane per applicant)					0.01		
Drum Mix Plant Load-Out	0.28	0.28	0.28		0.73	2.25	
Asphalt Product Silo Filing	0.32	0.32	0.32		0.64	6.58	
Cold Aggregate Screens and Storage Bins	7.78	4.75	0.95				
Cold Aggregate Handling/Conveyors	1.62	0.59	0.12				
Cold Aggregate Storage Piles	5.36	2.54	0.38				
Lime Silo	0.75	0.75	0.75				
Diesel Generator Engine (900-hp)							
	3.96	3.96	3.96	55.80	12.02	4.45	3.69
Diesel Generator Engine (145-hp)							
	0.48	0.48	0.48	6.74	1.45	0.54	0.45
Haul Roads/Vehicle Traffic	0.01	0.00	0.00				
Tank Emissions (asphalt and propane)					1.00	1.00	
<b>Total Emissions</b>	<b>39.02</b>	<b>26.10</b>	<b>9.85</b>	<b>92.24</b>	<b>86.06</b>	<b>32.09</b>	<b>10.08</b>

- Inventory reflects enforceable limits on asphalt production and hours of operation of the generator engines to keep emissions below the Title V threshold of 100 tpy of any pollutant; the allowable emissions remain at or above 80 tpy.

Some emissions may show zero due to rounding

\*\*

acfm = actual cubic feet per minute  
 in. Hg = inches of mercury  
 C = Celsius  
 CO = carbon monoxide  
 dscfm = dry standard cubic feet per minute  
 F = Fahrenheit  
 gal = gallon  
 HAPs = hazardous air pollutants  
 hp = horsepower  
 hr = hour  
 lb = pound  
 N/A = not applicable  
 ND = no data available

NO<sub>x</sub> = oxides of nitrogen  
 PM = particulate matter  
 PM<sub>10</sub> = particulate matter with an aerodynamic diameter of 10 microns or less  
 PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter of 2.5 microns or less  
 R = Rankine  
 SO<sub>x</sub> = oxides of sulfur  
 TPH = tons per hour  
 TPY = tons per year  
 VOC = volatile organic compounds  
 yr = year

<b>Operating Parameters:</b>							
Operating Hours:	3000	hr/yr	(per applicant)				
Plant Elevation	4680	ft.	(per topo map)			1080000	
Actual Pressure	25.92	in. Hg	Application Information				
Standard Pressure	29.92	in. Hg					
Flowrate	62,500	acfm	(Company Information)				
Std. Temp:	25	C	77	F	537	R	
Assumed Stack Temp:	177	C	350	F	810	R	
Correction Equation:	$V1 = V2 (P2/P1) (T1/T2)$						
Corr. Flowrate	62500 acfm * (25.92 in. Hg / 29.92 in. Hg) * (537 R / 810 R) =					35896	dscfm
Process Rate:	360	ton/hr	(Max capacity, Company Information)				

<b>Drum Mix Asphalt Plant Dryer</b>			
<b>PM Emissions</b>			
Emission Factor:	0.04 gr/dscf	(Permit Limit)	
Calculations:	0.04 gr/dscf * 35895.72 dscfm * 1 lb/7000 gr * 60 m/hr =		12.31 lb/hr
	12.31 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		18.46 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.023 lb/ton	(PM total, AP-42, Section 11.1, Table 11.1-3, Baghouse, 3/04)	
Calculations:	0.023 lb/ton * 360 ton/hr =		8.28 lb/hr
	8.28 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		12.42 ton/yr
<b>NOx Emissions</b>			
Emission Factor:	0.055 lb/ton	(AP-42, Section 11.1, Table 11.1-7, Drum Mix, #2 fuel, 3/04)	
Calculations:	0.055 lb/ton * 360 ton/hr =		19.80 lb/hr
	19.8 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		29.70 ton/yr
<b>CO Emissions</b>			
Emission Factor:	0.13 lb/ton	(AP-42, Section 11.1, Table 11.1-7, Drum Mix, #2 fuel, 3/04)	
Calculations:	0.13 lb/ton * 360 ton/hr =		46.80 lb/hr
	46.8 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		70.20 ton/yr
<b>VOC Emissions</b>			
Emission Factor:	0.032 lb/ton	(AP-42, Section 11.1, Table 11.1-8, #2 fuel, 3/04)	
Calculations:	0.032 lb/ton * 360 ton/hr =		11.52 lb/hr
	11.52 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		17.28 ton/yr
<b>SOx Emissions</b>			
Emission Factor:	0.011 lb/ton	(AP-42, Section 11.1, Table 11.1-7, Drum Mix, No. 2 fuel, 3/04)	
Calculations:	0.011 lb/ton * 360 ton/hr =		3.96 lb/hr
	3.96 lb/hr * 3000 hr/yr * 0.0005 ton/lb =		5.94 ton/yr
<b>Hot Oil Heater (propane per applicant)</b>			
Propane Fuel Consumption:	8 gal/hr	(Company Information, propane)	
Operating Hours:	3000 hr/yr	(Annual Capacity)	
Calculation:	8 gal/hr * 3000 hr/yr =		24000 gal/yr
<b>CO Emissions</b>			
Emission Factor:	0.0012 lb/gal	(AP-42, Section 11.1, Table 11.1-13, Fuel oil, 3/04)	
Calculations:	24000 gal/yr * 0.0012 lb/gal * 0.0005 ton/lb =		0.01 ton/yr
<b>Drum Mix Plant Load-Out</b>			
Process Rate:	360 ton/hr	(Company Information)	
Hours of Operation:	3000 hr/yr	(Annual Capacity)	
<b>PM Emissions</b>			
Emission Factor:	0.00052 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00052 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.28 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.00034 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00034 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.18 ton/yr
<b>CO Emissions</b>			
Emission Factor:	0.00135 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00135 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.73 ton/yr
<b>VOC Emissions (VOC = TOC)</b>			
Emission Factor:	0.00416 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00416 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		2.25 ton/yr

<b>Asphalt Product Silo Filing</b>			
Process Rate:	360 ton/hr	(Company Information)	
Hours of Operation:	3000 hr/yr	(Annual Capacity)	
<b>PM Emissions</b>			
Emission Factor:	0.00059 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00059 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.32 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.00025 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00025 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.14 ton/yr
<b>CO Emissions</b>			
Emission Factor:	0.00118 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.00118 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		0.64 ton/yr
<b>VOC Emissions (VOC = TOC)</b>			
Emission Factor:	0.01219 lb/ton	(AP-42, Section 11.1, Table 11.1-14, 3/04, see predictive equation at end of Inventory)	
Calculations:	0.01219 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb =		6.58 ton/yr
<b>Cold Aggregate Screens and Storage Bins</b>			
Process Rate:	360 tons/hr	(Company Information)	
Number of Transfers:	4 Transfers		
Hours of operation:	3000 hr/yr	(Annual Capacity)	
<b>PM Emissions</b>			
Emission Factor:	0.0036 lbs/ton	(AP-42, Section 11.19, Table 11.19.2-2, Fines Screening, Controlled, 8/04)	
Calculations:	0.0036 lbs/ton * 360 tons/hr * 3000 hr/yr * 0.0005 ton/lb * 4 Transfers =		7.78 ton/yr
<b>PM<sub>10</sub> Emissions:</b>			
Emission Factor:	0.0022 lbs/ton	(AP-42, Section 11.19, Table 11.19.2-2, Fines Screening, Controlled, 8/04)	
Calculations:	0.0022 lbs/ton * 360 tons/hr * 3000 hr/yr * 0.0005 ton/lb * 4 Transfers =		4.75 ton/yr
<b>Cold Aggregate Handling/Conveyors</b>			
Process Rate:	360 tons/hr	(Company Information)	
Number of Transfers:	1 Transfers	(Assumed)	
Hours of operation:	3000 hr/yr	(Annual Capacity)	
<b>PM Emissions</b>			
Emission Factor:	0.003 lb/ton	(AP-42, Section 11.19, Table 11.19.2-2, Conveyor Transfer, 8/04)	
Calculations:	0.003 lb/ton * 360 tons/hr * 3000 hr/yr * 0.0005 ton/lb * 1 Transfers =		1.62 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.0011 lb/ton	(AP-42, Section 11.19, Table 11.19.2-2, Conveyor Transfer, 8/04)	
Calculations:	0.0011 lb/ton * 360 tons/hr * 3000 hr/yr * 0.0005 ton/lb * 1 Transfers =		0.59 ton/yr
<b>Cold Aggregate Storage Piles</b>			
Process Rate:	360 ton/hr	(Company Information)	
Number of Piles:	3 Piles	(Assumed)	
Hours of Operation:	3000 hr/yr	(Annual Capacity)	
<b>PM Emissions</b>			
Emission Factor:	0.00331 lb/ton	(AP-42, Section 13.2.4, Table 13.2.4.3, see predicitive emission factor equation at end of inventory, 11/06)	
Calculations:	0.00331 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb * 3 Piles =		5.36 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.00157 lb/ton	(AP-42, Section 13.2.4, Table 13.2.4.3, see predicitive emission factor equation at end of inventory, 11/06)	
Calculations:	0.00157 lb/ton * 360 ton/hr * 3000 hr/yr * 0.0005 ton/lb * 3 Piles =		2.54 ton/yr
<b>Lime Silo</b>			
Flow Capacity:	1000 cfm	(Similar Source Information )	
<b>PM Emissions</b>			
Emission Factor:	0.02 gr/dscf		
Calculations:	0.02 gr/dscf * 1000 cfm * 60 min/hr * 1 lb/7000 gr =		0.17 lb/hr
	0.17 lb/hr * 8760 hr/yr * 0.0005 ton/lb =		0.75 ton/yr
<b>PM<sub>10</sub> Emissions</b>			
Emission Factor:	0.02 gr/dscf		
Calculations:	0.02 gr/dscf * 1000 cfm * 60 min/hr * 1 lb/7000 gr =		0.17 lb/hr
	0.171428571428571 lb/hr * 8760 hr/yr * 0.0005 ton/lb =		0.75 ton/yr

**Diesel Generator Engine**

Maximum hp: 900.0 hp

Hours of Operation: 4000 hr/yr

**PM Emissions**

Emission Factor: 0.0022 lb/hp-hr (AP-42 Table 3.3-1, 7/95)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 3.96 \text{ ton/yr}$

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

Emission Factor 0.0022 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 3.96 \text{ ton/yr}$

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

Emission Factor 0.0310 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 55.80 \text{ ton/yr}$

**CO Emissions**

Emission Factor 0.00668 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.00668 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 12.02 \text{ ton/yr}$

**VOC Emissions**

Emission Factor 0.00247 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.00247 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 4.45 \text{ ton/yr}$

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

Emission Factor 0.00205 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.00205 \text{ lb/hp-hr} * 900 \text{ hp} * 4000 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 3.69 \text{ ton/yr}$

**Diesel Generator Engine**

Maximum hp: 145.0 hp

Hours of Operation: 3000 hr/yr

**PM Emissions**

Emission Factor: 0.0022 lb/hp-hr (AP-42 Table 3.3-1, 7/95)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 60 \text{ hp} * 2400 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 0.48 \text{ ton/yr}$

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

Emission Factor 0.0022 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.0022 \text{ lb/hp-hr} * 60 \text{ hp} * 2400 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 0.48 \text{ ton/yr}$

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

Emission Factor 0.0310 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.031 \text{ lb/hp-hr} * 60 \text{ hp} * 2400 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 6.74 \text{ ton/yr}$

**CO Emissions**

Emission Factor 0.00668 lb/hp-hr (AP-42 Table 3.3-1, 10/96)  
Calculations:  $0.00668 \text{ lb/hp-hr} * 60 \text{ hp} * 2400 \text{ hrs/yr} * 0.0005 \text{ ton/lb} = 1.45 \text{ ton/yr}$



VI. Air Quality Impacts

The estimated net change of emissions between MAQP #3042-01 and MAQP #3042-02 is presented below. The increase in emissions assumed for permitting is minor on an industrial scale. The actual increase in emissions would be expected to be very minor. Minor impacts to air quality would be expected.

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>SO<sub>x</sub></b>
MAQP 3042-01	31.78	21.23	79.69	70.3	26.34	8.45
MAQP 3042-02	39.02	26.10	92.24	86.06	32.09	10.08
Net Allowable Emissions Change:	7.24	4.87	12.55	15.76	5.75	1.63

VII. Ambient Air Impact Analysis

The Department determined that the impact from this permitting action will be minor. The Department believes it will not cause or contribute to a violation of any ambient air quality standard.

VIII. Taking or Damaging Implication Analysis

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

<b>YES</b>	<b>NO</b>	
XX		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	XX	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	XX	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	XX	4. Does the action deprive the owner of all economically viable uses of the property?
	XX	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?
	XX	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	XX	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?
	XX	7a. Is the impact of government action direct, peculiar, and significant?
	XX	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	XX	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?
	XX	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

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

IX. 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 Resources Management Bureau**  
**P.O. Box 200901, Helena, MT 59620**  
**(406) 444-3490**

**FINAL ENVIRONMENTAL ASSESSMENT (EA)**

*Issued To:* Century Companies, Inc.  
P.O. Box 579  
Lewistown, MT 59457

*Montana Air Quality Permit number:* 3042-02

*Preliminary Determination Issued:* 3/30/2011

*Department Decision Issued:* 5/3/2011

*Permit Final:* 5/19/2011

1. *Legal Description of Site:* MAQP #3042-02 would permit operations at any location in Montana, except those areas having a Department-approved permitting program, areas considered tribal lands, or areas in or within 10 km of PM<sub>10</sub> nonattainment areas. The initial location after permit issuance is proposed to be Section 26, Township 35 North, Range 31 East.
2. *Description of Project:* Montana Air Quality Permit #3042-02 increases the allowable horsepower to be used for electrical generation for asphalt production and also increases the allowable asphalt production.
3. *Objectives of Project:* To continue to produce asphalt product.
4. *Alternatives Considered:* In addition to the proposed action, the Department also considered the “no-action” alternative. The “no-action” alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the “no-action” alternative to be appropriate because Century has demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the “no-action” alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a BACT analysis, would be included in MAQP #3042-02.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.

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

There is a possibility that terrestrials would use the same area as the asphalt plant. The plant would continue to be considered a minor source of emissions, and would continue to be expected to have intermittent and seasonal operations being a portable source. Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected from operation of the diesel engines and increased annual production to any one location.

B. Water Quality, Quantity and Distribution

The portable plant would continue to be required to use water, chemical, or other methods as necessary to control fugitive dust emissions from unpaved haul roads or other sources of fugitive dust emissions. Effects to water quality, quantity, and distribution would be expected to be minor as a result of an increase in allowable production and horsepower.

C. Geology and Soil Quality, Stability and Moisture

The proposed modification would be expected to have minor impacts on geology and soil quality, stability and moisture because deposition of air pollutants on soils would be minor. Conditions and limitations which would be placed in MAQP #3042-02 would limit the allowable amounts of air pollution to be generated. Pollutants would be widely dispersed before settling upon vegetation and surrounding soils. Therefore, any effects upon geology and soil quality, stability, and moisture at this proposed operational site would be expected to be minor and short-term.

D. Vegetation Cover, Quantity, and Quality

The modification would be considered a minor source of emissions by industrial standards and would typically operate in areas previously designated and used for this type of operation. The portable nature of the plant would limit the occupancy time at any one location. Minor impacts would occur on vegetative cover, quality, and quantity because this facility would be operating on an intermittent and temporary basis. Pollutants would be dispersed and corresponding deposition on vegetation from the proposed project would be expected to be minor. Given the temporary and portable nature of this operation and that pollutants would be widely dispersed; minor impacts to vegetative cover, quantity and quality would be expected to occur as a result of this project.

E. Aesthetics

The modification would replace an existing engine at the plant, and would allow for a small increase in total allowable production. MAQP #3042-02 would include conditions to control emissions, including visible emissions, from operations. Since the plant would be portable, and would be expected to operate on an intermittent and seasonal basis, any visual aesthetic impacts would be expected to be minor and short-lived.

F. Air Quality

MAQP #3042-02 would include conditions and limitations to control air pollutant emissions. The conditions and limitations are based on rules designed to limit the impacts to air quality. Minor impacts to air quality would be expected as a result of issuance of MAQP #3042-02.

G. Unique Endangered, Fragile, or Limited Environmental Resources

MAQP #3042-02 would allow an increase in particulate matter, oxides of nitrogen, carbon monoxide, volatile organic compounds, and sulfur oxides. However, the increase in calculated allowable emissions would be small on an industrial scale. Furthermore, these emissions may be greatly overestimated compared to actual emissions due to the portable, intermittent, and seasonal operations of portable asphalt plants. The asphalt plant would typically locate in areas designated for such operations. The Department would not expect more than a minor effect to any unique endangered, fragile, or limited environmental resources associated with any area in which the plant would typically operate as a result of the increase in allowable production and horsepower associated with this permitting action.

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

Diesel powered generator engines would continue to be used as needed to power the portable asphalt plant. As discussed in Sections 7.B and 7.F, minor effects to water and air would be expected. The Department would expect minor demands on environmental resources of water, air, and energy.

I. Historical and Archaeological Sites

The plant would be expected to continue to be a portable, intermittent, and seasonal operation. The asphalt plant would typically locate in areas designated for such operations, such as within open-cut permitted areas. Therefore, there would be a low likelihood of adverse disturbance to any known archaeological or historic site given previous industrial disturbance to these areas as a result of the increase in allowable production and horsepower. The Department would not expect any more than a minor effect to any historical or archaeological sites.

J. Cumulative and Secondary Impacts

The Department found minor impacts to the individual physical and biological considerations above. Cumulative and secondary impacts would be expected to be minor.

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			XX			Yes
B	Cultural Uniqueness and Diversity			XX			Yes
C	Local and State Tax Base and Tax Revenue			XX			Yes
D	Agricultural or Industrial Production			XX			Yes
E	Human Health			XX			Yes
F	Access to and Quality of Recreational and Wilderness Activities			XX			Yes
G	Quantity and Distribution of Employment			XX			Yes
H	Distribution of Population			XX			Yes
I	Demands for Government Services			XX			Yes
J	Industrial and Commercial Activity			XX			Yes
K	Locally Adopted Environmental Plans and Goals			XX			Yes
L	Cumulative and Secondary Impacts			XX			Yes

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

- A. Social Structures and Mores
- B. Cultural Uniqueness and Diversity

No additional employees would be expected as a result of issuing MAQP #3042-02. The portable nature of the plant would not change. A small increase in allowable production and hours of operation would be permitted. Minor, if any, effects to social structures and mores or cultural uniqueness and diversity would be expected as a result of issuing MAQP #3042-02.

- C. Local and State Tax Base and Tax Revenue

Minor, if any, change to local and state tax base and revenue would be expected as a result of issuing MAQP #3042-02. The permitting action would allow a small and likely unrealized increase in allowable asphalt production.

- D. Agricultural or Industrial Production

MAQP #3042-02 would permit a minor increase in allowable asphalt production, which may or may not be realized. The permit would contain conditions and limitations which would limit the allowable emissions. No change to the portable nature of the facility would occur. Minor, if any, affects to agricultural or industrial production would be expected.

E. Human Health

MAQP #3042-02 would be derived from rules designed to protect human health. Minor impacts to human health would be expected as a result of issuing MAQP #3042-02.

F. Access to and Quality of Recreational and Wilderness Activities

The permitting action would not change the portable nature of the facility. The action would allow for the replacement of one generator engine, and slightly increase total allowable asphalt production, which may or may not be realized. The portable plant would typically operate in areas designated for such activities. Minor, if any, affect to access to and quality of recreational and wilderness activities would be expected.

G. Quantity and Distribution of Employment

H. Distribution of Population

No change to the number of employees would be expected as a result of issuing MAQP #3042-01. A slight increase in total allowable asphalt production would be permitted, which may or may not be realized. No change to the portable nature in which the plant would operate would occur. Minor, if any, affects to quantity and distribution of employment or distribution of population would be expected.

I. Demands for Government Services

Permits and associated compliance activities would be required for the source. The Department would expect a minor increase in demands for government services.

J. Industrial and Commercial Activity

MAQP #3042-02 would permit a small increase in allowable asphalt production, which may or may not be realized. Minor, if any, impacts to industrial and commercial activity would be expected as a result of issuance of MAQP #3042-02.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals for which MAQP #3042-02 would affect. The permit would contain limitations and conditions derived from rules designed to protect human health.

L. Cumulative and Secondary Impacts

The Department found minor impacts to the individual economic and social considerations above. Cumulative and secondary impacts would be expected to be minor.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the construction and operation of a portable asphalt plant. MAQP #3042-02 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources  
Management Bureau

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