

DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION

Air and Waste Management Bureau



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STATE OF MONTANA

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September 23, 1999

Michael D. Spaulding
Spaulding Construction Company
2957 Eastside Highway
Stevensville, Montana 59870

Dear Mr. Spaulding:

Air Quality Permit #3068-00 is deemed final as of September 23, 1999 by the Department of Environmental Quality. This permit is for a crushing/screening facility. All conditions of the department's decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the department,

A handwritten signature in black ink, appearing to read "Richard Knatterud".

Richard Knatterud
Air Permitting Section Supervisor

RK:bjd

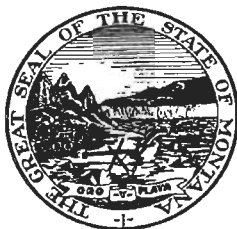
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #3068-00

Spaulding Construction Company
2957 Eastside Highway
Stevensville, Montana 59870

September 23, 1999



AIR QUALITY PERMIT

Issued To: Spaulding Construction Company
2957 Eastside Highway
Stevensville, MT 59870

Permit #3068-00
Application Complete: 08/09/99
Preliminary Determination: 08/20/99
Department Decision: 09/07/99
Permit Final: 09/23/99
AFS #777-3068

An air quality permit, with conditions, is hereby granted to the above-named permittee, hereinafter referred to as "Spaulding," pursuant to Sections 75-2-204 and 211, MCA, as amended, and Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

- A. Equipment: A portable 1955 CedaRapids jaw crusher, serial #12478 (maximum capacity 60 TPH); a 1955 CedaRapids roll crusher, serial #12478 (maximum capacity 60 TPH); a 1955 CedaRapids screen, serial #12478 (maximum capacity 60 TPH); and associated equipment. A complete equipment list is included in the permit analysis.
- B. Original Location: Section 34 (NE¼), Township 8N, Range 20W, in Ravalli County, Montana. Permit #3068-00 applies while operating in any location in the State of Montana, except within those areas that have a Department of Environmental Quality (department) approved permitting program. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Section II: Limitations and Conditions

- A. Operational Limitations and Conditions
 - 1. All visible emissions from the 1955 CedaRapids cone crusher and the CedaRapids rolls crusher may not exhibit an opacity of 20% or greater averaged over six (6) consecutive minutes (ARM 17.8.304 and ARM 17.8.715).
 - 2. Spaulding shall not cause or authorize to be discharged into the atmosphere from all other equipment used in conjunction with this facility, such as screens or transfer points, any visible emissions that exhibit an opacity of 20% or greater averaged over six (6) consecutive minutes (ARM 17.8.308 and ARM 17.8.715).
 - 3. Spaulding shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308 and 17.8.715).

4. Spaulding 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.3 (ARM 17.8.710).
5. Water and spray bars shall be available and used, as necessary, to maintain compliance with the opacity limitations in Section II.A.1 and 2 (ARM 17.8.715).
6. If the permitted equipment is used in conjunction with any other equipment owned or operated by Spaulding, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons/year during any rolling twelve (12) month time period. Any calculations used to establish production levels shall be approved by the department (ARM 17.8.710).

B. Testing Requirements:

1. All tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The department may require testing (ARM 17.8.105).

C. Reporting Requirements

1. If this crusher plant is moved to another location, a Public Notice form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made. This notice must be published at least fifteen (15) days prior to the move. Proof of publication and an Intent to Transfer form must be submitted to the Montana Department of Environmental Quality prior to the move. These forms are available from the department (ARM 17.8.734).
2. Spaulding shall maintain on-site records showing daily hours of operation and daily production rates for the last twelve (12) months. The records compiled in accordance with this permit shall be maintained by Spaulding as a permanent business record for at least five years following the date of the measurement, shall be submitted to the department upon request, and shall be available at the plant site for inspection by the department (ARM 17.8.710).
3. Spaulding shall supply the department with annual production information for all emission points, as required by the department, in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the most recent emission inventory report and sources identified in Section I.A of 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 (ARM 17.8.505).

4. Spaulding shall notify the department of any construction or improvement project conducted pursuant to ARM 17.8.701(1)(r) that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emissions unit. The notice must be submitted to the department, in writing, 10 days prior to start up or use of the proposed deminimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the deminimis change, and must include the information requested in ARM 17.8.705(1)(r)(iv) (ARM 17.8.705).

Section III: General Conditions

- A. Inspection - The recipient shall allow the department 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 17.8.701, *et seq.* (ARM 17.8.717).
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 *et seq.*, MCA.
- E. Appeals - Any person or persons jointly or severally adversely affected by the department 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 of Environmental Review. 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 decision until the conclusion of the hearing and issuance of a final decision by the Board.
- F. Permit Inspection - As required by ARM 17.8.716, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by department personnel at the location of the permitted source.

- G. Construction Commencement - Construction must begin within 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.
- J. Spaulding shall comply with the conditions contained in this permit while operating in any location in the State of Montana, except within those areas that have a department approved permitting program.

PERMIT ANALYSIS
Spaulding Construction
Permit Number 3068-00

I. Introduction/Process Description

A. Introduction

On August 9, 1999, Spaulding submitted a complete permit application to operate a portable 1955 CedaRapids jaw crusher, serial #12478 (maximum capacity 60 TPH); a 1955 CedaRapids roll crusher, serial #12478 (maximum capacity 60 TPH); a 1955 CedaRapids screen, serial #12478 (maximum capacity 60 TPH); and associated equipment. The original location is Section 34 (NE¼), Township 8N, Range 20W, in Ravalli County, Montana. The application was assigned permit #3068-00 and will apply to the source while operating in any location in the State of Montana, except within those areas that have a department approved permitting program. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

B. Process Description

Spaulding proposes to use this crushing plant and associated equipment to crush and sort sand and gravel materials for use in construction operations.

For a typical operational setup, the raw material is fed into the hopper by a front-end loader, or similar piece of equipment. Then the material is sent, on a belt conveyor, to the crusher. From the crusher, the material is sent, on a belt conveyor, to the screen. The finished material is ultimately conveyed to a stockpile for use.

II. Applicable Rules and Regulations

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

A. ARM 17.8.101, *et seq.* (Subchapter 1), General Provisions, including, but not limited to:

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

devices) and shall conduct tests (emission or ambient) for such periods of time as may be necessary, using methods approved by the department.

3. ARM 17.8.106, Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, MCA.

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

4. ARM 17.8.110, Malfunctions. The department must be notified by phone 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 four hours.
5. ARM 17.8.111, Circumvention. No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant which would otherwise violate an air pollution control regulation. No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

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

1. ARM 17.8.210, Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211, Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212, Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220, Ambient Air Quality Standards for Settled Particulate Matter
5. ARM 17.8.223, Ambient Air Quality Standards for PM-10.

Spaulding must comply with the appropriate ambient air quality standards. Reference Section V, Existing Air Quality Impacts.

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, emissions that exhibit an opacity of 20% or greater averaged over six (6) consecutive minutes.

2. ARM 17.8.308, Particulate Matter-Airborne. This rule requires an opacity limitation of 20% for all fugitive emissions, and that no person shall authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control airborne particulate matter are taken.
3. ARM 17.8.310, Particulate Matter, Industrial Processes. This rule requires a limitation of particulate emissions be calculated using the process weight rule. Total allowable particulate emissions shall be determined by using the maximum thru-put rates supplied in the permit application.
4. ARM 17.8.340, Standards of Performance for New Stationary Sources. The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, New Source Performance Standards (NSPS), shall comply with the standards and provisions of 40 CFR Part 60. In order for a crushing plant to be subject to NSPS requirements, two specific criteria must be met. First, the crushing plant must meet the definition of an affected facility and, second, the equipment in question must have been constructed, reconstructed or modified after August 31, 1983. Because the crusher capacity is less than 150 TPH and the plant was manufactured prior to August 31, 1983, the plant does not meet the definition of an affected facility and, subsequently, is not subject to NSPS requirements (40 CFR Part 60 Subpart 000, and Subpart A General Provisions).

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 section requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the department. Spaulding has submitted the appropriate application fee as required.
2. ARM 17.8.505, Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the department; 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 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 17.8.704, General Procedures for Air Quality Pre-construction Permitting. An air quality pre-construction permit shall contain requirements and conditions applicable to both construction and subsequent use.
 2. ARM 17.8.705, When Permit Required-Exclusions. Permits are required for crushing plants that have the potential to emit greater than five (5) tons/year of any pollutant. Spaulding has the potential to emit more than five (5) tons per year of total particulate matter, PM-10, oxides of nitrogen and carbon monoxide; therefore, a permit is required.
 3. ARM 17.8.706, New or Altered Sources and Stacks, Permit Application Requirements. This rule requires that an application for an air quality permit be submitted for a new or altered source or stack.
 4. ARM 17.8.707, Waivers. ARM 17.8.706 requires permit application be submitted 180 days before construction begins. This rule allows the department to waive this time limit; department hereby waives this limit.
 5. ARM 17.8.710, Conditions for Issuance of Permit. This rule requires that the source demonstrate compliance with applicable rules and standards before a permit can be issued. Also, a permit may be issued with such conditions as are necessary to assure compliance with all applicable rules and standards as required for permit issuance. The source has demonstrated compliance with the applicable rules and standards as required for permit issuance.
 6. ARM 17.8.715, Emission Control Requirements. Spaulding 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.
 7. ARM 17.8.716, Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the department at the location of the source.
 8. ARM 17.8.717, Compliance with Other Statutes and Rules. Issuance of this permit does not relieve the permit holder from the responsibility for complying with all other applicable federal and Montana statutes, rules and standards.
 9. ARM 17.8.720, Public Review of Permit Applications. This rule requires that Spaulding notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application of its application for permit. Spaulding has submitted proof of publication to the department.

10. ARM 17.8.731, Duration of Permit. An air quality permit shall be valid until revoked or modified as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than one year after the permit is issued.
11. ARM 17.8.733, Modification of Permit. An air quality permit may be modified for changes in any applicable rules and standards adopted by the board or changed conditions of operation at a source or stack which do not result in an increase in emissions because of 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.
12. ARM 17.8.734, Transfer of Permit. An air quality permit may be transferred from one location to another if written notice of intent to transfer is sent to the department.

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

1. ARM 17.8.801. 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 17.8.819-17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the Federal Clean Air Act that it would emit, except as this 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.

III. Emission Inventory: Permit #3068-00

Source	Tons/Year					
	TSP	PM-10	NOx	VOC	CO	SOx-
1955 CedaRapids Jaw Crusher (60 TPH)	0.66	0.32	0	0	0	0
1955 CedaRapids Roll Crusher (60 TPH)	0.66	0.32	0	0	0	0
1955 CedaRapids Screen (60 TPH)	4.14	1.97	0	0	0	0
Material Transfer	2.67	1.29	0	0	0	0
Pile Forming	1.10	1.10	0	0	0	0
Bulk Loading	1.10	1.10	0	0	0	0
Diesel Generator (330 kw)	1.35	1.35	19.01	1.51	4.10	1.26
Haul Roads	2.74	1.23	0	0	0	0
Total	14.41	7.52	19.01	1.51	4.10	1.26
PSD	6.80					

- A complete emission inventory for permit #3068-00 is on file with the department.

IV. BACT Determination

A Best Available Control Technology (BACT) determination is required for any new or altered source. Spaulding shall install on the new or altered source the maximum air pollution control capability which is technologically practicable and economically feasible, except that Best Available Control Technology shall be used.

All visible emissions from any equipment on site, including crushers, screens, and associated equipment, are limited to 20% opacity. Also, Spaulding must take reasonable precautions to limit the fugitive emissions of airborne particulate matter on haul roads, access roads, parking areas, and general plant property. Spaulding shall use water spray bars and/or chemical dust suppressant, as necessary, to maintain compliance with the opacity and reasonable precautions limitations. The department has determined that using water spray bars and/or chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precautions limitations constitutes BACT for these sources.

The control options 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

Permit #3068-00 is issued for the operation of a portable crushing plant to be originally located in Section 34 (NE¼), Township 8N, and Range 20W in Ravalli County, Montana. Permit #3068-00 will cover the operation when operating at any location within the state of Montana, excluding those counties which have a state-approved permitting program. In the view of the department, the amount of controlled emissions generated by this project will not exceed any set ambient standard. In addition, this source is portable and any air quality impacts will be minimal.

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

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

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Spaulding Construction
2957 Eastside Highway
Stevensville, MT 59870

Permit Number: 3068-00

Preliminary Determination on Permit Issued: 08/20/99

Department Decision Issued: 09/07/99

Final Permit Issued: 09/23/99

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

Legal Description of Site: The original plant site is located at section 34 (NE1/4), T8N, R20W, in Ravalli County, Montana. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Description of Project: Spaulding proposes to use this crushing/screening plant and associated equipment to crush and sort sand and gravel materials for use in construction operations.

For a typical operational setup, the raw material is fed into the hopper by a front-end loader, or similar piece of equipment. From the hopper, the material is sent, on a belt conveyor, to the crusher. From the crusher, the material is sent, on a belt conveyor, to the screen. The finished material is ultimately conveyed to a stockpile for use.

Benefits and Purpose of Proposal: Increased business and revenue for the company.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: None available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A listing of the enforceable permit conditions and a permit analysis, including a Best Available Control Technology analysis, are contained in permit #3068-00.

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 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.

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

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

SUMMARY OF COMMENTS ON POTENTIAL IMPACTS: The following comments have been prepared by the Department.

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

1. Terrestrial and Aquatic Life and Habitats

Terrestrials will use the areas in which the crusher operations occur. However, the crusher operations alone will present only minor affects to the terrestrial life.

2. Water Quality, Quantity and Distribution

Water will be used as pollution control, but will only cause a minor disturbance to the area. No surface water or ground water quality problems are expected as a result of using water for pollution control. Any accidental spills or leaks from equipment should be handled according to the appropriate environmental regulations in an effort to minimize any potential adverse impact on the immediate and surrounding area.

3. Geology and Soil Quality, Stability and Moisture

The soils will be impacted by the crusher operations. The impacts will be minor due to the relatively small size of the operation.

4. Vegetation Cover, Quantity and Quality

The quality and quantity of vegetation cover will be affected by the crusher operations. Given the temporary nature of the facility and its operations, the impacts will be minor.

5. Aesthetics

The crusher operations will be visible and will create additional noise in the area. Permit #3068-00 includes conditions to control emissions (including visible emissions) from the plant. Since the crusher operations are relatively small, any noise impacts will be minimal.

6. Air Quality

The air quality impacts from the crusher operations are minor. Permit #3068-00 includes conditions limiting the opacity from the plant, as well as requiring water spray bars to control air pollution. The crusher operations are limited, by permit #3068-00, to total particulate emissions of 250 tons/year or less from non-fugitive sources at the plant, along with any additional equipment at any individual site.

7. Unique Endangered, Fragile or Limited Environmental Resources

The department has contacted the Montana Natural Heritage Program (MNHP) in an effort to identify any species of special concern associated with the proposed site location. Search results have concluded there are several such environmental resources in the area. Area, in this case, will be defined by the township and range of the proposed site, with an additional one-mile buffer. These species of special concern include the Kitchen Creek Mountain Snail, *Bryum dichotomum*, *Pseudocrossidium obtusulum*, and Chaffweed. While these resources are found within the defined area, the MNHP search did not indicate any species of special concern located directly on the proposed site. Therefore, it is unlikely any of the previously listed species will be adversely affected by the proposed project.

A Missoula County air quality permit will be required for locations within Missoula County, Montana.

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

The crusher operations will only demand small quantities of water, air, and energy for proper operation. Generally, the operations are seasonal, which result in smaller demands on the environmental resources.

9. Historical and Archaeological Sites

The crushing operation will take place within a previously developed gravel pit. According to the Montana State Historic Preservation Office, there is low likelihood of disturbance to any known archaeological or historic site, given any previous industrial disturbance in the area. Therefore, it is unlikely that the crushing operation will have an adverse affect on any known historic or archaeological site.

10. Cumulative and Secondary Impacts

The crusher operations will cause a minor affect to both the physical environment and human environment. There is potential for other operations to locate at these sites. However, any operations will have to apply for and hold the appropriate permits from the department prior to operation. These permits will address the environmental impacts associated with the operations at this or any other site. The crusher operations are limited by permit #3068-00 to total particulate emissions of 250 tons/year or less from non-fugitive crusher operations and any other additional equipment used at the site.

POTENTIAL IMPACT ON HUMAN ENVIRONMENT

1. Social Structures and Mores

The crusher operation will cause no disruption to the native or traditional lifestyles or communities of the area.

2. Cultural Uniqueness and Diversity

The crusher operation will have no impact on the cultural uniqueness and diversity of the area.

3. Local and State Tax Base and Tax Revenue

The crusher operations will have little, if any, affects on the local and state tax base and tax revenue.

4. Agricultural or Industrial Production

The crusher operations will not displace any agricultural land. The proposed project will take place within a previously developed gravel pit. In addition, the crusher operations are small by industrial standards and will, therefore, have only a minor impact on local industrial production.

A Missoula County air quality permit will be required for locations within Missoula County, Montana.

5. Human Health

Permit #3068-00 incorporates conditions to ensure that the crusher operations will be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

6. Access to and Quality of Recreational and Wilderness Activities

The crusher operations will not affect any access to recreational and wilderness activities. However, minor affects to the quality of recreational and wilderness activities may be created by the noise from the site. Any impacts from the site will be minor and temporary due to the portable nature of the crusher operations.

7. Quantity and Distribution of Employment

The activities from the crusher operations will not affect the quantity and distribution of employment in the area. Spaulding will utilize a few company employees for the duration of the project.

8. Distribution of Population

The crusher operations will not disrupt the normal population distribution in the area.

9. Demands of Government Services

Minor increases will be seen in traffic on existing roads in the area while the crusher operations are in progress. In addition, government services will be required for acquiring the appropriate permits from government agencies. Demands for government services will be minimal.

10. Industrial and Commercial Activity

The crusher operations represent only a minor increase in the industrial activity in the area. No additional industrial or commercial activity is expected as a result of the crusher operations.

11. Locally Adopted Environmental Plans and Goals

The department is not aware of any locally adopted environmental plans or goals. The state standards will protect the proposed site and the environment surrounding the site.

12. Cumulative and Secondary Impacts

The crusher operations will cause a minor affect to both the physical environment and human environment. There is potential for other operations to locate at these sites. However, any operations will have to apply for and hold the appropriate permits from the department prior to operation. These permits will address the environmental impacts associated with the operations at this or any other site. The crusher operations are limited by permit #3068-00 to total particulate emissions of 250 tons/year or less from the crusher operations and any other additional equipment used at the site.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: Permit #3068-00 includes conditions and limitations which, if properly applied, will safeguard any potential environmental threat created by the proposed crushing operation.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality, Montana Natural Heritage Program, Montana Historical Preservation Office, State Historical Society.

Individuals or groups contributing to this EA: Department of Environmental Quality, Permitting and Compliance Division, Montana Natural Heritage Program, Montana Historical Preservation Office, State Historical Society.

EA prepared by: M. Eric Merchant, MPH

Date: August 3, 1999