



Montana Department of
ENVIRONMENTAL QUALITY

Marc Racicot, Governor

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August 29, 2000

Mark Dreesen
Cenex Harvest States
1100 A Avenue
Circle, MT 59215

Dear Mr. Dreesen:

Air Quality Permit #3124-00 is deemed final as of August 27, 2000 by the Department of Environmental Quality. This permit is for a grain elevator. All conditions of the department's decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the department,

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

DK:jw

Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #3124-00

Cenex Harvest States
1100 A Avenue
Circle, Montana 59215

August 27, 2000



AIR QUALITY PERMIT

Issued to: Cenex Harvest States
Farmers Elevator Company
P.O. Box 1391
Glendive, MT 59330

Permit: #3124-00
Complete Application Submitted: 7/18/00
Preliminary Determination Issued: 7/26/00
Department Decision Issued: 8/11/00
Final Permit Issued: 08/27/00
AFS#: 021-0007

An air quality permit, with conditions, is hereby granted to the Cenex Harvest States - Farmers Elevator Company, hereinafter referred to as "Farmers Elevator Company," pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

Farmers Elevator Company's proposed grain elevator is located at 320 Highway 16, near Glendive, Montana. The legal description of the facility is Section 15, Township 16 North, Range 55 East, Dawson County, Montana.

B. Permitted Equipment

Farmers Elevator Company is proposing to install and operate a facility to receive, clean, store, and ship grain for nearby farmers. The facility will have a storage capacity of approximately 814,000 bushels. A complete list of the permitted equipment is included in the permit analysis.

SECTION II: Conditions and Limitations

A. Emission Control Requirements and Limitations

1. Farmers Elevator Company shall operate and maintain the negative air fan and cyclone as specified in their application for an air quality permit and all supporting documentation (ARM 17.8.715).
2. Farmers Elevator Company shall not cause or authorize emissions to be discharged into the outdoor atmosphere, that exhibit an opacity of 20% or greater (ARM 17.8.304).
3. Grain elevator production shall not exceed 30,000,000 bushels during any rolling 12-month time period (ARM 17.8.710).
4. Farmers Elevator Company shall not cause or authorize the use of any street, road, or parking area without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
5. Farmers Elevator Company shall treat all unpaved portions of the haul roads, access roads, and the general plant property with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 17.8.710).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The Department of Environmental Quality (department) may require testing (ARM 17.8.105).

C. Operational and Emission Inventory Reporting Requirements

1. Farmers Elevator Company 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 equipment list contained in the permit analysis.

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

This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. Farmers Elevator Company shall notify the department of any construction or improvement project conducted pursuant to ARM 17.8.705(1)(r) that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emissions unit. The notice must be submitted to the department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.705(1)(r)(iv) (ARM 17.8.705).
 3. Farmers Elevator Company shall document, by month, the total production from the grain elevator. By the 25th of each month, Farmers Elevator Company shall total the production from the grain elevator during the previous 12 months to verify compliance with the limitation in Section II.A.3. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.710).
 4. All records compiled in accordance with this permit must be maintained by Farmers Elevator Company 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 17.8.710).
- D. Notification

Farmers Elevator Company shall provide the department with written notification of the following dates within the specified time periods (ARM 17.8.710):

1. Commencement of construction of the grain elevator within 30 days after commencement of construction;
2. Actual start-up date of the grain elevator within 15 days after the actual start-up; and
3. All compliance source tests as required by the Montana Source Test Protocol and Procedures Manual.

SECTION III: General Conditions

- A. Inspection – Farmers Elevator Company shall allow the department's representatives access to the source at all times for the purpose of making inspections and 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 Farmers Elevator Company fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Farmers Elevator Company of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, *et seq.* (ARM 17.8.717).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons, jointly or severally, adversely affected by the department's decision may request, within 15 days after the department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the application is not final unless 15 days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board.
- F. Permit Inspection – As required by ARM 17.8.716, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by department personnel at the location of the permitted source.

- G. Construction Commencement – Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- H. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Farmers Elevator Company may be grounds for revocation of this permit, as required by that Section and rules adopted thereunder by the Board.

PERMIT ANALYSIS
Cenex Harvest States – Farmers Elevator Company
Glendive, Montana
Permit #3124-00

I. Introduction/Process Description

A. Site Location and Description

Farmers Elevator Company is proposing to construct and operate a grain elevator to be located at 320 Highway 16, near Glendive, Montana. The legal description of the facility is Section 15, Township 16 North, Range 55 East, Dawson County, Montana.

The proposed grain elevator will be designed to receive grain from local farmers, clean the grain if necessary, and then store the grain until it is shipped to market. The storage capacity of the facility will be approximately 814,000 bushels.

B. Permitted Equipment

Equipment used at this facility includes all equipment listed in permit application #3124-00 including, but not limited to:

1. Receiving Pit #1;
2. Receiving Pit #2;
3. Receiving Drag Conveyor #1 - 10,000 bph;
4. Receiving Drag Conveyor #2 - 10,000 bph;
5. Receiving Leg #1 - 10,000 bph;
6. Receiving Leg #2 - 10,000 bph;
7. Receiving Leg Distributor - 10,000 bph;
8. Top Binfill Drag Conveyor #1 - 10,000 bph;
9. Top Binfill Drag Conveyor #2 - 10,000 bph;
10. Bottom Re-claim Conveyor - 40,000 bph;
11. Load-Out Leg - 40,000 bph;
12. Bulkweigh Load-Out - 60,000 bph;
13. Ten (10) Silo Bins - 69,309 bushels each;
14. Three (3) Interstice Bins - 22,200 bushels each;
15. Ten (10) Overhead Bins - 5,400 bushels each;
16. Rail Receiving Conveyor - 10,000 bph;
17. Auto Sampler - 60,000 bph;
18. Rail Load-Out Spout - 60,000 bph;
19. Grain Cleaner - 10,000 bph; and
20. Negative Air/Cyclone Dust System.

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 of Environmental Quality (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., Sub-Chapter 1, General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This section 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 emissions of any air contaminant into the outdoor atmosphere shall, upon written request of the department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary, using methods approved by the department. The department has determined, for the current permitting action, that no testing is required.
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.

Farmers Elevator Company 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 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. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.
- B. ARM 17.8., Sub-Chapter 2, Ambient Air Quality. The following ambient air quality standards or requirements may apply, including, but not limited to:
1. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter; and
 2. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀.

Farmers Elevator Company must maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8., Sub-Chapter 3, Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into an outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
 2. ARM 17.8.308 Particulate Matter, Airborne. (1) This section requires an opacity limitation of 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate. (2) Under this section, Farmers Elevator Company shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
 3. ARM 17.8.340 Standard of Performance for New Stationary Sources. This section incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). Subpart DD, Standards of Performance for Grain Elevators, indicates that grain terminal elevators that have a storage capacity of more than 2.5 million U.S. bushels are subject to the requirements of this subpart. The Farmers Elevator Company does not have a permanent storage capacity of 2.5 million bushels or more. Therefore, NSPS Subpart DD does not apply to this facility.
- D. ARM 17.8., Sub-Chapter 5, Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:
1. ARM 17.8.504 Air Quality Permit Application Fees. 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. Farmers Elevator Company has submitted the appropriate permit application fee.
 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.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which pro-rate the required fee amount.

- E. ARM 17.8., Sub-Chapter 7, Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.701 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.704 General Procedures for Air Quality Preconstruction Permitting. This air quality preconstruction permit contains requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
3. ARM 17.8.705 When Permit Required--Exclusions. This rule requires a facility to obtain an air quality permit or permit alteration if they construct, alter, or use any air contaminant sources which have the potential to emit more than 25 tons per year of any pollutant. Farmers Elevator Company has the potential to emit greater than 25 tons per year of PM and PM-10; therefore, a permit is required.
4. ARM 17.8.707 Waivers. ARM 17.8.706 requires the permit application to be submitted 180 days prior to construction. The department hereby waives this time limit.
5. ARM 17.8.710 Condition of Issuance of Permit. This section requires that Farmers Elevator Company 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. Farmers Elevator Company has demonstrated compliance with applicable rules and standards as required for permit issuance
6. ARM 17.8.715 Emission Control Requirements. Farmers Elevator Company is required to install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that a Best Available Control Technology (BACT) shall be used. A BACT analysis was conducted for sources of particulate matter at this facility. The BACT analysis 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. This rule states that nothing in the permit shall be construed as relieving Farmers Elevator Company of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.101, *et seq.*
9. ARM 17.8.720 Public Review of Permit Applications. 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. Farmers Elevator Company has submitted proof of compliance with the public notice requirement.
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 1 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 those changed conditions. 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. This section states an air quality permit 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., Sub-Chapter 8, Prevention of Significant Deterioration of Air Quality, including, but not limited to:

ARM 17.8.801 Definitions. This facility is not defined as 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 of any pollutant.

III. Emission Inventory

Source	Country Grain Elevator Tons/Year					SO _x
	PM	PM-10	NO _x	VOC	CO	
Grain Receiving	31.86	10.44				
Internal Handling	10.80	6.02				
Grain Cleaning	33.19	8.41				
Grain Shipping	15.22	5.13				
Total Emissions	91.07	30.00				

* A complete emission inventory is on file with the department.

IV. Best Available Control Technology Analysis

A BACT analysis is required for any new or altered source. Farmers Elevator Company shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be used. The following are the options the department has reviewed to make a BACT determination for the proposed facility:

A. Electrostatic Precipitator (ESP)

An ESP charges particles and then forces them out of the air-stream by passing them through a charged field. ESP's are very efficient at removing small particles, with removal efficiencies commonly ranging from 90 to 99%.

While ESP's can achieve high removal efficiencies, the installation and operation costs of the ESP are considerably higher than similar control technologies. For this reason, the ESP does not constitute BACT in this case.

B. Baghouse

Fabric filters are used to collect dust. The air stream passes through the fabric filter and the dust is collected by the filter cake that forms on the bags. Baghouses are also very efficient at removing small particles, with removal efficiencies commonly ranging from 95 to 99%.

Baghouses can achieve high removal efficiencies while the installation and operation costs of a baghouse are less than an ESP. However, the costs associated with a baghouse are still considerably higher than similar control technologies. For this reason, the baghouse does not constitute BACT in this case.

C. Cyclone

A cyclone acts as an inertial separator, which is very effective at separating the larger, coarser material from a gas stream. A cyclone has a lower collection efficiency for smaller diameter particles. Typical collection efficiencies of a cyclone range from 50 to 90%, depending on the particle size.

The negative air fan and cyclone proposed by Farmers Elevator Company are considered to be high efficiency controls. These controls provide high control efficiencies without the added cost of a baghouse or an ESP. Therefore, the department has determined that the operation and maintenance of a negative air fan and cyclone constitute BACT for this facility.

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

V. Existing Air Quality and Impacts

The area surrounding the proposed facility is mainly agricultural or rural in nature. The emissions from the proposed facility would be seasonal in nature, with the majority of the emissions occurring in the fall during the harvest. In addition, there is generally good dispersion in the area. Therefore, in the view of the department, the amount of controlled emissions from this facility will not cause an exceedance of any ambient air quality standard.

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 permitting action. A copy is attached.

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

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Cenex Harvest States
Farmers Elevator Company
P.O. Box 1391
Glendive, MT 59330

Air Quality Permit Number: #3124-00

Preliminary Determination Issued: 7/26/00
Department Decision Issued: 08/11/00
Final Permit Issued: 08/27/00

1. Legal Description of Site: The grain elevator is proposed to be located at 320 Highway 16, near Glendive, Montana. The legal description of the proposed site is Section 13, Township 16 North, Range 55 East, Dawson County, Montana.
2. Description of Project: The department proposes to issue an air quality preconstruction permit to the Farmers Elevator Company for the construction and operation of a Country Grain Elevator.
3. Objectives of Project: The proposed facility will receive, store, clean, and ship grain for the area farmers. The proposed facility will reduce some of the costs to the farmers in the area for the handling of their product.
4. Alternatives Considered: In addition to the proposed action, the department also considered the "no action" alternative. The "no action" alternative would deny the 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 the Farmers Elevator Company has demonstrated compliance with all applicable rules and regulations. 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, is included in permit #3124-00.
6. Regulatory effects on private property: The department has considered alternatives to the conditions imposed in this permit as part of the permit development. The department has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those 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.

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

Terrestrials would use the same area as the facility. However, the effects would be minor because the project area is small, consisting of approximately 5 acres disturbed.

B. Water Quality, Quantity, and Distribution

The proposed facility would not effect the water in the area.

C. Geology and Soil Quality, Stability, and Moisture

There would be an effect on the soils in the immediate area of the grain elevator because there would be new construction of footings, foundations, roads, etc. However, the effects would be minor because the construction would occur in a relatively small area of the property.

D. Vegetation Cover, Quantity and Quality

There would be an effect on the soils in the immediate area of the grain elevator because there would be new construction of footings, foundations, roads, etc. However, the effects would be minor because the construction would occur in a relatively small area of the property.

E. Aesthetics

There would be an effect on the aesthetics of the area from the construction of the facility as well as from the visible emissions from the facility. However, the aesthetic effects of the facility would be minor because the grain elevator would be located in an agricultural area and the visible emissions would be limited by permit to less than 20% opacity.

F. Air Quality

There would be minor effects on the air quality of the area from emissions of particulate matter from the facility. The effects would be minor because the air quality permit would contain limitations and conditions to ensure that the facility would operate in compliance with all applicable requirements.

G. Unique Endangered, Fragile, or Limited Environmental Resources

There would be no effect on any unique, endangered, fragile, or limited environmental resources from this facility.

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

There would be a minor effect on the air resource in the area of the facility. However, the effect would be minor because the air quality permit contains limitations and conditions to ensure that the facility would operate in compliance with all applicable requirements.

I. Historical and Archaeological Sites

Historical and archaeological sites are not present at the proposed site.

J. Cumulative and Secondary Impacts

This facility would only present minor cumulative and secondary impacts because the amount of emissions from this type of facility are small, well regulated, and seasonal in nature.

8. The following table summarizes the potential social and economic effects of the proposed project on the human environment. The "no action" alternative was discussed previously.

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

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

A. Social Structures and Mores

There would be no disruption of native or traditional lifestyles or communities from the facility.

B. Cultural Uniqueness and Diversity

The facility would not cause a change in the cultural uniqueness and diversity of the area.

C. Local and State Tax Base and Tax Revenue

The facility would have a minor effect on the local and state tax base and tax revenue. The facility would serve a need and generate local revenue in the process.

D. Agricultural or Industrial Production

The facility would have a minor effect on agricultural production in the area. This effect would be positive because farmers in the area would have a local facility to receive, store, clean, and ship their products.

E. Human Health

There would be a minor effect on human health from the emissions of particulate matter from the facility. The air quality permit for this facility incorporates conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

F. Access to and Quality of Recreational and Wilderness Activities

The facility would not have any effect on the access to and quality of recreational and wilderness activities.

G. Quantity and Distribution of Employment

There would be a minor effect on the employment of the area. The facility would employ approximately six individuals from the area.

H. Distribution of Population

The facility would not effect the normal population distribution in the area.

I. Demands of Government Services

Demands on government services from this facility would be minor. Minor increases may be seen in traffic on existing roads in the area while the facility is operating. The acquisition of the appropriate permits by the facility would also require minor services from the government.

J. Industrial and Commercial Activity

Construction and operation of this facility would not result in an increase in the industrial and commercial activity in the area.

K. Locally Adopted Environmental Plans and Goals

The facility would not affect any locally adopted environmental plans or goals.

L. Cumulative and Secondary Impacts

This facility would only present minor cumulative and secondary impacts because the amount of emissions from this type of facility are small, well regulated, and seasonal in nature.

Recommendation: No 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 grain elevator. Permit #3124-00 includes conditions and limitations to ensure the facility would operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: None

Individuals or groups contributing to this EA: Department of Environmental Quality, Air and Waste Management Bureau

EA prepared by: David Klemp

Date: July 24, 2000.