



Montana Department of
ENVIRONMENTAL QUALITY

Marc Racicot, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • E-mail: www.deq.state.mt.us

December 21, 2000

Roy Moen
M & W Milling & Refining Inc.
P.O. Box 33
Virginia City, MT 59755

Dear Mr. Moen:

Air Quality Permit #3129-00 is deemed final as of December 21, 2000, by the Department of Environmental Quality. This permit is for a portable crushing/screening operation. 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

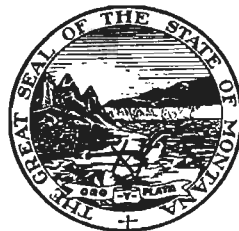
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #3129-00

M & W Milling & Refining, Inc.
P.O. Box 33
Virginia City, Montana 59755

December 21, 2000



AIR QUALITY PERMIT

Issued To: M & W Milling and Refining, Inc. Permit: #3129-00
Prospect Mine Road Application Complete: 11/03/00
P.O. Box 33 Preliminary Determination Issued: 11/17/00
Virginia City, MT 59755 Department Decision Issued: 12/05/00
Final Permit Issued: 12/21/00
AFS: 777-3129

An air quality permit, with conditions, is hereby granted to M & W Milling and Refining, Inc. (M & W) pursuant to Section 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/Introduction

A. Facility

A portable crushing/screening operation. A complete list of the permitted equipment is contained in the permit analysis.

B. Location

The facility will originally locate at Section 27, Township 6 North, Range 3 West, in Madison County, Montana. However, permit #3129-00 will apply while operating in any location in the State of Montana, except within those areas having a Department of Environmental Quality (department) approved permitting program. *A Missoula County air quality permit will be required for locations within Missoula County.*

C. Current Permit Action

On November 3, 2000, M & W submitted a complete permit application to permit a 1981 United Machinery feeder with a hydraulic tilt grizzly screen (maximum capacity 45 TPH), a 1974 Cedar Rapids 10" x 30" jaw crusher (maximum capacity 45 TPH), a 1972 Telesmith 24" cone crusher (maximum capacity 45 TPH), a 1972 4' x 6' homemade screen (maximum capacity 45 TPH), a 1980 Caterpillar Diesel Generator (250 kw), and associated equipment.

Section II: Limitations and Conditions

A. Operational Requirements

1. All visible emissions from the 1974 Cedar Rapids jaw crusher and 1972 Telesmith cone crusher shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and 17.8.715).

2. M & W shall not cause or authorize to be discharged into the atmosphere from any other associated equipment manufactured on or before August 31, 1983, such as screens or conveyor transfers, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.715).
3. M & W 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).
4. M & W 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 17.8.715).
5. Water spray bars shall be available on site at all times and operated, as necessary, to maintain compliance with the opacity limitations in Section II.A.1 and II.A.2 (ARM 17.8.715)
6. If the permitted equipment is used in conjunction with any other equipment owned or operated by M & W, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the department (ARM 17.8.710).

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 may require further testing (ARM 17.8.105).

C. Reporting Requirements

1. If this crushing/screening plant is moved to another location, a Notice of Intent to Transfer Location of Air Quality Permit must be sent to the department. In addition, a Public Notice Form of Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made. This Change of Location Notice must be published at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Change of Location Form must be submitted to the department prior to the move. These forms are available from the department (ARM 17.8.734).

2. M & W 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 M & W as a permanent business record for at least 5 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. M & W shall supply the department with annual production information for all emission points, as required by the department in the annual emissions 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 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 units as required by the department (ARM 17.8.505).

4. M & W 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 the control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the department, in writing, 10 days prior to 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).

Section III: General Conditions

- A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections 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 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'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 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 Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, the continuing validity of this permit is conditional upon the payment by the permittee of an annual operation fee, as required by that Section and rules adopted thereunder by the Board.
- 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. M & W shall comply with the conditions contained in this permit while operating in any location in the State of Montana, except within those areas having a department approved permitting program.

PERMIT ANALYSIS
M & W Milling and Refining, Inc.
Permit Number 3129-00

I. Introduction/Process Description

A. Introduction/Permitted Equipment

On November 3, 2000, M & W submitted a complete permit application for the operation of a 1981 United Machinery feeder with a hydraulic tilt grizzly screen (maximum capacity 45 TPH), a 1974 Cedar Rapids 10" x 30" jaw crusher (maximum capacity 45 TPH), a 1972 Telesmith 24" cone crusher (maximum capacity 45 TPH), a 1972 4' x 6' homemade screen (maximum capacity 45 TPH), a 1980 Caterpillar Diesel Generator (250 kw), and associated equipment.

B. Site Location

The original location is identified as Section 27, Township 6 North, Range 3 West, in Madison County, Montana. However, permit #3129-00 will apply while operating in any location in the State of Montana, except within those areas having a Department of Environmental Quality (department) approved permitting program. *A Missoula County air quality permit will be required for locations within Missoula County.*

C. Process Description

The crushing/screening plant will be used to crush and sort sand and gravel materials for sale and use in construction operations. For a typical operational setup, the raw material is sent through the feeder with attached grizzly screen and then conveyed to the 4' x 6' screen. The smaller material is conveyed to stockpile and the larger material is conveyed to the jaw crusher. From the jaw crusher, the material is sent to the cone crusher, crushed again, and sent to stockpile.

II. Applicable Rules and Regulations

The following are partial quotations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the department. 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, Sub-Chapter 1, General Provisions, including, but not limited to:

1. 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.

2. 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).

M & W 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.

3. ARM 17.8.110 Malfunctions. 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.
4. 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, Sub-Chapter 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 Standard for Settled Particulate Matter, and
5. ARM 17.8.223 Ambient Air Quality Standard for PM-10.

M & W must comply 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 to 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. M & W 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. The owner and operator of any stationary source, as defined and applied in 40 CFR Part 60, shall comply with the standards and provisions of 40 CFR Part 60. Based on the information submitted by M & W, the facility is not subject to NSPS requirements.

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. M & W shall 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. M & W 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. This 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 17.8.704 General Procedures for Air Quality Preconstruction Permitting. An air quality pre-construction permit shall contain requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
2. ARM 17.8.705 When Permit Required--Exclusions. This rule requires a facility to obtain an air quality permit if they construct, alter, or use a crushing facility which has the potential to emit more than 5 tons per year of any pollutant. M & W has the potential to emit more than 5 tons per year of particulate matter, PM-10, NO_x, and CO; 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. M & W has submitted the proper application for this permitting action.

4. 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. M & W has demonstrated compliance with applicable rules and standards as required for permit issuance.
5. ARM 17.8.715 Emission Control Requirements. M & W is required to install on a new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section IV of this permit analysis.
6. 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.
7. ARM 17.8.717 Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving M & W 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.*
8. ARM 17.8.720 Public Review of Permit Applications. This rule requires that M & W notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. M&W milling has submitted an affidavit of publication on October 3, 2000, from the Madisonian, a newspaper of general circulation in the town of Virginia City in Madison County, as proof of compliance with the public notice requirements.
9. ARM 17.8.731 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this sub-chapter, 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.
10. 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 of operation. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
11. 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, Sub-Chapter 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 sub-chapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--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 Federal Clean Air Act (FCAA) that it would emit, except as this sub-chapter would otherwise allow.

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

III. Emission Inventory

Source	Tons/Year					
	TSP	PM-10	NO _x	VOC	CO	SO _x
1972 Telesmith Cone Crusher (45 TPH)	0.49	0.24				
1974 Cedar Rapids Jaw Crusher (45 TPH)	0.49	0.24				
1972 Homemade Screen (45 TPH)	3.10	1.48				
1981 Feeder w/Grizzly Screen (45 TPH)	3.10	1.48				
Material Transfer	2.57	1.24				
Pile Forming	1.66	0.79				
Bulk Loading	0.83	0.39				
1980 Cat Diesel Generator (250 kw)	3.23	3.23	45.52	3.63	9.81	3.01
Haul Roads	2.74	1.23				
Total	18.21	10.32	45.52	3.63	9.81	3.01

- A complete emission inventory for permit #3129-00 is on file with the department.

IV. BACT Analysis

A BACT determination is required for each new or altered source. M & W 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 utilized.

All visible emissions from the 1974 Cedar Rapids jaw crusher and 1972 Telesmith cone crusher are limited to 20% opacity. In addition, all visible emissions from any other associated equipment manufactured on or before August 31, 1983, such as screens or conveyor transfers, are limited to 20% opacity. Furthermore, M & W must take reasonable precautions to limit the fugitive emissions of airborne particulate matter on haul roads, access roads, parking areas, and the general plant property. M & W shall use water spray bars and dust suppressant, as necessary, to maintain compliance with the opacity and reasonable precautions limitations. The department has determined that using water spray bars and reasonable precautions to comply with the opacity limitations constitutes BACT for this source.

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

V. Existing Air Quality

Permit #3129-00 is issued for the operation of a portable crushing/screening plant to be initially located in Section 27, Township 6 South, Range 3 West, in Madison County, Montana. Permit #3129-00 will cover the operation while operating at any location within the State of Montana, excluding those areas having a department approved permitting program. In the view of the department, the amount of controlled particulate emissions generated by this project will not cause concentrations of PM-10 in the ambient air to 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
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: M & W Milling and Refining, Inc.
Prospect Mine Road
P.O. Box 33
Virginia City, MT 59755

Air Quality Permit Number: 3129-00

Preliminary Determination Issued: November 17, 2000
Department Decision Issued: December 5, 2000
Final Permit Issued: December 21, 2000

1. Legal Description of Site: The plant would initially locate at Section 27, Township 6 South, Range 3 West, in Madison County, Montana. However, permit #3129-00 would apply while operating in any location in the State of Montana, except within those areas having a department approved permitting program.
2. Description of Project: Operation of a portable crushing/screening plant.
3. Purpose of Proposal: Increased business and revenue for the company.
4. Description of reasonable alternatives: 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 M & W 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 Mitigations, Stipulations and Other Controls: A list of enforceable conditions, including a Best Available Control Technology Analysis, is contained in Permit #3129-00.
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 has been 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 will use the areas in which the crushing/screening operations occur. However, the crushing/screening operations alone would present only minor effects to the terrestrial life.

B. Water Quality, Quantity, and Distribution

Water would be required for dust suppression, but would only cause a minor disturbance to the area. No additional surface water or ground water quality problems would result by using water for pollution control. Any accidental spills or leaks from equipment would be handled according to the appropriate environmental regulations in an effort to minimize any potential adverse impact on the immediate and surrounding area.

C. Geology and Soil Quality, Stability, and Moisture

The soils would be impacted by the crushing/screening operations. However, given the size and portable nature of the operation, and the previous industrial disturbance at the site location, any potential impacts would be minor.

D. Vegetation Cover, Quantity, and Quality

The soils would be impacted by the screening operation. However, given the size and portable nature of the operation, and the previous industrial disturbance at the site location, any potential impacts would be minor.

E. Aesthetics

The crushing/screening operations would be visible and would create additional noise in the area. Permit #3129-00 includes conditions to control emissions (including visible emissions) from the plant. Since the crushing operations are small and temporary, aesthetic impacts would be minor.

F. Air Quality

The air quality impacts from the crushing/screening operations would be minor. Permit #3129-00 includes conditions limiting the opacity from the plant, as well as requiring water spray bars and other means to control air pollution.

G. Unique Endangered, Fragile, or Limited Environmental Resources

Because the equipment would be located on a previously disturbed mine site that has already been permitted, there probably would be no impacts to the environmental resources.

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

The crushing/screening operations would only require small quantities of water, air, and energy for proper operating. Generally, the operations are seasonal, which would result in smaller demands on the environmental resources. Any impacts would be minor.

I. Historical and Archaeological Sites

The crushing/screening operations would initially take place within the Excelsior mine site, a previously disturbed industrial location. Therefore, crushing/screening operations will not have an effect on any known historical or archeological site.

J. Cumulative and Secondary Impacts

The crushing/screening operations will cause minor effects to the physical and biological environment. There is potential for other operations to locate at this site. However, any operations would have to apply for and receive the appropriate permits from the department prior to operation. These permits would address the environmental impacts associated with the operations at the proposed site. The crushing/screening operations would be limited by Permit #3129-00 to total particulate emissions of 250 tons/year or less from non-fugitive crushing/screening operations and any other additional equipment used at any given site.

8. The following table summarizes the potential social and economic effects of the proposed project on the human environment. The "no-action" alternative has been 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

In the view of the department, the crushing/screening operation would cause no disruption to native or traditional lifestyles or communities of any potential site or area of operation.

B. Cultural Uniqueness and Diversity

In the view of the department, the crushing/screening operations would not have an impact on the cultural uniqueness and diversity of any proposed area of operation.

C. Local and State Tax Base and Tax Revenue

The proposed crushing/screening operations would have little, if any, effect on local and state tax base and tax revenue. The facility would be a temporary source; therefore, would not remain at any individual site for a substantial period of time.

D. Agricultural or Industrial Production

The crushing/screening operations would initially locate at Section 27, Township 6 South, Range 3 West, in Madison County (a previously disturbed industrial area). Therefore, the permitted operation would not affect or displace any agricultural land. Further, the crushing/screening operations are small by industrial standards and, thus, would have only a minor impact on industrial activity in the area.

E. Human Health

Permit #3129-00 would incorporate conditions to ensure that the crushing/screening operations would be operated in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. Since these conditions would be incorporated, only minor impacts would be expected from this crushing/screening facility.

F. Access to and Quality of Recreational and Wilderness Activities

The crushing/screening operations would not affect any access to recreational and wilderness activities. However, minor effects on the quality of recreational activities might be created by the noise from the site.

G. Quantity and Distribution of Employment

The crushing/screening operations will not affect the quality and distribution of employment in the area.

H. Distribution of Population

The activities from the crushing/screening operations will not disrupt the normal population distribution in the area.

I. Demands of Government Services

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

J. Industrial and Commercial Activity

The crushing/screening operations would represent only a minor increase in the industrial activity in any given area. No additional industrial or commercial activity would result from the crushing/screening operations.

K. Locally Adopted Environmental Plans and Goals

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

L. Cumulative and Secondary Impacts

The crushing/screening operations would cause a minor effect to the social and economic environment. There is potential for other operations to locate at this site. However, any operations would have to apply for and receive the appropriate permits from the department prior to operation. These permits would address the environmental impacts associated with the operations at the proposed site. The crushing/screening operations would be limited by Permit #3129-00 to total particulate emissions of 250 tons/year or less from non-fugitive crushing/screening 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: The source would be applying the Best Available Control Technology. The analyses indicate compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality – Permitting and Compliance Division (Air and Waste Management Bureau and Industrial and Energy Minerals Bureau), Montana Natural Heritage Program, State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality – Permitting and Compliance Division (Air and Waste Management Bureau and Industrial and Energy Minerals Bureau), Montana Natural Heritage Program, State Historic Preservation Office (Montana Historical Society).

EA prepared by: Ron Lowney
Date: November 3, 2000