Montana Department of
ENVIRONMENTAL QUALITY
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August 5, 2014

Jim Summers
P.O. Box 1116
Port Angeles, WA
98362

Dear Mr. Summers:

Montana Air Quality Permit #3392-01 is deemed final as of August 5, 2014, by the Department of Environmental Quality (Department). This permit is for a crushing and screening plant. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Julie A. Merkel
Air Permitting Supervisor
Air Resources Management Bureau
(406) 444-3626

Rhonda Payne
Environmental Science Specialist
Air Resources Management Bureau
(406) 444-5287

JM:RP
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #3392-01

Delhur Industries, Inc.
P.O. Box 1116
Port Angeles, WA 98362

August 5. 2014

MONTANA AIR QUALITY PERMIT

Issued To: Delhur Industries, Inc.
P.O. Box 1116
Port Angeles, WA 98362

MAQP #3392-01
Application Complete: 6/25/14
Preliminary Determination Issued: 07/01/14
Department Decision Issued: 07/18/14
Permit Final:08/05/14
AFS #777-3392

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Delhur Industries, Inc. (Delhur), pursuant to Sections 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq*., as amended, for the following:

Section I: Permitted Facilities

A. Plant Location

Delhur operates a portable aggregate screening facility that will initially be located in the Section 30, Township 4 South, Range 16 East, in Stillwater County, Montana. However, MAQP #3392-01 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Delhur will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of certain PM_{10} nonattainment areas.

B. Current Permit Action

On June 3, 2014, the Department of Environmental Quality – Air Resources Management Bureau (Department) received from Delhur a modification application to add an engine/generator set with a maximum rated capacity of 225 horsepower (hp) to the current permit. The current permit action updates the permit to reflect the new engine, updates hour of operation limitations as necessary to limit emissions, updates the emissions inventory, and updates the permit to reflect the current permit language used by the Department.

Section II: Conditions and Limitations

A. Emission Limitations

1. All visible emissions from any Standards of Performance for New Stationary Source (NSPS)-affected crusher shall not exhibit an opacity in excess of the following averaged over 6 consecutive minutes (ARM 17.8.340 and 40 Code of Federal Regulations (CFR) 60, Subpart OOO).

    a. For crushers that commence construction, modification, or reconstruction on or after April 22, 2008: 12% opacity.

b. For crushers that commence construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008: 15% opacity.

2. All visible emissions from any other NSPS-affected equipment, such as screens or conveyor transfers, shall not exhibit an opacity in excess of the following averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

   a. For equipment that commences construction, modification, or reconstruction on or after April 22, 2008: 7% opacity.

   b. For equipment that commences construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008: 10% opacity.

3. All visible emissions from any non-NSPS affected equipment shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

4. Water and spray bars shall be available on site at all times and operated as necessary to maintain compliance with the opacity limitations in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.749 and ARM 17.8.752).

5. Delhur 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).

6. Delhur shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).

7. Delhur shall not operate more than one crusher at any given time and the maximum rated design capacity of the crusher shall not exceed 400 tons per hour (TPH) (ARM 17.8.749).

8. Delhur shall not operate more than one screening unit at any given time and the maximum rated design capacity of the screen shall not exceed 400 TPH (ARM 17.8.749).

9. Delhur is authorized to operate one or more diesel-fired engine/generator at any given time and the combined maximum rated design capacity of the engine/generators shall not exceed 685 horsepower (hp) (ARM 17.8.749).

10. If the permitted equipment is used in conjunction with any other equipment owned or operated by Delhur, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons of emissions during any rolling 12-month time period. Any calculations used to establish

11. Delhur shall comply with all applicable standards and limitations, monitoring, reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants* (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

12. Delhur shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart IIII; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Testing Requirements

1. Within 60 days after achieving maximum production, but no later than 180 days after initial start-up, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures as specified in 40 CFR Part 60.675 must be performed on all NSPS-affected equipment to demonstrate compliance with the emission limitations contained in Section II.A.1 and II.A.2 (ARM 17.8.340 and 40 CFR 60, Subpart A and Subpart OOO). Additional testing may be required by 40 CFR 60, Subpart OOO (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

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

2. Delhur shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. All records compiled in accordance with this permit shall be maintained by Delhur as a permanent business record for at least 5 years following the date of the measurement, must be submitted to the Department upon request, and must be available at the plant site for inspection by the Department (ARM 17.8.749).

3. Delhur 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 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. 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).

4. Delhur shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, 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 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 17.8.745(1)(d) (ARM 17.8.745).

B. Notification

Delhur shall provide the Department with written notification of the actual start-up date of the Perkins 225 hp diesel-fired engine/generator set facility postmarked within 15 days after the actual start-up date (ARM 17.8.749)

Section III: General Conditions

A. Inspection - Delhur 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 Delhur fails to appeal as indicated below.

C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving Delhur of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).

D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 *et seq.*, MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders it's decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

F. Permit Inspection - As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.

G. Air Quality Operation Fees – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Delhur may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762

I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.

J. Delhur shall comply with the conditions contained in this permit while operating at any location in Montana, except within those areas having a Department approved permitting program.

Montana Air Quality Permit (MAQP) Analysis
Delhur Industries, Inc.
MAQP # 3392-01

I. Introduction/Process Description

A. Permitted Equipment

Delhur Industries, Inc. (Delhur) owns and operates a portable crushing/screening facility consisting of a portable crusher (up to 400 tons per hour (TPH)), a screen (up to 400 TPH), three diesel-fired engine/generator sets (up to 685 horsepower (hp)), and associated equipment.

Delhur operates a portable aggregate screening facility that will initially be located in the Section 30, Township 4 South, Range 16 East, in Stillwater County, Montana. However, MAQP #3392-01 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Delhur will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of certain PM_{10} nonattainment areas.

B. Source Description

Delhur proposes to use this crushing/screening plant and associated equipment to crush sand and gravel materials for use in various construction operations. For a typical operational setup, materials are loaded into the crushing/screening plant by a feeder, transferred by conveyor, and passed through the crusher. Materials are crushed by the crusher and sent to the screen. Materials are screened, separated, and sent to stockpile for sale and use in construction operations.

C. Permit History

The Department of Environmental Quality (Department) issued MAQP #3392-00 to Delhur on April 26, 2005. MAQP #3392-00 allowed the operation of a portable crushing and screening facility consisting of a portable crusher (up to 400 tons per hour (TPH)), a screen (up to 400 TPH), a diesel generator (up to 460 hp), and associated equipment.

D. Current Permit Action

On June 3, 2014, the Department of Environmental Quality – Air Resources Management Bureau (Department) received from Delhur a modification application to add an engine/generator set with a maximum rated capacity of 225 hp to the current permit. The current permit action updates the permit to reflect the new engine, updates hour of operation limitations as necessary to limit emissions, updates the emissions inventory, and updates the permit to reflect the current permit language used by the Department. **MAQP #3392-01** replaces MAQP #3392-00.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

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

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule 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*., Montana Code Annotated (MCA).

   Delhur 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. (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 that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner 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
1. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
2. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
3. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
4. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

Delhur must comply with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter (PM). (2) Under this rule, Delhur shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne PM.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere PM caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Processes. This rule requires that no person shall cause or allow to be discharged into the atmosphere PM in excess of the amount set forth in this rule.

5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). Delhur is considered an NSPS-affected facility under 40 CFR Part 60 and is potentially subject to the requirements of the following subparts.

   a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:

b. 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants. In order for a crushing plant to be subject to this subpart, the facility must meet the definition of an affected facility and the affected equipment must have been constructed, reconstructed, or modified after August 31, 1983. Based on the information submitted by Delhur, the portable crushing and screening equipment to be used under MAQP #3392-01 is subject to this subpart because of the size and date of manufacture of the equipment.

c. 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). As it applies to an owner or operator, this subpart applies to stationary compression ignition internal combustion engines which:

- commence construction (the date the engine is ordered by the owner or operator) after July 11, 2005.
- are manufactured after April 1, 2006, and are not fire pump engines,
- are manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.
- are modified or reconstructed after July 11, 2005.

Since the CI ICE to be used under MAQP #3392-01 are intended to be portable, Delhur is not required to comply with the applicable emission limitations and operating limitations of 40 CFR 60, Subpart IIII. However, this subpart would become applicable if Delhur constructed and operated a CI ICE that remains in a location for more than 12 months.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories. Delhur is considered a NESHAP-affected facility under 40 CFR Part 63 and is potentially subject to the requirements of the following subparts.

a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a NESHAPs Subpart as listed below:

b. 40 CFR 63, Subpart ZZZZ – NESHAPs for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of HAP emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. . An area source of HAP emissions is a source that is not a major source. Since the RICE to be used under MAQP #3392-01 is intended to be portable, Delhur is not required to comply with the applicable emission limitations and operating limitations of 40 CFR 63, Subpart ZZZZ. However, this subpart would become applicable if Delhur constructed and operated a RICE that remains in a location for more than 12 months.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that Delhur 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. Delhur submitted the required permit application fee for the current permit action.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an 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 that pro-rate the required fee amount.

E. ARM 17.8, Subchapter 7 - Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a facility to obtain an air quality permit or permit alteration to construct, alter, or use any asphalt plant, crusher, or screen that has the Potential to Emit (PTE) greater than 15 tons per year of any pollutant. Delhur has a PTE greater than 15 tons per year of total PM, PM_{10}, and nitrogen oxides (NO_x); therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit Program.

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Delhur submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a

permit. Delhur submitted an affidavit of publication of public notice for the May 30, 2014 issue of the *Billings Gazette*, a newspaper of general circulation in the City of Billings in Yellowstone County , as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section IV of this permit analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Delhur of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An 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.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of Delhur, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a

permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of Intent to Transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an 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, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major 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 FCAA that it would emit, except as this subchapter would otherwise allow.

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

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:

   a. PTE > 100 tons/year of any pollutant.

   b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule.

   c. PTE > 70 tons/year of PM_{10} in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #3392-01 for the Delhur facility, the following conclusions were made:

a. The facility's PTE is less than 100 tons/year for any pollutant.

b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.

c. This source is not located in a serious PM_{10} nonattainment area.

d. This facility is currently subject to NSPS standards (40 CFR 60, Subpart A, General Provisions, Subpart OOO and Subpart IIII).

e. This facility is potentially subject to a current NESHAP (40 CFR 63, Subpart ZZZZ).

f. This source is not a Title IV affected source nor a solid waste combustion unit.

g. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that Delhur will be a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Delhur will be required to obtain a Title V Operating Permit.

III. BACT Analysis

A BACT determination is required for any new or altered source. Delhur shall install on the new or altered source the maximum air pollution control capability that is technologically practicable and economically feasible, except that BACT shall be used.

A. Area Source Fugitive Emissions and Crushing/Screening Emissions

Two types of PM emission controls are readily available and used for dust suppression of fugitive emissions at the site, fugitive emissions for the surrounding area of operations, and for equipment emissions from the crushing/screening operation. These two control methods are water and chemical dust suppressant. Chemical dust suppressant could be used for dust suppression on the area surrounding the crushing/screening operation and for emissions from the crushing/screening operation. However, because water is more readily available, is more cost effective, is equally effective as chemical dust suppressant, and is more environmentally friendly, water has been identified as the most appropriate method of pollution control of particulate emissions for the general plant area. In addition, water suppression has been required of recently permitted similar sources. Delhur may, however, use chemical dust suppressant to assist in controlling particulate emissions from the surrounding plant area.

Delhur shall not cause or authorize to be discharged into the atmosphere from any NSPS affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over six consecutive minutes. Also, Delhur shall not cause or authorize to be discharged into the atmosphere from any affected screen, any visible emissions that exhibit an opacity of 10% or greater averaged over six consecutive minutes. Further, Delhur shall not cause or authorize to be discharged into the atmosphere from any non-NSPS affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. Delhur must also

take reasonable precautions to limit the fugitive emissions of airborne particulate matter from haul roads, access roads, parking areas, and the general area of operation. Delhur is required to have water spray bars and water available on site (at all times) and to apply the water, as necessary, to maintain compliance with the opacity and reasonable precaution limitations. Delhur may also use chemical dust suppression, in order to maintain compliance with emission limitations in Section I.A of Permit #3392-01. The Department determined that using water spray bars, water, and/or chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precaution limitations constitutes BACT for the crushing/screening operation.

B. Diesel Generators

Because of the limited amount of emissions produced by the diesel generator/engine and the lack of readily available/cost effective add-on controls, add-on controls would be cost prohibitive. Generally, any new diesel engines would likely be required to comply with the federal engine emission limitations including, for example, EPA Tier emission standards for non-road engines (40 CFR Part 1039), New Source Performance Standard emission limitations for stationary compression ignition engines (40 CFR 60, Subpart IIII), or National Emissions Standards for Hazardous Air Pollutant Sources for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). Therefore, the Department determined that proper operation and maintenance with no additional controls would constitute BACT for the diesel generator/engine.

The control options required for the proposed crushing/screening facility and for the diesel generator/engine that would be used to power the facility are similar to other recently permitted similar sources.

IV. Emission Inventory

Source	PM	PM_{10}	NO_X	VOC	CO	SO_X
Crusher (up to 400 TPH)	4.73	2.10				
Screen (up to 400 TPH)	21.90	7.62				
Material Transfer (12 Transfers)	31.50	11.56				
Pile Forming (2 Piles)	8.28	7.01				
Bulk Loading (2 Loads)	8.28	7.01				
Haul Roads (5 Miles per Day)	2.74	1.23				
Generator (up to 685 hp)	6.60	6.60	93.01	6.75	20.04	1.50
Total	**84.03**	**43.13**	**93.01**	**6.75**	**20.04**	**1.50**

Crusher (400 TPH)

PM Emissions

Emission Factor:	0.0054 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Control Efficiency	50%	Water Spray
Hourly Calculations:	400 TPH * (0.0054 lb/ton) * (0.50) = 1.08 lb/hr	
Annual Calculations:	1.08 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 4.73TPY	

PM_{10} Emissions

Emission Factor:	0.0024 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Control Efficiency	50%	Water Spray
Hourly Calculations:	400 TPH * (0.0024 lb/ton) * (0.50) = 0.48 lb/hr	

Annual Calculations: 0.48 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 2.10 TPY

Screen (400 TPH)

PM Emissions

Emission Factor:	0.025 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.025 lb/ton) * (0.50) = 5.0 lb/hr
Annual Calculations: 5.0 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 21.90 TPY

PM_{10} Emissions

Emission Factor:	0.0087 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.0087 lb/ton) * (0.50) = 1.74 lb/hr
Annual Calculations: 1.74lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 7.62 TPY

Material Transfer (400 TPH)

PM Emissions

Emission Factor:	0.003 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Number of Transfers:	12	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.003 lb/ton) * (0.50) * (12) = 7.2 lb/hr
Annual Calculations: 7.2 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 31.50 TPY

PM_{10} Emissions

Emission Factor:	0.0011 lb/ton	(AP-42, Table 11.19.2-2, 8/04)
Number of Transfers:	12	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.0011 lb/ton) * (0.50) * (12) = 2.64 lb/hr
Annual Calculations: 2.64 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 11.56 TPY

Pile Forming (400 TPH)

PM Emissions

Emission Factor:	0.0084 lb/ton	(AP-42, Table 8.23-4, 8/82)
Number of Piles:	2	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.0084 lb/ton) * (0.50) * (2) = 3.36 lb/hr
Annual Calculations: 3.36 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 8.28 TPY

PM_{10} Emissions

Emission Factor:	0.004 lb/ton	(AP-42, Table 8.23-4, 8/82)
Number of Piles:	2	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.004 lb/ton) * (0.50) * (2) = 1.60 lb/hr
Annual Calculations: 1.60 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 7.01 TPY

Bulk Loading (400 TPH)

PM Emissions

Emission Factor:	0.0084 lb/ton	(AP-42, Table 8.23-4, 8/82)
Number of Loads:	2	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.0084 lb/ton) * (0.50) * (2) = 3.36 lb/hr
Annual Calculations: 3.36 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 8.28 TPY

PM_{10} Emissions

Emission Factor:	0.004 lb/ton	(AP-42, Table 8.23-4, 8/82)
Number of Loads:	2	
Control Efficiency	50%	Water Spray

Hourly Calculations: 400 TPH * (0.004 lb/ton) * (0.50) * (2) = 1.60 lb/hr
Annual Calculations: 1.60 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 7.01 TPY

Haul Roads (5 VMT/Day)

PM Emissions

Emission Factor: 6.0 lb/VMT
Control Efficiency 50% Water Spray
Daily Calculations: 5VMT/Day * (6.0 lb/VMT) * (0.50) = 15 lb/day
Annual Calculations: 15 lb/day * (365 day/yr) * (0.0005 lb/ton) = 2.74 TPY

PM_{10} Emissions

Emission Factor: 2.70 lb/VMT
Control Efficiency 50% Water Spray
Daily Calculations: 5VMT/Day * (2.70 lb/VMT) * (0.50) = 6.75 lb/day
Annual Calculations: 6.75 lb/day * (365 day/yr) * (0.0005 lb/ton) = 1.23 TPY

Diesel Generator (685 hp)

PM Emissions

Emission Factor: 0.0022 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.0022 lb/hp-hr) = 1.51 lb/hr
Annual Calculations: 1.51 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 6.60 TPY

PM_{10} Emissions

Emission Factor: 0.0022 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.0022 lb/hp-hr) = 1.51 lb/hr
Annual Calculations: 1.51 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 6.60 TPY

NO_X Emissions

Emission Factor: 0.031 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.031 lb/hp-hr) = 21.235 lb/hr
Annual Calculations: 21.235 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 93.01 TPY

VOC Emissions

Emission Factor: 0.00225 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.00225 lb/hp-hr) = 1.54 lb/hr
Annual Calculations: 1.54 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) =6.75 TPY

CO Emissions

Emission Factor: 0.0067 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.0067 lb/hp-hr) = 4.58 lb/hr
Annual Calculations: 4.58 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 20.04 TPY

SO_X Emissions

Emission Factor: 0.0005 lb/hp-hr (AP-42, Table 3.3-1, 10/96)
Hourly Calculations: 685 hp * (0.0005 lb/hp-hr) = 0.34 lb/hr
Annual Calculations: 0.34 lb/hr * (8760 hr/yr) * (0.0005 lb/ton) = 1.50 TPY

V. Existing Air Quality

Permit #3392-01 is issued for the operation of a portable aggregate screening facility to be initially located in the SW¼ of Section 2, Township 4 South, Range 13 East, in Sweet Grass County, Montana. This facility would be allowed to operate at any area designated as attainment or unclassified for all National Ambient Air Quality Standards (NAAQS); excluding those counties that have a Department approved permitting program, those areas considered Tribal Lands, or those areas in or within 10 km of certain PM_{10} nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* Delhur will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of certain PM_{10} nonattainment areas.

VI. Air Quality Impacts

This permit is for a portable crushing/screening plant to be located at various locations around Montana. This permit contains operational conditions and limitations that would protect air quality for this site and the surrounding area. Also, this facility is a portable source that would operate on an intermittent and temporary basis, so any effects to air quality will be minor and short-lived. Further, the amount of controlled particulate emissions generated by this project should not cause concentrations of PM_{10} in the ambient air that exceed the set standard. In addition, this source is portable and any air quality impacts will be minimal.

VII. Taking or Damaging Implication Analysis

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

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

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

VIII. Environmental Assessment

An Environmental Assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
1520 East Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Delhur Industries, Inc.
P.O. Box 1116
4333 Tumwater Access Road
Port Angeles, WA 98362

Permit Number: 3392-01

Preliminary Determination Issued: July 1, 2014
Department Decision Issued: July 18, 2014
Permit Final: August 5, 2014

1. *Legal Description of Site*: Delhur submitted an application to add the flexibility to operate additional horsepower (hp) for their diesel generator engine capacity to support their portable aggregate screening plant initially located in Section 30, Township 4 South, Range 16 East, in Stillwater County, Montana. MAQP #3392-01 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program, those areas considered to be tribal lands, or those areas in or within 10 km of certain PM_{10} nonattainment areas. An addendum to this air quality permit would be required if Delhur intends to locate in or within 10 km of certain PM_{10} nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*

2. *Description of Project*: The permit applicant proposes the operation of an additional 225 hp to their diesel generator engine capacity for a new facility maximum capacity of up to 685 hp.

3. *Objectives of Project*: The object of the project would be to provide additional electric capacity to their portable crushing/screening facility. The issuance of MAQP #3392-01 would allow Delhur to operate the permitted equipment at various locations throughout Montana.

4. *Alternatives Considered*: In addition to the proposed action, the Department 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 Delhur demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

5. *A Listing of Mitigation, Stipulations, and Other Controls*: A listing of the enforceable permit conditions and a Permit Analysis, including a BACT analysis, would be contained in MAQP #3392-01.

6. *Regulatory Effects on Private Property Rights*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and would not unduly restrict private property rights.

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

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			X			yes
B.	Water Quality, Quantity, and Distribution				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 generator engine. The engine would be considered a minor source of emissions, by industrial standards, with intermittent and seasonal operations. Therefore, only minor effects on terrestrial life would be expected as a result of equipment operations or from pollutant deposition.

Impacts on aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor as the facility would be a minor source of emissions (with seasonal and intermittent operations). Since only a minor amount of air emissions would be generated, only minor deposition would occur. Therefore, only minor and temporary effects to aquatic life and habitat would be expected from the proposed crushing/screening operation.

B. Water Quality, Quantity, and Distribution

MAQP #3392-01 would result in a minor increase in allowable emissions from an annual emissions standpoint. Use of water for control of particulate emissions would continue to be required. No additional water-using equipment is being permitted in this action. No more than a minor impact would be expected from the addition of the 225 hp generator engine.

C. Vegetation Cover, Quantity, and Quality

Because the facility would be a minor source of emissions by industrial standards and would typically operate in areas previously designated and used for aggregate crushing and screening, impacts from the emissions from the crushing/screening facility would be minor.

As described in Section 8.F of this EA, the amount of additional air emissions from the engine would be minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor.

D. Aesthetics

The additional engine would be visible and would create additional noise while operating in these areas. However, MAQP #3392-01 would include conditions to control emissions, including visible emissions, from the engine. Also, because the crushing/screening operation is portable and would operate on an intermittent and seasonal basis, would typically locate within an open-cut pit, any visual and noise impacts would be minor and short-lived.

E. Air Quality

The air quality impacts from the additional engine would be minor because it would generate a limited amount of emissions. Further, MAQP #3392-01 would limit total emissions from the crushing/screening operation and any additional Delhur equipment operated at the site to 250 tons/year or less, excluding fugitive emissions.

This facility would be used on a temporary and intermittent basis, thereby further reducing potential air quality impacts from the engine. Additionally, the small and intermittent amounts of deposition generated from the engine operation would only have minor impacts upon the surrounding environment. Therefore, air quality impacts would be minor.

F. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to unique, endangered, fragile, or limited environmental resources in the initial proposed area of operation, contacted the Montana Natural Heritage Program (MNHP). Search results concluded there is one such environmental resource found within the defined area. The defined area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer.

The Small Yellow Lady's-slipper is a vascular plant of concern in the area. While this species potential location has been generalized from many miles of potential habitat, that generalized area does not include the proposed operational site for the crushing operations. The boundary of the potential habitat is approximately 1 mile away from the proposed operational site. At such a distance, only minor and temporary effects to these species of concern would be expected from the proposed crushing operation because pollutants would be widely dispersed before reaching this species.

The mammals of concern have been identified as the Canada Lynx, the Grizzly Bear, the Veery, the Clark's Nutcracker and the Peregrine Falcon. These species have been identified both within and outside the defined area. However, given the temporary and portable nature of the operations, any impacts would be minor and short-lived. Additionally, operational conditions and limitations within MAQP #3392-01 would aid in the protection of these resources by protecting the surrounding environment.

G. Demands on Environmental Resources of Water, Air, and Energy

The operation of the additional engine would require only small quantities of air and energy for proper operation, and is not expected to require any additional water. Energy requirements would be in the form of diesel fuel, would be relatively low by industrial standards, and the engine would not be used continuously. The engine would have seasonal and intermittent use. In addition, impacts to air resources would be minor because the source is small by industrial standards, with intermittent and seasonal operations, and because air pollutants generated by the engine would be widely dispersed. Therefore, any impacts to water, air, and energy resources in any given area would be minor.

H. Historical and Archaeological Sites

The Department contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the location of the facility. According to correspondence from the Montana State Historic Preservation Office, there have been a few previously recorded sites within the designated search locales. In addition to the sites, there have been a few previously conducted cultural resource inventories done in the area. As long as there will be no disturbance or alteration to structure's over fifty years of age, SHPO indicates, "there is a low likelihood cultural properties will be impacted". Therefore, it is unlikely that the operation of the additional engine would have an effect on any known historic or archaeological sites.

I. Cumulative and Secondary Impacts

The operation of the additional engine would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would generate emissions. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance because the equipment is relatively small and the facility would be expected to operate in areas designated and used for such operations. Additionally, this facility, in combination with the other emissions from equipment operations at the operational site, would not be permitted to exceed 250 tons per year of non-fugitive emissions. Overall, any cumulative or secondary impacts to the physical and biological aspects of the human environment would be minor.

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

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Social Structures and Mores				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 ECONOMIC AND SOCIAL EFFECTS:
The Department has prepared the following comments.

A. Social Structures and Mores

The operation of the additional engine would cause no disruption to the social structures and mores in the area because the source is a minor source of emissions (by industrial standards) and would only have intermittent operations. Additionally, the equipment would be expected to operate in an area previously designated and used for aggregate crushing/screening and in an area removed from the general population. Further, the facility would be a minor source of air pollution and would be required to operate according to the conditions that would be placed in MAQP #3392-01. Thus, no native or traditional communities would be affected by the proposed project operations and no impacts upon social structures or mores would result.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of these areas would not be impacted by the proposed engine operation because these sites are expected to be previously designated and used for aggregate crushing/screening and because these sites are separated from the general population. Additionally, the facility would be considered a portable/temporary source with seasonal and intermittent operations. Therefore, predominant use of the surrounding areas would not change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The operation of the engine would have little, if any, impact on the local and state tax base and tax revenue because the source would be a relatively small industrial source (minor source) and would be used on a seasonal and intermittent basis. Thus, only minor, if any, impacts to the local and state tax base and revenue could be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue would be minor because the source would also be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The operation of the additional engine would have only a minor impact on local industrial production since the facility is a minor source of emissions (by industrial standards) and would typically locate in an existing open-cut pit. There could be minor effects on agricultural land but, the facility operations would be small and temporary in nature, and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation (as described in Section 8.D of this EA). Additionally, pollution control would be utilized for equipment operations and production limits would be established.

E. Human Health

MAQP #3392-01 would incorporate conditions to ensure that the engine would operate in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 8.F. of this EA, the air emissions from the engine would be minimized by the conditions that would be established in MAQP #3392-01, though the facilities air emissions would be quite small without the use of pollution controls. Therefore, only minor impacts would be expected upon human health from the proposed engine.

F. Access to and Quality of Recreational and Wilderness Activities

The engine would typically operate within the confines of an existing open-cut pit. Therefore, only minor impacts upon the access to and quality of recreational and wilderness activities would result. Additionally, noise from the engine would be minor because it would typically operate within the confines of an existing open-cut pit. Also, the engine would operate on a seasonal and intermittent basis and would be relatively small by industrial standards. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at a given site would be expected to be minor and intermittent.

G. Quantity and Distribution of Employment

The additional engine is relatively small and would not likely require any new employees to operate. The crushing/screening operation is a small, portable source, with seasonal and intermittent operations and would not be expected to have any long-term affects upon the quantity and distribution of employment in any given area of operation. Therefore, no effects upon the quantity and distribution of employment in these areas would be expected.

H. Distribution of Population

No individuals would be expected to permanently relocate to a given area of operation as a result of operating the engine, which would have only intermittent and seasonal operations. Therefore, the engine would not disrupt the normal population distribution in a given area of operation.

I. Demands of Government Services

Government services would be required for acquiring the appropriate permits from government agencies and determining compliance with the permits. Demands for government services would be minor.

J. Industrial and Commercial Activity

The operation of the additional engine would represent only a minor increase in the industrial activity in any given area because the source would be a minor source (relatively small in size by industrial standards) and would be portable and temporary in nature. No additional industrial or commercial activity would be expected as a result of the proposed operation.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals that would affect Delhur. The facility would be allowed, by permit, to operate in areas designated by EPA as attainment or unclassified. MAQP #3392-01 would contain limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards. Because the facility would be a small and portable source, and would have intermittent and seasonal operations, any effects from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The operation of the additional engine would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate areas of operation because the source is a portable and temporary source. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the engine. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from construction and operation of the proposed facility are minor; therefore, an EIS is not required.

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

Individuals, or groups, contributing to this EA: Department of Environmental Quality (Air Resources Management Bureau), Montana State Historic Preservation Office (Montana Historical Society).

EA prepared by: R. Payne
Date: June 27, 2014