



**Waste Management and Remediation Division
Waste and Underground Tank Management Bureau
Solid Waste Section
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**FINAL ENVIRONMENTAL ASSESSMENT
for the
Proposed Sanders County Class II Transfer Station
Thompson Falls, Montana**

August 10, 2018

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1. PURPOSE AND NEED FOR ACTION

1.1. SUMMARY

On March 13, 2018, Sanders County submitted a Solid Waste Management System license application to the Montana Department of Environmental Quality (DEQ) for the construction of a Class II Transfer Station Facility (Facility). The new Facility would be operated by the Sanders County Solid Waste Refuse District (District) and coordinate the management of nearly 6,800 tons of municipal solid waste, special waste, and recycling per year. Municipal solid waste (MSW) would be directly accepted from the public, contractors, and commercial collection vehicles. The Facility would manage the delivery of MSW collected at Sanders County Solid Waste District roll-off container sites to the Allied Waste Systems of Montana (AWSM) Class II Landfill in Missoula for disposal.

Wastes are grouped by their physical and chemical characteristics which affect the degree of care required for handling and disposal, and determine their potential to cause environmental degradation or public health hazards. Group II wastes, or MSW, include decomposable wastes and mixed solid wastes containing decomposable materials. Group III wastes include clean wood wastes and other clean non-water soluble or inert solids. This category largely includes, but is not limited to, unpainted brick or concrete, untreated, unpainted and unglued wood materials, and tires. Group IV wastes include construction and demolition wastes and asphalt. A Class II facility design requires the most stringent control to ensure the protection of human health and the environment. Special solid wastes have unique handling, transportation, or disposal requirements to ensure protection of the public health, safety, and welfare and the environment. All solid waste groups exclude regulated hazardous or Toxic Substance Control Act (TSCA) wastes and liquids.

The Facility would be located approximately 2.5 miles east of Thompson Falls, with access to the south off Montana State Highway 200 (Figure 1.1). The proposed Facility would occupy a portion of the 30.5-acre tract of County-owned property in the W1/2 of the NW1/4 of Section 14, Township 21 North, Range 29 West, Montana Principal Meridian, Sanders County, Montana. The proposed license boundary of the Facility would encompass 10 acres within the south-central area of the tract. The existing raised railroad bed and right-of-way delineates the southern Facility boundary.

In addition to the 2-acre footprint of the transfer station buildings, zee-wall, and Underground Storage Tank (UST) features, the applicant would construct the roads, approach ramp, storm water control features, trenches, and storage/parking area to disturb an additional 4 acres. Construction of the Facility would therefore initially disturb 10 acres with revegetation of approximately 4 acres at the proposed site. Construction of the access road to the Facility would permanently disturb 0.6 acres outside the licensed area.

Figure 1.1 – General Location of Proposed Sanders County Class II Facility located south of Montana Highway 200

(Source: Sanders County License Application, 2018)

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The perimeter of the transfer station would be surrounded by a fence to restrict access. Upon closure after 40 years, all buildings and the UST would be demolished and disposed offsite, pits reclaimed, and the site revegetated. The roads and septic tank may remain for future use. Thus, the only lasting minor impact at the site from the transfer station activity would be the effect of the roads that remain.

1.2. PURPOSE AND NEED

The Montana Integrated Waste Management Act (IWMA) establishes goals for waste reduction in the state through the development of an integrated approach to solid waste management. The IWMA's priority for solid waste management focuses first on source reduction, reuse, recycling, and composting. Landfill disposal and incineration are the final options for solid waste management. While source reduction, reuse, recycling, and composting all play a role in solid waste management in Montana, most solid waste is landfilled.

The Montana Solid Waste Management Act (SWMA) establishes the minimum requirements for the development of solid waste management facilities. The SWMA is the result of long range planning efforts that were performed to ensure landfill capacity in the state exists to meet the state's growing population needs. The administrative rules adopted in accordance with the authority provided by the SWMA establish requirements for the design, operation, financial assurance, closure, and post-closure care of solid waste management facilities.

Sanders County (SC) has applied to DEQ for the review and licensure of a Class II solid waste management facility. The purpose of the proposed action is the construction and operation of the solid waste transfer station upon DEQ approval. The proposed action would allow local SC waste generators an option for the efficient collection, transfer, and haulage of waste for the disposal services at the licensed AWSM Class II landfill in Missoula. The new transfer station would be more efficient, replace limited operations at the current transfer station, and reduce heavy truck mileage by 15% on the highways. Thus, the proposed action has a significant positive impact on overall public health and safety. The SC population is projected to only increase by 3% over the proposed 40-year period of Facility operations. The proposed new transfer station, combined with the updated container site facilities, will therefore handle significantly more tonnage than estimated from the projected growth in waste generated in the service area.

Because DEQ's Solid Waste Program (SWP) received an application for licensure of the proposed facility, DEQ is required under the Montana Environmental Policy Act (MEPA) to disclose the potential impacts to the human environment that may result from the agency action. The purpose of this environmental assessment (EA) is to provide the results of the environmental review conducted in accordance with MEPA and to determine the need for an environmental impact statement.

A MEPA document assists DEQ in making balanced decisions and does not expand the regulatory authority invested to DEQ. It does not result in a certain decision, but rather serves to identify the potential effect of a state action taken within the confines of the SWMA, solid waste rules, and other laws and rules governing the proposed Facility activities. This final EA documents the decision and incorporates any changes found necessary by DEQ in response to substantive comments received on the draft EA after the public comment period ended. Written responses are included in this document as Appendix C.

1.3. PROJECT LOCATION AND STUDY AREA

The proposed 10-acre transfer station facility would be located on property owned by SC, just south of Montana Highway 200, in the W1/2 of the N W1/4 of Section 14, Township 21 North, Range 29 West, Montana Principal Meridian, Sanders County, Montana (Figure 1.1). The site is presently preserved as green space and dominated by nearly flat meadow, but surrounded by sparsely wooded savanna. There are no local

restrictions that prohibit the location of the proposed Facility at the site selected by the applicant. The study area includes the extent of the proposed Facility and adjacent areas within at least one mile of the perimeter fence that may be impacted. The size of the study areas may increase as needed by resource. Adjacent land uses mostly include rural residential, agricultural, railroad, and light industrial.

1.4. REGULATORY RESPONSIBILITIES AND REQUIREMENTS

DEQ must comply with the MEPA and SWMA requirements including the administrative rules adopted pursuant to these state laws. DEQ is responsible for analyzing the possible environmental impacts of a proposed solid waste management system under the procedural requirements of MEPA. In order for DEQ to approve a proposed solid waste management system, DEQ must determine that the proposed solid waste management system complies with the requirements of the SWMA

Upon completion of the EA process, DEQ may 1) deny the application as submitted; 2) approve the application as submitted, 3) approve the application with agency mitigations; or 4) determine the need for further MEPA review to disclose and analyze potentially significant environmental impacts.

Table 1.1 provides a listing of agencies and their respective permit/authorizing responsibilities.

ACTION	REGULATORY AGENCY
Solid Waste Management System License	DEQ – Waste and Underground Tank Management Bureau
Air Quality Permitting	DEQ – Air Quality Bureau
General Permit for Storm Water Discharge Associated with Industrial Activity	DEQ-Water Protection Bureau
Montana Pollutant Discharge Elimination System Permit (MPDES)	DEQ – Water Protection Bureau
SWMS License Validation by County Health Officer	Sanders County Health Officer
County Road Construction, Maintenance, and Land Use, Weed Plan Approval	Sanders County
State Highway Encroachment Permit	Montana Department of Transportation
Wetland Modification (404 Permit)	U.S. Army Corps of Engineers
Waterway Construction (310 and 318 Permits)	Montana Department of Natural Resources and Conservation and Richland County Conservation District
Noxious Weed Control	Sanders County Weed District

1.5. PUBLIC PARTICIPATION

As the lead agency, DEQ is releasing this Final EA to present the findings from its analysis of all environmental consequences arising from potential impacts of the proposed action. The draft EA was published on DEQ's website on June 25, 2018, which began a 30-day public comment period which ended on July 25, 2018. Adjacent landowners and interested persons were sent a copy of the document for review. A public notice was published in the Sanders County Ledger on June 28, 2018.

2. DESCRIPTION OF ALTERNATIVES

2.1. INTRODUCTION

This chapter summarizes alternatives to the proposed plan including the No Action alternative required by MEPA. MEPA requires the evaluation of reasonable alternatives to the Proposed Action. Reasonable MEPA alternatives are those that are: (i) achievable under current technology, (ii) economically feasible as determined solely by the economic viability for similar projects having similar conditions and physical locations, and (iii) determined without regard to the economic strength of the specific project sponsor. Section 75-1-220, MCA, states that unless a project is state sponsored, DEQ review of an existing alternative facility or a modified alternative of the proposed project is not required. Therefore, DEQ only considers alternatives applicable to the proposed facility at the proposed location. The applicant's proposal includes materials and responses provided by discussion during DEQ review of the application.

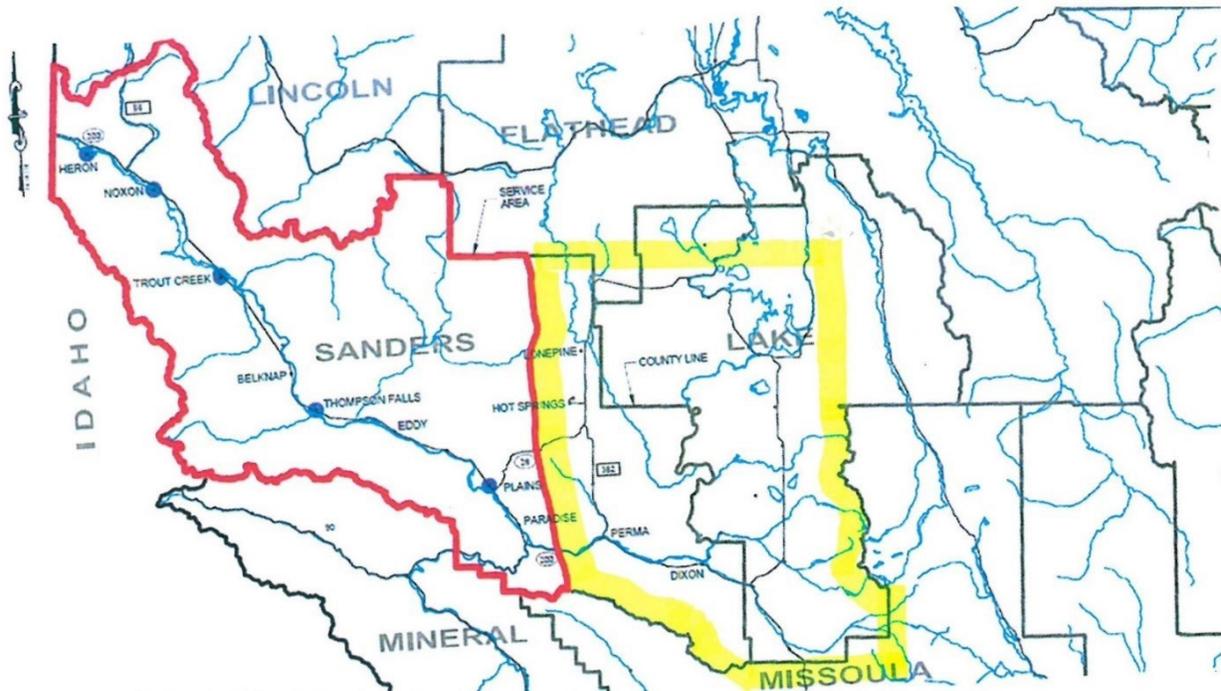
2.2. ALTERNATIVES CONSIDERED BUT DISMISSED

The SC Solid Waste Refuse District (District) includes all of Sanders County outside federal land and the Flathead Indian Reservation. Extending along the border with Idaho in northwest Montana, SC covers a largely timbered mountainous region with a significant portion of public lands. The lower Clark Fork River bisects the County along a corridor where most of the County's population lives in close proximity to the Flathead and Clark Fork Rivers (Figure 1.2). The narrow and scoured lower Clark Fork River valley hosts Pleistocene glacial outwash and lakebed deposits overlain by Holocene alluvial sediments. Ground water aquifers along the valley may be found in isolated zones at depth, but the successful completion of good water supply wells is most consistent when shallow but recent river gravels are tapped as a host reservoir. Potential access to a source of water supply via subsurface extraction wells has strongly influenced the District's choice of viable site alternatives for the new transfer station proposal. The six potential sites first considered for updated waste management system options are all located upon alluvial deposits, but only two identified east of Thompson Falls for the new transfer station site could be reached by an extension of existing water service mains.

Figure 1.2 –Sanders County Sites and Service Area (red) to the west borders the Flathead Indian Reservation (sovereign Confederated Salish-Kootenai Tribes, yellow) that extends into and beyond the remaining county area

(Source: Sanders County License Application, 2018)

NOT TO SCALE



The SC District manages approximately 6,800 tons of solid waste per year largely generated by the primary urban population centers in Sanders County are Plains, Thompson Falls, Trout Creek, Noxon, Heron and Paradise. For the purpose of waste stream projections, it is anticipated that the current service area configuration will remain essentially the same in the near future. The population of Sanders County in 2013 was estimated at 11,463. Approximately 2,164 people (19 percent of the total) live within the Flathead Indian Reservation (Confederated Salish-Kootenai Tribe). The current proposal does not involve service to people located on land within the reservation boundary east of the service area (see eastern segment of the County on Fig. 1.2).

On December 31, 2017, the lease from Thompson Falls Lumber Company expired and the District lost future access to the site where it has operated a transfer station in Thompson Falls since 1994. A study of potential sites available for siting a new transfer station evaluated the characteristics of expanding the existing container sites versus building a new transfer station at one of two sites located north of the airport and between Montana Highway 200 and the railroad tracks. The alternative for developing a local Class II landfill in SC was rejected for the high cost to construct and operate it relative to the small annual tonnage of waste generated in the service area. Expansion and improvement of operations at any of the four existing container sites to solely and fully support all waste transfer operations was eliminated. The two remaining sites north of the airport and railroad are considered prime farmland if irrigated, but the discovery of a consistent source of onsite ground water is questionable beneath these local areas. The first choice (Site A in the District planning options) of the remaining pair of sites under consideration for a new transfer station was located nearby west of the site proposed in this application. Although both sites had good access from Highway 200, the favored site had natural slopes that allowed construction with less fill. But the initially preferred site was eliminated when purchase of the property was not possible. Preference by the District was then shifted to the second viable site option which was purchased for potential development of the new transfer station facility as described below for the proposed action.

2.3. NO ACTION ALTERNATIVE

Under the No Action Alternative, the proposed transfer station would not be approved by DEQ. Therefore, the Facility could not be built by SC and disposal of county waste would continue via the current system of direct haulage to the AWSM landfill in Missoula.

2.4. PROPOSED ACTION

The Proposed Action is licensure of the Class II transfer station. The Proposed Action would construct a solid waste management facility according to the plans shown on Figure 2.1.

2.4.1. TRANSFER STATION DESIGN AND CONSTRUCTION

2.4.1.1. *Transfer Station Features*

The Facility would provide access to six separate waste management areas to conduct waste separation upon delivery to the site:

1. A main building (85x68-ft) to house an upper tipping floor, sunken hopper, and a lower top load transfer trailer tunnel
2. An internal leachate collection system to drain floor of tunnel
3. An outside zee-wall for delivery of MSW into containers by the public

4. One outside container and pit for separate off-loading of scrap metals
5. Two outside pits for stockpiling and burning clean wood debris and green waste
6. A leachate UST for drained liquids
7. An office and maintenance shop building (50x60-ft) with outside equipment storage area

The floor of the trailer tunnel is equipped with a collection system that drains leachate to an external double-walled UST and lift station. The leachate pumped from the UST would be delivered for treatment to the City of Missoula Publicly Owned Treatment Works (POTW). The three pits outside are separated by access ramps and individual storm water management systems. The sloping floor of the pits would be slightly crowned and form a sump at the toe. The office and shop building would be located just south of the transfer station building, adjacent to and facing the tunnel and its access road. The Facility will also require other significant site work including access roads, storm water controls, fencing, landscaping, and utilities. During construction of the Facility, excavated soils would be stockpiled on-site for use in embankments and roads.

All transfer station facility features, and structures would be installed according to DEQ-approved project design plans and Construction Quality Assurance and Construction Quality Control (CQA/CQC) requirements.

The solid waste rules on airport safety require evaluation of a potential bird hazard since the proposed Facility falls within 5,000 feet of the Thompson Falls Airport operating area (AOA). A certified airport biologist evaluated the site to determine that the proposed transfer station would not pose any significant bird hazard risks to the Thompson Falls Airport.

2.4.1.2. Earthwork and Main Building Design

The main transfer station building faces north and would be approached from the gated entrance on the access road heading the south from the Montana Highway 200 (Figure 2.1). The approach to the building climbs up the ramp embankment to the entrance of the building at floor level. The common floor, top-load transfer station building would consist of two levels. The top-level floor (Figure 2.2) accesses the concrete tipping pad (55x75-ft) where waste is delivered and pushed into a hopper through the floor. The second level consists

of a tunnel which accommodates a top load transfer trailer that collects the waste falling through the hopper.

The other building features would consist of the following:

1. Built with structural concrete and steel, metal walls and roof
2. Air venting system and two 16x24-ft overhead doors to main floor
3. A 50x7-ft metal hopper into lower tunnel for loading trailers
4. Armored 12-ft high concrete push walls with 6-ft high terminus
5. Two 16x16-ft and one 14x16-ft overhead doors to recycling area
6. Water and electrical service
7. A scale and leachate drain system in the floor of the lower tunnel
8. A 7-ft high locking gated fence electrified in the lower half

Earthwork would include the stripping of topsoil and surface clays before the placement of up to 18-ft of earthen fill to raise the surface elevation and separate grades for building the tunnel and retaining walls. Drilling and sampling of the near surface alluvium found 10 to 20 feet of gravels overlying loose silts and soft clays. Placement of the fill during construction would consolidate these fine-grained strata several inches. Consequently, the foundation materials should be placed to surcharge the subsurface for three to six months and induce settlement before construction of the concrete slabs and retaining walls. Settlement monuments will monitor settlement plates located at the base of the fill. Structural fill beneath the slab and footers would consist of onsite excavated gravels that are characterized as “not susceptible to frost” effects.

On the east side of the approach ramp, a retaining wall (zee-wall) would provide elevation for public drop-off access to four containers, one for metal. East of the Z-wall containers, two waste storage pits would be excavated to 15-ft depth with a sloping base and 2:1 side slopes. At that level, the base of each pit would not intercept ground water, nor the deeper soft clay stratum, but remain within the alluvium gravels. The two pits are separated by the metal storage pad and the three areas would provide the following maximum capacities for stockpiling clean wood and metal: 1.2-acre north pit (145x350-ft) capacity 32,400 cubic yards; 1.0-acre middle pad (145x350-ft) capacity 17,000 cubic yards; and 0.5-acre south pit (120x210-ft) capacity 14,300 cubic yards.

2.4.1.3. Trailer Tunnel and Leachate Collection System Construction

Construction of the lower transfer trailer tunnel would commence adjacent to the embankment on the south side of the transfer station beneath the overhead tipping floor that overhangs the tunnel pit.

Figure 2.1 – Sanders County Class II Transfer Station Plan
 (Source: Sanders County License Application, 2018)

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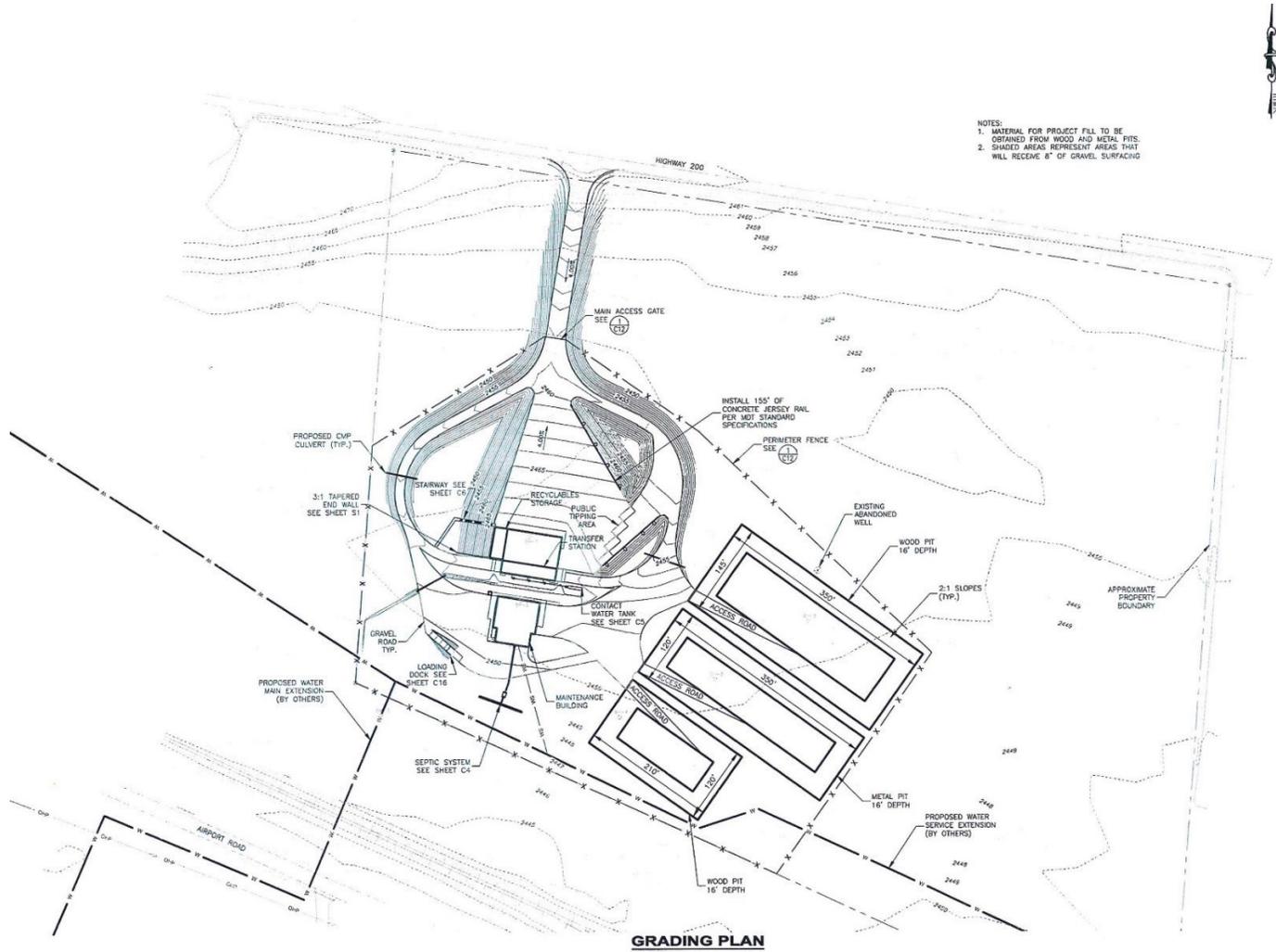
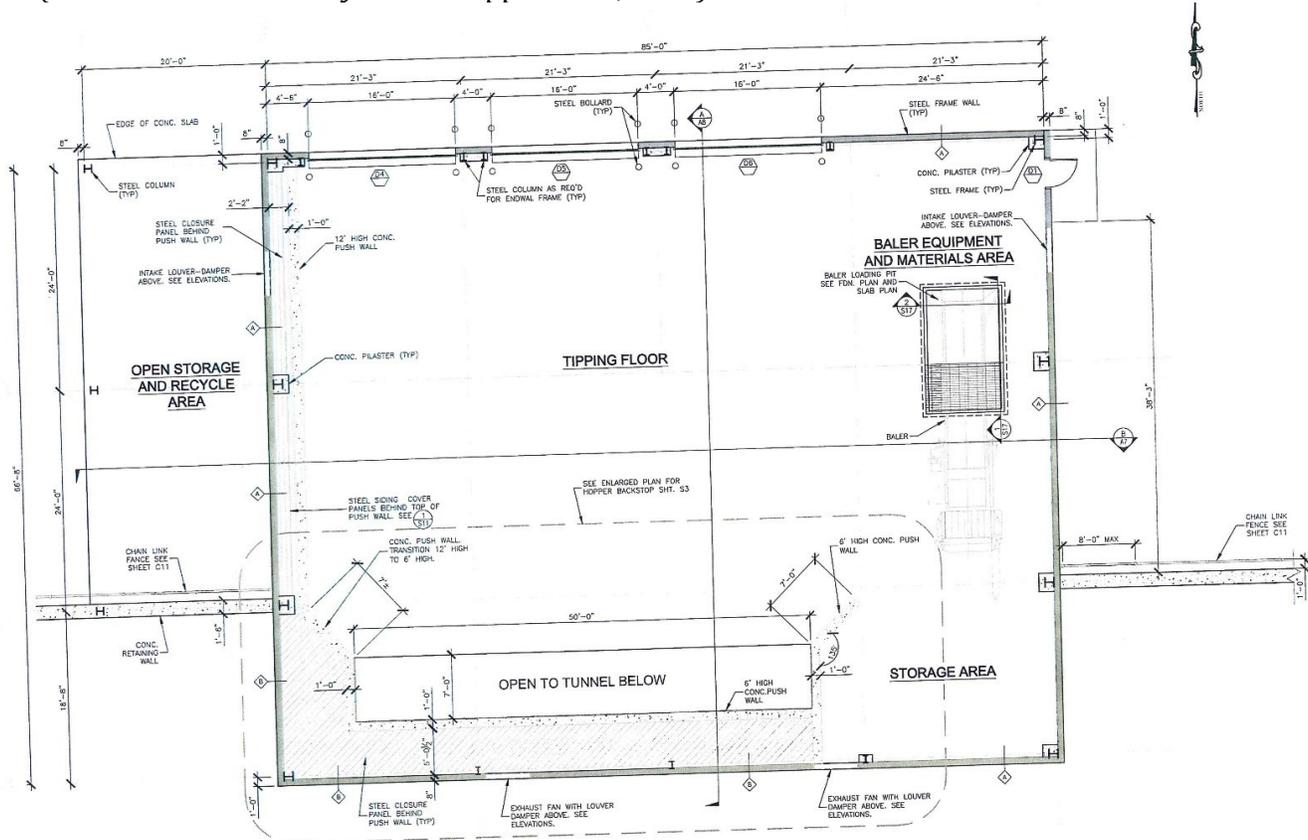


Figure 2.2 – Upper Level Transfer Station Tipping Floor Plan
 (Source: Sanders County License Application, 2018) **NOT TO SCALE**



The lower tunnel and leachate collection system (Figure 2.3) would include the following features:

1. Pass-through entrance road access from both ends of tunnel
2. Two 14x14-ft wide overhead doors
3. Concrete slab that slopes toward leachate collection drains
4. Two 11x20-ft steel deck truck scales (in pits) to weigh trailer loads
5. Two trench drains for scales and one center drain
6. Three buried 6-in PVC pipes that exit leachate floor/pit drains
7. Two standard doors on each end of the south wall
8. Air ventilation system

The floor drain pipes connect by tee into a sleeved 4-inch PVC leachate carrier pipe that slopes eastward to empty into the outside leachate UST (Figure 2.4). The building roof slopes south and drains over the tunnel. Snow guards protect from ice fall and gutters with downspouts drain runoff onto ground to enter a storm water drain system at grade between the south tunnel wall and shop building.

Figure 2.3 – Lower Level Trailer Tunnel and Leachate Collection System Plan
 (Source: Sanders County License Application, 2018)

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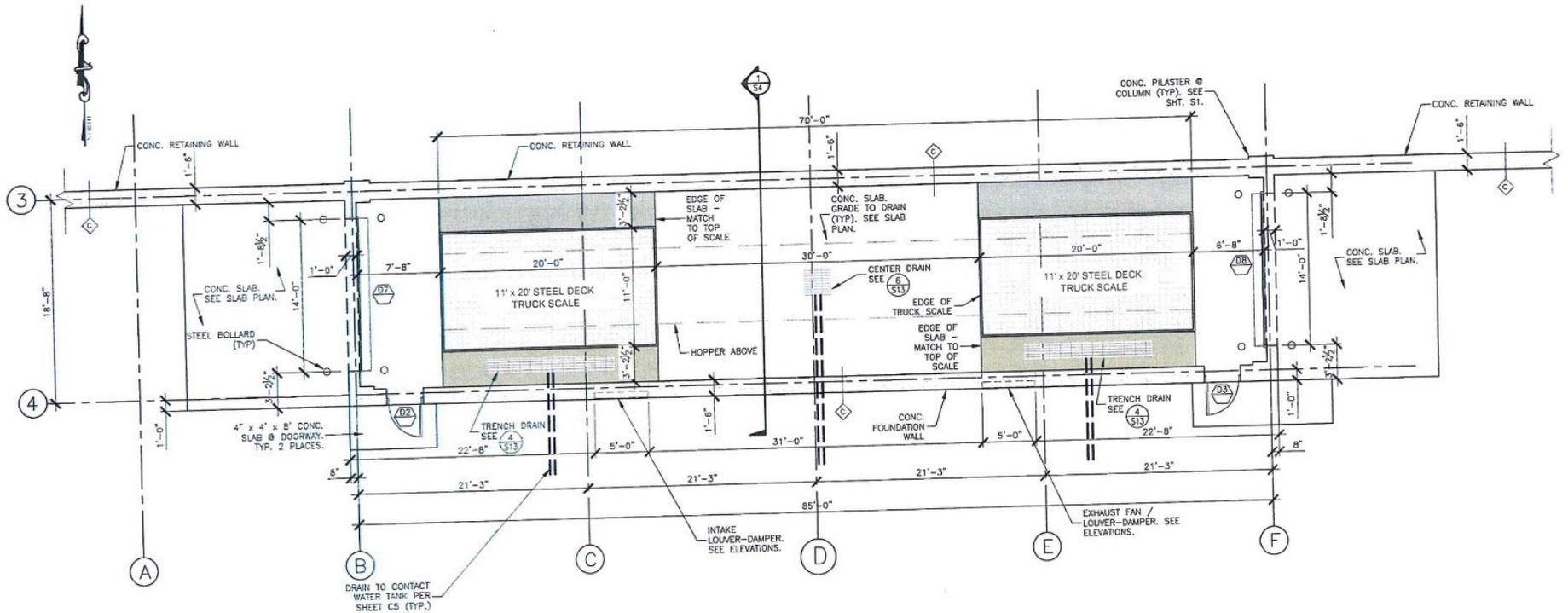
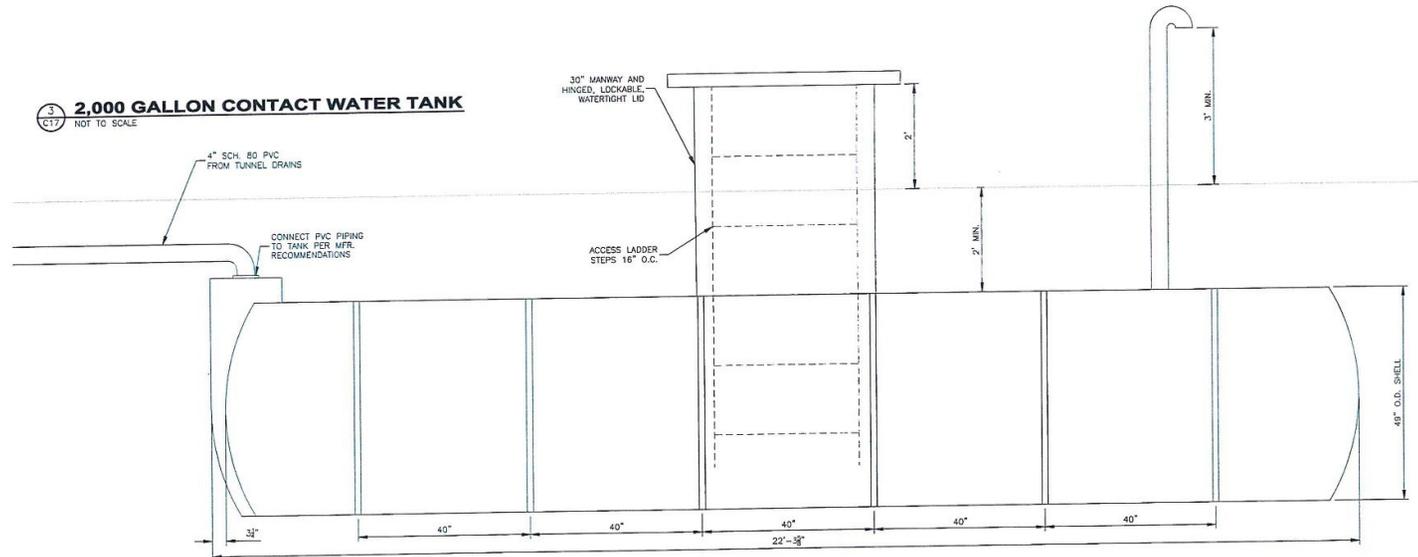
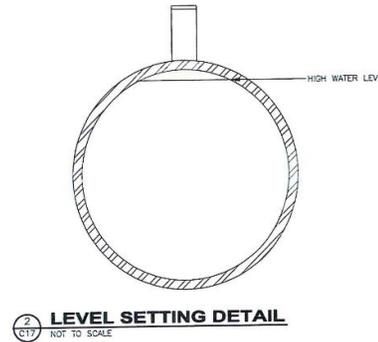
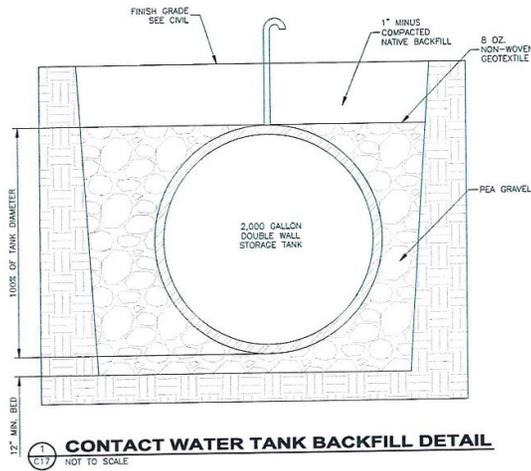


Figure 2.4 – Typical Section – Underground Leachate Storage Tank
 (Source: Sanders County License Application, 2018)

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2.4.1.4. Office and Shop Building

The north facing office and maintenance shop building would be located adjacent to the tunnel on the south-central side of the main transfer building. A heated 58x 60-ft shop building would be constructed to conduct maintenance on trucks, trailers, and containers. The shop building will include an office, restroom, and break room for employees. A pad for parking vehicles, trucks and trailers, and storing containers with other equipment, would be leveled to the south and west of the shop. An outside loading dock and would be installed adjacent to the pad for haulage. Commencement of operations would require the purchase of equipment, at least including at a minimum two top load transfer trailers and a backhoe loader with accessories.

2.4.1.5. Storm Water Controls

The approach ramp is flanked by two raised perimeter roadways that access the facility and surround three basins that capture runoff flowing east and west of the transfer station building. These depressions would act as temporary storm water detention areas that slow runoff from the main transfer station building. The northeast basin would pond water whereas the southeast and west basins are drained by two culverts that route clean storm water beneath both outer access roads for sheet wash to the adjacent areas. The two burn pits would capture storm water flowing eastward and down the pit access ramps. The sloping and crowned floor of each pit would drain to the toe to provide a temporary sump for infiltration of clean storm water. If necessary due to excess ponding during storms, the sump in each pit could be pumped into the northeast retention pond. All 18-in culverts would be constructed of corrugated metal pipe (CMP) to carry the largest anticipated peak flow from each collection basin or building roofs. A large storm water collection channel is located between the trailer tunnel and the shop building to the south and collects runoff from the main building downspouts. The channel exits to an 18-in culvert that drains onto the parking pad located west-southwest of the buildings.

2.4.1.6. Final Closure

The expected life of the facility would be 40 years. Final closure of the Facility would occur when operations ceased and the site would be abandoned. Prior to the commencement of closure activities:

1. The facility would submit an Intent to Close request along with any modifications to the approved closure plan.
2. DEQ will review, request additional information on the modifications or approve the closure request.
3. DEQ will notify the facility that they can commence closure activities.

Upon DEQ approval the final closure activities would commence and would be completed within 180 days.

Closure actions would consist of the following:

- Demolition of buildings and concrete walls
- Disposal of all demolition debris
- Removal of the UST
- Backfill of trenches
- Regrading and revegetation by native species, and at the request of the Montana Fish Wildlife and Parks, the seed mix should not contain clover seed.

Inspection of the site closure and final approval by DEQ would be required.

2.4.2. OPERATIONS AND MAINTENANCE

The proposed SC Transfer Station would be operated by the District personnel and follow a DEQ-approved Operations and Maintenance (O&M) Plan. Current regulations require DEQ approval prior to the commencement of facility operations and the implementation of changes to facility operations. The Facility must comply with applicable requirements of the SWMA and associated administrative rules, including the payment of fees and submittal of an annual application for renewal. Failure to operate the Facility according to these requirements could result in enforcement actions, license revocation, or denial of an application for renewal.

The District staffs, services, operates and maintains solid waste collection roll-off container sites at Plains, Trout Creek, Noxon and Heron. Municipal solid waste collected at these roll-off container sites would be hauled by the District to the Facility. Private haulers would also haul the waste they collect at the curb side to the transfer station. Residents could haul their waste directly to the transfer station z-wall containers. The waste capacity of the Facility for transfer to disposal would be maximum 264 cubic yards contained in the transfer trailer and four roll off containers.

The County transfers waste to the AWSM Class II Landfill in Missoula. Allied Waste Services then charges the District a per ton cost for disposal. The District also collects and diverts recyclables from the waste stream at the container sites and transfer station.

2.4.2.1. Personnel

The following personnel would work at the Facility either full or part time:

1. Four full time truck drivers to haul waste from the container sites and the transfer station. When not driving, the truck drivers assist with transfer station operations and recycling.
2. One full time transfer station employee.
3. Solid Waste Supervisor.

The full-time employee responsibilities would include:

1. Charging out-of-County users
2. Directing users to the proper disposal area
3. Monitoring material types in loads
4. Operating and maintaining the conveyor and baler
5. Pushing wastes into hopper with backhoe
6. Consolidating the waste loads in the transfer trailer
7. Ensuring scrap metal is properly segregated and placed in the container at the z-wall reserved for metals
8. Move the metal container to the metal pit until contractor crushes and hauls metal away
9. Ensure green wastes are properly segregated and placed in the container at the wall reserved for green wastes
10. Moving the green waste container to one of the burn pits until the County conducts a burn
11. Conducting green waste burns according to air permits
12. Processing and storing collected recyclables such as cardboard, newspaper, aluminum, and plastic
13. Baling collected recyclables
14. Picking up wind-blown litter
15. Overall maintenance of containers and other on-site equipment
16. Assisting public users
17. Ensuring that site access is secured during closed hours
18. Other duties as necessary to properly operate the transfer station

The Solid Waste Supervisor's duties would include:

1. Managing employees and overall solid waste operation in accordance with Sanders County, State and Federal requirements
2. Coordination with County support and administrative staff
3. Reporting to County Commission
4. Annual budgeting
5. Recordkeeping
6. Coordination and communication with vendors, suppliers, and contractors
7. Communication with customers
8. Fill-in driver, attendant, and transfer station attendant as needed

2.4.2.2. *Operating Hours*

The proposed Facility would be open to receive wastes Thursday through Saturday from 9:00 a.m. to 5:00 p.m., and Sunday from 1:00 p.m. to 5:00 p.m. Residential and commercial collection vehicles, and roll-off containers from Noxon, Heron, and Trout Creek container sites will dispose of waste on the days that the site is not open to the public. At the discretion of the management, operating hours may change during extreme weather conditions, construction efforts, or other extenuating circumstances.

2.4.2.3. Site Access

The entrance to the facility is a paved access road off Montana Highway 200 approximately 2.5 miles east of Thompson Falls, Montana. The entrance gate is closed and locked during nonoperating hours. Traffic is routed directly to the transfer station building. The attendant will direct small loads of household waste to the z-wall containers. Brush, green waste, and metals will also be directed to the z-wall containers. Empty waste hauling transfer trailers enter the lower bay of the structure from the west and exit to the east. All public roads within the facility are paved. Signs and personnel direct on-site traffic. The traffic exits the site through the entrance gate.

The transfer station would have signs posted which clearly indicate the purpose of each feature inside and outside the building, the hours of operation, and the types of waste accepted, as well as those specifically excluded. At the conclusion of each operating day, the entrance gate would be locked to prohibit vehicle access. Facility personnel would prohibit any unauthorized access and would record all incidences of unauthorized access. An electric fence to prevent bears from accessing garbage in the facility and to keep staff safe from bears that are attracted to the garbage will be constructed around the perimeter of the facility.

2.4.2.4. Transfer Station Equipment

Sanders County would own and operate equipment at the Facility that would handle and process wastes as needed. The District would be responsible for adequately training personnel to operate the equipment.

Equipment used daily at the transfer station facility would include:

1. Extendahoe on a backhoe to push waste into the hopper, consolidate loads in transfer trailers, and handle bulky wastes (green waste and scrap metals)
2. Baler to bale recyclables
3. Forklift to move bales to the storage locations outside building
4. Skid-steer to push waste into the hopper
5. Two semi-truck, 53-foot tractor trailers with walking floors
6. Several 40-cubic yard roll off containers
7. Roll-off trucks

2.4.2.5. Acceptable Wastes

2.4.2.5.1. MSW Wastes

Group II, III, and IV wastes would be accepted for management at the Facility. These wastes will include:

- Putrescible municipal solid waste
- Bulky and commercial waste
- Wood and green waste

- Non-water-soluble solids such as brick; dirt; rock; rebar-free concrete; brush; lumber and vehicle tires as defined in ARM 17.50.503(1)(b)
- General construction and demolition waste
- Asphalt
- Recyclables
- Special waste as defined in ARM 17.50.1115

2.4.2.6. Prohibited Wastes

Waste from unknown origins would not be accepted at the Facility.

The following materials are not to be accepted for transfer or management at the Facility:

- Mercury containing devices
- Hazardous materials
- Hazardous waste
- TENORM waste exceeding 50 picocuries per gram
- Un-rinsed pesticide containers
- Regulated infectious materials
- Septic tank pumpings
- PCB contaminated materials and TSCA wastes
- Liquid wastes

2.4.2.7. Waste Screening and Waste Acceptance Procedures

Loads will be inspected once they are tipped onto the tipping floor. The personnel are trained to inspect loads to ensure unacceptable wastes are rejected, such as liquid wastes, PCBs, infectious wastes, or regulated hazardous wastes. The Facility will notify the DEQ Solid Waste Program if non-approved waste is discovered at the facility. Non-approved waste discovered during the screening will not be accepted at the Facility.

Green wastes include tree limbs, other untreated wood waste and grass clippings. Green wastes and untreated wood waste is placed in the designated containers at the z-wall then moved to the burn pit and stockpiled and burned one to two times a year.

2.4.2.8. Waste Management Procedures

2.4.2.8.1. MSW Handling Procedures

Vehicles would deliver loads through overhead doors and dump all waste directly onto the upper concrete tipping floor where each load is inspected. Dumped waste is pushed by backhoe into a hopper centered above the top-load transfer trailer below in the tunnel on the second level. The waste is consolidated within the trailer with the backhoe boom, the backhoe would also handle MSW, metal, green waste, and bulky waste delivered to the containers or pits outside the building. Semi-truck, tractor trailers would be loaded in the tunnel to transport

collected wastes to the licensed AWSM Missoula landfill for disposal. The trailers are weighed at rest in the tunnel to optimize the tonnage and to assist in distributing the load. Roll-off trucks would be used to move and empty the z-wall containers onto the transfer station tipping floor or into the burn or metal pit.

2.4.2.8.2. *Recyclables and Special Waste (SpW) Procedures*

The District collects, processes and sells recyclables including cardboard, aluminum, paper, plastic, batteries, and metal.

The residents will dispose of their recyclables in the recycle bins located outside of the transfer station building. The Facility operator will tip the recyclables onto the tipping floor in a dedicated space for processing recyclables. The recyclables are separated and placed on a horizontal conveyor that conveys the recyclables into the baler. Bales of material will be placed in the recyclable storage areas. One of the recyclable storage areas is located under a lean-to which will house the baled cardboard and paper.

Scrap metals are placed in a designated container at the z-wall then moved to the metal pit and stockpiled. Once enough metal is stockpiled, the District contracts with a metal recycler to crush the metal and haul it to a metal recycler. The metal is then hauled to a recycler and sold. Metal consists primarily of white goods and other scrap metal wastes. The doors on all refrigerators and freezers must be removed or the doors or latches disabled to prevent child entrapment. County staff are licensed to perform Freon removal from refrigerators, freezers, and air conditioners. The public is charged for this service. SC maintains records for freon removal in compliance with Federal law.

The County manages SpW at the transfer station, however some wastes are not accepted. These materials would be monitored by the site attendant as they come into the site as follows:

1. Asbestos – Rejected at any site or the transfer station. Asbestos generators are required to haul waste directly to a licensed Class II or IV landfill.
2. Tires – Accepted at the sites for special waste fee.
3. Liquid and Hazardous Wastes – screened from the waste stream at the transfer station and container sites to help ensure that bulk liquid and hazardous wastes are not dumped at the transfer station.
4. Used Oil – Collected at the transfer station and container sites for use as a fuel source in several SC facilities.
6. Batteries – Collected and sold.

2.4.2.9. Litter Control

Litter produced by the Facility would be kept to a minimum at all times. Personnel would minimize the amount of blown debris by:

1. Conducting most waste operations inside the main building
2. Checking vehicles for waste before departing the building
3. Perimeter fencing around the site to catch blown litter
4. Collecting windblown debris on a routine basis inside and outside fence
5. Closing transfer station doors at the end of each operating day

The grounds and the access road would be patrolled to collect litter that has escaped the fences. At the end of each working day, all litter that has been collected would be placed into the transfer trailer. In windy conditions, the operator would be prepared to implement measures to keep litter to a minimum. If the operator is unable to keep litter from scattering or becoming airborne, the Facility Manager would halt operations to mitigate litter migration.

2.4.2.10 Vector Control

Facility staff would utilize proper operating procedures in the Facility to prevent favorable conditions for harboring vectors. The site will be protected from bears by a 7-foot high chain-link fence with 5 strands of electric wires along the entire perimeter. The access gate will be closed during non-operating hours. The doors to the transfer station building will be closed and locked during non-operating hours. The site will be graded to reduce ponding of water on site to prevent the attraction of migratory birds and bald eagles to the site as outlined in the bird study. Furthermore, stagnant pools of water and standing water would be eliminated to prevent mosquito breeding. If vectors become a problem, the operator would take the necessary corrective action to eliminate the dangers. Options may include modification of operational procedures, deterrents, or professional assistance.

2.4.2.11 Air Permit and Dust Control

The operator would likely generate minor dust on the paved Facility roads. Vehicle movement in areas outside roads would be sporadic and water could be applied on an as-needed basis. The water would be applied by a water truck at an application rate that would not result in runoff, erosion, or water/waste interaction.

The District would operate two burn pits at the transfer station for clean untreated wood waste. Both are located to the southeast of the transfer station. A proper public notice and notification of County Sanitarian would be done prior to burning. Green waste burns would be regularly conducted during appropriate times according to open burn air permits obtained from

the DEQ Air Quality Bureau (AQB). Burning of clean wood debris and natural branches from trimming or clearing and other such green wastes would not be initiated without a permit. Green wastes include tree limbs, other untreated wood waste and grass clippings. Green wastes and untreated wood waste is placed in the designated containers at the z-wall then moved to the burn pit and stockpiled and burned one to two times a year. The District would operate two burn pits at the transfer station for clean untreated wood waste. Both are located to the southeast of the transfer station. A proper public notice and notification of County Sanitarian would be done prior to burning.

2.4.2.12 *Onsite Traffic Control*

The design of the onsite roadways would allow for two-way traffic and accommodate the physical and performance characteristics of an interstate semitrailer design vehicle type used for the transfer trailers. The access road from Montana Highway 200 to the Facility gate and all onsite roads would be asphalt paved to reduce dust generated from waste management activities.

2.4.2.13 *Leachate Collection and Control System Management and Maintenance*

Weak leachate would be generated at the main building from, moist solid wastes during trailer loading operations, wash-down of the tipping floor, and drainage from the loaded trailer in the tunnel. The Facility features leachate collection sumps, drains, and conveyance pipes, to collect and convey leachate to the onsite UST in accordance with the engineering report and license application drawings. The leachate collection system would be routinely inspected and tested for proper operation. Any components of the leachate collection system that fail to operate properly would be repaired or replaced as soon as possible. The leak detection zone of the dual-wall pipe and UST would be regularly inspected for leaks, and any leaks noted would be documented and assessed for repair as soon as possible. Leachate levels in the UST would be regularly monitored and recorded. Leachate would be pumped from the UST before the “high water alarm” is triggered. The Facility would test the leachate and obtain permission for disposal from the receiving entity (e.g. treatment at the Missoula POTW) prior to transportation for offsite disposal.

2.4.2.14 *Storm Water Control*

The overall Facility would feature various storm water structures, including collection channels, culverts, and basins, to collect and convey storm water. One storm water pond would be constructed on the northeast flank of the main building to retain storm water for sediment control. The two other detention basins would temporarily collect runoff before it exits through culverts conveying storm water by sheet flow onto nearly flat adjacent areas. Storm water runoff would be managed using standard Best Management

Practices (BMP's). The storm water BMP's include berms and swales to divert and prevent storm water runoff from eroding loose soils and transporting it to state waters offsite. These features would be constructed according to the Facility Storm Water Pollution Prevention Plan (SWPPP).

Upon licensing and before operations approval, the facility would apply to the DEQ Water Protection Bureau for determination of the need for a general industrial storm water discharge permit (*i.e.* Montana Pollutant Discharge Elimination System or MPDES). Erosion would be identified and repaired as soon as possible after the storm. Storm water BMP's damaged or disturbed would be repaired or replaced.

2.4.2.15 Erosion control

The Facility would implement short-term and long-term erosion control to prevent degradation of the constructed grades and sedimentation of storm water. Prior to construction an MPDES Construction Permit obtained. A Construction SWPPP would be prepared. The SWPPP would specifically address erosion control from long slope construction as well as other areas of the site.

Areas of final constructed grade would be seeded to establish vegetation and would be contoured for positive drainage so that surface runoff would be routed away from the active waste management area. Routine visual inspection would be used to assess the condition of the vegetation. Seeded areas that fail to establish dense cover would be reseeded.

2.4.2.16 Fire control

Fire control consists of prevention and protection. Facility personnel would be alert for any indication that a load may be smoldering or about to ignite. If a smoking or smoldering load is observed at or on the Facility, the waste would immediately be pushed away from the active floor and isolated as much as possible. The suspected load would not be incorporated into the load until the fire is confirmed to be extinguished for a length of time. If a smoking or smoldering load is found in the containers at the z-wall or in the pits, water or fire extinguishers would be applied immediately. The Thompson Falls Rural Fire Station will provide fire protection services. Each operating piece of equipment on-site and all collection vehicles are equipped with fire extinguishers. Fire extinguishers will also be in all buildings on site.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES BY RESOURCE

3.1 INTRODUCTION

Section 3 describes resources that could be affected by the Proposed Action and discusses the environmental effects of the Proposed Action and the No Active Alternative.

3.2 LOCATION DESCRIPTION AND STUDY AREA

The project location and associated study area for the Proposed Action include all lands and resources in the proposed Project Area, plus those additional areas identified by technical disciplines as "resource analysis areas" that are at least within one mile beyond the Project Area. Resource analysis areas are identified for each technical discipline.

3.3 TERRESTRIAL AND AQUATIC LIFE AND HABITATS

3.3.1 ANALYSIS AREA AND METHODS

The analysis area for wildlife is the proposed license boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. The analysis methods included DEQ's research of the Montana Natural Resource Heritage Program (MNRHP) database to determine the presence of threatened, listed, and/or endangered plant and animal species. The MNRHP Montana Bird Distribution database provides information on the distribution and seasonal occurrence for each bird species in Montana. The database is a cooperative project of Montana Audubon, MNRHP, the Montana Department of Fish, Wildlife & Parks (FWP), and the Montana Bird Records Committee and provides locational information on the presence of threatened, endangered, or special status species of concern in any given area. MNRHP is the state's source for information on the status and distribution of native animals and plants, emphasizing species of concern and important habitats such as wetlands. MNRHP collects, validates, and distributes information to assist natural resource managers and others in applying this information effectively. In addition to DEQ's review of the MNRHP database, FWP provided additional information on Montana species of concern, or listed or proposed for listing under the Endangered Species Act (ESA).

3.3.2 AFFECTED ENVIRONMENT

The proposed SC Facility is considered prime farmland located in the Rocky Mountain Lower Montane, foothill, and valley dominated by relatively high vegetative cover and low shrub cover on fine textured soils. The vegetation is dominated by either Idaho fescue or bluebunch wheatgrass communities. The habitat is home to a wide range of mammals, from small shrews and mice to elk, sheep, deer and bear. Bird species include numerous songbirds and birds of prey, including larks, buntings, swallows, bluebirds, owls, hawks and eagles. Amphibious species are less abundant due to the generally dry conditions at the proposed transfer station property. The nearby Clark Fork River has rainbow, brown and cutthroat trout, sculpins, whitefish and, downstream toward Noxon and Heron, a few warm-water species. The property proposed for the Thompson Falls transfer station does maintain some relatively undisturbed habitat, consisting of open Ponderosa pine forest. The understory is typical of western Montana, but has suffered from invasive weeds.

The site does not fall within any floodplains, according to the Federal Emergency Management Act (FEMA) flood insurance rate maps. Nor does it fall within any mapped wetlands according to the Montana Natural Heritage Program.

The proposed 30-acre project area is not located within a Sage Grouse core, general habitat, or a connectivity area. A search of the Montana Natural Heritage Program found records for the study area of two threatened species (Table 3.1). FWP provided a fish species of concern for the Clark Fork River near or downstream of the project area and a bird species (Table 3.2). A search of the U.S. Fish and Wildlife Service (USFWS) listing of endangered, threatened, proposed, and candidate species in Montana, revealed the presence of one candidate species and listed as critical (Table 3.3). The Montana USFWS program is not aware of any documented bald eagle or golden eagle territories or active nests within one mile of the proposed site.

Table 3.1 – Montana Natural Heritage Program Threatened Animal Species

(Accessed May-June 2018)

Species Subgroup	Scientific Name	Common Name	Family Scientific Name	Family Common Name
Mammals (Mammalia)	Ursus arctos	Grizzly Bear	Ursidae	Bears
Fish(Actinopterygii)	Salvelinus confluentus	Bull trout	Salmonidae	Trout

Table 3.2 – Additional Sensitive Species of Concern provided by FWP (2015)

Species Subgroup	Scientific Name	Common Name	Family Scientific Name	Family Common Name
Birds(Aves)	Histrionicus histrionicus	Swans/Geese/Duck	Anatidae	Harlequin Duck
Fish(Actinopterygii)	Onocoryhynchus clarkii lewisi	Westslope Cutthroat Trout	Salmonidae	Fish

Table 3.3 - U.S. Fish and Wildlife Service Endangered, Threatened, Proposed and Candidate Species Montana Counties *(From U.S. Fish and Wildlife Service February 2018)*

Scientific Name	Common Name	Status*
Salvelinus confluentus	Bull Trout	LT, CH
Haliaeetus leucocephalus	Bald Eagle	SS

*LE=Listed as Endangered, LT=Listed Threatened, C=Candidate species for listing, P=Proposed, CH=Designated as Critical Habitat, SS=Special Status

3.3.3 ENVIRONMENTAL CONSEQUENCES

3.3.3.1 No Action Alternative

Under this alternative, the site would not be developed, and there would be no additional impacts to terrestrial and aquatic life and habitats.

3.3.3.2 *Proposed Action*

The applicant's consultants sent letters to all relevant agencies (listed below) for proposed project impacts. **Responding agencies included in Bold:**

- **US Department of Interior Fish Wildlife Service (USFWS)**
- **Montana Fish Wildlife & Parks (FWP) Region 1**
- **Montana Department of Transportation**
- Montana Department of Commerce, Census and Economic Improvements
- Montana Department of Labor and Industry
- Montana Department of Natural Resources and Conservation
- **Montana State Historic Preservation Office**
- US Environmental Protection Agency
- US Forest Service Region 1
- US Army Corps of Engineers
- **US Department of Agriculture**
- **Sanders County Floodplain Administrator**
- **Federal Aviation Administration (FAA)**
- **Montana Sage Grouse Habitat Conservation Program**

3.3.3.2.1 *Greater Sage Grouse*

The entirety of the project area is not in core or designated general sage grouse habitat. Core Areas are areas of highest conservation value for sage grouse. FWP estimates the Core Areas include approximately 76% of the displaying males in Montana, as of 2013.

Construction and operation of the proposed project would not reduce or degrade potential foraging or nesting habitat for greater sage grouse within the project area since no potential habitat exists.

Suitable habitat for the sage grouse is not present within the project area or surroundings. No direct or secondary impacts would occur to this species because of the proposed project. Therefore, the proposed project would have no effect on the greater sage grouse.

3.3.3.2.2 *Grizzly Bear*

In 1975, the USFWS listed the grizzly bear as a threatened species in the lower 48 states under the ESA. There are five areas where grizzlies remain today, Yellowstone ecosystem, Northern Continental Divide ecosystem, Cabinet-Yaak ecosystem, Selkirk ecosystem, and Northern Cascades ecosystem. The proposed site is several miles to the south of the southern border of the Cabinet-Yaak ecosystem. The grizzly bear population in this ecosystem is estimated to be approximately 50 individuals. Active research began in the Cabinet-Yaak recovery zone

in 1983 when one bear was captured and radio collared. The Cabinet–Yaak ecosystem encompasses the Yaak River drainage and the Cabinet Mountains. The ecosystem is bisected by the Kootenai River, with the Cabinet Mountains to the south and the Yaak River area to the north. Approximately 90% of the study area is on public land administered by the Kootenai and Panhandle National Forests. The Cabinet Mountains Wilderness Area encompasses part of the study area at higher elevations of the Cabinet Mountains.

The proposed project area has been partially impacted by small-scale agricultural pursuits. However, that property is not currently in production for any crop and is not currently used for livestock grazing. Since the project area is along established access roads, and between the highway and railroad and near an operating gravel pit, airport and other commercial activities, this species is unlikely to use this area for foraging habitat. Specifically, noise, airport flights and vehicle and railroad traffic may cause this species to avoid the project area and immediate surroundings, and instead use the management area and mountains to the north. There is known habitat to the north, directly cross Highway 200 from proposed site in the Mount Silcox Wildlife management area.

Construction and operation of the proposed project would not reduce or degrade potential foraging habitat for the Grizzly Bear within the project area. Since the site is located adjacent to the Cabinet Grizzly Bear ecosystem (Mount Silcox Wildlife management area), FWP advises that the site be fully fenced, gated and electrified. The District has committed to install the gates and fencing as FWP recommended.

3.3.3.2.3 Bull Trout

The USFWS has revised the 2005 critical habitat designation for bull trout, a threatened species protected under the ESA. The range of the bull trout includes Montana, Idaho, Oregon, Washington, and Nevada.

In Montana, the USFWS designated as critical habitat approximately 3,056 stream miles and approximately 221,471 acres of lakes or reservoirs in Deer Lodge, Flathead, Glacier, Granite, Lake, Lewis and Clark, Lincoln, Mineral, Missoula, Powell, Ravalli, and Sanders Counties.

Under the ESA, critical habitat is defined as a specific geographic area that is essential for the conservation of a threatened or endangered species and that may require special management considerations or protection. A critical habitat designation does not affect land ownership or set up a preserve or refuge and only applies to situations where federal funding, permitting, or land is involved.

The proposed project would be located entirely on an open Scattered Ponderosa pine forest habitat. The south property line of the site is approximately 3500 feet from the Clark fork river.

Since the site is on land, and approximately 3500 feet north of the Clark Fork river, no impacts to either surface water or ground are expected and there is no suitable habitat present within the areas disturbed by licensure of the project area that would affect the Bull Trout.

3.3.3.2.4 *Transient Wildlife Populations*

Transient wildlife populations, including whitetail deer, mule deer, many bird species, and bears occupy the habitat within and surrounding the proposed facility boundary. Transient, by definition, means “lasting only for a short time”, or “impermanent”. These species exhibit transient behavior, relocating regularly and rarely remaining in one area for long periods of time. Construction and operation of the proposed facility would cause transient populations to relocate to habitats surrounding the proposed facility boundary. Furthermore, the onsite potential for impoundment of storm water is temporary, because it would likely require spring melting or spring runoff. The residence time for such collection is the three basins (section 3.4.3.2.1) would be brief largely due to the rapid infiltration into the underlying onsite soils (section 3.5). The conditions lack the consistent environment that might harbor migratory aquatic species of birds like the Harlequin duck or others. The Harlequin duck was not noted onsite in the study conducted to assess airport hazards as impacted by the risk of bird strikes. However, considering the vast amount of similar habitat surrounding the proposed facility boundary, the impacts anticipated for these species are negligible. The proposed project would not add to the cumulative effects of these species.

3.3.3.2.5 *Airport Wildlife Hazard Assessment*

In response to a letter from the applicant’s consultant, the Federal Aviation Administration requested an assessment of the proposed site by the Montana USFWS, to determine what wildlife hazards might exist and what actions can be taken to mitigate these hazards. The Thompson Falls airport does not sell Jet-A fuel and generally would not accommodate any turbine powered aircraft. The 136- acre airport sees piston powered aircraft on a regular basis and has storage for these types of aircraft. The average flights per day is 3 over the course of the year, with more during the summer.

A certified airport biologist was sent to the site to evaluate any potential of risks the proposed Facility would pose to the Thompson

Falls airport, since the Facility falls with-in the 5,000-foot AOA. A one day assessment was conducted on June 1, 2017, from sunrise to sunset and included the existing transfer station, the proposed site and surrounding areas out 5,000 feet to cover the AOA. The timing of the survey, during spring migration, provided opportunities to view wildlife of all types. Each species was identified and number of each observed. Throughout the day 18 wildlife species were observed either at the existing transfer station or at the proposed site, or out 5,000 feet. Of these 18 species, only 8 species were found at the existing transfer station. The 8-species found at the existing site were all bird species. Two of 8 were insectivorous or grainvorous species that feed on insects and seeds. Only one bird species was found at the proposed site and 17 animal species were found off the site, but within 5,000 feet of the existing transfer station. Seventeen of the 18 species were birds except for one mammal, a whitetail deer. Of the 17-bird species, only 3 were scavenging birds that could be attracted to odors and garbage. The Montana USFWS program was contacted and is not aware of any documented bald eagle or golden eagle territories or active nests within one mile of the proposed site.

The conclusion from the USFWS assessment was that the proposed transfer station is not located within the airport Runway Protection Zone and should not pose any more of a wildlife attractant than any other business and facilities nearby. The Montana USFWS program supports the design and construction of the proposed facility.

3.4 HYDROLOGY

3.4.1 ANALYSIS AREA AND METHODS

The analysis area for hydrology is the proposed licensed boundary of the 30-acre proposed transfer station site and one mile radius from the surrounding perimeter. Some discussion of regional geology, based upon published reports, is also provided herein. The analysis methods for hydrology included reviewing wetlands and jurisdictional waters information, on-site drilling reports, publications of the Montana Bureau of Mines and Geology, and published topographic maps of the area.

Table 3.4-Species observed from the USFWS Airport Hazard Assessment

***=Scavenging species**

Species	Location: E=existing O=Off site P=Proposed	Loafing	Flying	Nesting	Feeding	Number
American Robin	E O	X	X X			3 2
Bald Eagle	O	X				1
Brewer's Blackbird	E O	X	X X		X	3 12
Canada Geese	O	X			X	15
Common Raven*	E O		X X			1 9
European Starlings*	E O		X X		X	4 20
Golden Eagle	O	X				1
House Sparrow	E O	X	X			3 8
Killdeer	E O	X			X	1
Mallard Duck	O		X			2
Meadow Lark	E				X	1
Osprey	O	X				2
Red-Tail Hawk	O	X				1
Red-Wing Blackbird	O		X			1
Tree Swallow	E O		X X		X X	10 10
Turkey Vulture*	O		X			13
Wild Turkey	O P				X X	5 1
White-tailed Deer	O				X	8

3.4.2 AFFECTED ENVIRONMENT

3.4.2.1 Surface Water

The proposed District transfer station facility is 3500 feet north of the Clark Fork river and is not located within the lower Clark Fork flood plain according to the Federal Emergency Management Agency Flood Insurance Rate Maps. The MNRH Program mapping service does not show any mapped wetlands within the boundaries of the proposed SC transfer station. Topography of the area is characterized by narrow floodplains and the steep rising mountain flanks of the Cabinet mountains to the north and the Coeur D Alene mountains to the south. Surface elevations at the site range from approximately 2,447 at the south property boundary to 2,470 feet above mean sea level at the northwest corner.

Surface water at the proposed site drains primarily towards the west and south from the proposed facility toward the railroad tracks to the south of the site. The railroad tracks are on a raised grade and prevent any flow from

the site directly into the Clark Fork River. Storm water Best Management Practices (BMP's) will be in place for the construction phase of the facility. Storm water controls for the facility once in operation are described in the section 2.4

3.4.2.2 Ground Water

Ground water in the lower Clark Fork River basin is generally found in either bedrock aquifers associated with older metasedimentary rock or within alluvial/fluvial deposits proximal to surface water. Production rates vary widely, from a few gallons per minute (gpm) to 700 gpm. A water supply source will be required for the proposed SC transfer station. The Facility will likely be supplied by extending a water main to the south from the Thompson Falls water system for water and general maintenance uses. A search of the Montana Bureau of Mines and Geology Ground Water Information Center database indicates there are 153 water-supply wells within a one mile radius of the proposed District project site.

3.4.3 ENVIRONMENTAL CONSEQUENCES

3.4.3.1 No Action Alternative

Under this alternative, there would be no impacts to site surface water or ground water because the site would not be developed.

3.4.3.2 Proposed Action

3.4.3.2.1 Surface Water

Storm water is water that originates during precipitation events and snow and ice melt. Storm water can soak into the ground, be held on the surface to evaporate, or run off towards downstream surface water bodies. Surface water flow may occur at the proposed site when water generated by rain or snowfall, melting of accumulated snow, flows freely over the land surface into the drainages. Surface water flow may occur over bare rock or ice, when the soil is saturated, and its holding capacity is exceeded, when precipitation falls more quickly than the soil can absorb it, or more typically, when a combination of these conditions exists. Storm water runoff can cause erosion and may transport sediments some distance from their source depending upon the intensity of the runoff, vegetative cover, soil characteristics, and topography.

There is an intermittent stream, Ashley Creek, that runs directly adjacent to the east property line of the site. A site visit on was made on May 18, 2018, by the SWP engineer and hydrogeologist. During the month of May the Clark Fork River had been at major flood stage. There was major snow melt and precipitation events prior to the visit. However, there was no water observed, nor any evidence of water having been in this stream.

SC would be required to obtain a General Construction Storm Water Permit from DEQ's Water Protection Bureau prior to any construction activities. The general storm water discharge permit coverage is for construction activities that include clearing, grading, grubbing, excavation, or other earth disturbing activities that disturb one or more acres and discharge storm water to state surface waters. Conditions of the general permit require the Facility to implement BMP's to control sediment and erosion during construction activities, washing off-road equipment prior to entering the construction site. Seeding will be done with a native seed mixture, and mulching and fertilizing of disturbed areas to reduce weed establishment and prevent erosion will be required. Storm water BMP's are control measures used to manage changes in the quality and quantity of storm water runoff. BMP's are designed to reduce the volume, peak flows, and/or quality of storm water through evaporation, infiltration, detention, and filtration.

The storm water control system for the proposed SC transfer station is designed to enhance the existing natural drainage patterns of the site. The design includes general site grading to divert the flow around the transfer station building and access roads to three drainage culverts and to three detention ponds on the east and west sides of the approach ramp to the public tipping area.

As designed, the storm water sediment retention ponds would contain any expected storm water runoff generated by an intense rainfall or snowmelt event, allowing any suspended sediment to settle in the ponds. No discharge from the storm water ponds is anticipated.

The storm water dissipation features would reduce the velocity of the natural runoff to prevent the further erosion. The three pits, two for wood waste and one for scrap metal will collect storm water. DEQ will require that the District use the upper slope of each pit for material storage, to create a sump at the lowest elevation of the pit. This will allow storm water to collect at the lowest elevation of the pit to either evaporate, infiltrate, or be pumped to the storm water ponds, if accumulation of the storm water is too great. No impacts are expected by the storage of this material in the pits, since all precipitation would rapidly drain away from the stockpiled wood and metal. Periodic sampling of storm water in the sumps will be required if any sheen is visible. Any exceedance of benchmark pollutants would result in pumping of the sump liquids to the onsite leachate tank for later removal. Therefore, DEQ expects no impacts to surface water in the project area should the transfer station be built.

3.4.3.2.2 Ground Water

No environmental consequences are anticipated for any aspect of the project as it relates to ground water. The District drilled a well to explore a water supply for the transfer station, the well was dry. SC is considering extending a water main from town, which terminates to the south of the site, for water service to the transfer station. The facility will have storm water run-off controls, as described in the surface water section. Any liquid spillage including leachate or water would be collected within the transfer station building by floor drains in the main tipping floor area and loading pit for the transfer trailers. The liquids would then be piped into a 2000 gallon UST. Site personnel would periodically inspect the UST as part of the operation and maintenance plan. This will be pumped on an as needed basis. In the case of a spill outside of the contained area, the Facility Operation and Maintenance plan states that the operator would immediately restrict access to the area until the situation is under control. The operator will immediately notify the SWP supervisor. Then contact a reputable, licensed firm that handle such spills. These contacts will be available at the Facility for this type of emergency. Because of the lack of ground water, the tank system, an immediate clean-up plan that would not allow spills to infiltrate to ground water, DEQ expects no impacts to ground water in the project area should the transfer station be built.

3.5 GEOLOGY AND SOILS

3.5.1 ANALYSIS AREA AND METHODS

The analysis area for geology is the proposed licensed boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. A discussion of regional geology, based upon published reports, is also provided herein. The analysis methods for geology included reviewing on-site drilling information, publications of the Montana Bureau of Mines and Geology, the U.S. Geological Survey, and the U.S. Department of Agriculture's Natural Resource Conservation Service (USDA-NRCS), along with the associated geology and soil maps and drawings.

3.5.2 AFFECTED ENVIRONMENT

The proposed District transfer station facility project site is situated within the Clark Fork River Valley, as described in the surface water section.

Regionally, the bedrock along the Clark Fork and Flathead River valleys between Ravalli and the Idaho boundary formed during the Precambrian era and is mostly sedimentary Belt formations. Much of the rock is of the Prichard formation. Glacial Lake Missoula was created about 15,000 years ago by an ice dam and covered much of the Clark Fork River valley as well as land to the east. The entire flow of the Clark Fork River backed up behind the dam and the glacial lake reached an elevation of about 4,350 feet. When the ice dam failed, Glacial Lake Missoula emptied through

the Clark Fork Valley in just a few days, releasing the greatest flood of known geologic record. This process occurred repeatedly, each time resulting in colossal floods. The passage of the torrents of water during the flooding scoured the narrow stretches of the valley, especially between Perma and Plains and several miles east of Thompson Falls. Exposed bedrock and sedimentary deposits provide evidence of the long - ago rushing floodwaters through the valley, as do ripple marks in Camas Prairie.

The soils associated with the stream terrace alluvium are typically gravelly loam and silty-loam soils and are excessively to well drained. The natural soils at the proposed District project site are dominated by the Bigarm gravelly loam, which makes up 66.7 percent of the site soils. Followed by the Grantsdale silt loam, which makes up 25.4 percent of the soils at the site. Minor occurrences of Sacheen loamy fine sand, and the Yellowbay gravelly loam are also present. Table 3.4, provides a summary of the soil properties for the major soils identified at the proposed District project site. Figure 3.3 shows the areal distribution of on-site soils. These soils were developed from stream terrace alluvium.

3.5.1 ENVIRONMENTAL CONSEQUENCES

3.5.1.1 *No Action Alternative*

Under this alternative, there would be no additional impacts to site geology and soils, because the site would not be developed,

3.5.1.2 *Proposed Action*

The site would need additional fill to develop the berm for the raised approach to the public tipping area and for the building to be elevated to accommodate the tunnel for the top load trailers. Additionally, general site grading would be necessary to construct roads, facilitate the storm water control features and excavate and construct the pits for metals recycling and wood waste.

Six exploratory soil borings were performed during the geotechnical site investigation conducted in November 2017.

The six soil borings were drilled using hollow stem augers methods.

Table 3.4: Summary of Major Soil Properties
 (Source: USDA-NRCS, Web Soil Survey, Sanders County, Montana)

Soil Type	Map Key	Depth profile	Drainage	Permeability	Available Water Capacity
Grantsdale silt loam	1A	0 to 7 inches: silt loam 7 to 14 inches: silt loam 14 to 27 inches: silt loam 27 to 60 inches: very gravelly loamy sand	Well Drained	Moderately High to High	Low
Sacheen loamy fine sand	41C	0 to 8 inches: loamy fine sand 8 to 60 inches: fine sand	Somewhat excessively Drained	Very High	Moderate
Yellowbay gravelly loam	54C	0 to 1 inches: slightly decomposed plant material 1 to 3 inches: gravelly loam 3 to 18 inches: very gravelly sandy loam 18 to 60 inches: extremely gravelly loamy sand	Excessively Drained	High	Very low
Bigarm gravelly loam	350B	0 to 12 inches: gravelly loam 12 to 38 inches: very gravelly loam 38 to 60 inches: extremely gravelly sandy loam	Somewhat excessively Drained	High	Low

Two of the samples were collected during the site investigation were submitted for geotechnical laboratory testing for grain size distribution. The results confirmed the USDA-NRCS, Web Soil Survey information for the first five feet at the site, which revealed clayey sands, silty gravels and occasional cobbles. This is typical of alluvial deposits which can vary greatly due to the fluvial/alluvial depositional environment. Ground water was encountered at depths of approximately 18 feet below ground level. This is a perched ground water aquifer and occurred at or above a lean clay layer. Since the water level observation were made during the drilling of the borings in a relatively short time frame, no long-term fluctuations can be accounted for. This study was conducted strictly for the purposes of the engineering structural design of the transfer station and not for environmental assessment.

There will be minor impacts to geology and soils due to some soil exposure by the cut and removal of topsoil and excavation of soils for the building footprint. Also excavation of soil for the construction of the three earthen pits for wood mulching, metal recycling materials, and for a wood burn pit; and from general grading and cuts for roads, storm water features and sloping for the ramp to the transfer station tipping area. Because these soils are well drained and there will be storm water BMPs in place minimizing erosion, construction and operation of the proposed Facility would only result in minimal erosion of soils during the construction phase of the project.

Figure 3.3: Map of the soil types in the proposed facility area (approximate facility boundary outlined in blue)

(Source: U.S. Department of Agriculture, Natural Resource Conservation Service)



3.6 VEGETATION

3.6.1 ANALYSIS AREA AND METHODS

The analysis area for vegetation is the Rocky Mountain Mesic Montane Mixed Conifer Forest, including the proposed licensed boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. These forests are common in extreme northwestern Montana and extend eastward to the Continental Divide in the Lake McDonald drainage of Glacier National Park. Isolated stands of western hemlock occur in the Swan Valley but are found most commonly in the Libby and Thompson Falls vicinities west to the Idaho border. The analysis method for vegetation consisted of published reports from the MNRH Program, the U.S. EPA, U.S. Fish and Wildlife Service and Sanders County.

3.6.2 AFFECTED ENVIRONMENT

The common native species in the Rocky Mountain Mesic Montane Mixed Conifer Forest are generally dominated by western hemlock, western red cedar, and grand fir. Disturbed sites can and occasionally do return directly to dominance by the climax tree species, but other stands are often a mixture of the climax species with seral tree species such as Douglas-fir, western white pine, lodgepole pine, western larch and paper birch. Engelmann spruce and subalpine fir may be present on the coldest sites, and ponderosa pine may be present on the warmest and driest sites.

Common shrubs include mountain boxwood, thinleaf alder, Rocky Mountain maple, birch leaf spiraea, common snowberry, bunchberry dogwood, thimbleberry, rusty leaf menziesia, and mountain huckleberry. Pacific yew can occur in a tree form in the understory on some occurrences in westernmost Montana.

Composition of the herbaceous layer reflects local climate and degree of canopy closure; it is typically highly diverse in all but closed-canopy conditions. Queen's cup beadleily, western foamflower, pioneer violet, Canadian white violet, dark woods violet and beargrass are the most common forbs in these forests. Other forbs include baneberry, pathfinder, false sarsaparilla, lanceleafarnica, fragrant bedstraw, rattlesnake plantain orchid, twinflower, liverleaf wintergreen and western trillium in extreme northwestern Montana, wild ginger is a component on mesic sites with a mild temperature regime.

Ferns and fern allies also form an important component of the understory and are indicative of the most mesic sites. Species include American ladyfern, western swordfern, male fern, oak fern and horsetails (*Equisetum* species). Bracken fern can occur in relatively high coverage (20% or greater) in mature stands, however it can form dense (up to 100%) cover in early seral stands, retarding forest regeneration. Graminoids may be absent or form a very minor component, and may include forest brome, fringed brome, Geyer's sedge, pinegrass, blue wildrye, and rough leaf ricegrass.

3.6.3 ENVIRONMENTAL CONSEQUENCES

3.6.3.1 *No Action Alternative*

Under this alternative, there would be no additional impacts to existing vegetation, because the site would not be developed.

3.6.3.2 *Proposed Action*

The MNRH Program report for the site revealed that there no records of plant species of concern in the area surrounding the proposed facility. During facility construction vegetation would be removed from approximately 10 acres of the site for establishing the proposed, roads, buildings, material storage pits and storm water control features. Not all 10 acres of vegetation would be removed at once. Construction activities would begin with the building of the access road. Additional vegetation and some trees would be removed for the construction of the storm water ponds as well as for on-site roads and buildings.

- The existing vegetation at the location of the proposed District transfer station facility, as noted in 3.5.4 Affected Environment, consists of Idaho fescue or bluebunch wheatgrass communities, with some invasive species such as knapweed. This vegetation is not unique or limited. The proposed District Facility is surrounded by an extensive amount of similar land. Further, once the construction is completed, the areas which are unpaved and not in the building footprint where soil and vegetation has been disturbed, will be graded and fully revegetated with native plant species. In addition, the seed mix used for revegetation must be approved by the Natural Resources Conservation Service (NRCS) to ensure the vegetation is adapted to the local climate. During operation, the District would manage noxious weeds according to a county approved noxious weed plan. At the end of the projected 40-year life of the Facility, all areas that have been disturbed will be re-vegetated and reclaimed to pre-project construction conditions and at the request of the Montana Fish Wildlife and Parks, the seed mix should not contain clover seed.

Therefore, minor impacts are expected to the vegetation in the project area should the transfer station be built.

3.7 AIR QUALITY

3.7.1 ANALYSIS AREA AND METHODS

The area for the air quality analysis is the proposed licensed boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. The analysis method will consider the information provided by the applicant and DEQ's experience with other solid waste transfer stations. All facilities are required to comply with applicable air quality rules.

3.7.2 AFFECTED ENVIRONMENT

Currently, this property is undeveloped with primitive dirt roads traversing the property. Limited vehicle activity occurs on this property and would cause minimal fugitive road dust and vehicle engine exhaust emissions.

3.7.3 ENVIRONMENTAL CONSEQUENCES

3.7.3.1 No Action Alternative

Under this alternative, because the site would not be developed, there would be no additional impacts to the existing air quality beyond current activities on the property.

3.7.3.2 Proposed Action

Air quality impacts associated with the proposed transfer station and its associated activities include fugitive dust generated during construction and fugitive dust from waste material transfer activities, vehicle activity, storage piles, and occasional burning of green wastes.

Fugitive dust is created from disturbing the ground during project construction from moving dirt, and vehicle activity. Blowing winds can increase fugitive dust during these construction activities. Fugitive dust during operation of the transfer station will come from transferring waste materials to the tipping deck and at the recyclable station, as well as from vehicle activity. Backhoe activity will generate more fugitive dust by moving waste on the tipping floor to the hopper for loading into trailers and from moving green waste to the burn pits. Fugitive road dust will also be generated at the transfer station from vehicle activity. Waste storage piles can also be a source of fugitive dust. Vehicle activity will also generate combustion emissions. Since the transfer station is only planned to be open part of each week, many of these sources of emissions will be restricted.

The impact of fugitive dust is affected by local meteorological conditions. Thompson Falls sits within a steep mountain valley that creates predominantly easterly and westerly wind flows within the valley. The proposed transfer station location has mountains immediately to the north and south creating these channeled winds. Temperature and precipitation data is collected at Thompson Falls Dam's powerhouse, located less than 2 miles west of the proposed transfer station. This data indicates the warmest temperatures occur in summer during July and August, as shown in Table 3.5.

Table 3.6 shows precipitation rates are generally less than 1 inch for the months of July, August, and September. October through June experiences greater precipitation levels with some months averaging over 2 inches. The average annual rainfall for Thompson Falls is 19.5 inches. The warm dry summers are likely to be the time when fugitive dust is highest. Windy

conditions during dry periods can generate the most fugitive dust if control methods are not applied. Applications of water and chemical dust suppressant could reduce the fugitive dust emissions by up to 50 to 80 percent if correctly applied.

The District plans to enclose the tipping floor, hopper and trailer tunnel of the transfer station. Vehicles depositing waste will access the tipping floor when the 24-foot garage doors are opened facing north. This type of enclosure can greatly reduce fugitive emissions and significantly reduce the effects of wind on blowing litter. The only potential for minor effects on litter would be at the zee-wall where public drop-off would be allowed but confined within roll-off containers. These doors will generally be closed when the transfer station is not operating which will prevent winds from generating fugitive dust from the deposited waste. Although unlikely to be necessary, The District may halt material handling operations to mitigate fugitive dust emissions if the operator is unable to control fugitive dust emissions.

Fugitive dust emissions are generated at a greater level during dry and windy times. Dirt can be carried onto paved roads from vehicles leaving dirt roads. Once this dirt becomes dry on the paved roadway it may be entrained into the air from vehicles driving over it and when strong winds occur. The District plans to pave the main road into the landfill from Highway 200 and all roads within the transfer site with public access. This would reduce fugitive emissions generated from vehicle traffic near the highway access point. There should be less carry-over dirt deposited on the highway because of paving the publicly accessible roads. Dirt roads available only to employees and contractors would carry dirt onto these paved roads. Water or chemical dust suppressants can be used to control fugitive road dust if necessary. Water or a chemical dust suppressant would be applied at a rate that would not cause runoff or erosion.

Table 3.5: Thompson Falls, Montana Temperature Data, January 2000 – May 2018

Monthly Mean Average Temperature for Thompson Falls, PH, Montana

Click column heading to sort ascending. click again to sort descending.

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2000	30.6	35.2	41.4	49.4	54.1	60.7	68.1	68.3	55.5	46.9	31.2	26.9	47.4
2001	31.1	30.0	41.7	46.1	57.9	60.8	69.6	72.5	64.5	47.0	40.6	31.3	49.4
2002	31.0	32.9	33.2	45.9	52.0	62.6	71.2	66.4	60.6	45.2	M	34.9	48.7
2003	34.5	35.1	40.2	48.7	54.6	64.4	74.1	73.1	61.5	50.9	30.1	29.5	49.7
2004	28.0	34.8	44.7	49.8	54.1	62.2	72.0	69.0	58.4	49.8	37.3	34.6	49.6
2005	27.7	35.9	42.5	48.9	57.1	60.7	70.7	70.3	59.7	49.7	36.4	26.1	48.8
2006	36.0	31.6	40.1	48.9	57.8	65.8	74.8	70.1	61.5	49.0	36.7	29.7	50.2
2007	27.8	35.5	45.1	48.6	57.5	63.9	78.0	69.5	61.0	49.1	36.7	30.6	50.3
2008	26.6	35.6	M	43.3	55.1	59.7	70.0	69.5	59.8	48.9	40.8	25.7	48.6
2009	29.9	34.4	36.7	47.4	56.7	63.5	71.4	70.6	64.7	43.9	39.6	27.2	48.8
2010	33.8	38.7	43.7	M	M	61.5	67.5	M	59.2	50.0	M	M	50.6
2011	28.3	29.1	39.1	41.9	52.7	58.2	66.4	70.3	63.2	48.1	33.7	29.8	46.7
2012	31.1	33.8	40.3	49.6	53.5	60.0	71.3	70.3	62.4	47.2	38.6	31.8	49.2
2013	28.3	35.6	39.6	44.6	55.6	61.8	71.7	70.4	62.6	44.5	34.7	25.4	47.9
2014	31.2	23.4	37.9	46.5	55.1	59.7	71.9	69.2	61.3	52.1	33.2	30.6	47.7
2015	30.2	37.8	44.8	47.7	57.9	68.5	71.4	71.0	59.0	53.4	35.1	29.9	50.6
2016	30.9	37.9	41.4	53.1	57.0	64.0	67.6	68.8	58.8	48.1	40.6	23.8	49.3
2017	20.4	29.5	39.3	45.1	56.5	63.5	72.4	71.3	60.7	45.7	36.1	29.0	47.5
2018	34.5	29.6	38.8	45.6	59.5	M	M	M	M	M	M	M	41.6
Mean	30.1	33.5	40.6	47.3	55.8	62.3	71.1	70.0	60.8	48.3	36.3	29.2	48.6
Max	36.0 2006	38.7 2010	45.1 2007	53.1 2016	59.5 2018	68.5 2015	78.0 2007	73.1 2003	64.7 2009	53.4 2015	40.8 2008	34.9 2002	50.6
Min	20.4 2017	23.4 2014	33.2 2002	41.9 2011	52.0 2002	58.2 2011	66.4 2011	66.4 2002	55.5 2000	43.9 2009	30.1 2003	23.8 2016	41.6

Note: M means missing data.

Table 3.6: Thompson Falls, Montana Precipitation Data, January 2000 – May 2018

Monthly Total Precipitation for Thompson Falls, PH, Montana

Click column heading to sort ascending, click again to sort descending.

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2000	2.28	1.72	1.09	1.50	2.73	1.05	0.70	0.15	1.23	1.20	1.06	1.69	16.40
2001	1.07	1.65	1.14	1.79	0.97	3.14	0.75	0.11	0.41	3.34	0.83	1.84	17.04
2002	3.15	2.21	3.51	1.13	2.91	2.61	0.15	1.03	0.71	0.24	M	1.90	M
2003	2.53	1.16	2.84	1.54	0.95	0.89	0.19	0.34	0.88	1.32	2.95	1.55	17.14
2004	2.02	0.66	0.60	0.79	3.33	0.74	0.94	2.65	1.65	1.55	0.90	1.74	17.57
2005	1.31	0.30	1.50	1.91	1.55	2.63	0.23	0.32	M	M	M	M	M
2006	M	M	M	M	M	M	M	M	M	M	M	M	M
2007	1.55	M	M	M	M	M	M	M	M	M	M	M	M
2008	M	M	M	M	M	M	M	M	M	M	M	M	M
2009	M	1.41	2.35	0.75	M	M	M	M	M	M	M	0.76	M
2010	1.00	0.67	M	M	M	3.74	0.54	0.87	1.45	1.21	2.77	3.05	M
2011	M	M	2.15	2.67	2.08	M	0.23	0.04	0.46	3.31	2.70	1.63	M
2012	M	M	M	1.31	1.50	M	1.85	0.00	0.00	M	3.21	2.28	M
2013	M	0.62	1.57	2.71	1.76	1.87	0.11	2.21	2.65	0.45	1.72	1.65	M
2014	2.35	3.68	3.97	1.71	1.95	3.31	0.31	1.32	0.55	1.94	4.12	2.12	27.33
2015	2.22	1.44	2.42	0.49	1.31	0.91	0.59	0.52	M	1.38	2.00	2.69	M
2016	1.23	1.87	3.02	0.91	2.10	1.34	1.13	0.38	0.66	5.96	1.24	1.99	21.83
2017	1.24	3.88	4.67	2.25	1.10	0.92	0.05	0.03	0.86	3.10	3.73	2.62	M
2018	1.78	3.29	1.15	1.30	3.25	M	M	M	M	M	M	M	M
Mean	1.83	1.75	2.28	1.52	1.96	1.93	0.56	0.71	0.96	2.08	2.27	1.97	19.55
Max	3.15 2002	3.88 2017	4.67 2017	2.71 2013	3.33 2004	3.74 2010	1.85 2012	2.65 2004	2.65 2013	5.96 2016	4.12 2014	3.05 2010	27.33 2014
Min	1.00 2010	0.30 2005	0.60 2004	0.49 2015	0.95 2003	0.74 2004	0.05 2017	0.00 2012	0.00 2012	0.24 2002	0.83 2001	0.76 2009	16.40 2000

Note: M means missing data.

The District plans to operate two burn pits to reduce the need to transport large volumes of green waste to the Missoula landfill. These pits are exposed to the weather so fugitive dust can be generated by blowing winds, especially during dry summer months. Fine particulate matter would likely fall to the bottom of the burn pits and be better protected from winds. The District is required to follow all open burning permit regulations and restrictions which will only allow burning of the green waste under favorable ambient air dispersion conditions. Smoke and combustion emissions including fine particles will be generated by the open burning, but impacts will be minimized by burning under favorable atmospheric conditions and only several times a year. Grass clippings will be deposited on the tipping floor and trucked to the Missoula landfill regularly, to prevent its decay in the burn pits.

Waste materials begin biological degradation even before arriving at the transfer station. The degradation produces gas that is mainly a mixture of methane and carbon dioxide, but can also include nitrogen dioxide, oxygen, ammonia, sulfides, hydrogen, and other volatile organic compounds. Since the waste material will be contained inside the transfer station building, its degradation will not be facilitated by additional moisture from precipitation while it's waiting for transfer to the Missoula landfill. Waste is planned to be removed from the transfer station within 24-hours, so methane and other gases from decomposing waste are not expected to be of concern.

The Administrative Rules of Montana (ARM) require that all facilities comply with applicable air quality requirements. These include restrictions on particulate matter emissions to not exceed an opacity of 20 percent or more averaged over 6 consecutive minutes, whether from fugitive dust sources or from combustion sources, per ARM 17.8.304 and ARM 17.8.308. In addition, ARM 17.8.308 also requires that facilities take reasonable precautions to control emissions of airborne particulate matter from the production, handling, and storage of any material and to apply reasonable precautions to any street, road or parking lot. As described above, the District can control fugitive dust at the transfer station by enclosing the transfer activities in the transfer building, watering roads and watering the construction area is an effective method for reducing fugitive dust emissions.

In the unlikely event of a fire occurring, the Thompson Falls Rural Fire Station will provide fire protection if the fire extinguishers in the buildings and county vehicles are not sufficient to extinguish the fire. Products of combustion and incomplete combustion would impact the air quality during the time of the fire.

In summary, ambient air quality impacts are expected to be minimal from the operation of the transfer station. Fugitive dust emissions will be controlled by enclosing the transfer operations, burning under acceptable

atmospheric conditions and controlling road dust as necessary with water. These air quality emission control methods would minimize emissions and the subsequent air quality impacts from the transfer station. Therefore, only minor air quality impacts are expected to the analysis area should the transfer station be built.

3.7.4 ODORS

3.7.4.1 ANALYSIS AREA AND METHODS

The analysis area for odor impacts is the proposed licensed boundary of the 30-acre proposed transfer station site and one mile radius from the surrounding perimeter. The analysis method will consider the information provided by the applicant and DEQ's experience with other solid waste transfer stations.

3.7.4.2 AFFECTED ENVIRONMENT

Currently, there is minimal activity on the project site with a few primitive roads.

3.7.5 ENVIRONMENTAL CONSEQUENCES

3.7.5.1 No Action Alternative

Under this alternative, there would be no additional impacts to the existing odor impacts on the property. because the site would not be developed

3.7.5.2 Proposed Action

Class II solid waste produces gases, primarily hydrogen sulfide and ammonia, from the bacterial breakdown of waste material resulting in odors. The amount of gas produced depends on the type of waste present, the age of the waste, oxygen content, the amount of moisture, and temperature, and the amount of time and conditions under which the waste stockpiled or disposed. Gas formation increases as the temperature and moisture content increase.

The waste arriving at the transfer station will likely be young waste and in the early stages of biological breakdown. The waste is planned to be trucked within 24-hours of arrival to the AWSM Missoula landfill. During its time at the transfer station it will mainly be inside the transfer station. Although the main building where waste is loaded into trailers faces north, any odors would generally be carried either east or west by ambient winds, as discussed in Section 3.6. There are no residences located adjacent to or nearby the proposed facility in those directions. Only minor odor impacts are expected to the analysis area should the transfer station be built.

3.8 INDUSTRIAL, COMMERCIAL, AND AGRICULTURAL ACTIVITIES

3.8.1 ANALYSIS AREA AND METHODS

The analysis area for industrial, commercial, and agricultural activities is the site of the proposed licensed boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. The analysis methods for these activities included a site reconnaissance to determine current land uses.

3.8.2 AFFECTED ENVIRONMENT

The site proposed for the District Facility encompasses approximately 30 acres. Land use in the area surrounding the proposed District Facility consists of commercial property, agricultural rural land, vacant rural land, and rural residential property. Adjacent properties are currently used for commercial activities, vacant land and private residences.

3.8.3 ENVIRONMENTAL CONSEQUENCES

3.8.3.1 No Action Alternative

There would be no additional impacts to existing land use activities under this alternative, because the site would not be developed as a solid waste management facility.

3.8.3.2 Proposed Alternative

Construction and operation of the proposed District Facility would not cause an increase in the industrial activity of the area, since this is a replacement of the existing Facility.

The nearest resident is located approximately 700 feet from the proposed Facility license boundary; however, the Facility will be shielded partially from view by the stand of Ponderosa pine on the perimeter of the property. The final soil cover of the Facility would be seeded with an NRCS-approved seed mix adapted to the local area climate. Therefore, only minor impacts are expected to these activities in the project area should the transfer station be built.

3.9 TRAFFIC

3.9.1 ANALYSIS AREA AND METHODS

The analysis area for traffic is the site of the proposed District Facility and Montana Highway 200, 2.5 miles east of Thompson Falls as it approaches the entrance to the proposed Facility. The analysis methods for these activities included a site reconnaissance to identify potential traffic issues and necessary improvements and research conducted by a Traffic Impact Study completed by Great West engineering and information provided by the Montana Department of Transportation.

3.9.2 AFFECTED ENVIRONMENT

The Montana Department of Transportation (MDT) maintains records of average annual daily traffic on state roadways; data for Montana Highway 200 is available

for Site 45-4-001, which is located just east of the proposed approach to the proposed Facility. According to the MDT data, the annual average daily traffic (AADT) observed in 2016 along Montana Highway 200 was 2,137 vehicles.

3.9.3 ENVIRONMENTAL CONSEQUENCES

3.9.3.1 *No Action Alternative*

Under this alternative, because the site would not be developed as a solid waste management facility, there would be no additional impacts to existing traffic.

3.9.3.2 *Proposed Alternative*

Traffic on the highway near the proposed facility currently consists of normal vehicle traffic, as well as haul trucks and local area logging trucks, and other goods. These roads currently support loaded waste, commercial, and agricultural vehicles. The Sanders County Road Department has jurisdiction over local county roads and MDT has jurisdiction over state highways, including the establishment of speed limits and load limits. All loaded commercial, logging and agricultural transport vehicles are subject to the established limits, both speed limits and load limits, regardless of the goods or commodities being hauled.

The facility access point from Montana Highway 200 proposed by the applicant was reviewed by the MDT. MDT determined that the access proposed by SC, a 30-foot wide paved approach with 50-foot radii flares, is appropriate. It supports two-way traffic with a single exit lane for turning right or left. SC expects traffic volumes to remain the same as currently experienced at the existing transfer station. A Traffic Impact Study was completed by Great West engineering and determined that a left turn lane is not warranted, based on the MDT traffic Engineering Guidelines in Section 28.4.1.2 of the MDT manual. SC submitted a Driveway Approach Application Permit to MDT on March 10, 2018. The approved design will include the placement of adequate signage to ensure highway users are aware of the facility entrance. Further, modifications to the roadway must be completed prior to the commencement of facility construction activities.

Because the proposed Facility will be constructed just west of the current transfer station, and traffic is not expected to increase. Any impacts would be short term while the modifications are made for the road approach from Highway 200 to the proposed Facility. There would be no additional impacts to existing traffic attributable to the proposed Facility.

3.10 PROPERTY VALUES

3.10.1 ANALYSIS AREA AND METHODS

The analysis is the site of the proposed licensed boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter.

3.10.2 AFFECTED ENVIRONMENT

The property proposed for the Sanders County Class II transfer station encompasses approximately a 30-acre parcel owned by the applicant. Land surrounding the project site is agricultural rural, vacant rural, and rural residential properties.

3.10.3 ENVIRONMENTAL CONSEQUENCES

3.10.3.1 No Action Alternative

Under this alternative, because the site would not be developed as a solid waste management facility, there would be no additional impacts to existing property values.

3.10.3.2 Proposed Alternative

Properties near other licensed Class II transfer stations in Montana suggest that the existence of transfer stations do not result in decreased property values for the areas surrounding the facilities. Studies show that adverse effects on home and property values from landfills are hard to quantify. The situation is probably even more obscure when the proposed facility is a standard yet small transfer station that will not involve hazardous waste. Thus, it is hard to say what the impacts of the proposed facility would be on home values. Clearly, mitigating factors such as distance from homes, visual breaks, and location away from the denser Thompson Falls city limits would lower any effect that occurs.

3.11 SOCIOECONOMIC

3.11.1 ANALYSIS AREA AND METHODS

The analysis area is the general location of the proposed landfill. Data was collected from SC's application.

3.11.2 AFFECTED ENVIRONMENT

The analysis area is the site of the proposed license boundary of the 30-acre proposed transfer station site and one-mile radius from the surrounding perimeter. Land surrounding the project site is commercial, agricultural rural, vacant rural, and rural residential properties.

3.11.3 ENVIRONMENTAL CONSEQUENCES

3.11.3.1 No Action Alternative

Under this alternative, because the site would not be developed as a solid waste management facility, additional workers that would be hired during the construction and operational phases of the proposed landfill would not be hired. No long-term impacts, either positive or negative, are anticipated.

3.11.3.2 Proposed Alternative

During the construction of the transfer station, especially during the initial startup of operations, there would be a minor increase in local employment due to the additional need for contractors, site operators, and associated support. Construction activities would employ approximately 15 additional people as construction workers for about four months. However, because this would occur only during the construction of transfer station features, the impact of these activities on employment are of short duration compared to the life of the Facility.

The long-term employment requirements already result in the jobs for six employees for facility operations, trucking and maintenance activities. Therefore, the tax base and employment would not change, resulting in zero net impact on the local tax base and revenues to businesses in the area, except for the construction phase.

3.12 CUMULATIVE EFFECTS

Cumulative impacts are the effects of the Proposed Action added to the impacts of past and present activities in the area along with the potential impacts of future actions under consideration by the state. Cumulative impact analyses help to determine whether an action would result in significant impacts when added to other activities.

The proposed District Facility is the only proposed transfer station in the immediate area. Other operations include a shed/storage building construction business to the east, a gravel pit operation to the southwest, and the airport to the south.

According to the Sanders County Land Services, County Planner, there are currently no other projects proposed on properties adjacent to or near the proposed Facility. The extension and construction of a water main to the Facility will be completed, if that is the chosen water source for the Facility, before final construction is finished.

The necessary modifications to Montana Highway 200 would result in short-term inconveniences to local users. The overall long-term effect of road reconstruction activities would result in a similar amount of traffic which currently turn into and out of the current existing transfer station. Traffic volumes are not expected to change dramatically, and this would only shift the traffic to the west into the new Facility.

Developments in the project area would likely continue at current rates. The Facility is a replacement for the existing Transfer Station. The new Facility would provide a modern and safe replacement. This would result in a positive cumulative effect for the District, making a safe, clean and more efficient Facility for the District employees, for the public and commercial businesses which use the Facility.

Construction and operation of the proposed project would not reduce or degrade potential habitat within the project area, and therefore cumulative effects because of the proposed project would be negligible and discountable.

Construction and operation of the proposed project would not reduce or degrade potential foraging or nesting habitat for greater sage grouse within the project area since no potential habitat exists. Therefore, cumulative effects because of the proposed project would be negligible and discountable.

Construction and operation of the proposed project would not reduce or degrade potential foraging habitat for the Grizzly Bear and within the project area since no potential habitat currently exists. There is known habitat to the north, directly across Montana Highway 200 from proposed site in the Mount Silcox Wildlife management area. Montana FWP recommended, and the District will construct, a 7-foot fence around the entire Facility with an entrance gate and 3 electrified wires along the entire outside of the fence, including gates. This will not only prevent bears from accessing the Facility but will keep employee's safe from bears that will be attracted to the Facility. Therefore, cumulative effects because of the proposed project would be negligible.

Construction and operation of the proposed project would not reduce or degrade potential habitat within the project area, for Bull Trout, since no potential habitat exists on the project site. The Clark Fork River is approximately 3,500 feet to the south. No storm water run-off from the site is expected to reach the river. Therefore, cumulative effects due of the proposed project would be negligible and discountable.

Construction and operation of the proposed project may cause a cumulative effect for dust and noise in addition to the adjacent gravel pit operation to the west and the airport to the south. The combined operations of the gravel pit and the proposed project may cause an increase in dust and noise.

Land uses in the area include rural commercial, agricultural, and residential activities. Cumulative impacts from the Proposed Action would be negligible for all resources, with the limited exception for dust and noise.

3.13 UNAVOIDABLE ADVERSE EFFECTS

Developed topsoil would be removed from approximately 10 acres of the 30-acre site. The topsoil would be reseeded with native vegetation.

- Plant communities dominated by native plants would be replaced by reclaimed plant communities on the property. Noxious weeds would increase from the soil disturbance, but weeds would be treated to ensure revegetation by native local grasses occurs as required by the county weed control program. At the request of the Montana Fish Wildlife and Parks, the seed mix would not contain clover seed.

The disturbed areas would be reclaimed, reseeded, revegetated, and a program implemented to inventory and treat noxious weeds.

4 CONCLUSIONS AND FINDINGS

4.1 A LISTING AND APPROPRIATE EVALUATION OF MITIGATION, STIPULATIONS AND OTHER CONTROLS ENFORCEABLE BY THE AGENCY OR ANOTHER GOVERNMENT AGENCY

The proposed licensure of the Sanders County Transfer Station would meet the minimum requirements of the SWMA and associated administrative rules regulating solid waste disposal. Adherence to the solid waste, water quality, and air quality regulations and the DEQ-approved facility Operation and Maintenance Plan would mitigate the potential for harmful releases and impacts to human health and the environment by the proposed Facility.

4.2 FINDINGS

To determine whether preparation of an environmental impact statement is necessary, DEQ is required to determine the significance of the impacts associated with the proposed action. The criteria that DEQ is required to consider in making this determination are set forth in ARM 17.4.608 as follows:

1. The severity, duration, geographic extent, and frequency of the occurrence of the impact;
2. The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
3. Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
4. The importance to the state and to society of each environmental resource or value that would be affected;
5. Any precedent that would be set because of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
6. Potential conflict with local, state, or federal laws, requirements, or formal plans.

The proposed District Facility would be constructed and operated approximately 2.5 miles east of Thompson Falls and accessed from Montana Highway 200. The Facility would consist of a fully enclosed Transfer Station, public tipping area and metal recycling pit and two wood waste pits. The Facility will disturb an area of approximately 10 acres. The Facility is expected to operate more than 40 years.

The Facility would accept Class II, Class III, Class IV, and special solid wastes, generally including putrescible municipal solid waste, bulky waste, wood waste, non-water-soluble solids (brick, dirt, rock, rebar-free concrete, brush, lumber and vehicle tires), general construction and demolition (C&D) waste, and asphalt. Any commercial C&D generated wastes are directly hauled to Republic Services. The District will transfer the solid waste to AWSM Landfill in Missoula, Montana.

The analysis area for vegetation contains Rocky Mountain Mesic Montane Mixed Conifer Forest, as found at the proposed District project site. Such forests are common in extreme northwestern Montana and are not unique or limited. This forest ecotype surrounds the proposed site, which is also not located within either Sage Grouse core habitat, general habitat, or connectivity area. Construction and operation of the Facility will not adversely affect any threatened or endangered species.

Construction and operation of the Facility is not expected to impact surface water resources. A stormwater control system will be constructed to accommodate runoff. Stormwater sediment retention ponds will contain any expected stormwater runoff generated by intense rainfall or snow melt, allowing sediments to settle out. Any storm water that is collected in the three pits for stockpiling wood waste and scrap metal would either evaporate, infiltrate, be pumped into the storm water retention ponds, or pumped into the onsite leachate UST if testing exceeds trigger values for benchmark contaminants when a sheen develops on the water in any sump.

Construction and operation of the Facility is not expected to impact ground water. The site access roads will be paved, as will be the approach into the transfer station building and other areas where waste will be handled and tipped by the public into containers. The tipping floor inside the building, and the tunnel floor, will consist of a concrete slab with floor drains that discharge to a UST collection tank.

DEQ has not identified any growth-inducing or growth-inhibiting aspects of the Facility. DEQ's approval of the Facility does not set any precedent and would not commit the DEQ to any future action with significant impacts, nor is it a decision in principle about any future actions that DEQ may act on. Finally, construction and operation of the Facility would not conflict with any local, state, or federal laws, requirements, or formal plans.

Based on consideration of all the criteria set forth in Arm 17.4.608, DEQ has determined construction and operation of the Facility will not significantly affect the human environment. Therefore, an environmental assessment is the appropriate level of environmental review and preparation of an environmental impact statement is not required. The application by Sanders County Solid Waste Refuse District to build and operate a Class II transfer station will be approved (Appendix D).

4.3 OTHER GROUPS OR AGENCIES CONTACTED OR CONTRIBUTING TO THIS EA

Great West Engineering

Montana Natural Heritage Program

Montana Department of Environmental Quality, Montana Environmental Public Policy Office

Montana Bureau of Mines and Geology

Montana State University-Agricultural Extension Office-Sanders County

Montana Department of Transportation

Sanders County Land Services Department

State of Montana Historic Preservation Office

U.S. Department of Agriculture - Natural Resource Conservation Service
U.S. Department of Interior Fish Wildlife Service
Montana Fish Wildlife & Parks (FWP) Region 1
Montana Department of Transportation
Montana Department of Commerce, Census and Economic Improvements
Montana Department of Labor and Industry
Montana Department of Natural Resources and Conservation
Montana State Historic Preservation Office
US Environmental Protection Agency
US Forest Service Region 1
US Army Corps of Engineers
US Department of Agriculture

4.4 AUTHORS

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Montana DEQ, Solid Waste Section

Date: August 10, 2018

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APPENDIX A

Safety Plan

(Taken from Sanders County Transfer Station
Operation and Maintenance Plan submitted by Great West Engineering)

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4.0 Safety

4.1 Safety Program

The implementation of a safety program is necessary for protecting life and property from injury and damage. Thorough knowledge of this plan by the transfer station employees will be required to facilitate immediate action if any situations should arise. All employees should be familiar with the County's and transfer station safety policies.

Safety at the site will be the responsibility of all personnel active at the site. The Solid Waste Supervisor is in charge of implementing the facility safety procedures. Records shall be kept verifying training, accidents and situations that may lead to unsafe working conditions. The County will have a policy for reporting accidents and injuries on the job.

The facility staff will incorporate or establish and supervise:

- A safe and healthful working environment
- An accident prevention training program detailing:
 - Fire protection
 - Hazardous wastes
 - Lifting injuries
 - Operating equipment
- Initiate preliminary investigation of an accident that causes serious injury.
- Report within 24 hours to the Department of Labor and Industries a fatality or multiple hospitalization (2 or more employees) resulting from an employment accident.
- Maintain records of occupational injuries and illnesses.
- Facility employees will be trained in first-aid and CPR methods by a qualified instructor.
- Facility employees should notify their supervisor if they suffer severe allergic reactions to wasp or bee stings or if they carry emergency devices for stings. Notification is not mandatory, nor is discrimination allowed if the employee refuses work assignments based on known allergic reactions.
- A first-aid kit will be maintained and checked quarterly in the shop building. The kit should contain sufficient supplies to assist a responder in basic first aid objectives for mitigating life threatening conditions. (e.g. respiratory, circulatory, bleeding or shock).
- The following phone numbers will be permanently posted next to the telephone in the transfer station building and shop building:
 - Local Police
 - State Police
 - Fire Department
 - Ambulance and Rescue services

- Hospitals
- Electrical/Gas Power Authority
- Montana Department of Environmental Quality
- US Environmental Protection Agency

4.2 General Emergency Response

When emergency situations occur, a prompt, appropriate response can often limit the extent of property damage and counteract the effects of injury to personnel. A knowledge and awareness of potential hazards will be most useful in identifying causes and conditions of an emergency. The basics of the contingency plan to provide for an effective emergency response are:

- Trained personnel capable of responding to fire, poisoning, accidental injury and damage, and life threatening occurrences.
- Safety equipment maintained in proper working order and in designated locations.
- Plan initial responses, assign responsibilities for actions and routinely review these plans and assignments.

4.3 Coordination Agreements with Enforcement Agencies

The Solid Waste Supervisor will obtain agreements from local authorities as to how jurisdiction will be broken down concerning lines of responsibilities. The fire department is usually the most appropriate agency to respond to fire and hazardous waste. Once the Fire

Department is on the scene, the Local Fire Chief is usually the Incident Commander. The Incident Commander will assist and guide people within the fire, police departments or other local emergency personnel, to handle hazardous waste situations.

Situations involving community health threats will need to be coordinated through the local hospitals and the local County Health Officer.

The Solid Waste Supervisor will need to also make arrangements for diverting the waste stream to another facility in the event of a severe emergency (fire, hazardous waste clean-up, etc.). The probability of such an event is extremely small but preparations will need to be in place should this occur. The transfer station should resume full or partial operation once the Solid Waste Supervisor, emergency remedial personnel, DEQ Waste Management Division and local County Health Officer concur that the situation has been remediated or is under sufficient control to not present a hazard to the public and daily operations.

4.4 Response Procedures

General response procedures will be provided for various scenarios requiring different levels of contingency plans:

- Earthquake
 - Solid Waste Supervisor will assess damage and ability to continue operations.
 - The Solid Waste Supervisor will notify DEQ Waste Management Division if emergency closure is necessary and implement emergency collection procedures.
 - Conduct repairs immediately under supervision of engineer.
 - Obtain additional construction equipment and crews necessary to conduct the repairs.
 - Any damage to structures should be reported to and evaluated by a professional engineer.
 - Solid Waste Supervisor will make a report and place this in the operating record.
 - In the event of a major earthquake, a detailed inspection and evaluation of the site shall be conducted by a professional engineer.

- Injury
 - Solid Waste Supervisor employee will summon proper emergency response personnel immediately and direct initial first aid.
 - Transfer station employee will brief the Solid Waste Supervisor upon release of initial first aid by emergency response personnel.
 - Solid Waste Supervisor will lead the investigation, a report will be placed into the operating record indicating cause, effect and review of safety measures reviewed and changed to mitigate a future occurrence.
 - Within 24 hours, Solid Waste Supervisor will file appropriate reports with respect to severity of the injury with the insurance carrier and the Montana Department of Labor & Industry, if necessary. The Solid Waste Supervisor will conduct a review of safety procedures with employees.
 - Transfer station personnel will be trained in basic first aid and CPR.

- Property Damage/Accident
 - In the event of property damage the employee shall immediately notify the Solid Waste Supervisor. The Solid Waste Supervisor will report the incident to the insurance company, if necessary.
 - The employee shall also fill out an Accident-Incident Report. The Solid Waste Supervisor will need to fill out an accident report for insurance purposes as well.

- Building Fire

- Evacuate all people from dangerous areas and either move off-site or up wind of the source. DO NOT RE-ENTER BURNING BUILDINGS!
- Contact fire department, report size, location, type of material involved (hazardous, inert, etc.). Contact Hazardous Waste Response Team if hazardous waste is involved.
- Small spot fires may be extinguished with a fire extinguisher by approaching the flame source from the up wind side and spraying flame suppressant material on the source with a sweeping motion. Do not attempt this in any temporary hazardous waste storage area.
- Contact and brief Solid Waste Supervisor of the situation.
- Conduct repairs immediately under supervision of Solid Waste Supervisor.

- Liquid Waste Spill

If a liquid waste spill occurs, the operator will immediately restrict access to the area until the situation is under control. The operator will immediately notify the Solid Waste Supervisor of the issue. Telephone numbers of reputable, licensed firms that handle such spills will be available at the transfer station. The County will be responsible to keep such firms on call in case such an emergency occurs.

APPENDIX B

ACRONYMS

**Proposed Sanders County Class II Transfer Station
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AADT – Annual Average Daily Traffic
AOA – Airport Operating Area
ARM – Administrative Rules of Montana
AWSM – Allied Waste Systems of Montana
BMP’s – Best Management Practices
C&D – Construction and Demolition
CMP – Corrugated Metal Pipe
CQA/CQC – Construction Quality Assurance/Construction Quality Control
DEQ – Montana Department of Environmental Quality
EA – Environmental Assessment
EIS – Environmental Impact Statement
E&P – Exploration and Production
ESA – Endangered Species Act
FML – Flexible Membrane Liner
FWP – Montana Department of Fish, Wildlife, and Parks
GWIC – Ground Water Information Center
HDPE – High Density Polyethylene
HELP – Hydrologic Evaluation of Landfill Performance
IWMA – Integrated Waste Management Act
LCRS – Leachate Collection and Removal System
LEL – Lower Explosive Limit
LFG – Landfill Gas
LLDPE – Low Linear Density Polyethylene
MBMG – Montana Bureau of Mines and Geology
MCA – Montana Code Annotated
MDT – Montana Department of Transportation
MEPA – Montana Environmental Policy Act
MNRHP – Montana Natural Resource Heritage Program
MPDES – Montana Pollutant Discharge Elimination System
MSL – Montana State Library

MSW – Municipal Solid Waste
NOI – Notification of Intent
NRCS – Natural Resource Conservation Service
O&M – Operation and Maintenance
OHWM – Ordinary High Water Mark
PCB – Polychlorinated Biphenyls
PCC – Post-Closure Care
POTW – Publicly Owned Treatment Works
RCRA – Resource Conservation and Recovery
Act SC – Sanders County
SpW – Special Waste
SWMA – Montana Solid Waste Management Act
SWP – Montana DEQ Solid Waste Program
SWPPP – Storm Water Pollution Prevention Plan
SWS – Montana DEQ Solid Waste Section
TENORM – Technologically Enhanced Naturally Occurring Radioactive Material
TSCA – Toxic Substance Control Act
USACE – United States Army Corps of Engineers
USDA – United States Department of Agriculture
USEPA – United States Environmental Protection Agency
USFWS – United States Fish and Wildlife Service
USGS – United States Geological Survey
UST – Underground Storage Tank

APPENDIX C

Response to Comments

Proposed Sanders County Class II Transfer Station Final Environmental Assessment

The following represent public comments that were received by the Montana Department of Environmental Quality (DEQ) after public review of the draft Environmental Assessment (EA) published for the proposed Sanders County transfer station project. The draft EA was published on June 25, 2018, commencing a 30-day public comment period ending July 25, 2018. DEQ received written comments on the proposal during the comment period. DEQ's response to all relevant and substantive public comments is provided below after the comments were reviewed, summarized, categorized, and combined. All written comments received during the public comment period are on file at DEQ.

Comment: *The Facility access point could affect uses of the adjacent Hillcrest Ranch property on the west.*

Response: The Facility access point is 300 feet from the northwest corner of the County property and 525 feet from the driveway accessing the Hillcrest. This distance would not likely cause significant congestion at average 200 vehicles per day, so a turn lane is not required. Montana Department of Transportation has reviewed the approach and proposed use for access point construction. The analysis methods for these activities and conclusions included a site reconnaissance to identify potential traffic issues and necessary improvements, research conducted by a Traffic Impact Study completed by Great West engineering, and information provided by the Montana Department of Transportation based on an access permit application. Potential future uses in the area are specifically excluded from potential cumulative impacts in a MEPA analysis. Because the proposed Facility will be constructed just west of access to the current transfer station, traffic is not expected to increase.

Comment: *Montana Fish Wildlife and Parks (FWP) requested that any re-vegetation of areas of soil disturbance on the site, either from initial construction or at closure of the proposed facility, be re-seeded with a mix that contains no clover. Clover is a known bear attractant.*

Response: Sanders county will ensure that the seed mix for re-vegetation of any areas of the site, does not contain any clover.

Comment: *FWP has also requested that proposed facility take dead animal carcasses. Since these can be left out on Forest Service roads and be a scavenging animal attractant.*

Response: Sanders county currently accepts dead animal's carcasses and will continue to accept those daily at the proposed facility.

Comment: *Residences close to the proposed Facility will be affected by odors due to proposed facility operations and impacted by displacement of bears attracted by these odors.*

Response: Odors related to waste are typically the result of decomposition, thus the probability is high for odors at the transfer station due to abundant putrefiable wastes delivered to the site daily. However, the facility is required to remove the trailer that is filled with waste from the transfer station daily and haul the load for disposal at the Allied Waste landfill in Missoula. The transfer of smell increases with waste exposure, so the trailer is housed below the floor at the back of the facility in an enclosed tunnel. This design minimizes odors during the daily operations before the trailer is removed.

Waste materials begin biological degradation even before arriving at the transfer station. The degradation produces gas that is mainly a mixture of methane and carbon dioxide, but can also include nitrogen dioxide, oxygen, ammonia, sulfides, hydrogen, and other volatile or organic compounds. Since the waste material will be contained inside the transfer station building, its degradation and increase in odors will not be facilitated during the normal working hours by additional moisture from precipitation while waiting for daily transfer to the Missoula landfill. Grass clippings will be deposited on the tipping floor and trucked to the Missoula landfill regularly. Grass clippings stored on site would be placed in the trailer for disposal before significant odors develop.

Although the main building where waste is loaded into trailers faces north, any odors would generally be carried either east or west by ambient winds. The effect of odors would therefore be reduced toward the north or south. There are no residences currently located adjacent or close to the proposed facility on the east or west. Only minor odor impacts on residences are expected in this situation.

Bears are most active at night after operations have ceased for the day. Bears also periodically wander through the area surrounding the site today, likely also attracted to smells from homes surrounding the proposed site. The concern that increased bear activity and displacement by the electric fence would potentially cause harm to citizens accessing the storage facility to the west is legitimate. Yet that facility is also surrounded by a gated fence that would protect those people who largely access their storage units during the day. Consequently, the potential impact to storage unit renters could slightly increase, but remain minor.

Comment: *Hillcrest Ranch owners are concerned that litter picking after dark (at 4:00 or earlier during winter) would not be possible. How will operations be adjusted to accommodate the change in conditions and keep litter from reaching our property and what provision will be in place to remove it should it happen?*

Response: Loads delivered to the site must be tarped to eliminate blowing litter during haulage. The facility building would enclose the tipping floor, hopper, and trailer tunnel of the transfer station. Vehicles depositing waste will access the tipping floor when the 24-foot garage doors are opened facing north. This type of enclosure can significantly reduce the effects of wind on blowing litter. The only potential for minor effects on litter would be at the zee-wall where public drop-off would be allowed, but again confined within roll-off containers. Personnel would minimize the amount of blown debris by:

3. Conducting most waste operations inside the main building
4. Checking vehicles for waste before departing the building
6. Perimeter fencing around the site to catch blown litter
7. Collecting windblown debris on a routine basis inside and outside fence
8. Closing transfer station doors at the end of each operating day

In windy conditions, the operator would be prepared to implement measures to keep litter to a minimum. If the operator is unable to keep litter from scattering or becoming airborne, the Facility Manager would halt operations to mitigate litter migration. Litter produced by the Facility would be kept to a minimum at all times. The County Waste District could be contacted

for immediate response should the Facility fail to keep litter under control. Furthermore, blowing litter is a violation of solid waste rules, so citizens may call DEQ's Solid Waste Section at (406) 444-5300 or DEQ's Enforcement Program Complaint Section at (406) 444-3109, if blowing litter is a problem.

Comment: *Residences close to the proposed Facility will be affected by smoke due to proposed burn operations.*

Response: All sources of airborne particulate matter from permitted open burning operations in Montana are required to use reasonable precautions so that the smoke generated is minimized and migration by wind is not severe. The proposed facility would take the following steps to comply with these requirements:

1. Wood would be dry and efficiently burned with good draft into the pile.
2. Smoldering of ignited wood would not be encouraged by limiting fragment size.
3. Burning would only be permitted during periods of calm without wind.
4. Wood would be clean without glues, treatment, or finishes.
5. Ignition of fuel could be limited to periods when nearby citizens are fewer.

The District plans to operate two burn pits to reduce the need to transport large volumes of green waste to the Missoula landfill. These pits are exposed to the weather so fugitive dust can be generated by blowing winds, especially during dry summer months. Fine particulate matter would likely fall to the bottom of the burn pits and be better protected from winds. The District is required to follow all open burning permit regulations and restrictions which will only allow burning of the green waste under favorable ambient air dispersion conditions. Smoke and combustion emissions including fine particles will be generated by the open burning, but impacts will be minimized by burning under favorable atmospheric conditions and only several times a year.

Comment: *Residences close to the proposed Facility will be affected by noise due to proposed facility operations.*

Response: The offset distances to the west, north, and east boundaries of the County property from the Transfer Station perimeter fence are 1 foot, 250 feet, and 425 feet. The most widespread effect on noise in the area would be due to vehicles entering the access road, entering the transfer station, and leaving the site. This effect would not cause a significant increase because Montana Highway 200 consistently carries much more traffic adjacent to the site toward the north. Activities inside the building would be significantly muffled and would involve brief deliveries from packer trucks and small equipment versus larger equipment typical of a landfill. All such activities would only affect the area during normal business hours when the surrounding commercial businesses adjacent to the site would also be operating. The loading of four to five empty rolloff containers for haulage to the container sites, or several containers per day from the zee wall, would only briefly generate louder noises outside daily. Consequently, the increased noise for residences near Highway 200, and facilities nearby at the east and west boundaries of the County property, would likely be minor.

Comment: *The electrified bear fence will not block site of the Facility from Highway 200 to the north or from residences north of the highway.*

Response: The elevated transfer station building does not allow the County to build a fence that would block the viewshed from any direction. The elevation is necessary to permit the top-loading of waste into the trailer below upon its delivery onto the floor inside the building. The function of the fence is to provide security and to deter wildlife, especially bears, from ranging onto the site. Most of the existing trees surrounding the facility will be left in place and will continue to provide some shielding of the facility from the north.

Comment: *What measures are in place to deter public users from dumping waste on Hillcrest Ranch property when the Facility is closed to the public and what is our recourse should it occur?*

Response: DEQ experience with illegal dumping when waste management facilities are closed very likely indicates that unhappy citizens would mostly dump somewhere along the access road to the proposed transfer station. There could be a slight possibility of dumping on adjacent Hillcrest Ranch property to the west, and the County Waste District could be contacted for immediate response should this happen. Furthermore, illegal dumping is a violation of state solid waste rules, your recourse would be to contact the Sanders County Solid Waste District, DEQ SWS, and Enforcement Program.

Comment: *The Facility will cause a loss in property values to homes nearby the site.*

Response: DEQ regulates over 145 solid waste management systems statewide. Many of the large Class II landfills are located near residential subdivisions and neighborhoods with more than 20 residences. The potential effect of that type of larger facility on property values has been widely studied.

In the past 30 years, various research has been done on the effects of landfills on property values. These studies have yielded inconsistent results. Typically, hedonic regression models have been used to try and isolate the effects of landfills on property values holding all other variables constant. Surveys have also been used in studies. Some studies show statistically significant adverse effects of landfills on property values and some do not. Generally, larger effects on property values are seen from larger landfills, less modern landfills, landfills that accept hazardous waste or pose health risks, areas with negative perceptions of landfills, landfills that are more visible, and higher end properties. However, even these effects are not robust across all studies nor are each of these effects studied in all studies. Although the effect of transfer station is likely less in most cases, the variation in outcome noted above would likely be similar for property values nearby.

The proposed small, low-volume transfer station removes waste stored on a 24-hour basis and is not a regular landfill nor a hazardous waste facility, which potentially lowers any effect on houses nearby. Thus, it is hard to say what the actual impacts would be on homes. Clearly, mitigating factors such as distance from homes, visual breaks, and location away from the denser Thompson Falls city limit would lower the result of any one effect that occurs.

APPENDIX D

Final Decision

Proposed Sanders County Class II Transfer Station
Final Environmental Assessment

1. Introduction

1.1. Background

On March 13, 2018, the Sanders County Solid Waste Refuse District (District) submitted a Solid Waste Management System (SWMS) license application to the Montana Department of Environmental Quality (DEQ) Solid Waste Program (SWP) for the expansion of their current facility license boundary. The application underwent deficiency reviews and was revised prior to DEQ determining that it was complete and in compliance with the substantive requirements of the Solid Waste Management Act (SWMA). DEQ published a Draft Environmental Assessment (EA) on June 25, 2018.

1.1. Project Area Description

The proposed transfer station encompasses 10 acres of city-owned property. The facility would be located approximately 2.5 miles east of Thompson Falls, with access to the south off Montana State Highway 200 on County-owned property in the W1/2 of the NW1/4 of Section 14, Township 21 North, Range 29 West, Montana Principal Meridian, Sanders County, Montana. In addition to the 2-acre footprint of the transfer station buildings, zee-wall, and Underground Storage Tank (UST) features, the applicant would construct the roads, approach ramp, storm water control features, trenches, and storage/parking area to disturb an additional 4 acres. Construction of the facility would therefore initially disturb 10 acres with revegetation of approximately 4 acres at the proposed site. Construction of the access road to the facility would permanently disturb 0.6 acres outside the licensed area.

The facility would coordinate the management of nearly 6,800 tons of municipal solid waste, special waste, and recycling per year. Municipal solid waste (MSW) would be directly accepted from the public, contractors, and commercial collection vehicles. The Facility would manage the delivery of MSW collected at Sanders County Solid Waste District roll-off container sites to the Allied Waste Systems of Montana (AWSM) Class II Landfill in Missoula for disposal.

1.2. DEQ's Responsibilities and Purpose of the Final Decision

The purpose of this Final Decision (FD) document is to set forth DEQ's decision on the District's application for a transfer station and reason for the decision. This FD documents DEQ's application of the decision criteria set forth in the SWMA.

DEQ administers the SWMA, Title 75, Chapter 10, Part 2, Montana Code Annotated (MCA) and its associated administrative rules. The Montana Environmental Policy Act (MEPA) required an environmental review of actions taken by State agencies that may significantly affect the quality of the human environment. The environmental review, culminating in the issuance of the Final EA on August 15, 2018, was conducted to fulfill MEPA.

2. Public Involvement

DEQ published the draft EA on DEQ's website on June 25, 2018, beginning a 30-day public comment period. DEQ distributed the draft EA to adjacent landowners and interested persons and published a notice on the document's availability in the local area newspaper. Copies of the document were sent to the Sanders County Public Library and the Sanders County Solid Waste Refuse District office. DEQ closed the comment period July 25, 2018. DEQ received three written comments from the public.

3. Alternatives Considered

Alternatives evaluated in the EA included the No Action and the Proposed Action Alternative.

3.1. No Action

If the application failed to meet the minimum requirements of the SWMA and could not be processed as submitted, DEQ would deny the license expansion application and the facility would not be licensed. If the application is denied, expansion of the facility would not occur and the impacts identified in the final EA would not happen.

3.2. Proposed Action

The Proposed Action Alternative would allow the licensed operation of the Class II Transfer Station facility as proposed.

4. Decision and Rationale for Decision

DEQ may deny an application for licensure of a solid waste management system if it fails to meet the requirements of the SWMA. DEQ may not withhold, deny, or impose conditions on any license based on the provision of MEPA. However, MEPA allows the license applicant for a SWMS license and DEQ to mutually develop measures that may be incorporated into a license.

The decision at this point in the process is whether DEQ issues a license for the transfer station. Pursuant to Section 75-10-221, MCA and the Administrative Rules of Montana (ARM) 17.50.513, DEQ determined District's application was complete and complied with the requirements of the SWMA.

DEQ has evaluated the District's application and determined the environmental consequences. It is DEQ's decision to approve the application and issue a Solid Waste Management System License for the proposed expansion.

For DEQ, the basis of the decision whether to license is to determine whether the proposed transfer station can be operated by the District in compliance with the Solid Waste Management Act and the accompanying administrative rules. The license is based on the management of the system as approved by DEQ. The District's failure to comply with applicable law or rule, in particular Title 75, chapter 10, parts 1 and 2, Montana Code Annotated, and Administrative Rules of Montana Title 17, chapter 50, sub-chapters 4, 5,

and 10-17, may result in enforcement actions or license revocation or denial of an application for annual renewal. The District will be required to operate and maintain the facility in accordance with DEQ-approved plans and specifications.

5. Findings Required by Laws and Policies

5.1. Montana Environmental Policy Act (MEPA)

MEPA requires State agencies to conduct an environmental review when making decisions or planning activities that may have a significant impact on the environment. MEPA and the administrative rules promulgated under MEPA define the process to be followed when conducting an environmental review. The draft and final EA that DEQ prepared regarding the District's application for a transfer station complies with the procedural requirements of MEPA.

5.2. Solid Waste Management Act (SWMA)

The Solid Waste Management Act recognizes that the health and welfare of Montana citizens is endangered by improperly operated solid waste management systems and by the improper and unregulated disposal of wastes. The SWMA and associated Administrative Rules control solid waste management systems to protect the public health and safety and to conserve natural resources whenever possible (Section 75-10-202, MCA). In addition to continuing to provide for the disposal of solid wastes for residents of Sanders County, the basic objective of the District's transfer station proposal is to establish a solid waste management system that controls the management of solid wastes, the operation and maintenance of facility activities, and the transfer of waste for disposal at the Allied Waste Systems of Montana Class II landfill in Missoula.

The site will be operated according to the approved facility Operation and Maintenance (O&M) Plan. The District will not depart from the approved facility design, O&M Plan, or Closure Plan.

6. Appeal of DEQ's Decision

This decision is subject to validation by the local health officer. According to Section 75-10-222, MCA, the license issued by DEQ under this section is not valid until signed by the local health officer having jurisdiction in the county in which the solid waste management system will be operated. The local health officer may refuse to validate a license issued only upon a finding that the requirements of the SWMA and associated administrative rules cannot be satisfied (Section 75-10-223, MCA). The applicant or any person aggrieved by the decision of the local health officer not to validate a license may appeal the decision to the Board of Environmental Review within 30 days after receiving written notice of the local health officer's decision. The hearing before the board must be held pursuant to the contested case provisions of the Montana Administrative Procedure Act.