

June 10, 2020

Parrish Andrews Malteurop North America, Inc. 2800 Great Bear Avenue Great Falls, Montana 59404

Sent Via Email: parrish.andrews@malteurop.com

RE: Request to Postpone Baghouse Source Testing

Dear Mr. Andrews:

On May 5, 2020, the Montana Department of Environmental Quality (DEQ) received a request from Bison Engineering, Inc. (Bison) on behalf of Malteurop North America, Inc. (Malteurop) to postpone source testing at baghouses BF01 and BF02 until later in 2020. Malteurop submitted a Source Test Protocol to DEQ on April 8, 2020 that described planned testing at the baghouses. Malteurop planned to test baghouse BF01 on May 5, 2020 and baghouse BF01 on May 6, 2020, for particulate matter (PM), PM with an aerodynamic diameter equal to or smaller than 10 microns (PM₁₀), and opacity emissions, as required under Montana Air Quality Permit (MAQP) #3238-08 (Final 4/17/2020).

Under the authority of the Administrative Rules of Montana (ARM) 17.8.105 and ARM 17.8.749, Section II.C of MAQP #3238-08 requires Malteurop to conduct source testing on baghouse BF02 on an every 2-year basis, or another testing schedule as may be approved by DEQ, to demonstrate compliance with the conditions in Section II.B of MAQP #3238-08. Section II.C of MAQP #3238-08 also requires Malteurop to conduct source testing on baghouse BF01 an annual basis, or another testing schedule as may be approved by DEQ, to demonstrate compliance with the conditions in Section II.B of MAQP #3238-08.

The postponement request noted that Malteurop has stopped production at the Great Falls plant due to the economic slowdown from the COVID-19 pandemic. Malteurop plans to reschedule the source testing activities when Malteurop is back to full production, hopefully, later in the summer.

DEQ approves the request to postpone the baghouse emission testing as required under MAQP #3238-08 with the following conditions:

- Malteurop shall complete the delayed tests no later than December 31, 2020, or another date as approved by DEQ.
- DEQ expects future source testing of baghouse BF01 to be conducted within the previously anticipated schedule, or to be completed by May 8, 2021, and future source testing of baghouse

Steve Bullock, Governor I Shawn McGrath, Director I PO Box 200901 I Helena, MT 59620-0901 I www.deq.mt.gov

2022.BF02 to be conducted within the previously anticipated schedule, or to be completed by May 8,

- Malteurop shall comply with all other applicable standards and limitations, and the reporting recordkeeping, and notification requirements contained in MAQP #3238-08
- Procedures Manual (MSTPPM) (ARM 17.8.106). All source tests must be conducted in accordance with the Montana Source Test Protocol and
- the test. Notification may be submitted by email or telephone. Failure to provide an actual change for various reasons, but notification of any change must be submitted to DEQ prior to Section 2 of the MSTPPM states that confirmation of the test date is required a minimum of source test date notification may result in DEQ's rejection of the source test results. three working days prior to the source test. DEQ understands that a test date may need to

(406) 258-4907, or by email at kawilson@mt.gov. Should you have any questions regarding the information contained in this letter, please contact me at

Sincerely,

Kane J. W.L

Karen J. Wilson, MS Senior Environmental Science Specialist

Air Quality Bureau Montana Department of Environmental Quality 301 West Alder Street Missoula, MT 59802

<u>cc</u>: Jamin Grantham, MT DEQ, AQB, Jamin.Grantham2@mt.gov Conor Fox, Bison, cfox @bison-eng.com