



Montana Department of
ENVIRONMENTAL QUALITY

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May 14, 2013

Susan Lasher
Hollow Contracting, Inc.
404 Greenwood Avenue
Butte, MT 59701

Dear Ms. Lasher:

Montana Air Quality Permit #2744-09 is deemed final as of May 14, 2013, by the Department of Environmental Quality (Department). This permit is for a portable non-metallic mineral processing plant and associated equipment. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

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

Doug Kuenzli
Environmental Science Specialist
Air Resources Management Bureau
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JM:DCK
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #2744-09

Hollow Contracting, Inc.
404 Greenwood Avenue
Butte, MT 59701

May 14, 2013



MONTANA AIR QUALITY PERMIT

Issued To: Hollow Contracting, Inc.
404 Greenwood Avenue
Butte, MT 59701

MAQP: #2744-09
Administrative Amendment (AA) Request
Received: 03/26/2013
Department's Decision on AA: 04/26/2013
Permit Final: 05/14/2013
AFS: #777-2744

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

SECTION I: Permitted Facilities

A. Plant Location:

Hollow owns and operates a portable non-metallic mineral processing plant located in various locations throughout Montana. MAQP #2744-09 applies while operating at any location in Montana, except within those areas having a Montana Department of Environmental Quality (Department)-approved permitting program or those areas considered tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum is required for locations in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas.

Addendum #7 will apply to the Hollow facility while operating at locations in or within 10 km of certain PM₁₀ nonattainment areas during the summer months (April 1 – September 30) and at sites approved by the Department during the winter months (October 1 – March 31). A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Current Permit Action:

On March 2, 2013, the Department issued MAQP #2744-08 which modified Hollows air quality permit to increase the maximum rated design capacity of the diesel engine driving the generator set to 810 brake-horsepower (bhp). Subsequent to this action Hollow determined that actual capacity rating of the diesel generator set engine was 815 bhp; therefore on March 26, 2013, Hollow submitted an AA request to update the capacity rating of the generator set engine. The current permit action is accomplished as a de minimis change which increases the bhp rate of generator set engine, updates associated permit conditions and limits within the MAQP and addendum, and updates the emission inventory.

SECTION II: Conditions and Limitations

A. Emission Limitations

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

- For crushers that commence construction, modification, or reconstruction on or after April 22, 2008: 12% opacity
 - For crushers that commence construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008: 15% opacity
2. All visible emissions from any other NSPS-affected equipment, other than a crusher (such as screens or conveyors), shall not exhibit opacity in excess of the following averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR, Subpart OOO).
 - For equipment that commences construction, modification, or reconstruction on or after April 22, 2008: 7% opacity
 - For equipment that commences construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008: 10% opacity
 3. All visible emissions from any non-NSPS affected equipment shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
 4. Water and spray bars shall be available on site at all times and operated, as necessary, to maintain compliance with the opacity limitations in Sections II.A.1, II.A.2 and II.A.3 (ARM 17.8.749 and 17.8.752).
 5. Hollow shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
 6. Hollow shall treat all unpaved portions of the haul roads, access roads, parking lots, or the general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).
 7. Hollow shall not operate more than three (3) crushers at any given time and the combined maximum rated design capacity shall not exceed 345 tons per hour (TPH) (ARM 17.8.749).
 8. Hollow shall not operate more than two (2) screens at any given time and the combined maximum rated design capacity shall not exceed 500 TPH (ARM 17.8.749).
 9. Hollow shall not operate or have on-site more than one diesel-fired generator. The maximum capacity of the engine that drives the generator shall not exceed 815 brake-horsepower (bhp) (ARM 17.8.749 and ARM 17.8.1204).
 10. Operation of the diesel engine driving the generator shall not exceed 6,320 hours during any rolling 12-month time period (ARM 17.8.749 and ARM 17.8.1204).
 11. If the permitted equipment is used in conjunction with any other equipment owned or operated by Hollow, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).

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

B. Testing Requirements

1. Within 60 days after achieving maximum production, but no later than 180 days after initial start-up, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures as specified in 40 CFR 60.675 must be performed on all NSPS-affected equipment to demonstrate compliance with the emission limitations contained in Section II.A.1 and II.A.2 (ARM 17.8.340 and 40 CFR 60, Subpart A and Subpart OOO).
2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this crushing/screening plant is moved to another location, an Intent to Transfer Form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Hollow shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but not be limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used to verify compliance with permit limitations (ARM 17.8.505).

3. Hollow shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include ***the addition of a new emissions unit***, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).

4. Hollow shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. The records compiled in accordance with this permit shall be maintained by Hollow as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
5. Hollow shall document, by month, the hours of operation of the diesel engine/generator. By the 25th day of each month, Hollow shall calculate the hours of operation for the diesel engine/generator for the previous month. The monthly information will be used to demonstrate compliance with the rolling 12-month limitation in Section II.A.10. A written report of the compliance verification shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Hollow shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

SECTION III: General Conditions

- A. Inspection – Hollow shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emission Monitoring System (CEMS), Continuous Emission Rate Monitoring System (CERMS)) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Hollow fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Hollow of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq.* (ARM 17.8.756)
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the board, the Department's decision on the application is final 16 days after the Department's decision is made.

- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Hollow may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).
- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Hollow shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program or areas considered tribal lands.

Montana Air Quality Permit (MAQP) Analysis
Hollow Contracting, Inc.
MAQP #2744-09

I. Introduction Process Description

A. Permitted Equipment

Hollow Contracting, Inc. (Hollow) owns and operates a portable non-metallic mineral processing plant consisting of the following equipment:

- One (1) diesel-fired generator engine with a rating not to exceed 815 brake-horsepower (bhp)
- Up to two (3) crushers with a combined capacity up to 345 tons per hour (TPH)
- Up to two (2) screens with combined capacity up to 500 TPH
- Associated equipment, such as: feeders, conveyors (including integrated equipment conveyors), stackers, and other material handling equipment.

MAQP #2744-09 is written de minimis friendly, whereby operational flexibility is provided so that alternate equipment may be utilized so long as maximum capacities are not exceeded. See Section II of the MAQP for specific equipment limitations and/or conditions.

B. Source Description

The crushing/screening plant is used to crush and sort sand and gravel materials for sale and use in construction operations. In a typical operational setup unprocessed materials are loaded into the crushing/screening plant via a hopper and transferred by conveyor to the crushers. Crushed materials are then conveyed to the screen where materials are screened, separated, and piled.

The designated home location for this facility is Section 25, Township 3 North, Range 8 West, in Silver Bow County, Montana.

C. Permit History

On March 19, 1993, **MAQP #2744-00** was issued to Hollow to operate a 1968 Eagle jaw crusher and associated equipment.

On April 24, 1995, Hollow submitted a request that air quality Permit #2744-00 be transferred to Montana Materials, LLC (MMLLC). In addition to transferring ownership of Permit #2744-00 from Hollow to Montana Materials, Montana Materials added a 1952 Telesmith cone crusher, a 1960 Symons cone crusher, two 1965 Telesmith screens, and a 1972 El-Jay screen. **MAPQ #2744-01** replaced MAQP #2744-00.

On May 21, 1998, Hollow requested a modification of MAQP #2744-01 to change the name of the company from MMLLC to Hollow. In addition, the rule references were updated. **MAQP #2744-02** replaced MAQP #2744-01.

On April 8, 1999, Hollow requested a modification to allow for summer operation (April 1, 1999, through September 30, 1999) within the Butte particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas at Section 25 (Tract 1), Township 3 North, Range 8 West, in Silver Bow County, Montana. **MAQP #2744-03** replaced Permit #2744-02 and **Addendum #1** was issued.

On May 31, 2000, Hollow requested a modification to allow for summer operation (April 1, 2000, through September 30, 2000) within the Butte PM₁₀ nonattainment area. Hollow initially located at Section 25 (Tract 1), Township 3 North, Range 8 West, Silver Bow County, Montana. In addition to the Butte nonattainment area, this permit action allowed the facility to operate in or within 10 kilometers of the following PM₁₀ nonattainment areas during the summer months: Libby, Kalispell, Columbia Falls, Whitefish, and Thompson Falls. **MAQP #2744-04** and **Addendum #2** replaced MAQP #2744-03 and Addendum #1.

Hollow submitted a request for an alteration to MAQP #2744-04 to add a 1986 El-Jay 45” cone crusher, a 1989 Barmac 9600 impact crusher, a Universal roll crusher, and two 1991 Fabtec screen plants. Hollow’s request also included the removal of a 1952 Telesmith cone crusher, a 1960 Symons cone crusher, two 1965 Telesmith screens, and a 1972 El-Jay screen. **MAQP #2744-05** and **Addendum #3** replaced MAQP #2744-04 and Addendum #2.

On November 20, 2002, Hollow submitted a request for a permit modification to correctly identify the equipment Hollow operates. Hollow requested to remove the universal roll crusher and properly identify the screens as rentals, which were improperly identified in the permit modification of MAQP #2744-04 and should be listed as 2 screens of up to 250 TPH. Also, in order to update the Addendum for operations in or within 10 km of certain PM₁₀ nonattainment areas and correctly list the equipment, Hollow submitted a request for an Addendum renewal on December 11, 2002. **MAQP #2744-06** and **Addendum #4** replaced MAQP #2744-05 and Addendum #3.

On April 19, 2007, Hollow requested an administrative amendment to write MAQP #2744-06 in a de minimis friendly manner, allowing Hollow additional flexibility in facility operations while limiting facility emissions. **MAQP #2744-07** and **Addendum #5** replaced MAQP #2744-06 and Addendum #4.

On December 3, 2012, the Department of Environmental Quality (Department) received a complete application to modify Hollow’s air quality permit to allow for an increase in the maximum rated design capacity of the diesel engine driving the generator set to 810 bhp. In addition to the generator engine capacity increase, language specific to the rating of diesel powered generator was updated from the rated output of the generator in kW to the size of engine powering the generator in bhp. With the increase in the allowable diesel engine capacity the facility’s potential to emit (PTE) exceeded the major source threshold; therefore, Hollow requested that federally-enforceable permit operating limits be established to maintain the facility’s PTE below 100 tons per year (tpy) and 80 tpy. **MAQP #2744-08** and **Addendum #6** replaced MAQP #2744-07 and Addendum #5.

D. Current Permit Action

On March 2, 2013, the Department issued MAQP 2744-08 which modified Hollows air quality permit to increase the maximum rated design capacity of the diesel engine driving the generator set to 810 bhp. Subsequent to this action Hollow determined that actual capacity rating of the diesel generator set engine was 815 bhp; therefore on March 26, 2013, Hollow submitted an AA request to update the capacity rating of the generator set engine. The current permit action is accomplished under the de minimis regulation to increase the bhp rate of generator set engine, updates associated permit conditions and limits within the MAQP and addendum, and updates the emission inventory. **MAQP #2744-09** and **Addendum #7** replaced MAQP #2744-08 and Addendum #6.

E. Additional Information

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

II. Applicable Rules and Regulations

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

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

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Hollow shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide (SO₂)
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide (NO₂)
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide (CO)
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone (O₃)

6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide (H₂S)
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter (PM)
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standards for Lead
10. ARM 17.8.223 Ambient Air Quality Standards for PM₁₀

Hollow must maintain compliance with the applicable ambient air quality standards.

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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions are taken to control emissions of airborne particulate matter. (2) Under this rule, Hollow shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 Code of Federal Regulation (CFR) Part 60, Standards of Performance for New Stationary Sources (NSPS). Based on the information submitted by Hollow the portable crushing/screening operation and associated equipment are applicable to NSPS (40 CFR 60), as follows:
 - a. 40 CFR, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
 - b. 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plant. In order for a crushing plant to be subject to this subpart, the facility must meet the definition of an affected facility and, the affected equipment must have been constructed, reconstructed, or modified after August

31, 1983. Based on the information submitted by Hollow, the portable crushing equipment to be used under MAQP #2744-09 is subject to this subpart as equipment meets the definition of an affected facility constructed after August 31, 1983.

- c. 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines, and owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005, are subject to this subpart. As the permit is written de minimis-friendly, Hollow may substitute compression ignition internal combustion engine(s), therefore applicability to this subpart shall be dependent upon the nature of operation and the date of construction and/or manufacture of the diesel engine utilized.
8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories. Based on the information submitted by Hollow the associated diesel engines are applicable to NESHAP (40 CFR 63), as follows:
- a. 40 CFR 63, Subpart A – General Provisions apply to all equipment of facilities subject to a NESHAP Subpart as listed below:
 - b. 40 CFR 63, Subpart ZZZZ – NESHAPs for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of hazardous air pollutant (HAP) emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. As Hollow is considered an area source of HAP emissions and operates RICE equipment, the engine(s) are potentially subject to this subpart depending upon the operation of the engine(s).
- D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:
- 1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. The current permit action is an administrative amendment; therefore an application fee is not required.
 - 2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

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

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any asphalt plant, crusher or screen that has a PTE greater than 15 tpy of any pollutant. Hollow has the PTE greater than 15 tpy of PM, PM₁₀, CO, and oxides of nitrogen (NO_x); therefore, an air quality permit is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
 4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. The current permit action is an administrative amendment; therefore an application is not required. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. A permit holder requesting an administrative amendment is not required to notify the public.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be used. The required BACT analysis is included in Section III of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Hollow of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of intent to transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because it is not a listed source and the facility's PTE is less than 250 tpy of any pollutant (excluding fugitive emissions).

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tpy of any pollutant;

- b. PTE > 10 tpy of any single HAP, PTE > 25 tpy of combined HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tpy of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2744-09 for Hollow, the following conclusions were made:
- a. Hollow has requested federally-enforceable permit operating limits be established to maintain the facility's PTE below 100 tpy and 80 tpy.
 - b. The facility's PTE is less than 10 tpy for any single HAP and less than 25 tpy of combined HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is subject to current NSPS (40 CFR 60, Subpart OOO and potentially Subpart IIII).
 - e. This facility is potentially subject to a current NESHAP standard (40 CFR 63, Subpart ZZZZ).
 - f. This source is not a Title IV affected source or a solid waste combustion unit.
 - g. This source is not an EPA designated Title V source.

Hollow has requested federally-enforceable permit limitations to remain a minor source of emissions with respect to Title V. Based on these limitations, the Department determined that this facility is not subject to the Title V Operating Permit Program. However, in the event that the EPA makes minor sources that are subject to NSPS obtain a Title V Operating Permit; this source will be subject to the Title V Operating Permit Program.

- h. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's PTE.
 - i. In applying for an exemption under this section the owner or operator of the facility shall certify to the Department that the source's PTE does not require the source to obtain an air quality operating permit.
 - ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.
3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal required by ARM 17.8.1204(3) shall contain a certification of truth, accuracy, and completeness by a responsible official. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. BACT Determination

A BACT determination is required for each new or modified source. Hollow shall install on the new or modified source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT determination was not required for the current permit action because the permit change is considered an administrative amendment.

IV. Emission Inventory

Emission Source	Emissions Tons/Year [PTE] ^{(a)(b)}							
	PM	PM ₁₀	PM _{2.5}	PM _{cond}	CO	NO _x	SO ₂	VOC
Aggregate Crushers	1.81	0.82	0.15	--	--	--	--	--
Aggregate Deck Screen	4.82	1.62	0.11	--	--	--	--	--
Material Handling	19.32	8.53	1.48	--	--	--	--	--
Diesel-Fired Generator Set [≤ 815 bhp]	5.67	5.67	1.00	0.14	17.20	79.84	5.28	6.47
Unpaved Roadways (Haul Roads)	5.49	1.51	0.15	--	--	--	--	--
EMISSION TOTALS ►	37.11	18.14	2.89	0.14	17.20	79.84	5.28	6.47

(a) Emission Inventory reflects enforceable limits on hours of operation of the diesel-fired generator engine to keep allowable NO_x emissions below the Title V threshold [100 tpy] and the State CMS SM Source threshold [80 tpy].

(b) PM emissions presented in the table represent the sum of the filterable and condensable particulate matter (CPM) fractions. All CPM is considered to be PM_{2.5}.

ASOS, Automated Surface Observing System	PTE, Potential To Emit
AWOS, Automated Weather Observing System	PM, particulate matter
BSFC, brake specific fuel consumption	PM _{COND} , condensable particulate matter
bhp, brake-horsepower	PM ₁₀ , particulate matter with an aerodynamic diameter of 10 microns or less
Btu, British Thermal Units	PM _{2.5} , particulate matter with an aerodynamic diameter of 2.5 microns or less
CMS, Compliance Monitoring Strategy	[Sum of condensable and filterable]
CO, carbon monoxide	SCC, Source Classification Code
EF, emission factor	SM, synthetic minor (with respect to Title V criteria pollutants)
hr, hour	SO ₂ , sulfur dioxide
lbs, pounds	TPH, tons per hour
MM, million	TPY, tons per year
mph, miles per hour	VMT, vehicle miles travelled
NO _x , oxides of nitrogen	VOC, volatile organic compounds

Portable Crushing and Screening Plant

Production Rate:

Crushers (3) 345 tons/hour (Maximum) 3,022,200 tons/year (Maximum)

Screens (2) 500 tons/hour (Maximum) 4,380,000 tons/year (Maximum)

Allowable Hours of Operation: 8760 hours/year [Material Processing]

6320 hours/year [Diesel-Fire Engine]

Power Source: Diesel-Fired Direct Drive Engine or Generator Set Engine Not To Exceed 815 bhp

Material Processing:

Aggregate Crushers [SCC 3-05-020-01]

Process Rate: 345 tons/hour

Operating Hours: 8760 hours/year

Particulate Emissions (controlled):

PM Emissions:

Emission Factor 0.0012 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.0012 lbs/ton) * (345 tons/hr) = 0.41 lbs/hr
(0.414 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 1.81 TPY

PM₁₀ Emissions:

Emission Factor 0.00054 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.00054 lbs/ton) * (345 tons/hr) = 0.19 lbs/hr
(0.1863 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.82 TPY

PM_{2.5} Emissions:

Emission Factor 0.00010 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.0001 lbs/ton) * (345 tons/hr) = 0.03 lbs/hr
(0.0345 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.15 TPY

Aggregate Cold Deck Screens [SCC 3-05-020-02]

Process Rate: 500 tons/hour
Operating Hours: 8760 hours/year

Particulate Emissions (controlled):

PM Emissions:

Emission Factor 0.0022 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.0022 lbs/ton) * (500 tons/hr) = 1.10 lbs/hr
(1.1 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 4.82 TPY

PM₁₀ Emissions:

Emission Factor 0.00074 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.00074 lbs/ton) * (500 tons/hr) = 0.37 lbs/hr
(0.37 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 1.62 TPY

PM_{2.5} Emissions:

Emission Factor 0.00005 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.00005 lbs/ton) * (500 tons/hr) = 0.03 lbs/hr
(0.025 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.11 TPY

Material Handling:

Fragmented Stone Load-In ► Ground Storage [SCC 3-05-020-31]

Process Rate: 345 tons/hour [Crusher Capacity]
Operating Hours: 8760 hours/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor 0.000031 lbs/ton [PM = PM₁₀/0.51 ► AP-42 Appendix B.2 - Table B.2.2, Category 3, 1/95]
Calculations (0.000031 lbs/ton) * (345 tons/hr) = 0.01 lbs/hr
(0.010695 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.05 TPY

PM₁₀ Emissions:

Emission Factor 0.000016 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.000016 lbs/ton) * (345 tons/hr) = 0.01 lbs/hr
(0.00552 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.02 TPY

PM_{2.5} Emissions:

Emission Factor 0.000005 lbs/ton [PM_{2.5} = PM*0.15 ► AP-42 Appendix B.2 - Table B.2.2, Category 3, 1/95]
Calculations (0.000005 lbs/ton) * (345 tons/hr) = 0.00 lbs/hr
(0.00160425 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.01 TPY

Conveyor Transfer Points [SCC 3-05-020-06]

Process Rate: 345 tons/hour [Maximum Facility Capacity]
Operating Hours: 8760 hours/year
Total Transfers: 20 Transfers [Worst-Case Based On Equipment Available]

Particulate Emissions (controlled):

PM Emissions:

Emission Factor 0.00014 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.00014 lbs/ton) * (345 tons/hr) * (20 Transfers) = 0.97 lbs/hr
(0.966 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 4.23 TPY

PM₁₀ Emissions:

Emission Factor 0.000046 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.000046 lbs/ton) * (345 tons/hr) * (20 Transfers) = 0.32 lbs/hr
(0.317 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 1.39 TPY

PM_{2.5} Emissions:

Emission Factor 0.000013 lbs/ton processed [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.000013 lbs/ton) * (345 tons/hr) * (20 Transfers) = 0.09 lbs/hr
(0.090 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.39 TPY

Storage Pile Load-In & Load-Out [SCC 30502505 / 30502502]

Process Rate: 345 tons/hour [Maximum Facility Capacity]
Operating Hours: 8760 hours/year
Pile Transfers: 2 [Initial Pile Formation]

Particulate Emissions (controlled):

Emission Factor $EF = k (0.0032) * [(U/5)^{1.3} / (M / 2)^{1.4}]$ [AP-42 13.2.4, 11/06]
where: EF, Emission Factor = lbs Emitted / ton Processed

k, Dimensionless Particle Size Multiplier PM = 0.74 [AP-42 13.2.4, 11/06]
 k, Dimensionless Particle Size Multiplier PM₁₀ = 0.35 [AP-42 13.2.4, 11/06]
 k, Dimensionless Particle Size Multiplier PM_{2.5} = 0.053 [AP-42 13.2.4, 11/06]
 U, Mean Wind Speed (mph) = 9.3 [ASOS/AWOS AVE-MT 10 yr Ave.]
 M, Material Moisture Content (%) = 2.10 [AP-42 13.2.4.1, 11/06]

PM Emissions:

Emission Factor EF = $0.74 * (0.0032) * [(9.33/5)^{1.3} / (2.1/2)^{1.4}] = 0.0050$ lbs/ton
 Calculations $(0.0050 \text{ lbs/ton}) * (345 \text{ tons/hr}) * (2 \text{ pile transfers}) = 3.43$ lbs/hr
 $(3.43 \text{ lbs/hr}) * (8760 \text{ hours/yr}) * (0.0005 \text{ tons/lb}) = 15.04$ TPY

PM₁₀ Emissions:

Emission Factor EF = $0.35 * (0.0032) * [(9.33/5)^{1.3} / (2.1/2)^{1.4}] = 0.0024$ lbs/ton
 Calculations $(0.0024 \text{ lbs/ton}) * (345 \text{ tons/hr}) * (2 \text{ piles}) = 1.62$ lbs/hr
 $(1.62 \text{ lbs/hr}) * (8760 \text{ hours/yr}) * (0.0005 \text{ tons/lb}) = 7.11$ TPY

PM_{2.5} Emissions:

Emission Factor EF = $0.053 * (0.0032) * [(9.33/5)^{1.3} / (2.1/2)^{1.4}] = 0.00036$ lbs/ton
 Calculations $(0.0004 \text{ lbs/ton}) * (345 \text{ tons/hr}) * (2 \text{ piles}) = 0.25$ lbs/hr
 $(0.25 \text{ lbs/hr}) * (8760 \text{ hours/yr}) * (0.0005 \text{ tons/lb}) = 1.08$ TPY

Diesel Generator Engine [SCC 2-02-001-02]

Engine Rating: 815 bhp [Design Maximum Output]
 Fuel Input: 5.71 MMBtu/hr [BSFC → 7,000 Btu/hp-hr]
 41.6 gallons/hour [Estimated → 19,300 Btu/lb]
 Hours of Operation: 6320 hours/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
 Calculations $(0.0022 \text{ lb/hp-hr}) * (815 \text{ bhp}) = 1.79$ lbs/hr
 $(1.79 \text{ lbs/hr}) * (6320 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 5.67$ TPY

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
 Calculations $(0.0022 \text{ lb/hp-hr}) * (815 \text{ bhp}) = 1.79$ lbs/hr
 $(1.79 \text{ lbs/hr}) * (6320 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 5.67$ TPY

PM_{2.5} Emissions (filterable):

Emission Factor 0.0479 lb/MMBtu [AP-42 Table 3.4-2, 10/96]
 Calculations $(0.0479 \text{ lb/MMBtu}) * (5.71 \text{ MMBtu/hr}) = 0.27$ lbs/hr
 $(0.27 \text{ lbs/hr}) * (6320 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 0.86$ TPY

PM_{2.5} Emissions (condensable):

Emission Factor	0.0077 lb/MMBtu	[AP-42 Table 3.4-2, 10/96]	
Calculations	(0.0077 lb/MMBtu) * (5.71 MMBtu/hr) =		0.04 lbs/hr
	(0.04 lbs/hr) * (6320 hrs/yr) * (0.0005 tons/lb) =		0.14 TPY

CO Emissions (uncontrolled):

Emission Factor	0.00668 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.00668 lb/hp-hr) * (815 bhp) =		5.44 lbs/hr
	(5.44 lbs/hr) * (6320 hrs/yr) * (0.0005 tons/lb) =		17.20 TPY

NO_x Emissions (uncontrolled):

Emission Factor	0.031 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.031 lb/hp-hr) * (815 bhp) =		25.27 lbs/hr
	(25.27 lbs/hr) * (6320 hrs/yr) * (0.0005 tons/lb) =		79.84 TPY

SO₂ Emissions (uncontrolled):

Emission Factor	0.00205 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.00205 lb/hp-hr) * (815 bhp) =		1.67 lbs/hr
	(1.67 lbs/hr) * (6320 hrs/yr) * (0.0005 tons/lb) =		5.28 TPY

VOC Emissions (uncontrolled):

Emission Factor	0.002514 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.002514 lb/hp-hr) * (815 bhp) =		2.05 lbs/hr
	(2.05 lbs/hr) * (6320 hrs/yr) * (0.0005 tons/lb) =		6.47 TPY

Unpaved Roadways (Haul Roads) - Secondary Emissions

Miles Travelled: 5 Miles/Day [Estimate]
Vehicle Weight: 50 Tons [Mean Vehicle Weight Empty/Full]
Control Method: Water Application
Control Efficiency (C_e): 50%

Particulate Emissions (controlled):

Emission Factor	EF = k(s/12) ^a * (W/3) ^b	[AP-42 13.2.2.2, 11/06]	
	where: EF, Emission Factor = lbs Emitted Per Vehicle Mile Traveled (VMT)		
	k, Empirical Constant PM =	4.9 [AP-42 Table 13.2.2-2, 11/06]	
	k, Empirical Constant PM ₁₀ =	1.5 [AP-42 Table 13.2.2-2, 11/06]	
	k, Empirical Constant PM _{2.5} =	0.15 [AP-42 Table 13.2.2-2, 11/06]	
	s, Surface Material Silt Content (%) =	7.1 [AP-42 Table 13.2.2-1, 11/06]	
	W, Mean Vehicle Weight (tons) =	50 [Applicant Provided Data]	
	a, Empirical Constant PM =	0.7 [AP-42 Table 13.2.2-2, 11/06]	
	a, Empirical Constant PM ₁₀ /PM _{2.5} =	0.9 [AP-42 Table 13.2.2-2, 11/06]	
	b, Empirical Constant PM - PM _{2.5} =	0.45 [AP-42 Table 13.2.2-2, 11/06]	

PM Emissions:

Emission Factor	$EF = 4.9 * (7.1/12)^{0.7} * (50/3)^{0.45} =$	12.04 lbs/VMT	
Calculations	$(12.04 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 \text{ Ce}) =$		30.09 lbs/day
	$(30.09 \text{ lbs/day}) * (365 \text{ days/yr}) * (0.0005 \text{ tons/lb}) =$		5.49 TPY

PM₁₀ Emissions:

Emission Factor	$EF = 1.5 * (7.1/12)^{0.9} * (50/3)^{0.45} =$	3.32 lbs/VMT	
Calculations	$(3.32 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 \text{ Ce}) =$		8.29 lbs/day
	$(8.29 \text{ lbs/day}) * (365 \text{ days/yr}) * (0.0005 \text{ tons/lb}) =$		1.51 TPY

PM_{2.5} Emissions:

Emission Factor	$EF = 0.15 * (7.1/12)^{0.9} * (50/3)^{0.45} =$	0.33 lbs/VMT	
Calculations	$(0.33 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 \text{ Ce}) =$		0.83 lbs/day
	$(0.83 \text{ lbs/day}) * (365 \text{ days/yr}) * (0.0005 \text{ tons/lb}) =$		0.15 TPY

V. Existing Air Quality

The designed home-pit (Section 25, Township 3 North, Range 8 West, in Silver Bow County) for this portable operation is to be located in an area designated as nonattainment for PM₁₀ and attainment or unclassified for all other National Ambient Air Quality Standards.

VI. Air Quality Impacts

MAQP #2744-09 covers operation of the crushing and screen plant while operating in areas within Montana that are classified as attainment or unclassifiable with federal ambient air quality standards, excluding counties that have a Department-approved permitting program and areas that are considered tribal lands. This permit contains conditions and limitations that would protect air quality, and would limit the facility's emissions below the major source threshold. Furthermore, this facility is a portable source that would operate on an intermittent and temporary basis, so any effects to air quality will be minor and of limited duration.

While the source is located in or within 10 km of a PM₁₀ nonattainment area, Hollow will be required to operate in accordance with MAQP #2744-09 and Addendum #7, which includes more stringent limits and conditions to ensure that the proposed operation does not result in additional degradation of air quality in the affected nonattainment area. A more detailed discussion and analysis of ambient impacts from operations locating in or within 10 km of certain PM₁₀ nonattainment areas is contained in the Addendum Analysis to Addendum #7 of MAQP #2744-09.

VII. Ambient Air Impact Analysis

The Department determined that there will be no significant impact from this permit action. Furthermore, the Department believes that the amount of emissions generated by this project will not exceed any set ambient standard.

VIII. Taking or Damaging Implication Analysis

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

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

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

IX. Environmental Assessment

The current permit action is considered an administrative amendment; therefore, an environmental assessment is not required.

MAQP Analysis Prepared By: D. Kuenzli

Date: April 19, 2013

Addendum #7
Hollow Contracting, Inc.
Montana Air Quality Permit (MAQP) #2744-09

An addendum to Montana Air Quality Permit (MAQP) #2744-09 is hereby granted to Hollow Contracting, Inc. (Hollow), pursuant to Sections 75-2-204 and 75-2-211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.765, as amended, for the following:

I. Permitted Equipment

Hollow owns a portable crushing and screening plant consisting of up to three (3) crushers and two (2) screens with a combined maximum rated design capacity of 345 TPH crushing production and 500 TPH of screening production. Associated equipment included a single 810 brake-horsepower (bhp) diesel-fired generator set and miscellaneous material handling equipment.

II. Seasonal and Site Restrictions – **Winter and Summer Seasons**

Addendum #7 applies to the Hollow facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1-March 31) – The only location(s) in or within 10 km of a PM₁₀ nonattainment area where Hollow may operate is:
- Section 25 (Tract 1), Township 3 North, Range 8 West, in Silver Bow County, Montana; and
 - Any other site that may be approved, in writing, by the Department of Environmental Quality (Department).
- B. During the summer season (April 1-September 30) – Hollow may operate at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM₁₀ nonattainment areas.
- C. Hollow shall comply with the limitations and conditions contained in Addendum #7 to MAQP #2744-09 while operating in or within 10 km of any of the previously identified PM₁₀ nonattainment areas. Addendum #7 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum #7 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

- A. Operational Limitations and Conditions – **Summer Season (April 1 – September 30)**
1. Water spray bars must be available and operated, as necessary, on the crushers, screens, and all transfer points whenever the crushing/screening plant is in operation (ARM 17.8.749).
 2. Hollow shall not cause or authorize to be discharged into the atmosphere from any equipment, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749). For NSPS-affected equipment

constructed after April 22, 2008, for which an opacity limitation of 7% applies (such as screens and conveyors), that 7% limit shall apply to the affected equipment (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

3. Hollow shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater (ARM 17.8.749).
4. Hollow shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).
5. Hollow shall not operate, or have on-site, more than three (3) crushers at any one time. Total crusher production shall not exceed 8,280 tons per day (ARM 17.8.749).
6. Hollow shall not operate, or have onsite, more than two (2) screens at any one time. Total screen production shall not exceed 12,000 tons per day (ARM 17.8.749).
7. Hollow shall not operate or have on-site more than one (1) diesel-fired generator engine. The maximum rate capacity of the engine that drives the generator shall not exceed 815 bhp (ARM 17.8.749).

B. Operational Limitations and Conditions – Winter Season (October 1-March 31)

1. Water spray bars must be available and operated, as necessary, on the crushers, screens, and all transfer points whenever the crushing/screening plant is in operation (ARM 17.8.749).
2. Hollow shall not cause or authorize to be discharged into the atmosphere from any equipment, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749). For NSPS-affected equipment constructed after April 22, 2008 for which an opacity limitation of 7% applies (such as screens and conveyors), that 7% limit shall apply to the affected equipment (ARM 17.8.340 and 40 CFR 60, Subpart OOO).
3. Hollow shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater (ARM 17.8.749).
4. Hollow shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).
5. Hollow shall not operate, or have on-site, more than three (3) crushers at any one time. Total crusher production shall not exceed 5,175 tons per day (ARM 17.8.749).
6. Hollow shall not operate, or have onsite, more than two (2) screens at any one time. Total screen production shall not exceed 7,500 tons per day (ARM 17.8.749).
7. Hollow shall not operate or have on-site more than one (1) diesel-fired generator engine. The maximum rate capacity of the engine that drives the generator shall not exceed 815 bhp (ARM 17.8.749).

8. Operation of the diesel engine driving the generator shall not exceed 15 hours per day. (ARM 17.8.749).

C. Operational Reporting Requirements

1. If this crushing/screening plant is moved to another nonattainment location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Production information for the sites covered by this addendum must be maintained for five years and submitted to the Department upon request. The information must include (ARM 17.8.749):
 - a. Daily tons of material crushed by each crusher at each site (including amount of recirculated/rerun material). Hollow shall document, by day, the total crushing production. Hollow shall sum the total crushing production for the previous day to demonstrate compliance with the limitations in Sections III.A.5 and III.B.5.
 - b. Daily tons of material screened by each screen at each site (including amount of recirculated/rerun material). Hollow shall document, by day, the total screening production. Hollow shall sum the total screening production for the previous day to demonstrate compliance with the limitations in Sections III.A.6 and III.B.6.
 - c. Daily bhp rating and hours of operation for the generator set diesel engine at each site to demonstrate compliance with the limitations in Sections III.A.7, III.B.7 and III.B.8.
 - d. Daily tons of bulk material loaded at each site (production).
 - e. Daily hours of operation at each site.
 - f. Fugitive dust information consisting of the daily total miles driven on unpaved roads within the operating site for all plant vehicles.

Addendum #7 Analysis
Hollow Contracting, Inc.
Montana Air Quality Permit (MAQP) #2744-09

I. Permitted Equipment

Hollow owns a portable crushing and screening plant consisting of up to three (3) crushers and two (2) screens with a combined maximum rated design capacity of 345 TPH crushing production and 500 TPH of screening production. Associated equipment included a single 810 brake-horsepower (bhp) diesel-fired generator set and miscellaneous material handling equipment.

II. Source Description

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

III. Applicable Rules and Regulations

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

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

- A. ARM 17.8.749 Conditions for Issuance of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
- B. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one location to another if:
 - 1. Written notice of intent to transfer location and proof of public notice are sent to the Department;
 - 2. The source will operate in the new location for a period of less than 1 year; and
 - 3. The source will not have any significant impact on any nonattainment area or any Class I area.

IV. Emission Inventory

Emission Source	PM ₁₀ Emissions	
	Summer [April 1 - Sept 31]	Winter [Oct 1 – March 31]
Aggregate Crushers	4.47 (lbs/day)	2.79 (lbs/day)
Aggregate Deck Screen	8.88	5.55
Material Handling	54.87	34.30
Diesel-Fired Generator Set [≤ 815 bhp]	43.03	26.90
Unpaved Roadways (Haul Roads)	8.29	8.29
TOTAL EMISSIONS ►	119.55	77.83

ASOS, Automated Surface Observing System AWOS, Automated Weather Observing System bhp, brake-horsepower BSFC, brake-specific fuel consumption hrs, hours lbs, pounds Btu, British Thermal Units	MM, million mph, miles per hour PM ₁₀ , particulate matter with an aerodynamic diameter of 10 microns or less PTE, potential to emit SCC, Source Classification Code VMT, vehicle miles travelled
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Portable Crushing and Screening Plant

Production Rate:		Summer Months	Winter Months
Crushers (3)	345 tons/hour (Max)	8,280 tons/day (Max)	5,175 tons/day (Allowable)
Deck Screen (2)	500 tons/hour (Max)	12,000 tons/day (Max)	7,500 tons/day (Allowable)
Allowable Hours of Operation [Material Processing Plant and Generator Set]			
	Summer Season:	24 hours/day	
	Winter Season:	15 hours/day (Allowable)	

Power Source: 815 bhp Diesel-Fired Generator Set

Material Processing:

Aggregate Crushers [SCC 3-05-020-01]

Process Rate: 345 tons/hour
 Operating Hours: 24 hours/day (Summer Season)
 15 hours/day (Winter Season)

PM₁₀ Emissions (controlled):

Emission Factor	0.00054 lbs/ton processed	[AP-42 Table 11.19.2-2, 8/04]
Calculations	(0.00054 lbs/ton) * (345 tons/hr) =	0.19 lbs/hr
	(0.1863 lbs/hr) * (24 hrs/day) =	4.47 lbs/day (Summer Season)
	(0.1863 lbs/hr) * (15 hrs/day) =	2.79 lbs/day (Winter Season)

Aggregate Cold Deck Screens [SCC 3-05-020-02]

Process Rate: 500 tons/hour
 Operating Hours: 24 hours/day (Summer Season)
 15 hours/day (Winter Season)

PM₁₀ Emissions (controlled):

Emission Factor	0.00074 lbs/ton processed	[AP-42 Table 11.19.2-2, 8/04]
Calculations	(0.00074 lbs/ton) * (500 tons/hr) =	0.37 lbs/hr
	(0.37 lbs/hr) * (24 hrs/day) =	8.88 lbs/day (Summer Season)
	(0.37 lbs/hr) * (15 hrs/day) =	5.55 lbs/day (Winter Season)

Material Handling:

Fragmented Stone Load-In ► Ground Storage [SCC 3-05-020-31]

Process Rate:	500 tons/hour [Screen Capacity]
Operating Hours:	24 hours/day (Summer Season)
	15 hours/day (Winter Season)

Particulate Emissions (uncontrolled):

PM₁₀ Emissions (uncontrolled):

Emission Factor	0.000016 lbs/ton processed	[AP-42 Table 11.19.2-2, 8/04]
Calculations	(0.000016 lbs/ton) * (500 tons/hr) =	0.01 lbs/hr
	(0.008 lbs/hr) * (24 hrs/day) =	0.19 lbs/day (Summer Season)
	(0.008 lbs/hr) * (15 hrs/day) =	0.12 lbs/day (Winter Season)

Conveyor Transfer Points [SCC 3-05-020-06]

Process Rate:	500 tons/hour [Screen Capacity]
Operating Hours:	24 hours/day (Summer Season)
	15 hours/day (Winter Season)
Total Transfers:	20 Transfers [Based on Process Flow Diagram]

PM₁₀ Emissions (controlled):

Emission Factor	0.000046 lbs/ton processed	[AP-42 Table 11.19.2-2, 8/04]
Calculations	(0.000046 lbs/ton) * (500 tons/hr) * (20 Transfers) =	0.46 lbs/hr
	(0.46 lbs/hr) * (24 hrs/day) =	11.04 lbs/day (Summer Season)
	(0.46 lbs/hr) * (15 hrs/day) =	6.90 lbs/day (Winter Season)

Storage Pile Load-In & Load-Out [SCC 30502505 / 30502502]

Process Rate:	500 tons/hour [Screen Capacity]
Operating Hours:	24 hours/day (Summer Season)
	15 hours/day (Winter Season)
Pile Transfers:	2 [Plant Load-in → Initial Pile Formation]

PM₁₀ Emissions (uncontrolled):

Emission Factor	$EF = k (0.0032) * [(U/5)^{1.3} / (M / 2)^{1.4}]$	[AP-42 13.2.4, 11/06]
	where: EF, Emission Factor = lbs Emitted / ton Processed	
	k, Dimensionless Particle Size Multiplier PM =	0.74 [AP-42 13.2.4, 11/06]
	k, Dimensionless Particle Size Multiplier PM ₁₀ =	0.35 [AP-42 13.2.4, 11/06]
	k, Dimensionless Particle Size Multiplier PM _{2.5} =	0.053 [AP-42 13.2.4, 11/06]
	U, Mean Wind Speed (mph) =	9.3 [ASOS/AWOS AVE-MT 10 yr Ave.]
	M, Material Moisture Content (%) =	2.53 [AP-42 13.2.4.3, 11/06]

Emission Factor	$EF = 0.35 * (0.0032) * [(9.33/5)^{1.3} / (2.525/2)^{1.4}] =$	0.0018 lbs/ton
Calculations	$(0.0018 \text{ lbs/ton}) * (500 \text{ tons/hr}) * (2 \text{ piles}) =$	1.82 lbs/hr
	$(1.818 \text{ lbs/hr}) * (24 \text{ hrs/day}) =$	43.64 lbs/day (Summer Season)
	$(1.818 \text{ lbs/hr}) * (15 \text{ hrs/day}) =$	27.28 lbs/day (Winter Season)

Diesel Generator Engine [SCC 2-02-001-02]

Engine Rating:	815 bhp [Maximum Rated Output]
Fuel Input:	5.71 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
	41.6 gallons/hour [Estimated →19,300 Btu/lb]
Hours of Operation:	24 hours/day (Summer Season)
	15 hours/day (Winter Season)

PM₁₀ Emissions (uncontrolled):

Emission Factor	0.0022 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]
Calculations	$(0.0022 \text{ lb/hp-hr}) * (815 \text{ bhp})$	1.79 lbs/hr
	$(1.793 \text{ lbs/hr}) * (24 \text{ hrs/day})$	43.03 lbs/day (Summer Season)
	$(1.793 \text{ lbs/hr}) * (15 \text{ hrs/day})$	26.90 lbs/day (Winter Season)

Unpaved Roadways (Haul Roads) - Secondary Emissions

Miles Travelled:	5 Miles/Day [Estimate]
Vehicle Weight:	50 Tons [Mean Vehicle Weight Empty/Full]
Control Method:	Water Application
Control Efficiency (C _e):	50%

PM₁₀ Emissions:

Emission Factor	$EF = k(s/12)^a * (W/3)^b$	[AP-42 13.2.2.2, 11/06]
	where: EF, Emission Factor = lbs Emitted Per Vehicle Mile Traveled (VMT)	
	k, Empirical Constant PM =	4.9 [AP-42 Table 13.2.2-2, 11/06]
	k, Empirical Constant PM ₁₀ =	1.5 [AP-42 Table 13.2.2-2, 11/06]
	k, Empirical Constant PM _{2.5} =	0.15 [AP-42 Table 13.2.2-2, 11/06]
	s, Surface Material Silt Content (%) =	7.1 [AP-42 Table 13.2.2-1, 11/06]
	W, Mean Vehicle Weight (tons) =	50 [Applicant Provided Data]
	a, Empirical Constant PM =	0.7 [AP-42 Table 13.2.2-2, 11/06]
	a, Empirical Constant PM ₁₀ /PM _{2.5} =	0.9 [AP-42 Table 13.2.2-2, 11/06]
	b, Empirical Constant PM - PM _{2.5} =	0.45 [AP-42 Table 13.2.2-2, 11/06]
Emission Factor	$EF = 1.5 * (7.1/12)^{0.9} * (50/3)^{0.45} =$	3.32 lbs/VMT
Calculations	$(3.32 \text{ lbs/VMT}) * (5 \text{ miles/day}) =$	16.59 lbs/day (Summer Season)
	$(3.32 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 C_e) =$	8.29 lbs/day (Winter Season)

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀). Due to exceedance of the national standards for PM₁₀, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM₁₀. As a result of this designation, the EPA required the Department and the City-County Health Departments to submit

PM₁₀ State Implementation Plans (SIP). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies identified these sources to be the major contributors to PM₁₀ emissions.

MAQP #2744-09 and Addendum #7 are for a portable crushing/screening plant that will locate at sites in or within 10 kilometers (km) of certain PM₁₀ nonattainment areas. The more stringent operating conditions contained in the addendum will minimize any potential impact on the nonattainment areas and will protect the national ambient air quality standards. Also, this facility is a portable source that would be expected to operate on an intermittent and temporary basis and any effects on air quality would be expected to be minor and short-lived.

VI. Air Quality Impacts

MAQP #2744-09 and Addendum #7 will cover the operations of this portable crushing/screening plant, while operating in or within 10 km of a PM₁₀ nonattainment area during the summer months (April 1 through September 30).

VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

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

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

VIII. Environmental Assessment

The current permit action is considered an administrative amendment; therefore, an environmental assessment is not required.

Addendum Analysis Prepared by: D. Kuenzli
Date: April 19, 2013