Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
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December 16, 2011

Tim Kaschmitter
Kaschmitter Enterprises Inc.
616 West North Street
Grangeville, ID 83530-1240

Dear Mr. Kaschmitter:

Montana Air Quality Permit #4054-01 is deemed final as of December 16, 2011, by the Department of Environmental Quality (Department). This permit is for a portable crushing and screening operation. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-3490

Stephen Coe P.E.
Environmental Engineer
Air Resources Management Bureau
(406) 782-2689 ext 209

VW:SC
Enclosures

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Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #4054-01

Kaschmitter Enterprises Inc.
616 West North Street
Grangeville, ID 83530-1240

December 16, 2011

MONTANA AIR QUALITY PERMIT

Issued To: Kaschmitter Enterprises Inc.
DBA Camas Gravel Co.
616 West North Street
Grangeville, ID 83530

Montana Air Quality Permit: #4054-01
Application Complete: October 24, 2011
Preliminary Determination Issued: November 14, 2011
Department's Decision Issued: November 30, 2011
Permit Final: December 16, 2011
AFS #: 777-4054

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Kaschmitter Enterprises Inc./DBA Camas Gravel Co. (Camas) 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

Camas operates a portable crushing/screening operation with an original location in Section 35, Township 12 North, Range 22 West, Missoula County, Montana. MAQP #4054-01 applies while operating at any location in Montana, except those areas having a Montana Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana*.

B. Current Permit Action

Camas submitted a request to update MAQP #4054-00 to change the equipment identified within the permit. New equipment includes: one jaw crusher, one impact crusher, and one three deck screen. Existing equipment includes: two cone crushers, one three deck screen, one two deck screen, one 1,071 horsepower (HP) diesel generator, and associated equipment.

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 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 (such as screens and conveyors) shall not exhibit an opacity in excess of the following averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR 60, Subpart OOO):

- For equipment that commence construction, modification, or reconstruction on or after April 22, 2008: 7% opacity

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

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

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

5. Camas 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. Camas 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. Camas shall not operate more than four (4) crushers at any given time and the maximum combined rated capacity of the crushers shall not exceed 1,400 tons per hour (TPH) (ARM 17.8.749).

8. Camas shall not operate more than three (3) screens at any given time and the maximum rated combined capacity of the screens shall not exceed 900 TPH (ARM 17.8.749).

9. Camas shall not operate more than one (1) diesel engine driven generator at any given time and the maximum rated capacity of the Engine shall not exceed 1,071 HP (ARM 17.8.749)

10. Operation of the diesel engine driving the generator shall not exceed 6,070 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 Camas, 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. Camas shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart OOO (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

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, General Provisions and Subpart OOO). Additional testing may be required by 40 CFR 60, Subpart OOO (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

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

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

C. Operational Reporting Requirements

1. If this crushing/screening plant is moved to another location, an Intent to Transfer form must be sent to the Department. In addition, 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 Intent to Transfer form and 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. Camas 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 for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

3. Camas 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 or the addition of a new emission unit. 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. Camas shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. The records complied in accordance with this permit shall be maintained by Camas 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. Camas shall document, by month, the hours of operation of the diesel generators. By the 25th day of each month, Camas shall calculate the hours of operation for the diesel generators for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.11. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

6. Camas shall annually certify that its emissions are less than those that would require the facility 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 along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

D. Notification – (New Equipment)

Camas shall provide the Department with written notification of the actual start-up date of the additional crushers and additional screen, postmarked within 15 days after the actual start-up date (ARM 17.8.749)

SECTION III: General Conditions

A. Inspection – Camas 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 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 Camas fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Camas 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. Air Quality Operation Fees – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Camas 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. Camas 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.

Montana Air Quality Permit (MAQP) Analysis
Kaschmitter Enterprises Inc./DBA Camas Gravel Co.
MAQP #4054-01

I. Introduction/Process Description

Kaschmitter Enterprises Inc./DBA Camas Gravel Co. (Camas) owns and operates a crushing and screening operation.

A. Permitted Equipment

Camas owns and operates a portable crushing/screening facility consisting of two cone crushers, one jaw crusher, one impact crusher, two three deck screens, one two deck screen, one 1,071 horsepower (HP) diesel generator, and associated equipment.

B. Source Description

Camas will initially be located in Section 35, Township 12 North, Range 22 West, in Missoula County, Montana. MAQP #4054-01 will apply to the source while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Camas will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of certain PM_{10} nonattainment areas.

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

C. Permit History

On February 22, 2007, Camas was issued **MAQP #4054-00** to operate a portable crushing/screening facility consisting of a 1998 Pioneer Jaw Crusher (300 ton per hour (TPH)), a 2006 Nordberg Cone Crusher (400 TPH), a 1984 Nordberg Cone Crusher (300 TPH), a 1987 Seco 2-Deck Screen Plant (300 TPH), a 1994 Fab-Tec 3-Deck Screen Plant (300 TPH), a diesel generator (up to 725 kilowatts (kW)), and associated equipment.

D. Current Permit Action

On October 24, 2011, Camas submitted an application to update MAQP #4054-00 to change the equipment identified within the permit. New equipment includes: one jaw crusher, one impact crusher, and one three deck screen. Existing equipment includes: two cone crushers, one three deck screen, one two deck screen, one 1,071 HP diesel generator, and associated equipment. MAQP #4054-00 was also updated to reflect current permit language and rule references used by the Department. **MAQP #4054-01** replaces MAQP #4054-00.

E. Additional Information

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

II. Applicable Rules and Regulations

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

   Camas 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 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

Camas 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 be taken to control emissions of airborne Particulate Matter (PM). (2) Under this rule, Camas 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 CFR 60, Standards of Performance for New Stationary Sources (NSPS). The owner or operator of any stationary source or modification, as defined and applied in 40 CFR 60, NSPS, shall comply with the standards and provisions of 40 CFR 60.

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

   b. 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants. In order for a crushing plant to be subject to this subpart, the facility must meet the definition of an affected facility and, the affected equipment must have been constructed, reconstructed, or modified after August 31, 1983. Based on the information submitted by Camas, the portable crushing equipment to be used under MAQP #4054-01 is subject to this subpart because the date of manufacture of the equipment (40 CFR Part 60, Subpart A General Provisions, and Subpart OOO, Non-Metallic Mineral Processing Plants).

c. 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE). 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.

Based on the information submitted by Camas, the CI ICE equipment to be used under MAQP #4054-01 is not currently subject to this subpart because it was manufactured prior to the applicable dates. However, this subpart would become applicable if a CI ICE were modified, constructed, or reconstructed after July 11, 2005, and if they remain in a location for more than 12 months.

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

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

40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants (HAPs) for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of HAP emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. An area source of HAP emissions is a source that is not a major source. Based on the information submitted by Camas, the RICE equipment to be used under MAQP #4054-01 may potentially be subject to this subpart because it operates a compression ignition RICE at an area source of HAP emissions. However since the RICE was constructed prior to June 12, 2006, and the RICE is intended to be portable Camas does not have to comply with the applicable emission limitations and operating limitations of 40 CFR 63, subpart ZZZZ. However, this subpart would become applicable if a RICE were modified, constructed, or reconstructed after June 12, 2005, and if they remain in a location for more than 12 months.

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

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

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 alteration to construct, alter, or use any asphalt plant, crusher or screen that has the Potential to Emit (PTE) greater than 15 tons per year (TPY) of any pollutant. Camas has a PTE greater than 15 TPY of PM, PM_{10}, nitrogen oxides (NOx), and carbon monoxide (CO) 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, alteration, or use of a source. Camas submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Camas submitted an affidavit of publication of public notice for the October 13, 2011, issue of the *Missoulian*, a newspaper of general circulation in the Town of Missoula in Missoula County, as proof of compliance with the public notice requirements.

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

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section 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 Camas of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

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

11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of 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 Modification--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 since 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 one Hazardous Air Pollutant (HAP), PTE > 25 TPY of a combination of all HAPs, or lesser quantity as the Department may establish by rule, or

   c. PTE > 70 TPY of PM_{10} in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #4054-01 for Camas, the following conclusions were made:

   a. The facility's PTE is greater than 100 TPY for NOx pollutant. Camas has requested federally-enforceable permit operating limits be established to maintain the facility's PTE to less than the 100 TPY threshold.

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

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

   d. This facility is subject to current NSPS (40 CFR 60, Subpart OOO).

   e. This facility is potentially subject to the area source provisions of a current NESHAP standard (40 CFR 63, Subpart ZZZZ).

   f. This source is not a Title IV affected source.

   g. This source is not a solid waste combustion unit.

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

   Camas 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.

   i. 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 certification by a responsible official of truth, accuracy, and completeness. 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 altered source. Camas shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

Area Source Fugitive Emissions and Crushing Emissions

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

Camas shall not cause or authorize to be discharged into the atmosphere from any NSPS - affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over 6 consecutive minutes. Further, Camas shall not cause or authorize to be discharged into the atmosphere from any non-NSPS affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. Camas must also take reasonable precautions to limit the fugitive emissions of airborne particulate matter from haul roads, access roads, parking areas, and the general area of operation. Camas is required to have water spray bars and water available on site (at all times) and to apply the water, as necessary, to maintain compliance with the opacity and reasonable precaution limitations. Camas may also use chemical dust suppression, in order to maintain compliance with emission limitations in Section I.A of MAQP #4054-01. The Department determined that using water spray bars, water, and/or chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precaution limitations constitutes BACT for the crushing/screening operation.

IV. Emission Inventory

	tons/year						
Emission Source	**PM**	**PM_{10}**	**$PM_{2.5}$**	**NO_x**	**CO**	**VOC**	**SO_2**
1071 hp Diesel Generator Engine	2.28	2.28	2.28	78.01	17.88	2.29	6.66
400 TPH Jaw Crusher	2.10	0.95	0.18	--	--	--	--
1000 TPH Combined Cone/Impact crushing	5.26	2.37	0.44	--	--	--	--
Screens	8.67	2.92	0.20	--	--	--	--
Piles	10.11	4.78	0.72	--	--	--	--
Plant Load-Out	0.19	0.10	0.01	--	--	--	--
Haul Roads / Vehicle Traffic	17.05	4.70	0.94	--	--	--	--
Cold Aggregate Handling/Conveyors	18.89	6.21	1.75	--	--	--	--
Total Emissions	**64.55**	**24.29**	**6.52**	**78.01**	**17.88**	**2.29**	**6.66**

Inventory reflects maximum allowable emissions for all pollutants based on maximum production and year-round operation (8,760 hours), with the exception of the diesel engine. The generator operations have been limited to 6,070 hours per year to limit NO_x emissions below 80 TPY.

Diesel Generator Engine

Note: Emissions are based on the power output of the engine (1071 hp).
Operational Capacity of Engine = 1,071 hp
Hours of Operation = 6,070.00 hours

PM Emissions:
PM Emissions = 2.28 ton/yr (Assume all PM < 1.0 um)

PM_{10} Emissions:
Emission Factor = 0.0007 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)
Calculation: (6,070 hours) * (1,071 hp) * (0.0007 lbs/hp-hr) * (ton/2000 lb) = 2.28 ton/yr

PM2.5 Emissions
Emission Factor = 0.0007 lbs/hp-hr (Assume all PM < 1.0 um)
Calculation: (6,070 hours) * (1,071 hp) * (0.0007 lbs/hp-hr) * (ton/2000 lb) = 2.28 ton/yr (Assume PM < 1.0 um)

NO_x Emissions:
Emission Factor = 0.024 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)
Calculation: (6,070 hours) * (1,071 hp) * (0.024 lbs/hp-hr) * (ton/2000 lb) = 78.01 ton/yr

CO Emissions:
Emission Factor = 0.0055 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, 10/96)
Calculation: (6,070 hours) * (1,071 hp) * (0.0055 lbs/hp-hr) * (ton/2000 lb) = 17.88 ton/yr

VOC Emissions:
Emission Factor = 0.000705 lbs/hp-hr (AP-42, Sec. 3.4, Table 3.4-1, TOC, Exhaust & Crankcase, 10/96)
Calculation: (6,070 hours) * (1,071 hp) * (0.000705 lbs/hp-hr) * (ton/2000 lb) = 2.29 ton/yr

SO_2 Emissions:
Emission Factor = 0.00205 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)
Calculation: (6,070 hours) * (1,071 hp) * (0.00205 lbs/hp-hr) * (ton/2000 lb) = 6.663 ton/yr

Crushing [Jaw Crusher] (SCC 3-05-020-05)

Maximum Process Rate = 400 ton/hr (Application information)
Maximum Hours of Operation = 8,760 hrs/yr

PM Emissions:

Emission Factor = 0.0012 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)

Calculation: (400 ton/hr) * (8760 hrs/yr) * (0.0012 lb/ton) * (ton/2000 lb) = 2.10 ton/yr

PM_{10} Emissions:

Emission Factor = 0.00054 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)

Calculation: (400 ton/hr) * (8760 hrs/yr) * (0.00054 lb/ton) * (ton/2000 lb) = 0.95 ton/yr

PM2.5 Emissions

Emission Factor = 0.0001 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)

Calculation: (400 ton/hr) * (8760 hrs/yr) * (0.0001 lb/ton) * (ton/2000 lb) = 0.18 ton/yr

Crushing [Jaw Crusher] (SCC 3-05-020-05) AS APPLIED TO CONE CRUSHER(S)

Maximum Process Rate = 1,000 ton/hr (Maximum plant process rate) (Combined Cone Crushing Capacity)
Maximum Hours of Operation = 8,760 hrs/yr

PM Emissions:
Emission Factor = 0.0012 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)
Calculation: (1,000 ton/hr) * (8760 hrs/yr) * (0.0012 lb/ton) * (ton/2000 lb) = 5.26 ton/yr

PM_{10} Emissions:
Emission Factor = 0.00054 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)
Calculation: (1,000 ton/hr) * (8760 hrs/yr) * (0.00054 lb/ton) * (ton/2000 lb) = 2.37 ton/yr

PM2.5 Emissions:
Emission Factor = 0.0001 lb/ton (tertiary crushing, controlled, AP 42, Table 11.19.2-2, 8/04)
Calculation: (1,000 ton/hr) * (8760 hrs/yr) * (0.0001 lb/ton) * (ton/2000 lb) = 0.44 ton/yr

Screening (SCC 3-05-020-02, 03)

Maximum Process Rate = 900 ton/hr (Maximum plant process rate)
Maximum Hours of Operation = 8,760 hrs/yr 7884000 tons/year
Number of Screens = 1 screen(s) (Company Information) Total combined screening capacity.

Total PM Emissions:
Emission Factor = 0.0022 lb/ton (0.025 uncontrolled, 0.0022 controlled, AP 42, Table 11.19.2-2, 8/04)
Calculation: (900 ton/hr) * (8760 hrs/yr) * (0.0022 lb/ton) * (ton/2000 lb) * (1 screen(s)) = 8.67 ton/yr

Total PM_{10} Emissions:
Emission Factor = 0.00074 lb/ton (0.0087 uncontrolled, 0.00074 controlled, AP 42, Table 11.19.2-2, 8/04)
Calculation: (900 ton/hr) * (8760 hrs/yr) * (0.00074 lb/ton) * (ton/2000 lb) * (1 screen(s)) = 2.92 ton/yr

Total PM2.5 Emissions

Emission Factor = 0.00005 lb/ton (ND uncontrolled, 0.000050 controlled, AP 42, Table 11.19.2-2, 8/04)

Calculation: (900 ton/hr) * (8760 hrs/yr) * (0.00005 lb/ton) * (ton/2000 lb) * (1 screen(s)) = 0.20 ton/yr

Cold Aggregate Storage Piles

Maximum Process Rate = 1,400 ton/hr (Maximum plant process rate)

Maximum Hours of Operation = 8,760 hrs/yr

Number of Piles = 1 piles

PM Emissions:

Predictive equation for emission factor provided per AP 42, Sec. 13.2.4.3, 11/06.

Emission Factor = k (0.0032) * (U/5)^1.3 * (M / 2)^-1.4 = 0.00330 lb/ton

Where: k = particle size multiplier = 0.74 (Value for PM < 30 microns per AP 42, Sec. 13.2.4.3, 11/06)

U = mean wind speed = 8.2 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

Control Efficiency = 50% (Water or chemical spray)

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00330 lb/ton) * (ton/2000 lb) * (1 piles) = 20.21 ton/yr

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00330 lb/ton) * (ton/2000 lb) * (1 piles) * (1 - 50/100) = 10.11 ton/yr

PM_{10} Emissions:

Predictive equation for emission factor provided per AP 42, Sec. 13.2.4.3, 11/06.

Emission Factor = k (0.0032) * (U/5)^1.3 * (M / 2)^-1.4 = 0.00156 lb/ton

Where: k = particle size multiplier = 0.35 (Value for PM < 10 microns per AP 42, Sec. 13.2.4.3, 11/06)

U = mean wind speed = 8.2 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

Control Efficiency = 50% (Water or chemical spray)

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00156 lb/ton) * (ton/2000 lb) * (1 piles) = 9.56 ton/yr

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00156 lb/ton) * (ton/2000 lb) * (1 piles) * (1 - 50/100) = 4.78 ton/yr

PM2.5 Emissions:

Predictive equation for emission factor provided per AP 42, Sec. 13.2.4.3, 11/06.

Emission Factor = k (0.0032) * (U/5)^1.3 * (M / 2)^-1.4 = 0.00024 lb/ton

Where: k = particle size multiplier = 0.053 (Value for PM < 2.5 microns per AP 42, Sec. 13.2.4.3, 11/06)

U = mean wind speed = 8.2 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)

Control Efficiency = 50% (Water or chemical spray)

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00024 lb/ton) * (ton/2000 lb) * (1 piles) = 1.45 ton/yr

Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.00024 lb/ton) * (ton/2000 lb) * (1 piles) * (1 - 50/100) = 0.72 ton/yr

Truck Unloading (SCC 3-05-020-31)

Maximum Process Rate = 1,400 ton/hr (Maximum plant process rate)
Maximum Hours of Operation = 8,760 hrs/yr
Number of loads = 1 loads (Estimate)

Total PM Emissions:
Emission Factor = 0.0000314 lb/ton (PM=PM10 / 51%, AP-42, Appendix B.2, Table B.2.2, Category 3, 9/90)
Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.0000314 lb/ton) * (ton/2000 lb) * (1 loads) = 0.19 ton/yr

Total PM_{10} Emissions:
Emission Factor = 0.000016 lb/ton (PM10=1.6E-05, AP 42, Table 11.19.2-2, 8/04)
Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.000016 lb/ton) * (ton/2000 lb) * (1 loads) = 0.10 ton/yr

Total PM2.5 Emissions:
Emission Factor = 0.0000024 lb/ton (PM2.5=1.6E-05 * 15%, AP-42, Appendix B.2, Table B.2.2, Category 3, 9/90)
Calculation: (1,400 ton/hr) * (8760 hrs/yr) * (0.0000024 lb/ton) * (ton/2000 lb) * (1 loads) = 0.01 ton/yr

Haul Roads

Vehicle Miles Traveled (VMT) per Day = 15 VMT/day (Estimate)
VMT per hour = (15 VMT/day) * (day/24 hrs) = 0.63 VMT/hr
Hours of Operation = 8,760 hrs/yr

PM Emissions:
Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.
Emission Factor = k * (s / 12)^a * (W / 3)^b = 12.46 lb/VMT
Where: k = constant = 4.9 lbs/VMT (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)
s = surface silt content = 7.1 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)
W = mean vehicle weight = 54 tons (1994 average loaded/unloaded or a 40 ton truck)
a = constant = 0.7 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)
b = constant = 0.45 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)
Control Efficiency = 50% (Water spray or chemical dust suppressant)
Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (12.46 lb/VMT) * (ton/2000 lb) = 34.11 tons/yr (Uncontrolled Emissions)
Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (12.46 lb/VMT) * (ton/2000 lb) * (1-50/100) = 17.05 tons/yr (Apply 50% control efficiency)

PM_{10} Emissions:

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor = k * (s / 12)^a * (W / 3)^b = 3.43 lb/VMT

Where: k = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 7.1 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 54 tons (1994 average loaded/unloaded or a 40 ton truck)

a = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (3.43 lb/VMT) * (ton/2000 lb) = 9.40 tons/yr (Uncontrolled Emissions)

Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (3.43 lb/VMT) * (ton/2000 lb) * (1-50/100) = 4.70 tons/yr (Apply 50% control efficiency)

PM2.5 Emissions

Predictive equation for emission factor for unpaved roads at industrial sites provided per AP 42, Ch. 13.2.2, 11/06.

Emission Factor = k * (s / 12)^a * (W / 3)^b = 0.34 lb/VMT

Where: k = constant = 0.15 lbs/VMT (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

s = surface silt content = 7.1 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)

W = mean vehicle weight = 54 tons (1994 average loaded/unloaded or a 40 ton truck)

a = constant = 0.9 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

b = constant = 0.45 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)

Control Efficiency = 50% (Water spray or chemical dust suppressant)

Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (0.34 lb/VMT) * (ton/2000 lb) = 0.94 tons/yr (Uncontrolled Emissions)

Calculation: (8760 hrs/yr) * (0.63 VMT/hr) * (0.34 lb/VMT) * (ton/2000 lb) * (1-50/100) = 0.47 tons/yr (Apply 50% control efficiency)

V. Air Quality Impacts

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

VI. Ambient Air Impact Analysis

The Department determined that the impact from this permitting action will be minor. The Department believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

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

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

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

VIII. Environmental Assessment

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

Analysis Prepared By: Stephen Coe
Date: November 14, 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, MT 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Kaschmitter Enterprises Inc./DBA Camas Gravel

Montana Air Quality Permit number: 4054-01

Preliminary Determination Issued: November 14, 2011
Department Decision Issued: November 30, 2011
Permit Final: December 16, 2011

1. Legal Description of Site: Camas Gravel Co. (Camas) submitted an application to add additional equipment and operate a crushing/screening operation to be located in Section 35, Township 12 North, Range 22 West, in Missoula County, Montana. Montana Air Quality Permit (MAQP) #4054-01 would apply to the source while operating at any location in Montana, except within those areas having a Department approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* Camas would be required to obtain an addendum to this MAQP to operate at locations in or within 10 km of certain PM_{10} nonattainment areas.

2. Description of Project: Camas submitted a request to update MAQP #4054-00 to change the equipment identified within the permit. New equipment includes: one jaw crusher, one impact crusher, and one three deck screen. Existing equipment includes: two cone crushers, one three deck screen, one two deck screen, one 1,071 horsepower (HP) diesel generator, and associated equipment.

3. Objectives of Project: The object of the project would be to produce business and revenue for the company through the sale and use of aggregate. The issuance of MAQP #4054-01 would allow Camas to operate the permitted equipment at various locations throughout Montana.

4. Alternatives Considered: In addition to the proposed action, the Department also considered the "no-action" alternative. The "no-action" alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Camas has demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

5. A Listing of Mitigation, Stipulations, and Other Controls: A list of enforceable conditions, including a Best Available Control Technology (BACT) analysis, would be included in MAQP #4054-01.

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

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

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Terrestrial and Aquatic Life and Habitats			X			Yes
B	Water Quality, Quantity, and Distribution			X			Yes
C	Geology and Soil Quality, Stability and Moisture			X			Yes
D	Vegetation Cover, Quantity, and Quality			X			Yes
E	Aesthetics			X			Yes
F	Air Quality			X			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources			X			Yes
H	Demands on Environmental Resource of Water, Air and Energy			X			Yes
I	Historical and Archaeological Sites			X			Yes
J	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Terrestrials would use the same area as the crushing and screening operation. The crushing and screening operation would be considered a minor source of emissions, by industrial standards, with intermittent and seasonal operations. Therefore, only minor effects on terrestrial life would be expected as a result of equipment operations or from pollutant deposition.

Impacts on aquatic life because of the additional equipment could result from storm water runoff and pollutant deposition, but such impacts would be minor as the facility would be a minor source of emissions (with seasonal and intermittent operations) and only minor amounts of water would be used for pollution control. Since only a minor amount of air emissions would be generated, only minor deposition would occur. The facility is located approximately 50 meters from the west fork of Lolo Creek. Therefore, only minor and temporary effects to aquatic life and habitat would be expected from the proposed crushing/screening operation.

B. Water Quality, Quantity and Distribution

Water would be used for dust suppression on the surrounding roadways and areas of operation and for pollution control for equipment operations. However, water use would only cause a minor impact to the water quality, quantity, and distribution in the area, since only small amounts of water would be required to control air pollutant emissions and deposition of air pollutants (as described in Section 7.F of this EA).

C. Geology and Soil Quality, Stability and Moisture

Because the additional equipment will be operating at an existing facility which is a minor source of emissions by industrial standards and would typically operate in areas previously designated and used for aggregate crushing, impacts from the emissions from the crushing facility would be minor.

The crushing and screening operation would have only minor impacts on soils in any proposed site location (due to the construction and use of the crushing facility) because the facility is relatively small in size, would use only relatively small amounts of water for pollution control, and would only have seasonal and intermittent operations. Therefore, any affects upon geology and soil quality, stability, and moisture at any proposed operational site would be minor.

D. Vegetation Cover, Quantity, and Quality

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

As described in Section 7.F of this EA, the amount of air emissions from this facility would be minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor. Also, because the water usage is minimal, as described in Section 7.B, and the associated soil disturbance is minimal, as described in Section 7.C, corresponding vegetative impacts would be minor.

E. Aesthetics

The additional equipment would be visible and would create additional noise while operating in these areas. However, MAQP #4054-01 would include conditions to control emissions, including visible emissions, from the plant. Also, because the crushing and screening operation is portable, would operate on an intermittent and seasonal basis, and would typically locate within an open-cut pit, any visual and noise impacts would be minor and short-lived.

F. Air Quality

The air quality impacts from the additional equipment would be minor because the facility is relatively small. MAQP #4054-01 would include conditions limiting the opacity from the plant, as well as requiring water spray bars and other means to control air pollution. Further, MAQP #4054-01 would limit total emissions from the crushing and screening operation and any additional Camas equipment operated at the site to 250 tons/year or less, excluding fugitive emissions.

This facility would be used on a temporary and intermittent basis, thereby further reducing potential air quality impacts from the facility. Additionally, the small and intermittent amounts of deposition generated from the crushing/screening operation would be minimal because the pollutants emitted would be well controlled, widely dispersed (from such factors as wind speed and wind direction) and would have minimal deposition on the surrounding area. Therefore, air quality impacts would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to unique, endangered, fragile, or limited environmental resources in the initial proposed area of operation, contacted the Montana Natural Heritage Program (MNHP). Search results concluded there are such environmental resources found within the defined area. The defined area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer. Dryocopus pileatus (Pleated Woodpecker), Nucifraga columbiana (Clark's Nutcracker), *Certhia americana* (Brown Creeper), *Troglodytes pacificus* (Pacific Wren), *Oncorhynchus clarkii lewisi* (Westslope Cutthroat Trout), *Salvelinus confluentus* (Bull Trout), *Martes*

pennant (Fisher) and Gulo gulo (Wolverine) are species of concern in the area. These species potential location has been identified both within and outside the defined area. Given the relatively small size of the facility, the probability that the facility would locate in a previously disturbed area, and the temporary and portable nature of the operations, any impacts would be minor and short-lived. Additionally, operational conditions and limitations within MAQP #4054-01 would aid in the protection of these resources by protecting the surrounding environment. Therefore, impacts to unique, endangered, fragile, or limited environmental resources would be minor.

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

Due to the size of the facility, the crushing and screening operation would require only small quantities of water, air, and energy for proper operation. Small quantities of water would be used for dust suppression and would control particulate emissions being generated at the site. Energy requirements would also be small because the energy demands of the crushing and screening operation would be relatively small and the facility would not be used continuously. The facility would have limited production, and would have seasonal and intermittent use. In addition, impacts to air resources would be minor because the source is small by industrial standards, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed. Therefore, any impacts to water, air, and energy resources in any given area would be minor.

I. Historical and Archaeological Sites

In an effort to identify any historical and archaeological sites located near the proposed project area, the Department contacted the Montana Historical Society, State Historic Preservation Office (SHPO). According to SHPO records, there are no previously recorded historic or archaeological sites within the proposed area. However, SHPO stated that the absence of cultural properties in the area does not mean that they do not exist, but may reflect a lack of previous cultural resource inventories in the area. The Department determined that the chance of the project impacting any historical and archaeological sites in the area would be minor due to the relatively small size of the project. However, should cultural materials be inadvertently discovered during this project SHPO requests that their office be contacted and the site investigated?

J. Cumulative and Secondary Impacts

The additional equipment would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would generate emissions of PM and PM_{10}. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance because the equipment is small and the facility would be expected to operate in areas designated and used for such operations. Additionally, this facility, in combination with the other emissions from equipment operations at the operational site, would not be permitted to exceed 250 tons per year of non-fugitive emissions. Overall, any cumulative or secondary impacts to the physical and biological aspects of the human environment would be minor.

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

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Social Structures and Mores				X		Yes
B	Cultural Uniqueness and Diversity			X			Yes
C	Local and State Tax Base and Tax Revenue			X			Yes
D	Agricultural or Industrial Production			X			Yes
E	Human Health			X			Yes
F	Access to and Quality of Recreational and Wilderness Activities			X			Yes
G	Quantity and Distribution of Employment				X		Yes
H	Distribution of Population				X		Yes
I	Demands for Government Services			X			Yes
J	Industrial and Commercial Activity				X		Yes
K	Locally Adopted Environmental Plans and Goals			X			Yes
L	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The additional equipment at the crushing and screening operation would cause no disruption to the social structures and mores in the area because the source is a minor source of emissions (by industrial standards) and would only have intermittent operations. Further, the facility would be required to operate according to the conditions that would be placed in MAQP #4054-01. Thus, no native or traditional communities would be affected by the proposed project operations and no impacts upon social structures or mores would result.

B. Cultural Uniqueness and Diversity

The impact to cultural uniqueness and diversity of these areas would be minor from the proposed equipment because the site will be located on ground previously used as irrigated hay ground and is immediately adjacent to an existing gravel pit. Additionally, the facility would be considered a portable/temporary source with seasonal and intermittent operations. Therefore, predominant use of the surrounding areas would experience minor change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The additional equipment would have little, if any, impact on the local and state tax base and tax revenue because the facility would be a relatively small industrial source (minor source) and would be used on a seasonal and intermittent basis. The facility would likely not add additional employees. Thus, only minor, if any, impacts to the local and state tax base and revenue could be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue would be minor because the source would also be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The additional equipment at the crushing and screening operation would have only a minor impact on local industrial production since the facility is a minor source of emissions (by industrial standards). There could be minor effects on agricultural land from the deposition of pollutants (as described in Section 7.F of this EA) but, the facility operations would be small and temporary in nature, and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation (as described in Section 7.D of this EA).

E. Human Health

MAQP #4054-01 would incorporate conditions to ensure that the crushing facility would operate in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 7.F. of this EA, the air emissions from this facility would be minimized by the use of water spray and other conditions that would be established in Permit #4054-01, though the facility's air emissions would be quite small without the use of pollution controls. Therefore, only minor impacts would be expected upon human health from the proposed crushing/screening facility.

F. Access to and Quality of Recreational and Wilderness Activities

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

G. Quantity and Distribution of Employment

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

H. Distribution of Population

The portable crushing and screening operation is small and would only require a few existing employees to operate. Also, no individuals would be expected to permanently relocate to a given area of operation as a result of operating the crushing facility, which would have only intermittent and seasonal operations. Therefore, the crushing facility would not disrupt the normal population distribution in a given area of operation.

I. Demands for Government Services

Little or no increases would be seen in traffic on existing roadways in a given area while the crushing and screening operation is in progress. In addition, government services would be required for acquiring the appropriate permits from government agencies and determining compliance with the permits. Overall, the demands for government services would be minor.

J. Industrial and Commercial Activity

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

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans and goals that would affect Camas. The facility would be allowed, by permit, to operate in areas designated by EPA as attainment or unclassified. MAQP #4054-01 would contain limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards. Because the facility would be a small and portable source, and would have intermittent and seasonal operations, any effects from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The crushing and screening operation would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate areas of operation because the source is a portable and temporary source. Minor increases in traffic would have minor effects on local traffic in the immediate areas, thus, having a direct effect on the social environment. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the construction and operation of a portable crushing/screening facility. MAQP #4054-01 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

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