



February 5, 2016

Johnson Lumber Company, LLC
P.O. Box 17283
Missoula, MT 59808

Dear Mr. Johnson:

Montana Air Quality Permit #4057-01 is deemed final as of February 5, 2015, by the Department of Environmental Quality (Department). 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,

A handwritten signature in cursive script that reads "Julie A. Merkel".

Julie A. Merkel
Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626

A handwritten signature in cursive script that reads "Craig Henrikson".

Craig Henrikson, P.E.
Environmental Engineer
Air Quality Bureau
(406) 444-6711

JM:CH
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #4057-01

Johnson Lumber Company, LLC
P.O. Box 17283
Missoula, MT 59808

February 5, 2016



MONTANA AIR QUALITY PERMIT

Issued To: Johnson Lumber Company, LLC
P.O. Box 17283
Missoula, MT 59808

MAQP: #4057-01
Administrative Amendment (AA)
Request Received: 8/12/15:
Department's Decision on AA: 01/20/16
Permit Final: 2/5/2016
AFS: #053-0018

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Johnson Lumber Company, LLC. (JLC) 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

JLC owns and operates a rough lumber finishing and finish dimension mill including two planers, a molder, and associated equipment. JLC is located in the southeast $\frac{1}{4}$ of Section 3, Township 36 North, Range 27 West, in Lincoln County, Montana.

B. Current Permit Action

On August 12, 2015, the Department received a request from Montana Renewable Resources, LP to transfer the permit to Johnson Lumber Company, LLC. In addition, the permit was updated to reflect the current permit language and rule references used by the Department. The previous permit language discussing "common control" was also removed as the Eureka Pellet Mills permit is in the process of being revoked.

SECTION II. Conditions and Limitations

A. Emission Limitations

1. JLC shall not cause or authorize to be discharged into the atmosphere from any source visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.752).
2. JLC 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).
3. JLC 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.2 (ARM 17.8.752).

4. JLC production shall be limited to 66 million board-feet (MMbf) during any rolling 12-month time period (ARM 17.8.749).
5. If the permitted equipment is used in conjunction with any other equipment owned or operated by JLC, 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).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures manual (ARM 17.8.106).
2. The Department may require testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. JLC 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, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. JLC 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).
3. JLC 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 under JLC control as a permanent business record for at least 5 years following the date of the measurement, must be available for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
4. JLC shall document, by month, mill production in MMbf. By the 25th day of each month, JLC shall total the mill production in MMbf for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.4. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

SECTION III. General Conditions

- A. Inspection – JLC 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 such as continuous emissions monitoring systems (CEMS) or continuous emission rate monitoring systems (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 JLC fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving JLC 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 JLC 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. JLC 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
Johnson Lumber Company, LLC
MAQP #4057-01

I. Introduction/Process Description

A. Permitted Equipment

Johnson Lumber Company LLC (JLC) owns and operates a rough lumber finishing and finish dimension mill. JLC is located in the southeast ¼ of Section 3, Township 36 North, Range 27 West, in Lincoln County, Montana. Equipment includes but is not limited to the following;

Two planers, a molder, and associated pneumatic conveying equipment for each planer and molder which transfers lumber byproducts to individual cyclones and stores by-products in a storage bin.

B. Source Description

JLC owns and operates a rough lumber finishing and finish dimension mill in Eureka, MT. The mill purchases low value and rough-cut lumber for processing. Depending on lumber size and dimension, each piece of lumber is processed through one of three process units: 1) a Madison molder, 2) a Yates planer, or 3) a Woods planer. Each process unit has different abilities to accommodate different widths and produce different finished lumber profiles, while all have the ability to trim, rip, and plane lumber. After processing, all finished wood products are stacked, packaged, and moved by forklift to a paved area for storage. From storage, the finished and packaged lumber product is loaded onto trucks for shipment off-site. In addition, each process unit is equipped with its own blower and pneumatic conveying system to move lumber by-products (shavings, sawdust, and/or wood-chips) to an associated cyclone, which drops the lumber by-products into a storage bin. The lumber by-products are then sold for various industrial purposes.

C. Permit History

MAQP #4057-00 was issued on April 17, 2007, for a rough lumber finish and finish dimension mill including two planers, a molder, and associated equipment.

D. Current Permit Action

On August 12, 2015, the Department received a request from Montana Renewable Resources, LP to transfer the permit to Johnson Lumber Company, LLC. In addition, the permit was updated to reflect the current permit language and rule references used by the Department. **MAQP #4057-01** replaces MAQP #4057-00.

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 the 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).

JLC 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
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀
11. ARM 17.8.230 Fluoride in Forage

JLC must maintain compliance with all 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 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter (PM). (2) Under this rule, JLC 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.

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. JLC was not required to submit a fee because the current permitting action is administrative.
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.

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

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a facility to obtain an air quality permit or permit modification if they construct, modify, or use any air contaminant sources that have the Potential to Emit (PTE) more than 25 tons per year of any pollutant. JLC has the PTE greater than 25 tons per year of particulate matter, therefore, a 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 MAQP 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. JLC was not required to submit an application for the current permit action because the permit change is considered an administrative permit change. (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. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative permit change.

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 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 JLC 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 (EIS).
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 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 tons per year 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 tons/year of any pollutant;
 - b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP) , PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule, or
 - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (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 #4057-01 for JLC, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons/year for any pollutant.
 - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.

- c. This source is not located in a serious PM₁₀ nonattainment area.
- d. This facility is not subject to any NSPS.
- e. This facility is not subject to any current NESHAP standards.
- 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.

Based on these facts, the Department determined that JLC is a minor source of emissions as defined under Title V.

III. BACT Determination

A BACT determination is required for each new or modified source. JLC shall install on the new or modified source the maximum air pollution control capability that 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 current permit action is considered an administrative permit action.

IV. Emission Inventory

In the original application for MAQP #4057-00, the following emission inventory was prepared.

Montana Renewable Resources						
tons/year						
Source	PM	PM₁₀	NO_x	CO	VOC	SO_x
Woods Planer Cyclone	8.76	3.50	---	---	---	---
Yates Planer Cyclone	8.76	3.50	---	---	---	---
Mattison Molder Cyclone	8.76	3.50	---	---	---	---
Planer Shavings Loadout	6.76	2.46	---	---	---	---
Chip Loadout	0.41	0.14	---	---	---	---
Vehicle Fugitives	3.48	1.57	---	---	---	---
Totals	36.93	14.67	0.00	0.00	0.00	0.00

Emission Inventory Calculations Permit #4057-00

Woods Planer Cyclone

Hours of Operation: 8760 hr/yr

PM Emissions

Emission Factor: 2.00 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $2.00 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 8.76 \text{ ton/yr}$

PM₁₀ Emissions:

Emission Factor: 0.80 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $0.80 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 3.50 \text{ ton/yr}$

Yates Planer Cyclone

Hours of Operation: 8760 hr/yr

PM Emissions

Emission Factor: 2.00 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $2.00 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 8.76 \text{ ton/yr}$

PM₁₀ Emissions:

Emission Factor: 0.80 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $0.80 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 3.50 \text{ ton/yr}$

Mattison Molder Cyclone

Hours of Operation: 8760 hr/yr

PM Emissions

Emission Factor: 2.00 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $2.00 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 8.76 \text{ ton/yr}$

PM₁₀ Emissions:

Emission Factor: 0.80 lb/hr (AFSSCC 3-07-008-08, pg 144)
Calculations: $0.80 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 3.50 \text{ ton/yr}$

Planer Shavings Loadout

Production Rate: 66 MMbf/yr (Permit Limit)
Planer Production: 621 ton/MMbf (Department Information)
Calculation: $66 \text{ MMbf/yr} * 621 \text{ ton/MMbf} = 40,986 \text{ ton/yr}$
PM Emissions

Emission Factor: 0.33 lb/ton (FIRE Version 5.0, SCC 3-07-008-03)
Calculations: $0.33 \text{ lb/ton} * 40,986 \text{ ton/yr} * 0.0005 \text{ ton/lb} = 6.76 \text{ ton/yr}$

PM₁₀ Emissions

Emission Factor: 0.12 lb/ton (FIRE Version 5.0, SCC 3-07-008-03)
Calculations: $0.12 \text{ lb/ton} * 40,986 \text{ ton/yr} * 0.0005 \text{ ton/lb} = 2.46 \text{ ton/yr}$

Chip Loadout

Production Rate: 66 MMbf/yr (Permit Limit)
Chip Production: 411 ton/MMbf (Department Information)
Calculation: $66 \text{ MMbf/yr} * 411 \text{ ton/MMbf} = 27,126 \text{ ton/yr}$

PM Emissions

Emission Factor: 0.03 lb/ton (assume 10% of wood waste loadout)
Calculations: $0.03 \text{ lb/ton} * 27,126 \text{ ton/yr} * 0.0005 \text{ ton/lb} = 0.41 \text{ ton/yr}$

PM₁₀ Emissions

Emission Factor: 0.01 lb/ton (assume 10% of wood waste loadout)
Calculations: $0.01 \text{ lb/ton} * 27,126 \text{ ton/yr} * 0.0005 \text{ ton/lb} = 0.14 \text{ ton/yr}$

Vehicle Fugitives

Miles Traveled: 2321 mile/yr (Company Information)

PM Emissions

Emission Factor: 6 lb/VMT (Department Information)
Control Efficiency: 50% (Water)
Calculations: $6 \text{ lb/VMT} * 2321 \text{ mile/yr} * 0.0005 \text{ ton/lb} * (1-0.5) = 3.48 \text{ ton/yr}$

PM₁₀ Emissions

Emission Factor: 2.7 lb/VMT (Department Information)
Control Efficiency: 50% (Water)
Calculations: $2.7 \text{ lb/VMT} * 2321 \text{ mile/yr} * 0.0005 \text{ ton/lb} * (1-0.5) = 1.57 \text{ ton/yr}$

V. Existing Air Quality

JLC is located in the southeast ¼ of Section 3, Township 36 North, Range 27 West, in Lincoln County, Montana. The air quality of this area is classified as better than National Standards or unclassifiable/attainment for the National Ambient Air Quality Standards (NAAQS) for criteria pollutants.

VI. Ambient Air Quality Impacts

Based on the relatively low levels of pollutants emitted from JLC, the Department determined that ambient air impacts from this permitting action will be minor. The Department believes that JLC, operating under the limits and conditions contained in Permit #4057-01, will not cause or contribute to a violation of any applicable ambient air quality standard.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 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.

IX. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an Environmental Assessment is not required.

Analysis Prepared By: Craig Henrikson
December 22, 2015