Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
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September 13, 2012

Bonnie Kostelecky
Fisher Sand & Gravel Co.
P.O. Box 1034
Dickinson, ND 58601

Dear Ms. Kostelecky:

Montana Air Quality Permit #4059-02 is deemed final as of September 13, 2012, by the Department of Environmental Quality (Department). This permit is for a portable diesel-fired generator engine. 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,

Charles Homer
Manager, Air Permitting, Compliance and Registration
Air Resources Management Bureau
(406) 444-5279

Deanne Fischer, P.E.
Environmental Engineer
Air Resources Management Bureau
(406) 444-3403

CH:DF
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #4059-02

Fisher Sand & Gravel Co.
P.O. Box 1034
Dickinson, ND 58601

September 13, 2012

MONTANA AIR QUALITY PERMIT

Issued to: Fisher Sand & Gravel Co.
P.O. Box 1034
Dickinson, ND 58601

MAQP: #4059-02
Application Complete: 06/20/2012
Preliminary Determination Issued: 07/27/2012
Department's Decision Issued: 08/28/2012
Permit Final: 09/13/2012
AFS: #777-4059

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Fisher Sand & Gravel Company (Fisher) 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

Fisher owns and operates a portable diesel-fired generator engine at various locations throughout Montana. MAQP #4059-02 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*. A list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Current Permit Action

On June 20, 2012, the Department received an application to modify MAQP #4059-01 to modify the size of the existing diesel-fired generator engine from 1,220 brake-horsepower (bhp) to 1,372 hp. This permit action modifies the size of the diesel-fired generator engine and adjusts the associated hourly limit to maintain permit allowable emissions below 80 tons per year (tpy). In addition, the permit action updates the emissions inventory.

Section II: Limitations and Conditions

A. Emission Limitations

1. All visible emissions from the diesel-fired generator engine may not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

2. Fisher 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. Fisher 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 17.8.749 and ARM 17.8.752).

4. Fisher shall not operate or have on site more than one (1) diesel-fired engine/generator set at any given time. The maximum rated design capacity of the diesel-fired generator engine shall not exceed 1,372 bhp (ARM 17.8.749 and ARM 17.8.1204).

5. Operation of the diesel-fired generator engine shall not exceed 3,755 hours during any rolling 12-month period (ARM 17.8.749 and ARM 17.8.1204).

6. If the permitted equipment is used in conjunction with any other equipment owned or operated by Fisher, 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).

7. Fisher shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 Code of Federal Regulations (CFR) 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart IIII; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

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. If the diesel-fired generator engine is moved to another location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).

2. Fisher 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.

3. 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).

4. Fisher 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).

5. Fisher shall document, by month, the hours of operation of the diesel-fired engine/generator set. By the 25th day of each month, Fisher shall calculate the hours of operation for the diesel-fired generator engine for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.5. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

6. Fisher 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).

Section III: General Conditions

A. Inspection – Fisher shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emissions Monitoring System (CEMS), Continuous Emissions Rate Monitoring System (CERMS)) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Fisher fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Fisher 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 Fisher 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. Fisher 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
Fisher Sand & Gravel, Co.
MAQP #4059-02

I. Introduction/Process Description

A. Permitted Equipment

Fisher Sand & Gravel (Fisher) owns and operates a portable diesel-fired generator engine with a maximum rated design capacity of 1,372 brake-horsepower (bhp).

B. Source Description

Fisher operates this portable diesel-fired generator engine at various locations throughout the state of Montana. Typically, the diesel-fired generator engine supplies electrical power to support other Fisher-owned portable process equipment (i.e. aggregate screens and crushers, asphalt plants, concrete batch plants, etc.). The aforementioned process equipment is permitted separately from the diesel-fired engine/generator set.

This unit is based in North Dakota and does not have a designated home location in Montana.

C. Permit History

On March 29, 2007, the Department of Environmental Quality (Department) issued **MAQP #4059-00** to allow for the operation of a portable diesel-fired generator engine with a maximum design capacity not to exceed 1,220 bhp.

On April 16, 2012, the Department received a request to amend Fisher's MAQP, to incorporate limits which maintain potential emissions below 80 tons per year (TPY). This request was made as part of a project created by the Department to address those sources with existing federally enforceable permit limits established to keep potential emissions below major source permitting thresholds. The project encouraged these sources to further reduce emissions to avoid additional monitoring and increased inspections required under the Compliance Monitoring Strategy (CMS) in connection with the U. S. Environmental Protection Agency (EPA). This permitting action amended MAQP #4059-00 to incorporate limits and conditions to maintain potential emissions below 80 TPY. In addition, the permit action updated the rule references, permit format, and the emissions inventory. **MAQP #4059-01** replaced MAQP #4059-00.

D. Current Permit Action

On June 20, 2012, the Department received an application to modify the size of the existing diesel-fired generator engine included in MAQP#4059-01. MAQP #4059-01 described the existing generator engine as having a maximum rated capacity of 1,220 horsepower (hp). Upon inspection of the facility by a Department Compliance Inspector, it was observed that the existing generator engine is actually rated with a maximum capacity of 1,372 hp. Therefore, the current permit action modifies the size of the diesel-fired generator engine and adjusts the associated hourly limit to maintain permit allowable emissions below 80 tons per year (tpy). In addition, the permit action updates the emissions inventory. **MAQP #4059-02** replaces MAQP #4059-01.

E. 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 locations 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).

   Fisher shall comply with all 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 in 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 Standards for Ozone
6. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
7. ARM 17.8.221 Ambient Air Quality Standard for Visibility
8. ARM 17.8.223 Ambient Air Quality Standards for Particulate Matter with an Aerodynamic Diameter of Ten Microns or Less (PM_{10})

Fisher must comply 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 20% for all fugitive emission sources and that reasonable precautions are taken to control emissions of airborne particulate matter. (2) Under this section, Fisher 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 the amount set forth in this section.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 Code of Federal Regulations (CFR) Part 60, Standards of Performance for New Stationary Sources (NSPS). Fisher is considered an NSPS affected facility under this standard and is potentially subject to the requirements of the following subparts:

   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 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.

Applicability to this subpart is dependent upon the nature and location of operation. The diesel-fired engine associated with this air quality permit is a CI ICE engine potentially constructed after July 11, 2005; however, the engines will not be considered an affected source unless operated as a stationary source.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories. Based on the information submitted by Fisher the associated diesel-fired engine/generator set is applicable to NESHAP (40 CFR 63), as follows:

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

   b. 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary RICE at a major or area source of Hazardous Air Pollutant (HAP) emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. An area source of HAP emissions is a source that is not a major source. As an area source, the diesel RICE operated by Fisher is potentially subject to this rule. Although diesel RICE engines are an affected source, per 40 CFR 63.5490(b)(3), they do not have any requirements unless they are new or reconstructed after June 12, 2006. As Fisher is considered an area source of HAP emissions and operates RICE equipment, the engine is potentially subject to this subpart depending on the location and nature of operation.

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. Fisher submitted the appropriate permit application fee for the current permit action.

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 person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 tpy of any pollutant. Fisher has a PTE greater than 25 tpy of oxides of nitrogen (NO_x); therefore an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits – General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit Program.

4. ARM 17.8.745 Montana Air Quality Permits – Exclusions 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 the installation, modification, or use of a source. Fisher 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. Fisher submitted an affidavit of publication of public notice for the June 21, 2012, issue of the *Big Timber Pioneer*, a newspaper of general circulation in the Town of Big Timber in Sweet Grass 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 BACT shall be utilized. The required BACT analysis is included in Section III of the 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 Fisher 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 sub-chapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of Intent to Transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

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

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this sub-chapter would otherwise allow.

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

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:

   a. PTE > 100 tpy of any pollutant;

   b. PTE > 10 tpy of any single Hazardous Air Pollutant (HAP), PTE > 25 tpy of combined HAPs, or a lesser quantity as the Department may establish by rule; or

   c. Sources with PTE > 70 tpy of PM10 in a serious PM10 non-attainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. 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 #4059-02 for Fisher, the following conclusions were made:

   a. Fisher has requested that federally-enforceable permit operating limits be established to maintain the facility's PTE to less than the 100 tpy and 80 tpy thresholds for all criteria pollutants.

   b. The facility's PTE is less than 10 tpy of any single HAP and less than 25 tpy of combined HAPs.

   c. This source is not located in a serious PM10 non-attainment area.

   d. This facility is potentially subject to a current NSPS standard (40 CFR 60, Subpart IIII).

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

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

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

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

   Fisher 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 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 modified source. Fisher 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.

Because of the limited amount of emissions produced by the diesel-fired generator engine and the lack of readily available/cost-effective add-on controls, the Department determined that add-on pollution controls for the generator would be economically infeasible. Therefore, the Department determined that proper operation and maintenance, and good combustion practices with no additional controls would constitute BACT for the diesel-fired engine/generator set.

The control options selected contain control equipment and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

IV. Emission Inventory

	Emissions Tons/Year [PTE] [(a)(b)]							
SOURCE TOTAL EMISSIONS ►	PM	PM_{10}	$PM_{2.5}$	PM_{cond}	CO	NOx	SO_2	VOC
diesel-fired generator engine [≤1,372 bhp]	5.67	5.67	1.00	0.14	17.21	79.85	5.28	6.48

(a) *Emission Inventory reflects enforceable limits on hours of operation of the diesel-fired generator engine to 3,755 hr/yr to keep allowable NO_x emissions below the Title V threshold [100 tpy] and the State CMS SM Source threshold [80 tpy].*

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

bhp, brake-horsepower
BSFC, brake-specific fuel consumption
CO, carbon monoxide
CMS, Compliance Monitoring Strategy
hr, hour
lbs, pounds
MMBtu, million British Thermal Units
NO_X, oxides of nitrogen
NG, negligible emissions [< 0.01 tpy]
PTE, Potential To Emit
PM, particulate matter
PM_{COND}, condensable particulate matter
PM_{10}, particulate matter with an aerodynamic diameter of 10 microns or less
$PM_{2.5}$, particulate matter with an aerodynamic diameter of 2.5 microns or less [Sum of condensable and filterable]
SCC, Source Classification Code
SO_2, oxides of sulfur
TPH, tons per hour
TPY, tons per year
VOC, volatile organic compounds

D diesel-fired engine/generator set [SCC 2-02-001-02]

Engine Rating:	1372	hp
Fuel Input:	9.60	MMBtu/hr
	70.1	gallons/hour [Estimated]
Hours of Operation:	3755	hours/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor	0.0022	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.0022 lb/hp-hr) * (1372 hp) =			3.02	lbs/hr
	(3.02 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			5.67	TPY

PM_{10} Emissions:

Emission Factor	0.0022	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.0022 lb/hp-hr) * (1372 hp) =			3.02	lbs/hr
	(3.02 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			5.67	TPY

$PM_{2.5}$ Emissions (filterable):

Emission Factor	0.0479	lb/MMBtu	[AP-42 3.4-2, 10/96]		
Calculations	(0.0479 lb/MMBtu) * (9.60 MMBtu/hr) =			0.46	lbs/hr
	(0.46 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			0.86	TPY

$PM_{2.5}$ Emissions (condensable):

Emission Factor	0.0077	lb/MMBtu	[AP-42 3.4-2, 10/96]		
Calculations	(0.0077 lb/MMBtu) * (9.60 MMBtu/hr) =			0.07	lbs/hr
	(0.07 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			0.14	TPY

CO Emissions (uncontrolled):

Emission Factor	0.00668	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.00668 lb/hp-hr) * (1372 hp)	=		9.16	lbs/hr
	(9.16 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			17.21	TPY

NO_x Emissions (uncontrolled):

Emission Factor	0.031	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.031 lb/hp-hr) * (1372 hp)	=		42.53	lbs/hr
	(42.53 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			79.85	TPY

SO_2 Emissions (uncontrolled):

Emission Factor	0.00205	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.0021 lb/hp-hr) * (1372 hp)	=		2.81	lbs/hr
	(2.81 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			5.28	TPY

VOC Emissions (uncontrolled):

Emission Factor	0.002514	lb/hp-hr	[AP-42 3.3-1, 10/96]		
Calculations	(0.0025 lb/hp-hr) * (1372 hp)	=		3.45	lbs/hr
	(3.45 lbs/hr) * (3755 hrs/yr) * (0.0005 tons/lb) =			6.48	TPY

V. Existing Air Quality

MAQP #4059-02 will cover the operation of this portable diesel-fired generator engine while operating at those areas for which this facility is permitted to operate, that have been designated unclassified/attainment with all ambient air quality standards, and where there are no major air pollution sources in the surrounding area.

VI. Air Quality Impacts

This permit contains conditions and limitations that would protect air quality for the site and surrounding area. Furthermore, this facility is a portable source that would operate on an intermittent and temporary basis, so any effects to air quality will be minor and of limited duration.

VII. Ambient Air Impact Analysis

Based on the information provided and the conditions established in MAQP #4059-02 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.

VIII. Taking or Damaging 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.

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: Fisher Sand & Gravel
P.O. Box 1034
Dickinson, ND 58601

Montana Air Quality Permit number: 4059-02

Preliminary Determination Issued: 07/27/2012
Department Decision Issued: 08/28/2012
Permit Final: 09/13/2012

1. Legal Description of Site: Fisher owns and operates a portable diesel-fired generator engine at various locations throughout Montana. MAQP #4059-02 would apply 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*.

2. Description of Project: The permit modification would correct the actual size of the existing diesel-fired generator engine from 1,220 brake-horsepower (bhp) to 1,372 bhp. The diesel-fired generator engine would continue to be used to provide power to other Fisher equipment (i.e. screens, crushers, etc.), which was permitted separately from the diesel-fired generator engine.

3. Objectives of Project: The current permit action would correct the size of the existing diesel-fired generator engine in the permit so it would be more accurately reflect the actual equipment being operated.

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 Fisher 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 BACT analysis, would be included in MAQP #4059-02.

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

The current permit action would modify the actual size of the existing diesel-fired engine/generator set in the permit. Although air pollutant deposition would occur in the areas where the engine/generator set would operate, the size and temporary nature of the operation, dispersion characteristics of pollutants, and conditions placed in MAQP #4059-02, would result in minor impacts. In addition, the engine/generator set would be relatively small by industrial standards and located at previously disturbed sites. Therefore, the operation of the engine/generator set would present only minor impacts to the terrestrial and aquatic life and habitats in areas of potential operation.

B. Water Quality, Quantity and Distribution

Although there would be an increase in air emissions in the area where the diesel-fired generator engine would operate, there would only be minor impacts on water quality, quantity, and distribution because of the temporary nature, size, operational requirements, and conditions placed in MAQP #4059-02 for the facility. Further, as described in Section 7.F. of this EA, the Department determined that any impacts from deposition of pollutants would be minor. In addition, any accidental spills or leaks from equipment would be required to be handled according to the appropriate environmental regulations in an effort to minimize any potential adverse impact on the immediate and surrounding area. Overall, the current permit action would have minor impacts to water quality, quantity, and distribution in the area of operations.

C. Geology and Soil Quality, Stability and Moisture

As a result of the operation of the diesel-fired generator engine, there would be minor impacts to the geology and soil quality, stability, and moisture near the equipment's operational area caused by increased vehicle traffic and deposition of pollutants from portable generator

operations. As explained in Section 7.F. of this EA, the facility's size, operational requirements, temporary nature of the operation, and conditions placed in MAQP #4059-02 would minimize the impacts from deposition. In addition, the engine/generator set would be relatively small by industrial standards and located at previously disturbed sites, which would also reduce the potential impact to the local geology and soil quality, stability, and moisture.

D. Vegetation Cover, Quantity, and Quality

The operation of the engine/generator set would result in minor impacts to the vegetative cover, quantity, and quality, because small amounts of vegetation would likely be disturbed as a result of operating the diesel-fired generator engine. In addition, pollutant deposition would occur on the surrounding vegetation. However, as explained in Section 7.F. of this EA, the Department determined that, due to the relatively small size and temporary nature of the operation, conditions placed in MAQP #4059-02, and dispersion characteristics of the emissions, any impacts from deposition would be minor. In addition, because the water usage would be minor (as described in Section 7.B. of this EA) and the associated soil disturbance would be minor (as described in Section 7.C. of this EA), corresponding vegetative impacts from water and soil disturbance would also be minor

E. Aesthetics

The diesel-fired generator engine would be visible and would create noise in the areas where it would operate. MAQP #4059-02 would include conditions to control emissions (including visible emissions) from the generator and the surrounding work area. The engine/generator set would be relatively small by industrial standards and temporary and would be used to power permitted portable equipment owned by Fisher at previously disturbed sites. Therefore, any aesthetic impact to a given area would be minor and temporary.

F. Air Quality

Air quality impacts from the operation of the diesel-fired generator engine would be minor because emissions from the diesel-fired generator engine would be relatively small. Dispersion and deposition of pollutants would occur from the operation of the diesel-fired generator engine; however, the Department determined that any air quality impacts from the pollutants would be minor due to dispersion characteristics (from factors such as wind speed and wind direction) and conditions placed in MAQP #4059-02. MAQP #4059-02 would include conditions limiting opacity from the diesel-fired generator engine and would require that reasonable precautions be taken to control emissions from haul roads, access roads, parking lots, or the general work area. In addition, MAQP #4059-02 would also limit total emissions from the diesel-fired generator engine and any additional equipment operated at the same site to 250 tons per year or less. Further, because the diesel-fired engine/generator set would be limited in hours of operation to keep the potential emissions to less than 100 tons per year for any pollutant generated, the Department determined that the diesel-fired generator engine would be a minor source of emissions as defined under Title V.

G. Unique Endangered, Fragile, or Limited Environmental Resources

In an effort to identify species of special concern that may be present in the proposed areas of operation, the Department previously contacted the Montana Natural Heritage Program (MNHP) for a review of species of special concern for many gravel pits around the state. This would include many of the pits where the engine/generator set may be located, but no initial location was identified under this permit. Issuance of this permit would increase emissions to the atmosphere near the location proposed for the operation of the diesel-fired generator engine. However, as explained in Section 7.F. of this EA, because of the relatively small size and

temporary nature of the diesel-fired generator engine, operating in previously disturbed areas, and conditions placed in MAQP #4059-02, any impacts to unique endangered, fragile, or limited environmental resources from the deposition of pollutants would be minor.

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

The diesel-fired generator engine would be used to provide power to other Fisher equipment (i.e. screens, crushers, etc.) that is permitted separately. Water would be used on haul roads, access roads, parking lots, or the general plant property, as necessary, to control dust resulting from indirect use of the diesel-fired generator engine. Also minor amounts of air would be used in diesel-fired generator engine operations and air quality would be impacted by pollutant emissions. The engine/generator set would consume energy from diesel fuel, a non-renewable resource. Generally, the operations are seasonal and would result in smaller demands on environmental resources. Therefore, any impacts on the demands of the environmental resources of water, air, and energy would be minor

I. Historical and Archaeological Sites

According to past correspondence with the Montana State Historic Preservation Office (SHPO), there is low likelihood of disturbance to any known archaeological or historic site given that the diesel engine generator would be locating in existing gravel pits. Therefore, it is unlikely that the project would affect any known historic or archaeological site and any impacts would be minor.

J. Cumulative and Secondary Impacts

The operation of the diesel-fired generator engine would cause minor cumulative and secondary impacts to the physical and biological environment because other operations (i.e. screening, crushing, etc.) may potentially locate at the same site. Any operations would have to apply for and receive the appropriate permits from the Department prior to operation and the permits would address the environmental impacts associated with the operations at the proposed sites. The diesel-fired generator engine operations would be limited by Permit #4059-02 to total emissions of 250 tons/year or less when operated in conjunction with other Fisher equipment, of any air pollutant (excluding fugitive emissions).

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 operation of the diesel engine generator would not alter or disrupt any local lifestyles or communities (social structures and mores) in the area of operation because the generator would be relatively small by industrial standards, would operate intermittently, and would be used with the additional permitted equipment at a previously disturbed site. Therefore, the existing social structures and mores would not be affected as a result of this permitting action.

B. Cultural Uniqueness and Diversity

It would be unlikely that the operation of the portable engine/generator set would have any impact on the cultural uniqueness and diversity of the proposed area of operation because the generator operations would be temporary and would take place in a previously disturbed industrial area.

C. Local and State Tax Base and Tax Revenue

The proposed operation of the diesel-fired generator engine would have little, if any affect on local and state tax base and tax revenue. The facility is a relatively small and temporary source; therefore, it would not remain at any individual site for any extended time period. No full time, permanent employees would be added as a result of issuing MAQP #4059-02, and any revenue created by the operation of the diesel engine generator would be widespread and for a relatively short time period.

D. Agricultural or Industrial Production

Under normal circumstances, the operation of the diesel-fired generator engine would take place in a previously disturbed industrial area. Therefore, the Department does not expect that the operation of the diesel-fired generator engine would affect or displace any agricultural land. Further, the diesel-fired generator engine operation is small by industrial standards and would have only a minor impact on any local industrial production.

E. Human Health

MAQP #4059-02 would incorporate conditions to ensure that the diesel-fired generator engine would be operated in compliance with all applicable 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 Department determined that any impacts from deposition of pollutants would be minor due to dispersion characteristics and conditions placed in MAQP #4059-02. The air emissions from this facility would be minimized by opacity limitations on the diesel engine generator and the surrounding area of operation.

F. Access to and Quality of Recreational and Wilderness Activities

This engine/generator set would be located on previously disturbed property and would not impact access to recreational and wilderness activities. However, minor impact on the quality of recreational activities might be created by the noise from the generators. Emissions from this engine/generator set would be minimized as a result of limitations placed in MAQP #4059-02 and the temporary and portable nature of the operation.

G. Quantity and Distribution of Employment

Given the relatively small size and temporary nature of the operation, it is not expected that the activities from the operation of the diesel-fired generator engine would affect the quantity and distribution of employment in any given area. No full time, permanent employees would be hired or discharged as a result of issuing MAQP #4059-02.

H. Distribution of Population

Given the relatively small size and temporary nature of the operation, it is not expected that the activities from the diesel-fired generator engine would disrupt the normal population distribution of any given area. No secondary activities are expected to move to any area as a result of the current project.

I. Demands for Government Services

Government services would be required for acquiring the appropriate permits and ensuring compliance with the permits that are issued; however, the government services required would be minor.

J. Industrial and Commercial Activity

The operation of the diesel-fired generator engine would represent only a minor increase in the industrial activity in any given area. No additional industrial or commercial activity would result from the operation of the diesel-fired generator engine because no secondary activities are expected to move to any area as a result of the current project.

K. Locally Adopted Environmental Plans and Goals

The Department is unaware of any locally adopted environmental plans or goals at any given site that the diesel-fired generator engine may be operated under MAQP #4059-02. Fisher would be allowed, by MAQP #4059-02, to operate in areas designated by the United States Environmental Protection Agency as attainment or unclassified for ambient air quality. MAQP #4059-02 contains operational restrictions for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards, as a locally adopted environmental plan or goal for operating at the proposed site. Because the proposed diesel-fired generator engine would be a portable source and would likely have intermittent and seasonal operations, any impacts from the project would be expected to be minor and short-lived.

L. Cumulative and Secondary Impacts

Overall, the cumulative and secondary social and economic impacts from this project would be minor because the diesel-fired generator engine would typically locate at an existing gravel pit. New businesses would not be drawn to the area and permanent jobs would not be created or lost due to the operation of the diesel engine generator. Because no new employees would be hired due to the operation of the diesel engine generator, there would be no economic impacts from new employees. In addition, any social and economic impacts that are created would be minor and short-lived because of the relatively small size and temporary nature of the operation.

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 diesel-fired generator engine. MAQP #4059-02 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 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

EA prepared by: Deanne Fischer
Date: July 17, 2012