March 3, 2025

Jim Hill, Owner
Contact Mining Company
1029 Choteau St.
Helena, MT 59601

Sent via email: jimandnancyhill@msn.com

RE: Final Permit Issuance for MAQP #1642-01

Dear Mr. Hill:

Montana Air Quality Permit (MAQP) #1642-01 is deemed final as of March 18, 2025, by DEQ. This permit is for Contact Mining Company. All conditions of the Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For DEQ,

Eric Merchant
Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626

John P. Proulx
Air Quality Engineer
Air Quality Bureau
(406) 444-5391

Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality Bureau

Montana Air Quality Permit #1642-01

Contact Mining Company
Section 36, Township 7 North, Range 14 West
1029 Choteau St.
Helena, MT 59601

March 18, 2025

MONTANA AIR QUALITY PERMIT

Issued To: Contact Mining Company
1029 Choteau St.
Helena, MT 59601

MAQP: #1642-01
Application Received: November 27, 2024
Application Complete: January 6, 2025
Preliminary Determination Issued: 02/12/2025
DEQs' Decision Issued: 03/03/2025
Permit Final: 03/18/2025

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Contact Mining Company (Contact), 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

The facility is located approximately 1mile south of Philipsburg, Montana, in Section 36, Township 7 North, Range 14 West, in Granite County, 46.31832°N, latitude and -113.28936°W, Longitude.

B. Current Permit Action

On November 27, 2024, Contact submitted an application to modify MAQP #1642-00. The modification is an update from the original MAQP issued to Contact on November 11, 1981. The modification updates the equipment list to include material transfer belts (conveyor belts) that were not previously permitted and updates the permit with currently applicable requirements and MAQP format.

Section II: Conditions and Limitations

A. Emission Limitations

1. Contact shall comply with all applicable New Source Performance Standards (NSPS), including standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 Code of Federal Regulations (CFR), Part 60, Subpart LL - Standards of Performance for Metallic Mineral Processing Plants (ARM 17.8.340, ARM 17.8.749 and 40 CFR 60, Subpart LL).

    - 10% opacity

2. 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 (ARM 17.8.752).

3. Mineral processing equipment shall be enclosed (ARM 17.8.752).

4. Except as required by Section II.A.1, Contact shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

5. 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).

6. Contact 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).

7. Contact shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.6 (ARM 17.8.749).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures, as specified in 40 CFR Part 60.675 must be performed on all NSPS-affected equipment to demonstrate compliance with the emissions limitations contained in Section II.A.1 (ARM 17.8.340, 40 CFR 60, Subpart A and Subpart LL).

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 of Environmental Quality (DEQ) may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. Contact shall supply DEQ with annual production information for all emission points, as required by DEQ in the annual emission inventory request. The request shall include, but is not 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 DEQ by the date required in the emission inventory request. Information shall be in the units required by DEQ. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505). Contact shall submit the following information annually to DEQ by March 1 of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

   a. Tons of ore processed

2. Contact shall notify DEQ 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 DEQ, 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. All records compiled in accordance with this permit must be maintained by Contact 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 DEQ, and must be submitted to DEQ upon request. These records may be stored at a location other than the plant site upon approval by DEQ (ARM 17.8.749).

SECTION III: General Conditions

A. Inspection – Contact shall allow DEQ'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 Emission 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 the terms, conditions, and matters stated herein shall be deemed accepted if Contact fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Contact 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.* (ARM 17.8.756).

D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by DEQ's decision may request, within 15 days after DEQ renders its decision, upon affidavit setting forth the grounds therefor, 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 DEQ'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 DEQ'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, DEQ's decision on the application is final 16 days after DEQ'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 DEQ at the location of the source.

G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Contact 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).

Montana Air Quality Permit Analysis
Contact Mining Company
MAQP #1642-01

I. Introduction/Process Description

Contact Mining Company (Contact) owns and operates a metallic mineral processing facility. The facility is located approximately 1-mile south of Philipsburg, Montana, in Section 36, Township 7 North, Range 14 West, Granite County, 46.31832°N, latitude and -113.28936°W, Longitude.

A. Permitted Equipment

Contact operates the following equipment

- Apron feeder
- Two single deck screens
- One jaw crusher
- One cone crusher
- Material transfer belts (conveyor belts)
- Baghouse
- Associated equipment

B. Source Description

Contact operates a precious metals mill. The process involves receiving ore from various mines in the area. After the ore is received, it is screened and then sent to primary and secondary crushing operations. After crushing, the ore is sent off site for further refining.

C. Permit History

On November 3, 1981, **Air Quality Permit #1642-00** was issued to Contact.

D. Current Permit Action

On November 27, 2024, Contact submitted an application to modify Air Quality Permit #1642-00.

On June 13, 2008, Field Services Section staff (FSS) of the Montana Department of Environmental Quality's (DEQ) Air Quality Bureau inspected the Contact site and noted there were multiple pieces of equipment in operation that were not included in Air Quality Permit #1642-00. At that time, DEQ prepared a Warning Letter #WLAD08-18, however, this letter was not issued to Contact.

On May 30, 2024, FSS conducted a subsequent site inspection and again determined that Contact was operating equipment that was not listed in their existing MAQP. In response to these findings, FSS issued a Violation Letter #VL-20240905-00434 and solicited submittal of the current permit application.

The modification is an update from the original MAQP issued to Contact on November 11, 1981. The modification updates the equipment list to include material transfer belts (conveyor belts) that were not previously permitted and updates the permit with currently applicable requirements and MAQP format. **MAQP #1642-01** replaces Air Quality Permit #1642-00.

E. Response to Public Comments

Person/Group Commenting	Permit Reference	Comment	DEQ Response
Contact Mining Company	MAQP Analysis, Section A – Permitted Equipment	Contact submitted a public comment stating that there was a baghouse used to control emissions from the assay lab.	DEQ listed the baghouse into the MAQP Analysis, Section A – Permitted Equipment.

F. Additional Information (Changes to an existing permit)

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 DEQ. Upon request, DEQ will provide references to the location 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 DEQ, 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 DEQ.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, 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).

   Contact 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 DEQ upon request.

4. ARM 17.8.110 Malfunctions. (2) DEQ 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 the following:

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 PM_{10}

Contact 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. (2) Under this rule, Contact 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, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.

5. ARM 17.8.316 Incinerators. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any incinerator, particulate matter in excess of 0.10 grains per standard cubic foot of dry flue gas, adjusted to 12% carbon dioxide and calculated as if no auxiliary fuel had been used. Further, no person shall cause or authorize to be discharged into the outdoor atmosphere from any incinerator emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes.

6. 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 rule.

7. 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 is equipped with a vapor loss control device as described in (1) of this rule.

8. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). Contact is considered an NSPS affected facility under 40 CFR Part 60 and is 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 LL – Standard of Performance for Metallic Mineral Processing Plants. This subpart applies to each crusher and screen in open-pit mines; each crusher, screen, bucket elevator, conveyor belt transfer point, thermal dryer, product packaging station, storage bin, enclosed storage area, truck loading station, truck unloading station, railcar loading station, and railcar unloading station at the mill or concentrator. Because Contact operates a cone crusher, jaw crusher, screen, and conveyor belts used for metallic mineral processing, this subpart is applicable.

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 DEQ. Contact 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 DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by DEQ. 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. DEQ 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 prorate 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 tons per year of any pollutant. Contact has a PTE greater than 25 tons per year particulate matter, therefore, an air quality permit is required.

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

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Contact 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. Contact submitted an affidavit of publication of public notice for the *December 5, 2024*, issue of the *Philipsburg Mail*, a newspaper of general circulation in the Town of Philipsburg, in Granite 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 DEQ 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 DEQ 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 Contact 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 DEQ'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 17.8.760 Additional Review of Permit Applications. This rule describes DEQ's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.

12. 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.

13. 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).

14. 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.

15. ARM 17.8.765 Transfer of Permit. 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 DEQ.

16. ARM 17.8.770 Additional Requirements for Incinerators. This rule specifies the additional information that must be submitted to DEQ for incineration facilities subject to 75-2-215, Montana Code Annotated (MCA).

17. ARM 17.8.771 Mercury Emission Standards for Mercury-Emitting Generating Units. This rule identifies mercury emission limitation requirements, mercury control strategy requirements, and application requirements for mercury-emitting generating units.

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

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

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

This facility is not a major stationary source because this facility is not a listed source and the facility's PTE is below 250 tons per year of any regulated 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 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 DEQ may establish by rule; or

c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (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 #1642-01 for Contact, the following conclusions were made:

a. The facility's PTE is less than 100 tons/year for any regulated pollutant.

b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for 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 A & LL).

e. This facility is not subject to any current NESHAP standards.

f. This source is not a Title IV affected source, or a solid waste combustion unit.

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

Based on these facts, DEQ determined that Contact will be a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Contact will be required to obtain a Title V Operating Permit.

III. BACT Determination

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

A BACT analysis was not submitted by Contact in permit application #1642-01. The current permit action updates Contact's current equipment list to include the addition of material handling (conveyer) belts.

Contact's original Air Quality Permit required the use of chemical and/or water for dust suppression along with water spray bars and enclosed processing equipment which are currently in use. Chemical and/or water suppression, water spray bars, and enclosed material transfer belts (conveyor belts) are commonly used at mineral and nonmineral processing facilities.

Chemical and/or water dust suppression for all vehicle traffic surfaces, water spray bars for all NSPS and non-NSPS regulated equipment, and enclosed conveyor belts constitute BACT for this source. Contact also operates a baghouse in the assay lab.

IV. Emission Inventory

Emission Source	PM	PM_{10}	$PM_{2.5}$
Cone Crusher	2.37	1.05	0.04
Jaw Crusher	2.37	1.05	0.04
Screen	10.95	3.81	0.02
Conveyor	21.02	7.71	0.09
Piles	1.70	0.80	0.12
Haul Roads	15.38	1.92	0.28
Truck Loading	1.31	0.48	0.01
Truck Unloading	1.31	0.48	0.01
Total Emissions	**56.41**	**17.31**	**0.62**

Notes:
1. Values in table reflect "uncontrolled" emissions

Calculations:

Cone Crusher		
Operational Capacity of Engine = 100 ton/hour	100	ton/hour
Hours of Operation = 8,760 hours	8,760	hours
PM Emissions:		
Emission Factor = 0.0054 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0054	lb/ton
Calculation: (0.0054 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 2.37 ton/yr	**2.37**	ton/yr
PM-10 Emissions:		
Emission Factor = 0.0024 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0024	lb/ton
Calculation: (0.0024 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 1.05 ton/yr	**1.05**	ton/yr
PM2.5 Emissions		
Emission Factor = 0.0001 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0001	lb/ton
Calculation: (0.0001 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 0.04 ton/yr	**0.04**	ton/yr

Jaw Crusher		
Operational Capacity of Engine = 100 ton/hour	100	ton/hour
Hours of Operation = 8,760 hours	8,760	hours
PM Emissions:		
Emission Factor = 0.0054 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0054	lb/ton
Calculation: (0.0054 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 2.37 ton/yr	**2.37**	ton/yr
PM-10 Emissions:		
Emission Factor = 0.0024 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0024	lb/ton
Calculation: (0.0024 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 1.05 ton/yr	**1.05**	ton/yr
PM2.5 Emissions		
Emission Factor = 0.0001 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0001	lb/ton
Calculation: (0.0001 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 0.04 ton/yr	**0.04**	ton/yr

Screening		
Maximum Process Rate = 100 ton/hr	100	ton/hr
Maximum Hours of Operation = 8,760 hrs/yr	8,760	hrs/yr
Number of Screens = 1 screen	1	screen
Total PM Emissions:		
Emission Factor = 0.025 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.025	lb/ton
Calculation: (0.025 lb/ton) * (8760 hrs/yr) * (ton/2000 lb) * (1 screen) = 10.95 ton/yr	**10.95**	ton/yr
Total PM10 Emissions:		
Emission Factor = 0.0087 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0087	lb/ton
Calculation: (0.009 lb/ton) * (8760 hrs/yr) * (ton/2000 lb) * (1 screen) = 3.81 ton/yr	**3.81**	ton/yr
Total PM2.5 Emissions		
Emission Factor = 0.00005 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.00005	lb/ton
Calculation: (0.000 lb/ton) * (8760 hrs/yr) * (ton/2000 lb) * (1 screen) = 0.02 ton/yr	**0.02**	ton/yr

Conveyor Transfer Point		
Maximum Process Rate = 100 ton/hr	100	ton/hr
Maximum Hours of Operation = 8,760 hrs/yr	8,760	hrs/yr
Number of Transfers = 16 transfer	16	transfer
Total PM Emissions:		
Emission Factor = 0.003 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.003	lb/ton
Calculation: (0.003 lb/ton) * (8760 hrs/yr) * (0.003 lb/ton) * (ton/2000 lb) * (16 transfer) = 21.02 ton/yr	**21.02**	ton/yr
Total PM10 Emissions:		
Emission Factor = 0.0011 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.0011	lb/ton
Calculation: (100 ton/hr) * (8760 hrs/yr) * (0.0011 lb/ton) * (ton/2000 lb) * (16 transfer) = 7.71 ton/yr	**7.71**	ton/yr
Total PM2.5 Emissions		
Emission Factor = 0.000013 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.000013	lb/ton
Calculation: (100 ton/hr) * (8760 hrs/yr) * (0.000013 lb/ton) * (ton/2000 lb) * (16 transfer) = 0.09 ton/yr	**0.09**	ton/yr

Cold Aggregate Storage Piles		
Maximum Process Rate = 100 ton/hr	100	ton/hr
Maximum Hours of Operation = 8,760 hrs/yr	8,760	hrs/yr
Number of Piles = 1 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 = 0.00388 lb/ton	0.00388	lb/ton
Where: k = particle size multiplier = 0.74 (Value for PM < 30 microns per AP 42, Sec. 13.2.4.3, 11/06)	0.74	
U = mean wind speed = 9.3 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	9.3	mph
M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	2.5	%
Calculation: (0.00388 lb/ton) * (8,760 hrs/yr) * (ton/2000 lb) * (1 piles) = 1.70 ton/yr	**1.70**	ton/yr
PM10 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 = 0.00184 lb/ton	0.00184	lb/ton
Where: k = particle size multiplier = 0.35 (Value for PM < 10 microns per AP 42, Sec. 13.2.4.3, 11/06)	0.35	
U = mean wind speed = 9.3 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	9.3	mph
M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	2.5	%
Calculation: (0.00184 lb/ton) * (8,760 hrs/yr) * (ton/2000 lb) * (1 piles) = 0.80 ton/yr	**0.80**	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 = 0.00028 lb/ton	0.00028	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)	0.053	
U = mean wind speed = 9.3 mph (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	9.3	mph
M = material moisture content = 2.5% (Average from values provided in AP 42, Sec. 13.2.4.3, 11/06)	2.5	%
Calculation: (0.00028 lb/ton) * (8,760 hrs/yr) * (ton/2000 lb) * (1 piles) = 0.12 ton/yr	**0.12**	ton/yr

Haul Roads		
Vehicle Miles Traveled (VMT) per Day = 7 VMT/day (Estimate)	7	VMT/day
VMT per hour = (7 VMT/day) * (day/24 hrs) = 0.29 VMT/hr	0.29	VMT/hr
Hours of Operation = 8,760 hrs/yr	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 = 12.04 lb/VMT	12.04	lb/VMT
Where: k = constant = 4.9 lbs/VMT (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)	4.9	lbs/VMT
s = surface silt content = 7.1 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)	7.1	%
W = mean vehicle weight = 50 tons (1994 average loaded/unloaded or a 40 ton truck)	50	tons
a = constant = 0.7 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)	0.7	
b = constant = 0.45 (Value for PM30/TSP, AP 42, Table 13.2.2-2, 11/06)	0.45	
Calculation: (12.04 lb/VMT) * (8760 hrs/yr) * (4.9 lbs/VMT) * (ton/2000 lb) = 15.38 tons/yr (Uncontrolled Emissions)	**15.38**	tons/yr

PM10 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 = 1.50 lb/VMT	1.50	lb/VMT
Where: k = constant = 1.5 lbs/VMT (Value for PM10, AP 42, Table 13.2.2-2, 11/06)	1.5	lbs/VMT
s = surface silt content = 7.1 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)	7.1	%
W = mean vehicle weight = 50 tons (1994 average loaded/unloaded or a 40 ton truck)	50	tons
a = constant = 0.9 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)	0.9	
b = constant = 0.45 (Value for PM10, AP 42, Table 13.2.2-2, 11/06)	0.45	
Calculation: (1.50 lb/VMT) * (8760 hrs/yr) * (1.5 lbs/VMT) * (ton/2000 lb) = 1.92 tons/yr (Uncontrolled Emissions)	**1.92**	tons/yr

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 = 0.22 lb/VMT	0.22	lb/VMT
Where: k = constant = 0.15 lbs/VMT (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)	0.15	lbs/VMT
s = surface silt content = 4.8 % (Mean value, sand/gravel processing, material storage area, AP 42, Table 13.2.2-1, 11/06)	4.8	%
W = mean vehicle weight = 45 tons (1994 average loaded/unloaded or a 40 ton truck)	45	tons
a = constant = 0.9 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)	0.9	
b = constant = 0.45 (Value for PM2.5, AP 42, Table 13.2.2-2, 11/06)	0.45	
Calculation: (0.22 lb/VMT) * (8760 hrs/yr) * (0.2 lbs/VMT) * (ton/2000 lb) = 0.28 tons/yr (Uncontrolled Emissions)	**0.28**	tons/yr

Truck Loading

Operational Capacity of Engine = 100 ton/hour	100	ton/hour
Hours of Operation = 8,760 hours	8,760	hours

PM Emissions:

Emission Factor = 0.003 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.003	lb/ton
Calculation: (0.003 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 1.31 ton/yr	**1.31**	ton/yr

PM-10 Emissions:

Emission Factor = 0.0011 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.00110	lb/ton
Calculation: (0.001 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 0.48 ton/yr	**0.48**	ton/yr

PM2.5 Emissions

Emission Factor = 0.000013 lb/ton (AP-42, Sec. 11.19, Table 11.19.2-2, 10/96)	0.000013	lb/ton
Calculation: (0.000013 lb/ton) * (100 ton/hour) * (8,760 hours) * (ton/2000 lb) = 0.01 ton/yr	**0.01**	ton/yr

Truck Unloading		
Operational Capacity of Engine = 100 ton/hr	100	ton/hr
Hours of Operation = 8,760 hours	8,760	hours
PM Emissions:		
Emission Factor = 0.003 lb/ton (AP-42, Sec. 3.3, Table 3.3-1, 10/96)	0.003	lb/ton
Calculation: (0.003 lb/ton) * (100 ton/hr) * (8,760 hours) * (ton/2000 lb) = 1.31 ton/yr	**1.31**	ton/yr
PM-10 Emissions:		
Emission Factor = 0.0011 lb/ton (AP-42, Sec. 3.3, Table 3.3-1, 10/96)	0.0011	lb/ton
Calculation: (0.0011 lb/ton) * (100 ton/hr) * (8,760 hours) * (ton/2000 lb) = 0.48 ton/yr	**0.48**	ton/yr
PM2.5 Emissions		
Emission Factor = 0.000013 lb/ton (AP-42, Sec. 3.3, Table 3.3-1, 10/96)	0.00001 3	lb/ton
Calculation: (0.000013 lb/ton) * (100 ton/hr) * (8,760 hours) * (ton/2000 lb) = 0.01 ton/yr	**0.01**	ton/yr

V. Existing Air Quality

Contact is located at 77 Red Mill Road, Philipsburg, MT in Section 36, Township 7 North, and Range 14 West in Granite County. This area is considered attainment/unclassifiable for all criteria pollutants.

VI. Air Quality Impacts

DEQ determined that there will be no impacts from this permitting action because while this permitting action is considered a modification it makes no changes to any existing operational conditions or processes. Therefore, DEQ believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Ambient Air Impact Analysis

Based on the information provided by the applicant and the conditions established in MAQP #1642-01, DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, DEQ conducted a private property taking and damaging assessment which, is available for review in the attached environmental assessment.

IX. Environmental Assessment

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

DRAFT ENVIRONMENTAL ASSESSMENT

Contact Mining Company

Air Quality Bureau

Air, Energy, and Mining Division

Table of Contents

Project Overview

COMPANY NAME:	Contact Mining Company
EA DATE:	February 12, 2025
SITE NAME:	Contact Mill
MAQP#:	1642-01
Application Received Date:	November 27, 2024
Additional Information Received:	January 6, 2025

Location

Township Section 36, Township 7 North, Range 14 West
County: Granite
PROPERTY OWNERSHIP: FEDERAL STATE
PRIVATE X

Compliance with the Montana Environmental Policy Act

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human environment. The proposed action is considered to be a state action that may have an impact on the human environment and, therefore, the Department of Environmental Quality (DEQ) must prepare an environmental review. This Environmental Assessment (EA) will examine the proposed action and alternatives to the proposed action and disclose potential impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608. DEQ may not withhold, deny, or impose conditions on the Permit based on the information contained in this EA (§ 75-1- 201(4), MCA).

Proposed Action

Contact operates a metallic mineral processing facility. The proposed project identifies and regulates pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site.

Purpose and Need

Under MEPA, Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human environment. The Proposed Action is considered to be a state action that may have an impact on the human environment and, therefore, DEQ must prepare an environmental review. This EA will examine the proposed action and alternatives to the proposed action and disclose potential impacts that may result from the proposed and alternative actions. DEQ will determine the need

for additional environmental review based on consideration of the criteria set forth in ARM 17.4.608.

TABLE 1: SUMMARY OF ACTIVITIES PROPOSED IN APPLICATION

Table 1. Summary of Proposed Activities in Application	
General Overview	The proposed action would update Contact Mining Company's Montana Air Quality Permit to reflect the current operating environment and equipment.
Duration and Timing	None.
Estimated Disturbance	None.
Equipment	None.
Location	Contact currently operates the mineral processing facility on Section 36, Township 7 North, Range 14 West.
Personnel on-site	Staff range from 5 to 25, depending on workload.
Location and Analysis Area	Section 36, Township 7 North, Range 14 West
Air Quality	The facility is located at 77 Red Mill Road, Philipsburg, MT in Section 36, Township 7 North, and Range 14 West in Granite County. This area is considered unclassifiable/attainment for all criteria pollutants.
Water Quality	None.
Erosion Control and Sediment Transport	Operation: Existing company staff would oversee operation of the equipment on an as needed basis.
Solid Waste	The analysis area for this permit action is the area shown in Figure 1 and the immediate area surrounding the Contact facility.

Cultural resources	The property is already in use and would have no additional effects on cultural resources. The Applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to cultural resources.
Aesthetics	The property is already in use and there would be no additional changes to aesthetics. The Applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to cultural resources.
Hazardous Substances	This project does not contribute any hazardous substances to the facility. The Applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to hazardous substances.
Weed Control	The Applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to weed control.
Reclamation Plans	The property is already in use and would require minor reclamation at the end of the projects lifespan.

Cumulative Impact Considerations	
Past Actions	No past actions would contribute to cumulative impact considerations.
Present Actions	Update Contacts' Montana Air Quality Permit to reflect current operations and equipment.
Related Future Actions	No future actions are foreseen at this site.

See Figure 1 – Current Location.

Figure 1. Contact Mining Company

Evaluation of Affected Environment and Impact by Resource:

The impact analysis will identify and evaluate whether the impacts are direct or secondary impacts to the physical environment and human population in the area to be affected by the proposed project. Direct impacts occur at the same time and place as the action that causes the impact. Secondary impacts are a further impact to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts will be described.

Cumulative impacts are the collective impacts on the human environment within the borders of Montana that could result from the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future impacts must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures. The activities identified in Table 1 were analyzed as part of the cumulative impacts assessment for each resource.

The duration is quantified as follows:

- Construction Impacts (short-term): These are impacts to the environment during the construction period. When analyzing duration, please include a specific range of time.

- Operation Impacts (long-term): These are impacts to the environment during the operational period. When analyzing duration, please include a specific range of time.

The intensity of the impacts is measured using the following:

- No impact: There would be no change from current conditions.

- Negligible: An adverse or beneficial effect would occur but would be at the lowest levels of detection.

- Minor: The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.

- Moderate: The effect would be easily identifiable and would change the function or integrity of the resource.

- Major: The effect would alter the resource

1. Geology and Soil Quality, Stability, and Moisture

The proposed project identifies and regulates pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site.

The affected area is a polymetallic, porphyry-lode deposit in the Cordilleran style. The area's geology is characterized by the presence of fluorescent sphalerite, which is rich in tungsten, copper, gallium, and silver.

Direct Impacts:
No direct construction or operational impacts to geology, soil quality, stability, and moisture are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to geology, soil quality, stability, and moisture are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to geology, soil quality, stability, or moisture associated with the proposed action.

2. Water Quality, Quantity, and Distribution

The proposed project identifies and regulates pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site This project would not impact any surface or groundwater in the area.

Direct Impacts:
A limited amount of water may be required to control fugitive dust emissions from day-to-day activities and would likely be sourced on-site. Therefore, any adverse direct impacts to water quantity would be short-term and negligible.

Secondary Impacts:
No secondary impacts would be expected as a result of the proposed action because the action updates the permit and does not change the operational environment.

Cumulative Impacts:
No cumulative impacts are expected because of the proposed project.

3. Air Quality

The proposed project identifies and regulates multiple pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates

Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site.

Air quality in the area affected by the proposed project is currently unclassifiable or in compliance with applicable NAAQS. No significant point-sources of air pollution exist in the area affected by the proposed project. Existing sources of air pollution in the area are limited and generally include mining operations similar to Contacts' operation. The proposed project updates the MAQP to include and regulate equipment that has been in operation but was not previously permitted. The proposed action does regulate equipment not previously permitted, but does not actually add any new emitting sources to the existing operation.

Applicants are required to comply with all laws relating to air, such as the Federal Clean Air Act, NAAQS set by the Environmental Protection Agency (EPA), and the Clean Air Act of Montana.

In addition, MAQP #1642-01 provides legally enforceable conditions regarding the emitting units themselves, pollution controls, and requires the applicant to take reasonable precautions to limit fugitive dust from this location. Furthermore, the proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to geology, soil quality, stability, and moisture are expected as a result of the proposed action.

Secondary Impacts:
There are no emissions associated with the proposed action. However, emissions from the site would use BACT and would not be expected to cause or contribute to a violation of the health and welfare-based primary and secondary NAAQS. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. See permit analysis for more detailed information regarding air quality impacts. Any adverse impacts would be long-term and minor. No beneficial secondary impacts would be expected because of the proposed project.

Cumulative Impacts:
No cumulative impacts are expected because of the proposed project.

4. Vegetation Cover, Quantity, and Quality

The proposed project identifies and regulates pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site.

The affected area consists primarily of dirt roads, parking lots, and vegetation along the property

boundaries. The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to vegetative cover, quantity, or quality are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to vegetative cover, quantity, or quality are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to vegetative cover, quantity, or quality associated with the proposed action.

5. Terrestrial, Avian, and Aquatic Life and Habitats

The proposed project identifies and multiple pieces of equipment in operation at the site that were not included in Contact's initial MAQP and otherwise updates Contact's existing MAQP with currently applicable requirements and MAQP format. The current permit action does not result in any changes to existing, actual operations at the site.

The area where the proposed action will take place is an already developed facility with no new construction planned. The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Wildlife species in the affected area include the species of concern identified in Section 6 below as well as various other plains species such as deer, raptors, and rodents. No water resources exist in the project area so no aquatic species would be expected to be present in the area.

Direct Impacts:
No direct construction or operational impacts to terrestrial, avian, or aquatic life and habitats are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to terrestrial, avian, or aquatic life and habitats are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to terrestrial, avian, or aquatic life and habitats associated with the proposed action.

6. Unique, Endangered, Fragile, or Limited Environmental Resources

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

DEQ conducted a search using the Montana Natural Heritage Program (MTNHP) webpage with file downloads saved to the AQB project file. The query was run and downloaded on December 30, 2024. The polygon selected was the immediate area surrounding the proposed site.

The proposed project is not in core, general or connectivity sage grouse habitat, as designated by the Sage Grouse Habitat Conservation Program at: http://sagegrouse.mt.gov.

Species of concern identified in the MTNHP report include the following:

Birds – Evening Grosbeak, Pileated Woodpecker, Brown Creeper, Great Blue Heron, and the Long-Billed Curlew

Fish – Bull Trout and Westslope Cutthroat Trout
Mammals – Hoary Bat, Wolverine, and Fisher

Most of these species are outside of the analysis area but included in the MTNHP polygon area.

Direct Impacts:
The Sage Grouse Habitat Conservation Program has stated that the proposed project would not occur in core, general or connectivity sage grouse habitat. Therefore, impacts to sage grouse would not occur. Noted species of concern identified from the MTNHP report mostly indicate species related to surface water which is not present at the proposed site. Therefore, no direct impacts to the MTNHP identified *species of concern* would be expected because of the proposed project.

Numerous other terrestrial and avian species such as deer, raptors, and rodents, may also use the affected area, including the project area, for all or part of their life cycle.

However, because the project area is surrounded by similar habitats, any species displaced by construction and/or operation of the permitted facility would be expected to relocate to nearby, similar habitat. Any adverse direct impacts would be short-and long-term, consistent with existing impacts, and minor.

Secondary Impacts:
According to the MTNHP as stated above, there are some species of concern located or potentially located in the affected area. Further, exiting emissions from the facility would not be expected to cause or contribute to a violation of the health and welfare-based NAAQS. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. No secondary impacts would be expected to unique, endangered, fragile or other environmental resources.

Cumulative Impacts:
No cumulative impacts would be expected.

7. Historical and Archaeological Sites

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations with no new construction. The Montana State Historic Preservation Office (SHPO) was notified of the application and SHPO conducted a file search and provided a letter dated December 30, 2024.

Site Name	Twp	Rng	Sec	Qs	Site Type 1	Site Type 2	Time Period	Owner	NR Status
24GN0572	7N	14W	36	NE	Historic Mining	Historic Hard Rock Mine	Historic, More Than One Decade	Private	Eligible
24GN0615	7N	14W	36	NE	Historic Railroad		Historic, More Than One Decade	BLM	Eligible
24GN0623	7N	14W	36	Comb	Historic Ranger Station		Historic, More Than One Decade	Forest Service	Eligible
24GN0711	7N	14W	36	NE	Historic Flume		Historic, More Than One Decade	Private	Eligible
24GN0832	7N	14W	36	Comb	Historic Mining		Historic, More Than One Decade	BLM and Other	Eligible
24GN0852	7N	14W	36	NE	Historic Transmission Line		Historic, More Than One Decade	Combination	Eligible

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place. No underground disturbance would be required for the proposed action as the engines just sit on skids located on top of the ground surface.

Direct Impacts:

According to the SHPO, there have been six (6) previously recorded historical or archaeological sites identified within the search area. The same rationale would apply here, as long as the land marker was undisturbed, no impact would occur.

Secondary Impacts:

According to the State Historical Preservation Society, there have been six (6) previously recorded historical or archaeological site identified within the search area. Further, the proposed project would not be expected to violate the Secondary NAAQS. See air quality impacts analysis in the permit analysis. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings, including historical buildings. Therefore, any direct impacts would be long-term and negligible. No beneficial direct impacts would be expected because of the proposed project.

Cumulative Impacts:

No cumulative impacts to historical and archaeological sites are anticipated since the proposed action site is located on land currently used for metallic mineral processing. Further, there was a single site identified which would not be expected to be disturbed.

8. Aesthetics

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations. There will be no new structures associated with the proposed project, therefore there will be no changes to the aesthetics of area.

Direct Impacts:
No direct construction or operational impacts to vegetative cover, quantity, or quality are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to vegetative cover, quantity, or quality are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to vegetative cover, quantity, or quality associated with the proposed action.

9. Demands on Environmental Resources of Land, Water, Air, or Energy

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to demands of environmental resources of land, water, air, or energy are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to demands of environmental resources of land, water, air, or energy are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to demands of environmental resources of land, water, air, or energy associated with the proposed action.

10. Impacts on Other Environmental Resources

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:

Existing fugitive dust emissions resulting from daily operation of facility may adversely impact air quality in the affected area. However, Contact must use reasonable precautions to limit fugitive dust generated from construction activities; therefore, the proposed project would not be expected to cause or contribute to a violation of the applicable NAAQS for particulate matter (fugitive dust). See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Therefore, any adverse direct impacts to other environmental resources would be short-term and minor. No beneficial direct impacts would be expected because of the proposed project.

Secondary Impacts:
Proposed operations would not be expected to cause or contribute to a violation of the public welfare-based Secondary NAAQS. See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Therefore, any adverse secondary impacts to other environmental resources would be long-term and minor. No beneficial secondary impacts would be expected because of the proposed project.

Cumulative Impacts:
No other environmental resources, beyond the resource areas already covered within this EA would result in any known additional cumulative impacts.

11. Human Health and Safety

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to human health and safety are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to human health and safety are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to human health and safety associated with the proposed action.

12. Industrial, Commercial, and Agricultural Activities and Production

The area where the proposed action is located is a small mining complex. The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:

No direct construction or operational impacts to industrial, commercial, or agricultural activities or production are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to industrial, commercial, or agricultural activities or production are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to industrial, commercial, or agricultural activities or production associated with the proposed action.

13. Quantity and Distribution of Employment

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
Contact would use existing staff or contracted services to operate the facility. Therefore, any direct impacts to the quantity and distribution of employment in the affected area would be short-term, negligible, and beneficial. No adverse direct impacts would be expected because of the proposed project.

Secondary Impacts:
Contact would use existing staff to operate the proposed facility. Therefore, any secondary impacts to the quantity and distribution of employment in the affected area would be long-term, negligible, and beneficial. No adverse secondary impacts would be expected because of the proposed project.

Cumulative Impacts:
No cumulative impact is expected on long-term employment from the proposed action because the existing MAQP update would not create any permanent new jobs.

14. Local and State Tax Base and Tax Revenues

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to local and state tax base and tax revenues are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to local and state tax base and tax revenues are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to local and state tax base and tax revenues associated with the proposed action.

15. Demand for Government Services

Direct Impacts:
The air quality permit has been prepared by state government employees as part of their day-to-day, regular responsibilities. Therefore, any adverse direct impacts to demands for government services is consistent with existing impacts and negligible. No beneficial direct impacts would be expected because of the proposed project.

Secondary Impacts:
Following construction of the proposed facility, initial and ongoing compliance inspections of facility operations would be accomplished by state government employees as part of their typical, regular duties and required to ensure the facility is operating within the limits and conditions listed in the air quality permit. Therefore, any adverse secondary impacts to demands for government services would be consistent with existing impacts and negligible.
No beneficial secondary impacts would be expected because of the proposed project.

Cumulative Impacts:
Minor cumulative impacts are anticipated on government services with the proposed action and a minimal increase in impact would occur but regulators would likely combine visits to cover regulatory oversight needs.

16. Locally Adopted Environmental Plans and Goals

DEQ has reviewed the Granite County website and found no locally adopted environmental plans and goals for the area.

Direct Impacts:
No locally adopted environmental plans and goals were identified. Therefore, no direct impacts would be expected because of the proposed project.

Secondary Impacts:
No locally adopted environmental plans and goals were identified.; therefore, no secondary impacts to locally adopted environmental plans and goals would be expected because of the proposed project.

Cumulative Impacts:
No cumulative impacts to the locally adopted environmental plans and goals are anticipated since no direct impacts or secondary impacts were identified.

17. Access to and Quality of Recreational and Wilderness Activities

The proposed project updates the MAQP to reflect current equipment located at the facility and

does not include any changes to property boundaries.

Direct Impacts:
No recreational or wilderness areas occur in the vicinity of the proposed project. Therefore, no direct impacts to access and quality of recreational and wilderness activities would be expected because of the construction phase of the proposed project.

Secondary Impacts:
The affected area consists primarily of mine sites. No recreational or wilderness areas occur in the immediate area; therefore, no secondary impacts to access and quality of recreational and wilderness activities would be expected because of proposed facility operations.

Cumulative Impacts:
No cumulative impacts to access and quality of recreational and wilderness activities are anticipated as a result of the proposed permitting action.

18. Density and Distribution of Population and Housing

The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
No direct construction or operational impacts to density and distribution of population or housing are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to density and distribution of population or housing are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to density and distribution of population or housing associated with the proposed action.

19. Social Structures and Mores

DEQ is not aware of any Native American cultural concerns that would be affected by the proposed activity. Based on the information provided by the Applicant, it is not anticipated that this project would disrupt traditional lifestyles or communities. A SHPO cultural inventory was noted in Section 7 of the EA.

Direct Impacts:
No direct construction or operational impacts social structures or mores are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational impacts to social structures or mores are

expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts to social structures or mores with the proposed action.

20. Cultural Uniqueness and Diversity

The existing nature of the area affected by the proposed project is mining industry. It is not anticipated that this project would cause a shift in some unique quality of the area. The proposed project updates the MAQP to reflect current equipment located at the facility and does not include any changes to operations.

Direct Impacts:
Contact would continue to employ existing staff and/or contracted services to operate the facility and thus the proposed project would not be expected to otherwise result in an increase or decrease in the local population. Therefore, no direct impacts to the existing cultural uniqueness and diversity of the affected population would be expected because of the proposed project.

Secondary Impacts:
The existing nature of the area affected by the proposed project is mining industry. Further, Contact would employ existing staff to operate the facility and thus the proposed project would not be expected to result in an increase or decrease in the local population. Therefore, no secondary impacts to the existing cultural uniqueness and diversity of the affected population are anticipated as a result of the proposed action.

Cumulative Impacts:
No cumulative impacts to cultural uniqueness and diversity are anticipated because the skills required by this project would be similar to other existing sites in the area and this project would be considered small by industrial standards.

21. Private Property Impacts

The proposed project would take place on privately owned land. DEQ's approval of MAQP #1642-01 permit would not affect the applicant's real property. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ's approval of MAQP #1642-01 would not have private property-taking or damaging implications.

As required by 2-10-105, MCA, DEQ 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)

22. Other Appropriate Social and Economic Circumstances

Direct Impacts:

DEQ is unaware of any other appropriate short-term social and economic circumstances in the affected area that may be directly impacted by the proposed project. Due to the nature of the proposed action, no further direct impacts would be expected because of the proposed project.

Secondary Impacts:

DEQ is unaware of any other appropriate long-term social and economic circumstances in the affected area that may be impacted by the proposed project. No further secondary impacts would be expected because of the proposed project.

Cumulative Impacts:

No cumulative impacts to any other appropriate social and economic circumstances are anticipated

because no direct and secondary impacts were identified. The proposed project would take place on private land. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ's approval of MAQP #1642-01 would not have private property-taking or damaging implications.

23. Other Appropriate Social and Economic Circumstances

Due to the nature and scope of the proposed project activities, no further direct or secondary impacts would be anticipated from this project.

24. Greenhouse Gas Assessment

The proposed action updates the permit to reflect current operations and equipment at the facility and does not include the addition of any greenhouse gas emitting units.

Direct Impacts:
No direct construction or operational are expected as a result of the proposed action.

Secondary Impacts:
No secondary construction or operational are expected as a result of the proposed action.

Cumulative Impacts:
There will be no cumulative impacts with the proposed action.

Proposed Action Alternatives
No Action Alternative: In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval of MAQP #1642-01. The applicant would lack the authority to conduct the proposed activity. Any potential impacts that would result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.
If the Applicant demonstrates compliance with all applicable rules and regulations required for approval, the "no action" alternative would not be appropriate.

Other Reasonable Alternative(s): No other alternatives were considered.

Consultation

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries to the following websites/databases/personnel:
https://www.rooseveltcountymt.gov/

A review of the Granite County website, and listed department information did not indicate any specific planning documents that would be relative to this permitting action.

MAQP #1642-01 Application, State Historical Preservation Office, and NRIS.

Public Involvement

The public comment period for this permit action was from 02/12/2025 through 02/27/2025. Public comments were submitted during the public comment period and are located in Section II.E of the MAPQ Analysis.

Other Governmental Agencies with Jurisdiction

The proposed project would be located on private land. All applicable state and federal rules must be adhered to, which, at some level, may also include other state, or federal agency jurisdiction.

This environmental review analyzes the proposed project submitted by the Applicant. The project would be negligible and would be fully reclaimed to the permitted postmining land uses at the conclusion of the project and thus would not contribute to the long-term cumulative effects of mining in the area.

Need for Further Analysis and Significance of Potential Impacts

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in ARM 17.4.608, which are as follows:

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts – identify the parameters of the proposed action;
- The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
- The importance to the state and to society of each environmental resource or value that would be affected.
- Any precedent that would be set as a result of an impact of the proposed action that would commit DEQ to future actions with significant impacts or a decision in principle about such future actions; and
- Potential conflict with local, state, or federal laws, requirements, or formal plans.

Conclusions and Findings

DEQ finds that this action results in negligible impacts to air quality and GHG emissions in Granite County, Montana.

No significant adverse impacts would be expected because of the proposed project. As noted through the draft EA, the severity, duration, geographic extent and frequency of the occurrence of the impacts associated with the proposed air quality project would be

negligible. The proposed action would result in an updated permit, reflective of the operational environment and equipment on site.

The Applicant is proposing to update the air quality permit as explained in MAQP #1642-01.

As discussed in this EA, DEQ has not identified any significant impacts associated with the proposed actions for any environmental resource. DEQ does not believe that the activities proposed by the Applicant would have any growth-inducing or growth-inhibiting aspects, or contribution to cumulative impacts. The proposed engine site does not appear to contain known unique or fragile resources.

There are no unique or known endangered fragile resources in the project area and no underground disturbance would be required for this project.

There would be negligible impacts to view-shed aesthetics as the site is already in operation and is not adding any new structures.

Demands on the environmental resources of land, water, air, or energy would not be significant.

Impacts to human health and safety would not be significant as the site would be required to operate with Best Available Control Technology to control fugitive emissions.

As discussed in this EA, DEQ has not identified any significant impacts associated with the proposed activities on any environmental resource.

Issuance of a Montana Air Quality Permit #1642-01 to the Applicant does not set any precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the Applicant submits another modification or proposes to amend the permit, DEQ is not committed to issuing those revisions.

DEQ would conduct an environmental review for any subsequent permit modifications sought by the Applicant pursuant to MEPA. DEQ would make permitting decisions based on the criteria set forth in the Clean Air Act of Montana.

Issuance of the Permit to the Applicant does not set a precedent for DEQ's review of other applications for Permits, including the level of environmental review. The level of environmental review decision is made based on case-specific consideration of the criteria set forth in ARM 17.4.608.

Finally, DEQ does not believe that the proposed air quality permitting action by the Applicant would have any growth-inducing or growth inhibiting impacts that would conflict with any local, state, or federal laws, requirements, or formal plans.

Based on a consideration of the criteria set forth in ARM 17.4.608, no significant adverse impacts to the affected human environment would be expected because of the proposed

project. Therefore, preparation of an Environmental Impact Statement or EIS is not required, and the draft EA is deemed the appropriate level of environmental review pursuant to MEPA.

Preparation and Approval

Draft EA and Significance Determination prepared by:

John P. Proulx
Air Quality Engineering Scientist

Environmental Assessment Reviewed By:

Eric Merchant, Supervisor, Air Quality Permitting Services Section, Air Quality Bureau

Environmental Assessment Approved By:

Eric Merchant, Supervisor, Air Quality Permitting Services Section, Air Quality Bureau

References

- 1642-01_2024_11_27_APP – Application received from Contact Mining Company on November 27, 2024 and additional information provided on January 6, 2025.

- 1642-01_2024_13_30_SHPO – State Historical Preservation Office Investigation

- 1642-01_2024_13_30_NRIS – Natural Resource Information System Endangered Species Investigation,

- https://www.granitecountymt.us/

- https://pubs.usgs.gov/publication/pp78#:~:text=The%20western%20limit%20is%20fairly,broad%20stretches%20of%20semiarid%20lowland.