

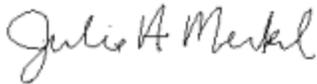
May 6, 2021

Mr. Kraig Keltz
American Chemet Corporation
P.O. Box 1160
East Helena, MT 59635

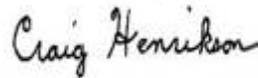
Dear Mr. Keltz:

Montana Air Quality Permit #1993-22 is deemed final as of May 6, 2021, by the Department of Environmental Quality (Department). All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,



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



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

Montana Department of Environmental Quality
Air, Energy & Mining Division

Montana Air Quality Permit #1993-22

American Chemet Corporation
P.O. Box 1160
East Helena, MT 59635

May 6, 2021



MONTANA AIR QUALITY PERMIT

Issued to: American Chemet Corporation
P.O. Box 1160
East Helena, MT 59635

MAQP: #1993-22
Application Received: March 26, 2021
Preliminary Determination: April 1, 2021
Department's Decision: April 20, 2021
Permit Final: May 6, 2021

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

Section I: Permitted Facilities

A. Plant Location

American Chemet owns and operates the East Helena facility for the primary purpose of the production of copper oxides and zinc oxides for use in multiple products, including marine paints and animal feeds. The American Chemet facility is located immediately south of State Highway 12, within the city limits of East Helena. The legal description is the Northeast $\frac{1}{4}$ of Section 36, Township 10 North, Range 3 West, Lewis and Clark County, Montana. A list of permitted equipment is contained within the permit analysis.

B. Current Permit Action

On March 26, 2021, the Department received an application from American Chemet to install and operate new process equipment associated with the new Basic Copper Carbonate Plant. The new process includes a new copper feed hopper, a new duct burner (Stack 48 Duct Burner), a new baghouse (Stack 48 Baghouse), a new copper furnace (#75 Copper Furnace with Stack #49 baghouse) and a new packer (#76 Copper Packer) as well as various other process vessels. In order to accommodate the new equipment, several existing production units must also be rerouted from their existing baghouses to alternate baghouses with equivalent control. In addition, American Chemet requested the list of permitted equipment in Section I.A. of the Permit Analysis for MAQP #1993-21 be updated to reflect the changes. The application also requested the removal of the Control Unit Stack #13 and the #65 Copper Furnace which are being removed from service. Permit conditions Section II.A.13 and II.A.14 in MAQP #1993-21 were also removed from the permit. Permit condition Section II.A.7 was also deleted to remove the annual hour limitation.

Section II: Conditions and Limitations

A. Emission Limitations

1. The #41 Copper Furnace emissions shall be controlled by a baghouse (ARM 17.8.749).
2. Emissions from the individual baghouses (stacks #2 and #31) that control the #1 Copper Furnace and the #41 Copper Furnace, shall each not exceed:

- a. 0.015 gr/dscf of particulate matter (ARM 17.8.749)
 - b. 0.007 lb/hour of lead (American Chemet Board Order dated 8/4/95 and 6/30/95 stipulation (ARM 17.8.749))
 - c. 15.4 lb of lead/calendar quarter (American Chemet Board Order dated 8/4/95 and 6/30/95 stipulation (ARM 17.8.749))
 - d. 20% opacity (ARM 17.8.752)
3. Emissions from the #11 Copper Mill Support Baghouse (stack #11) that controls the #48 Mill, the Feed Hopper for the #4 Copper Furnace, the #50 Copper Sizer Feed Bin, and the #47 Copper Screen shall not exceed:
- a. 0.010 gr/dscf of particulate (ARM 17.8.749)
 - b. 20% opacity (ARM 17.8.304)
4. Emissions from the #5 Copper Mill shall be controlled by the #5 Copper Mill Vent Baghouse (stack #4), the #5 Copper Mill Transfer Baghouse (stack #5), and the #5 Copper Mill Feed Baghouse (stack #6). Emissions from each of these baghouse stacks shall not exceed:
- a. 0.015 gr/dscf of particulate (ARM 17.8.749)
 - b. 20% opacity (ARM 17.8.304)
5. Emissions from the baghouse (stack #21) that controls the gas-fired #28 Copper Furnace (#CL-056) system and the #74 Copper Furnace, shall not exceed:
- a. 0.01 gr/dscf of particulate (ARM 17.8.752)
 - b. 20% opacity (ARM 17.8.752)
6. Emissions from the baghouse (stack #25) that controls the #34 Copper Mill, the #35 Copper Sieve, the #36 Copper Blender, the #37 Copper Packer, #38 Copper Mill, and the #44 Copper Mill shall not exceed:
- a. 0.01 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 7% opacity (ARM 17.8.752)
7. Emissions from the #16 Copper Furnace, the #17 Copper Furnace, and the #18 Copper Furnace shall be controlled by a baghouse (stack #14). Emissions from stack #14 shall not exceed:
- a. 0.01 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 10% opacity (ARM 17.8.752)

8. Emissions from the individual baghouses (stack #27) that control the #73 Copper Furnace, #3 Copper Furnace and the #4 Copper Furnace, shall each not exceed:
 - a. 0.015 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 10% opacity (ARM 17.8.752)
9. Emissions from the #19 Copper Furnace, controlled by a thermal oxidation unit (stack #15) shall not exceed:
 - a. 0.10 gr/dscf of particulate matter adjusted to 12% carbon dioxide and calculated as if no auxiliary fuel had been used (ARM 17.8.316)
 - b. 10% opacity (ARM 17.8.316)
10. The #43 Copper Blender emissions must be controlled by a baghouse (ARM 17.8.752). Emissions from the baghouse (stack #30) that control the emissions from the #43 Copper Blender shall each not exceed:
 - a. 0.01 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 7% opacity (ARM 17.8.752)
11. The #24 Copper Mill, #30 Copper Mill, the #32 Crusher, the #46 Copper Mill, and the #72 Copper Mill, shall be controlled by a baghouse (ARM 17.8.749). Emissions from the baghouse (stack #32) shall not exceed:
 - a. 0.010 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 7% opacity (ARM 17.8.752)
12. The #31 Copper Sieve shall be controlled by a baghouse. Emissions from the baghouse (Stack #42) shall not exceed:
 - a. 0.010 gr/dscf of particulate matter (ARM 17.8.749)
 - b. 10% opacity (ARM 17.8.749)
13. The #60 Copper Furnace shall be controlled by a baghouse (ARM 17.8.749). Emissions from the baghouse (stack #40) shall not exceed:
 - a. 0.015 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 7% opacity (ARM 17.8.752)
14. The #61 Copper Mill shall be controlled by a baghouse (ARM 17.8.749). Emissions from the baghouse (stack #41) shall not exceed:
 - a. 0.015 gr/dscf of particulate matter (ARM 17.8.752)
 - b. 7% opacity (ARM 17.8.752)

15. The #16 Copper Furnace, the #17 Copper Furnace and the #74 Copper Furnace must comply with the following requirements when receiving process gas from the #49 Gas Processor:
 - a. Emissions from the feed end of the #16 Copper Furnace, #17 Copper Furnace and the #74 Copper Furnace shall be controlled with a flame curtain during all periods when the copper furnace is receiving process gas from the #49 Gas Processor (ARM 17.8.752).
 - b. Emissions from the discharge end of the #16 Copper Furnace, #17 Copper Furnace and the #74 Copper Furnace shall be controlled with a double lip curtain seal, or equivalent, during all periods when the copper furnace is receiving process gas from the #49 Gas Processor (ARM 17.8.752).
 - c. Excess process gas from the #16 Copper Furnace, #17 Copper Furnace and the #74 Copper Furnace shall be collected and routed to a continuously operated, natural gas-fired afterburner (ARM 17.8.752).
 - d. Emissions from the afterburner stack that controls emissions from the process gas-supplied #16 Copper Furnace or #17 Copper Furnace, shall not exceed 1.99 pounds per hour of carbon monoxide (CO) (ARM 17.8.749).
 - e. Emissions from the flame curtain discharge stack and the afterburner stacks shall not exceed 10% opacity (ARM 17.8.749).
 - f. The #49 Gas Processor, and the #16 Copper Furnace, #17 Copper Furnace and the #74 Copper Furnace, when receiving process gas from the #49 Gas Processor, shall not be operated unless the afterburner and flame curtain is fully operational and providing the maximum emission reduction for which it was designed. The #16 Copper Furnace, #17 Copper Furnace and #74 Copper Furnace shall be equipped and operated with feed end controls that monitor the operational status (i.e., presence of a flame) of the afterburner and flame curtain (ARM 17.8.749).
16. The #55 packer and the #26 packer shall be controlled by a baghouse (ARM 17.8.749). Emissions from the baghouse (stack #35) shall not exceed:
 - a. 0.015 gr/dscf of particulate matter (ARM 17.8.749)
 - b. 20% opacity (ARM 17.8.752)
17. The #5 Copper Mill Batch Bin and the #58 Copper Sizer shall not be charged simultaneously (ARM 17.8.749).
18. The Batch Bin and the #52 Copper Mixer Feed Bin #1 shall not be charged simultaneously (ARM 17.8.749).
19. The #53 Copper Mixer and the #54 Copper Mixer shall not be charged simultaneously (ARM 17.8.749).
20. The #53 Copper Mixer Conveyor and the #54 Copper Mixer Conveyor shall not be charged simultaneously (ARM 17.8.749).

21. The #48 Duct Burner and #75 Copper Furnace discharges shall each be controlled by a baghouse and shall not exceed 0.010 gr/dscf of particulate matter (ARM 17.8.752).
22. Except as otherwise specified in this permit, American Chemet shall not operate any process equipment that was installed after August 21, 2002, unless:
 - a. Conveyer covers or enclosures are being used and maintained on that process equipment, and/or
 - b. Transfer point covers or enclosures are being used and maintained on that process equipment, and/or
 - c. Structural enclosures surround that process equipment (ARM 17.8.749)

B. Testing Requirements

1. American Chemet shall perform compliance tests for particulate, lead, and opacity on the baghouse (stack #2) controlling the #1 Copper Furnace; testing must demonstrate compliance with the limitations in Section II.A.2. The opacity test shall consist of a minimum of 30 minutes of readings. Compliance testing shall be performed on a once every 5-year basis, or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105).
2. American Chemet shall perform compliance testing (stack #31) on the baghouse controlling the #41 Copper Furnace for particulate, lead, and opacity. The testing must demonstrate that the #41 Copper Furnace is in compliance with the limitations in Section II.A.2. The tests shall be performed on a once every 5-year basis, or according to another testing/monitoring schedule as may be approved by the Department. The opacity test shall consist of a minimum of 30 minutes of readings (ARM 17.8.105).
3. American Chemet shall perform compliance testing for CO on the afterburner controlling emissions from the #16 Copper Furnace. The testing must demonstrate compliance with the CO limitations in Section II.A.15. The tests shall be performed on a once every-2-year basis, or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105).
4. American Chemet shall perform compliance testing for CO on the afterburner controlling emissions from the #17 Copper Furnace, in the event the connection between the #49 Gas Processor and #17 Copper Furnace is reestablished. The testing must demonstrate compliance with the CO limitations in Section II.A.15. The testing shall be conducted within 180 days of connection to the #49 Gas Processor. The tests shall continue on a once every 2-year basis, or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105).
5. The Department may require further testing (ARM 17.8.105).
6. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

C. Operational Reporting Requirements

1. American Chemet 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 is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis and sources identified in Section I of the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. The information shall include the following and shall be in the units required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505). American Chemet shall submit the following information annually to the Department by March 1, of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

- a. Tons of material processed or handled by the following:

- #1 Zinc
- #1 Copper Furnace
- #3 Copper Furnace
- #4 Copper Furnace
- #5 Copper Mill
- #8 Copper Blender
- #9 Copper Blender
- #11 Copper Mill
- #11 Copper Mill Support Baghouse
- #50 Copper Sizer
- #16 Copper Furnace
- #17 Copper Furnace
- #18 Copper Furnace
- #19 Copper Furnace
- #24 Copper Sizer
- #26 Packer
- #28 Copper Furnace
- #30 Copper Mill
- #31 Copper Sieve
- #32 Crusher
- #34 Copper Mill
- #35 Copper Sieve
- #36 Copper Blender
- #37 Copper Packer

- #41 Copper Furnace
- #43 Copper Blender
- #44 Copper Mill
- #46 Copper Mill
- #47 Copper Screen
- #48 Copper Mill
- #52 Copper Mixer
- #53 Copper Mixer

#54 Copper Mixer
#55 Packer
#58 Copper Sizer
#59 Packer
#60 Copper Furnace
#61 Copper Mill

#66 Copper Mill Feed
#66 Copper Furnace
#68 Packer
#66 Copper Furnace Feed
#69 Copper Mill
#70 Copper Mixer
#71 Copper Mixer
#72 Copper Mill
#73 Copper Furnace
#74 Copper Furnace
#75 Copper Furnace
Stack #48 Duct Burner

- b. Hours of operation of each source of emissions at the facility
 - c. Amount of gas burned for each piece of fuel-burning equipment
 - d. Amount of process gas generated by the #49 Gas Processor
2. The following information shall be submitted to the Department on a quarterly basis. Data for each calendar quarter shall be submitted within 45 days of the end of the quarter (ARM 17.8.749).
 - a. Hours of operation of the #1 Copper Furnace and the #41 Copper Furnace
 - b. Pounds per quarter of lead emissions from the #1 Copper Furnace Stack (stack #2) and the #41 Copper Furnace Stack (stack #31)
 3. American Chemet 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 emission 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 start up or use of the proposed de minimis change or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change and must include the information requested in ARM 17.8.745 (l)(d) (ARM 17.8.745).
 4. All records compiled in accordance with this permit must be maintained by American Chemet as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

D. Notification

American Chemet shall provide the Department with written notification of the actual start-up date of the #75 Copper Furnace. The notice shall be provided no later than 15 days after the actual start-up date of the #75 Copper Furnace (ARM 17.8.749).

Section III: General Conditions

- A. Inspection – American Chemet shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emission Monitoring Systems CEMS, Continuous Emission Rate Monitoring Systems (CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if American Chemet fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving American Chemet 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 as specified in Section 75-2-401 *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fees – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by American Chemet may be grounds for revocation of this permit, as required by that section and rules adopted there under 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 (MAQP) Analysis
American Chemet Corporation
MAQP #1993-22

I. Introduction/Process Description

The American Chemet Corporation (American Chemet) facility is located within the City of East Helena, approximately 3 miles east of Helena. The legal description of the facility is the Northeast ¼ of Section 36, Township 10 North, Range 3 West, Lewis and Clark County, Montana.

A. Permitted Equipment

This permit covers the following equipment at the facility:

Emitting Unit(s)	Stack ID	Control Equipment
#1 Zinc	#1	Baghouse
#1 Copper Furnace	#2	Baghouse
#5 Copper Mill Vent Baghouse	#4	Baghouse
#5 Copper Mill Transfer Baghouse	#5	Baghouse
#5 Copper Mill Feed Baghouse	#6	Baghouse
#8 Copper Blender #9 Copper Blender	#7	Baghouse
#11 Copper Mill Vent	#9	Baghouse
#11 Copper Mill Feed	#10	Baghouse
#11 Copper Mill Support #47 Copper Screen #48 Copper Mill	#11	Baghouse
#16 Copper Furnace #17 Copper Furnace #18 Copper Furnace	#14	Baghouse
#16 Copper Furnace (Oxidation Unit for #16 Cu Furnace - #43 Gas Processor) #17 Copper Furnace (Oxidation unit for #16 Cu Furnace - #43 Gas Processor)	#14A, #14B	Oxidation Unit
#19 Copper Furnace	#15	Oxidation Unit
#76 Packer	#18	Baghouse
#59 Packer (Bin System) #59 Packer	#20	Baghouse
#28 Copper Furnace	#21	Baghouse

Emitting Unit(s)	Stack ID	Control Equipment
#74 Copper Furnace		
#34 Copper Mill #35 Copper Sieve #36 Copper Blender #37 Copper Packer #44 Copper Mill	#25	Baghouse
#73 Copper Furnace #3 Copper Furnace #2 Copper Furnace	#27	Baghouse
#43 Copper Blender	#30	Baghouse
#41 Copper Furnace (Outlet)	#31	Baghouse
#30 Copper Mill #32 Crusher #46 Copper Mill #24 Copper Mill #72 Copper Mill	#32	Baghouse
#49 Gas Processor	#33	Baghouse
#26 Packer #55 Packer	#35	Baghouse
#52 Copper Mixer #58 Copper Sizer (Closed Loop)	#36	Baghouse
#41 Copper Furnace (Inlet)	#38	Baghouse
#59 Packer	#39	Baghouse
#61 Copper Mill	#41	Baghouse
#61 Copper Mill Feed #66 Copper Furnace #68 Packer #31 Copper Sieve #67 Copper Furnace	#42	Baghouse
#66 Copper Furnace Feed #67 Copper Furnace Feed	#43	Baghouse
#69 Copper Mill	#44	Baghouse
#70 Copper Mixer #71 Copper Mixer	#45	Baghouse
#60 Copper Furnace	#46	Baghouse
#53 Copper Mixer #54 Copper Mixer	#47	Baghouse
Stack 48 Duct Burner	#48	Baghouse
#75 Copper Furnace	#49	Baghouse

B. Source Description

The primary purpose of the facility is the production of copper oxides and zinc oxides for use in multiple products, including the production of marine paints and animal feeds. The facility consists of numerous gas-fired and electric furnaces, mills, and blenders for the production of the oxides.

C. Permit History

Permit #685(-020674) was the first permit issued to American Chemet on November 20, 1973, for the construction of a scrubber (referred to as the Ducon scrubber) and associated duct work and settling tank to control emissions from two (#1 and #2) copper furnaces.

Permit #882 was issued on August 12, 1975, for the #19 Copper Furnace. Permit #882 replaced Permit #685(-020647).

Permit #883 was issued on June 9, 1975, for a new copper grinding facility. At the time, the facility was known as the #5 and #6 Copper Mills – which referred to the two baghouses. This permit covered the installation of the process equipment and the product recovery baghouses. Permit #883 replaced Permit #882.

Permit #934 was issued on April 6, 1976, for the #1 Copper Furnace. Permit #934 replaced Permit #883.

Permit #1020 was issued on December 21, 1976, for a copper furnace and stack. The furnaces covered by Permit #1020 were a furnace, which has been removed and sold, and the #1 Copper Furnace that was still operating. Permit #1020 replaced Permit #934.

Permit #1290 was issued on October 24, 1978, for the installation of the #9 Packer and appurtenances (three baghouses). Permit #1290 replaced Permit #1020.

Permit #1454 was issued on March 18, 1980, for the #20 Copper Furnace. The #20 Copper Furnace was the second furnace of this type at the facility. Permit #1454 replaced Permit #1290.

Permit #1585 was issued on April 29, 1981, for the installation of cyclones and a courtyard baghouse. A cyclone was installed on each of the #2, #3, and #4 Copper Furnaces. The courtyard baghouse reference was later changed to the #13 Copper Mill Baghouse. Permit #1585 replaced Permit #1454.

Permit #1589 was issued on May 7, 1981, for a crusher baghouse. The crusher baghouse became the third baghouse (named the #7 copper mill) installed on the #5 Copper Mill system that was originally covered by Permit #883.

MAQP #1993-00 was issued on February 5, 1985, for the #23 Copper Furnace. MAQP #1993-00 replaced Permit #1589.

MAQP #1993-01 was issued on February 25, 1994, for the construction and operation of the gas-fired #28 Copper Furnace. The #28 Copper Furnace would produce the premium product at American Chemet. Copper powder was the material fired in the furnace. Also, this permit

alteration was the mechanism used to combine all previously existing permits issued to American Chemet for the East Helena plant into one permit. MAQP #1993-01 replaced Permits #685, #882, #883, #934, #1020, #1290, #1454, #1585, #1589, and #1993-00. All conditions contained in the permits became conditions in MAQP #1993-01. MAQP #1993-00 replaced MAQP #1993-01.

MAQP #1993-02 was issued on April 22, 1994, for the construction and operation of an experimental furnace (#29 Copper Furnace) and a stirred ball mill system (#30 Copper Mill). The experimental furnace was constructed and installed to allow American Chemet the opportunity to evaluate the use of other types of feed material. The #29 Copper Furnace was constructed outdoors, adjacent to the existing #1 copper furnace.

The #30 Copper Mill was installed to process some of the copper oxides previously processed in the #5 Copper Mill. The material processed was oversized lumps, which caused problems in the #5 Copper Mill. The mill was fed by a vibratory or screw-type feeder. The milled product was discharged into a 48-cubic-foot metal tote. The #30 Copper Mill was installed in an existing building located on the south side of the plant. **MAQP #1993-02** replaced MAQP #1993-01.

MAQP #1993-03 was issued on February 15, 1995, for the construction and operation of new processing equipment and controls. The equipment included the #33 Copper Blender, #34 Copper Mill, #35 Copper Sieve, #36 Copper Blender, #37 Copper Packer, and the #38 Copper Mill. The emissions from this processing equipment were controlled by a Mikro Pulsaire dust collector, except for the #38 Copper Mill, that was controlled by an existing baghouse. The new equipment also included the #39 Gas Processor, which burned natural gas. This additional equipment allowed American Chemet to produce a new product.

Other changes included the construction and operation of a new baghouse to control emissions from the #3 and #4 Copper Furnaces and the addition of a #40 Copper Sizer. At the time, the #3 and #4 furnaces were controlled by a scrubber system that also controlled emissions from the #2 Copper Furnace. The change was made to decrease the inlet loading to the scrubber. The #40 Copper Sizer was added to increase the flexibility of the facility. The emissions from the sizer were controlled by a cyclone followed by a baghouse. **MAQP #1993-03** replaced MAQP #1993-02.

MAQP #1993-04, issued July 17, 1996, authorized two separate projects at the facility. The first project resulted in the installation of an additional copper furnace to increase production. The new #41 Copper Furnace was identical to the #1 Copper Furnace, except for some minor changes to the feed and discharge systems. Emissions from the new #41 Copper Furnace were controlled with a pulse-jet baghouse.

The first project also included the possible construction of a new 20-meter exhaust stack. Emissions from the baghouse controlling the #1 Copper Furnace, as well as from the new baghouse controlling the #41 Copper Furnace, would be routed to the existing 8.8-meter stack or the new 20-meter stack. The construction of the #41 Copper Furnace would result in a minor increase in actual emissions from the facility (approximately 1.1 ton/year of particulate, 0.01 ton/year of SO₂, and 0.0008 ton/year of lead), but no increase in allowable particulate or lead emissions. American Chemet had until July 17, 1999, to construct a new 20-meter stack as allowed by the Board of Environmental Review (Board) order issued August 4, 1995.

The second project authorized the alteration of the existing #19 Copper Furnace. The furnace consists of two separate sections that exhaust through a single stack. The unit was modified to

disable the west section and relocate the stack over the east section. The existing burner and afterburner were redesigned to improve efficiency. Also, the feed and discharge methods were redesigned from batch to continuous processing of the copper laden feed. The capacity of the furnace did not change through this alteration, therefore, the emissions were not expected to change. These changes did not trigger review under the Montana Clean Air Act 75-2-215. **MAQP #1993-04** replaced MAQP #1993-03.

MAQP #1993-05 was issued on July 2, 1997, to allow the construction of a new #42 Copper Sizer and associated baghouse, and the construction of a new #43 Copper Blender and associated baghouse. The #42 Copper Sizer was a possible replacement for the #14 Copper Sizer (an old unit with uncertain spare parts availability). The actual shutdown date of the #14 Copper Sizer was unknown and, therefore, the new unit was permitted to operate concurrently with the old unit. The #43 Copper Blender was installed to improve the efficiency of various facility processes. The blender had an associated natural gas-fired unit. The particulate emissions from the #43 Copper Blender was to be controlled by a new baghouse. The emissions from the dump hopper for the #42 Copper Sizer was to be controlled by the new baghouse.

The permit alteration slightly changed the language related to the #41 and #1 Copper Furnaces to clarify that the #41 and #1 Copper Furnace emissions had to vent through the same stack. Each furnace had a designated baghouse for controlling particulate and lead emissions. The stack could either be the existing 8.8-meter stack or a new 20-meter stack, which, if constructed, would replace the 8.8-meter stack. The requirement for the specific stacks and associated emission limit for lead came from the Board order issued on June 30, 1995. If American Chemet changed the discharge points of the exhaust gases, they would need to run a revised dispersion model to demonstrate compliance with the ambient lead standard.

The Department of Environmental Quality (Department) also removed the conditions associated with the #29 Copper Furnace that had been permitted as an experimental unit on April 22, 1994. On March 12, 1996, American Chemet informed the Department that this unit had been permanently disabled.¹ Since the unit was no longer usable, the conditions associated with its use and emission testing was no longer needed. American Chemet was no longer authorized to use the #29 Copper Furnace. **MAQP #1993-05** replaced MAQP #1993-04.

MAQP 1993-06 was issued on April 17, 1998, to allow American Chemet to separate the emissions from the #1 and #41 Copper Furnaces. Originally, American Chemet had planned (and was required by MAQP #1993-04) to route the emissions from the proposed #41 Copper Furnace to the #1 Copper Furnace Stack. The company determined this was probably not feasible, based on system configurations. However, the facility was located in an area designated as non-attainment for the lead National Ambient Air Quality Standard (NAAQS). Therefore, the Department performed modeling to demonstrate that separating the two exhausts would not violate the ambient standard for lead if half of the emission limit that applied to the #1 Copper Furnace Stack was applied to each of the stacks, separately.

The permitting action described above did not increase emissions from American Chemet; therefore, the Department did not perform an Environmental Assessment (EA) for the project. In addition, the relocation of the emissions from the furnace did not adversely impact the ambient air

¹ In the letter, American Chemet referenced the furnace as #32 Copper Furnace. This was an incorrect number reference. The name for the furnace is #29 Copper Furnace.

or the State Implementation Plan (SIP) provisions designed to bring the area into compliance with the ambient lead standard. **MAQP #1993-06** replaced MAQP #1993-05.

MAQP #1993-07, issued August 14, 1998, allowed American Chemet to initiate four minor changes within their facility, but did not permit an increase in allowable emissions. The first change American Chemet intended to make was to replace the #32 Crusher with the #45 Crusher, and control the #45 Crusher with the baghouse that vented to Stack #5. The #32 Crusher was controlled by the baghouse venting to Stack #19. After construction, the baghouse that vented to Stack #5 would control the #6 Copper Mill and the #45 Crusher. However, American Chemet elected to not construct the #45 Crusher and to keep the #32 Crusher in service.

The second change removed the #25 Copper Shredder. The #25 Copper Shredder had been controlled by the baghouse that vented to Stack #19. Prior to MAQP #1993-07, the baghouse that vented to Stack #19 controlled the #32 Crusher, the #25 Shredder, and the #30 Copper Mill. The third change moved the #31 sieve and controlled its emissions with the baghouse that vented to Stack #19. Prior to MAQP #1993-07, the #31 Sieve was controlled by the baghouse that vented to Stack #18. After MAQP #1993-07, the baghouse that vented to Stack #19 controlled the #30 Copper Mill and the #31 Sieve. The fourth change relocated the #44 copper mill and controlled its emissions by the baghouse that vented to Stack #25. MAQP #1993-07 allowed the baghouse that vented to Stack #25 to control the #36 Copper Blender, the #35 Copper Sieve, the #34 Copper Mill, the #33 Copper Blender, the #37 Copper Packer, and the #44 Copper Mill. **MAQP #1993-07** replaced MAQP 1993-06.

MAQP #1993-08, issued September 1, 1999, allowed American Chemet to replace the baghouse that vented to Stack #19 with a new larger capacity baghouse. The new larger capacity baghouse then vented to the new #32 Stack and controlled the emissions from the existing #30 Copper Mill and #32 Crusher. The #31 Sieve was moved to work in association with the #24 Copper Mill, and be controlled by the baghouse venting to Stack #18. Previously, MAQP #1993-07 allowed American Chemet to replace the #32 Crusher; however, American Chemet elected to not construct the #45 Crusher and kept the #32 Crusher in active service. MAQP #1993-08 allowed the facility to control the emissions from the #32 Crusher with the new baghouse.

American Chemet also installed three new process units, all controlled by a new baghouse venting to the #32 Stack. The new process units were denoted as the #46 Copper Mill, the #47 Screen, and the #48 Copper Mill. Thus, the new baghouse controlled five process units: the three new units described above and two existing units. Additionally, American Chemet requested an extension of time to construct a 20-meter stack that would exhaust emissions from the #1 and #41 Copper Furnaces. The new stack was approved in a previous permit (MAQP #1995-05) and a Board order issued on June 30, 1995. MAQP #1993-08 granted American Chemet an extension to construct the taller stack. Under MAQP #1993-08, the new stack had to be constructed no later than August 31, 2002.

MAQP #1993-08 did not increase lead emissions and the process equipment within the facility that might possibly contribute to ambient lead concentrations were not affected by the alterations. A small increase in particulate emissions from the facility was anticipated as a result of emissions from the new stack (#32); however, modeling was not required due to the diminutive nature of the emissions increase. The permitted modification did not adversely impact the SIP for lead in East Helena. **MAQP #1993-08** replaced MAQP #1993-07.

MAQP #1993-09 was issued September 22, 2000, for a modification of MAQP #1993-08. American Chemet proposed to install and operate a new gas processor (#49 gas processor) to supply process gas to an existing copper furnace (#16 Copper Furnace). The #49 gas processor would have enough capacity to supply process gas for two additional copper furnaces. The permitting action allowed American Chemet to operate two additional copper furnaces in conjunction with the #49 gas processor, in the future. The two additional copper furnaces would be the #17 Copper Furnace and the #18 Copper Furnace or the #28 Copper Furnace. The #49 gas processor would replace the #39 gas processor that would be removed from service.

The permit did not allow an increase in allowable lead emissions and the process equipment within the facility that could possibly contribute to ambient lead concentrations was not affected by the alterations proposed. A small increase in CO emissions from the facility was anticipated as a result of emissions from the new #49 gas processor. However, modeling was not required because of the small increase in emissions. The modification did not adversely impact the SIP for lead in East Helena. **MAQP #1993-09** replaced MAQP #1993-08.

MAQP #1993-10 was issued January 20, 2001, for modification of Permit #1993-09. On September 27, 2000, the Department received American Chemet's initial request to change conditions in Permit MAQP #1993-09. American Chemet requested removal of the condition in Section II.A.22.b that required the operation of a nitrogen gas purge at the discharge end of any copper furnace receiving process gas from the #49 gas processor. The company also requested deletion of the notification requirements contained in Sections II.D.1, II.D.2, II.D.4, and II.D.5 of MAQP #1993-09. Additionally, American Chemet requested permission to control CO emissions from the three copper furnaces - #49 gas processor combinations with individual afterburners, instead of just one afterburner. The Department agreed to this approach and apportioned the original CO limit between the three afterburners. All three afterburners were required to be source tested. Finally, the company requested a de minimis determination on their proposal to vent the #44 Copper Mill's baghouse directly to atmosphere, instead of venting it to the inlet of the baghouse associated with Stack #25. The Department agreed to the change, but added the same limits to the #44 Copper Mill, as applied to the baghouse associated with Stack #25.

The permitting action did not increase lead emissions. A minor increase in CO emissions (0.21 tpy) from the facility was anticipated as a result of the emissions from the two additional incinerators associated with the new #49 gas processor. Modeling was not required because of the minimal increase in emissions. **MAQP #1993-10** replaced MAQP #1993-09.

MAQP #1993-11 was issued on October 12, 2001, to allow for a modification of MAQP #1993-10. The modification reflected changes to the #5 Copper Mill and related conditions in MAQP #1993-10. Further analysis of the permit application and historical records concluded that the proposed changes would be de minimis and that a permit alteration was not required. Additionally, the Department had previously issued de minimis determinations on other equipment changes. All of these changes were incorporated in the permit modification and are discussed below:

- In a letter dated January 24, 2001, American Chemet requested a de minimis determination on the replacement of the baghouse on the #1 Copper Furnace. The new baghouse would be identical to the baghouse on the #41 Copper Furnace. The baghouse proposed for the #1 Copper Furnace differed from the original furnace with minor changes in operational parameters. Because American Chemet was located in a lead non-attainment area and the #1 Copper Furnace is a minor source of lead emissions, the Department

modeled the new baghouse parameters. The Department concluded that the proposed changes complied with the East Helena lead SIP; therefore, in a letter dated March 22, 2001, the Department agreed that the proposed change was de minimis in nature.

- In a letter dated March 12, 2001, American Chemet requested a de minimis determination on ancillary equipment upgrades to the baghouse on the #41 Copper Furnace. American Chemet proposed to replace the blower fan and motor in order to increase the airflow rate through the baghouse from 5,800 to 6,600 actual cubic feet per minute (acfm). Additionally, American Chemet proposed to upgrade the #1 Copper Furnace baghouse so that it would have operational parameters identical to the baghouse on the #41 Copper Furnace. Because American Chemet is located in a lead non-attainment area and because the #1 and #41 Copper Furnaces are minor sources of lead emissions, the Department modeled the new parameters on both baghouses and concluded that the proposed changes complied with the East Helena lead SIP. Therefore, in a letter dated March 22, 2001, the Department agreed that the proposed changes were de minimis in nature.
- In an application received on August 2, 2001, American Chemet requested a modification of MAQP #1993-10 to replace a fan and the particle classification system on their #5 Copper Mill to increase the process rate of the #5 Copper Mill. The Department's review concluded that the proposed changes would not increase the "Potential to Emit (PTE)" since the emissions from the three, product-recovery baghouses and the product-recovery cyclone associated with the #5 Copper Mill would not increase. Therefore, the proposed changes were determined to be de minimis in nature. However, the review of historical Department records for earlier permits on the #5 Copper Mill revealed that conditions from an earlier permit had not been carried forward. As a result of a previous Best Available Control Technology (BACT) analysis, conditions had been placed on a #5 Copper Mill baghouse in Permit #1589 by the Department's predecessor, the Department of Health & Environmental Sciences. These conditions were inadvertently left out of MAQP #1993-01 when it was issued to consolidate all of American Chemet's earlier permits. Therefore, the Department restored those conditions as part of this permit action.
- As part of this permit modification, the Department clarified the names for two copper mills and their associated product recovery units and updating the equipment list. The product recovery baghouses associated with the two copper mills have in the past been referred to individually as "copper mills." These names potentially led readers into thinking that there were six copper mills, instead of only two copper mills and six product recovery baghouses. The permit action also clarified the limitations and conditions on the two copper mills and their associated baghouses. Additionally, the inventory of potential emissions was updated. **MAQP #1993-11** replaced MAQP #1993-10.

On July 11, 2002, American Chemet was issued **MAQP #1993-12**. This modification included the installation and operation of a pilot plant to test a new production operation. American Chemet proposed to use an existing baghouse to control the particulate emissions from the pilot plant. Based on the emission limits for the existing baghouse, the potential emissions from the pilot plant were less than 15 tons per year (tpy). Therefore, the proposed change was accomplished through the de minimis rule.

The modification also addressed a previously issued de minimis determination on another equipment change. In a letter dated January 11, 2002, American Chemet requested a de minimis determination on the upgrade of the #14 Copper Sizer. The new Copper Sizer (Copper Sizer #50) incorporated the process baghouse which controlled the #14 Copper Sizer into its closed-loop system design. In a letter dated January 16, 2002, the Department agreed that the proposed change was de minimis in nature. Additionally, the permit action reflected a request by American Chemet to delete the notification requirements in Section II.D.2, II.D.3, and II.D.5 of MAQP #1993-11, which were met, and change the name of Stack 14 to Stack 14, 14A, 14B, and 14C. **MAQP #1993-12** replaced MAQP #1993-11.

On September 19, 2002, American Chemet was issued **MAQP #1993-13**. On August 20, 2002, the Department received a request for a modification of MAQP #1993-12 for the addition of a federally enforceable condition (Section II.A.25 of MAQP #1993-13) to allow for a de minimis friendly permit. The condition required American Chemet to utilize, on new equipment installed after August 21, 2002, conveyor covers or enclosures, transfer point covers or enclosures and structural enclosures surrounding process equipment unless otherwise specified in the permit. **MAQP #1993-13** replaced MAQP #1993-12.

On December 2, 2003, the Department issued **MAQP #1993-14** to modify MAQP #1993-13. The permit action included several previous approved de minimis changes. On September 26, 2003, American Chemet requested an extension to permit condition under Section II.A.6. The condition was originally added to the air quality permit to assist with any potential emission problems which could have affected the East Helena Lead SIP. American Chemet had no plans to construct the 20-meter stack, however, the facility wanted to keep the option available for future use.

On September 8, 2003, the Department received a request from American Chemet to upgrade the pilot plant, permitted in MAQP #1993-12 to a full scale operation. The pilot plant was installed as a test unit of a new technology for producing copper oxide. The proposed unit, referred to as the #56 Copper Furnace, used the baghouse, which controlled the #24 Copper Mill (Stack #18) for product recovery in the same manner as the pilot plant. The #56 Copper furnace feed system was controlled by the baghouse at the #15 Copper Sizer (Stack #13). Based on the information submitted by American Chemet, the Department determined the upgrade fell within the de minimis rule, because the potential emissions were well below 15 tpy and the change did not violate any conditions of the existing permit.

In addition, on September 13, 2002, the Department received American Chemet's proposed facility modifications which enabled an increase in production and improved material handling efficiency. The project affected the facility's sizing, mixing and packaging processes. The new equipment included a copper furnace and associated baghouse, a new conveying system and associated feed bins, 3 copper mixers and associated bins, bin vents and boiler, and a packer with associated baghouse, bins, and bin vents. The Department determined that the modifications met the criteria set forth in the Administrative Rules of Montana (ARM) 17.8.745, as the increase in emissions for the facility was less than 15 tpy.

American Chemet also proposed to remove the #11 Copper Mill Vent Baghouse and the #11 Copper Mill Feed Baghouse. Some of the equipment controlled by those baghouses were also removed or shut down. The remaining equipment was to be controlled by the #11 Copper Mill Support Baghouse. The #21 Copper Furnace was also removed from the permit. American

Chemet requested that the outlet grain loading limitation for several emitting units be reduced. The grain loading limitation was lowered for the emissions from the following equipment: Stack #14 (controlling emissions from the #24 Copper Mill, the #28 Copper Furnace), Stack #25 (controlling emissions from the #33 Copper Blender, the #34 Copper Mill, the #35 Copper Sieve, the #36 Copper Blender, and the #37 Copper Packer).

Furthermore, American Chemet requested the following equipment and associated baghouses be restricted to an operating limit of 7,000 hours per rolling 12-month period: #33 Copper Blender, the #34 Copper Mill, the #35 Copper Sieve, the #36 Copper Blender, the #37 Copper packer, the #44 Copper Mill, the #16, #17, and #18 Copper Furnaces, the #38 Copper Mill, and the #42 Copper Sizer. Finally, American Chemet proposed to upgrade the pollution control equipment for the #2 Copper Furnace and the Copper Furnace by installing a new baghouse dust collector that serves both units. Currently, the #2 Copper Furnace emissions are controlled by a wet scrubber. Emissions from the #19 Copper Furnace are currently controlled by a thermal oxidation unit. MAQP #1993-14 replaced MAQP #1993-13.

The Department received a request from American Chemet on August 1, 2006, to make several administrative changes to MAQP #1993-14 to better reflect current operations at the facility. On September 12, 2006, American Chemet submitted an application to the Department for a modification to MAQP #1993-14. The request included the installation and operation of a new piece of process equipment to be called the #60 Copper Furnace. The permit application was withdrawn by American Chemet on December 5, 2006, however a permit action resulted which included the following proposed amendments presented in American Chemet's letter dated August 1, 2006;

- Removal of the #23 Copper furnace, scrubber, and associated conditions (removed from service)
- Removal of the #51 Copper Furnace, baghouse, and associated conditions (never installed)
- Increase in baghouse flow rate on the #1 Copper Furnace Baghouse from 6,600 cfm to 8,100 cfm
- Increase in baghouse flow rate on the #41 copper furnace baghouse from 6,600 cfm to 8,100 cfm
- Change in production rate of #41 Copper Furnace
- Removal of notification requirements that have been met
- Correct administrative error from previous permitting action to reflect hours of operation for the #16, #17, and #18 Copper Furnaces from 7,000 hours per year to 8,760 hours per year

- Removal of the following sources which have been removed from service:
 - ▶ #15 Copper Sizer (stack 13) – this baghouse stack is now combined with Stack #18 as one emission point associated with the #56 Copper furnace, #24 Copper Mill, and #31 Sieve
 - ▶ #26 Packer is no longer at Stack #20 – the #26 Copper Packer is now controlled by Stack #35, which also control the #55 Packer
 - ▶ #33 Copper Blender at Stack #25
 - ▶ #42 Copper Sizer at Stack #29 and associated baghouse

- Lower emission limits in the following sources from 0.02 gr/dscf to 0.015 gr/dscf:
 - ▶ #5 Copper Mill Vent Baghouse
 - ▶ #5 Copper Mill Transfer baghouse
 - ▶ #11 Copper Mill Vent baghouse
 - ▶ #11 Copper Mill Feed baghouse
 - ▶ #11 Copper Mill Support baghouse
 - ▶ #3 & #4 Copper furnace baghouse
 - ▶ #40 Copper Sizer baghouse

American Chemet proposed to maintain the option of combining emissions from the #1 and #41 Copper Furnaces into one 20 meter stack. Since this condition was a Board Order, the Department was unable to extend the date of compliance. Therefore, the condition was removed from the permit.

In addition, American Chemet proposed to maintain the option of combining emissions from the #2 Copper Furnace (currently routed to a wet scrubber) and the #19 Copper Furnace (currently routed to a thermal oxidizer), and route them to a baghouse. According to the ARM 17.8.762, because the facility did not commence construction on this project within 3 years, the condition was considered revoked. **MAQP #1993-15** replaced MAQP #1993-14.

On February 2, 2012, the Department received an application to modify American Chemet's air quality permit for the installation and operation of a new Cupric Oxide Plant to be constructed within the existing building. The permit action approved the construction of the following units;

- #60 Copper Furnace
- #61 Copper Mill
- #62 Copper Furnace

- #63 Copper Furnace
- #64 Copper Furnace

In addition, the permit action incorporated the following administrative equipment change notifications submitted by American Chemet;

- Permit conditions related the #17 Copper Furnace and #18 Copper Furnace receipt of process gas from the #49 Gas Processor were removed. American Chemet requested that testing be discontinued on the #17 Copper Furnace and further detailed in subsequent correspondence that the process lines which delivered process gas from the #49 Gas Processor were removed.
- In accordance with ARM 17.8.762, conditions related to the #18 Copper Furnace were removed. Because the facility did not commence construction on this project within 3 years the conditions associated with this project were considered revoked [Notifications received 05/9/2006 and 05/15/2006].
- Installed an additional baghouse on #41 Copper Furnace - inlet (stack #38) [De minimis notification received 05/23/2007].
- Increased stack flow rate of the #11 Copper Mill Support baghouse (stack #11) to 8,000 cfm [De minimis notification received 03/12/2008].
- Removed the #27 Packer and replaced it with the #59 packer and new a baghouse (stack #39). Routed existing baghouse ventilation (stack #20) to control the #59 Packer Bin System. The new baghouse to control emissions from the only the #59 Packer [De minimis notification received 12/15/2009].
- Replacement of the baghouse controlling emissions from the #52 Copper Mixer. Baghouse volume flow rate and emission rate specifications were identical [De minimis notification received 02/20/2012].

In addition, the permit action updated language and rule references used by the Department and updated the emissions inventory to incorporate the additional emitting units. **MAQP #1993-16** replaced MAQP #1993-15.

On August 4, 1995, the Montana Board of Environmental Review (BER) issued an order requiring American Chemet to comply with stipulated emission limitations and conditions established by the Department. The stipulation, dated June 30, 1995, provided a control strategy to reduce lead emissions in the East Helena lead nonattainment area. The control strategy was later approved by EPA under the East Helena State Implementation Plan for Lead (East Helena Lead SIP). As part of the control strategy, a limit on the percent of lead in copper feed material entering and used within American Chemet's process was prescribed. In order to ensure a readily available supply of copper, American Chemet initiated efforts to have the lead in feed limit removed on the basis that this limit is not reasonably related to the attainment and maintenance of the lead ambient air quality standards in the East Helena lead nonattainment area. On May 17, 2013, American Chemet, in

cooperation with the Department, petitioned the BER to revoke the lead in feed limit provision of the stipulation. The BER formally acted on June 10, 2013, by issuing a revised order whereby the lead in feed limit was revoked. All other lead limitations and conditions required under the June 30, 1995, order and stipulation and the East Helena Lead SIP remain in effect. The revised order will be submitted to EPA under a request to revise the East Helena Lead SIP to reflect this change. On June 19, 2013, the Department received a request from American Chemet to remove the lead in feed limitation from the MAQP. The action removed language associated with the lead in feed limit to reflect the board order. **MAQP #1993-17** replaced MAQP #1993-16.

On March 30, 2015, the Department received a request from American Chemet to remove three Copper Furnaces from the facility emissions inventory and to modify the emissions calculations to reflect the removal of the three Copper Furnaces. American Chemet stated in their letter to the Department that the three furnaces were not, and will not be installed.

The permit action removed language associated with #62 Copper Furnace, #63 Copper Furnace, and #64 Copper Furnace, as well as reflected changes in the emissions inventory in Section IV. B. **MAQP #1993-18** replaced MAQP #1993-17.

De minimis Actions Summarized from June 6, 2013 through MAQP Issuance

On June 6, 2013, the Department received a de minimis notification from American Chemet describing the proposed installation of a new process furnace identified as the #65 Copper Furnace. American Chemet indicated that PM emissions from the proposed furnace were to be controlled by an existing baghouse and no increases to PM emissions were expected. In addition, American Chemet submitted information demonstrating potential emissions from other criteria pollutants were below the de minimis threshold.

On March 11, 2014, the Department received a de minimis notification from American Chemet proposing the installation and operation of a new process, identified as the Type B Cupric Plant. The proposed Type B Cupric Plant entails the installation and operation of multiple material handling operations and additional process equipment. Under this request, both Copper furnaces #66 and #67 were included as part of the Cupric Plant. An emission inventory was submitted in conjunction with the notice; demonstrating potential emissions from the Type B Cupric Plant did not exceed the five (5) ton per year de minimis threshold.

On June 30, 2016, the Department received a de minimis notification from American Chemet proposing the installation and operation of new equipment, identified as the New #69 Copper Mill and #70 and #71 Copper Mixers. The request proposed the installation and operation of a new copper mill and associated baghouse for product recovery and the addition of two copper mixers also with a common baghouse for product recovery. An emission inventory was submitted in conjunction with the notice; demonstrating potential emissions from the proposed equipment did not exceed the five (5) ton per year de minimis threshold.

On July 21, 2016, the Department received a de minimis notification from American Chemet proposing the installation and operation of new equipment, identified as New #72 Copper Mill and Relocation of #48 Copper Mill. The request proposed the installation and operation of a new copper mill (#72) and connection to the Stack 32 Baghouse. Copper Mill #48 will be relocated and disconnected from Stack 32 baghouse and connected to #11 Copper Mill Support Baghouse. The

existing emission inventory assumed potential emissions at the maximum rated baghouse design and respective permit limits in grains per dry standard cubic feet.

On June 1, 2017, the Department received a de minimis notification from American Chemet. The request would allow for replacing the existing afterburner located on the #16 Copper Furnace. The afterburner conditions were included as part of the #49 Gas Processor project and was treated as a single process when calculating the emission inventory for the process. The afterburner functions as an emission control device for the #16 Copper Furnace and would be a similar design to the afterburner located on the #17 Copper Furnace. The afterburner serves to provide a reduction in carbon monoxide (CO) emissions. The fuel source for the afterburner will utilize natural gas and therefore, emission factors from AP-42, Section 1.4 Natural Gas Combustion were appropriate for estimating the potential to emit for this emission control device.

On May 18, 2017, the Department received a de minimis notification from American Chemet. The request provided for decommissioning the #3 Stack Wet Scrubber which provided particulate control for the #2 Copper Furnace and for ducting the exhaust from the #2 Copper Furnace into the #27 Baghouse. The change required a new baghouse fan to overcome the static pressure losses due to the overall airflow increase from 5,500 cubic feet per minute (CFM) to 7,500 CFM. The #27 Baghouse also provided particulate control for the #3 and #4 Copper Furnaces. The Department also received additional information on May 23, 2017, documenting the baghouse vendor's evaluation that the proposed airflow increase associated with the change still provide acceptable conditions for proper baghouse operation.

The de minimis request was approved pending receipt of a request to administratively update the permit to reflect the change from a scrubber to a baghouse for the #2 Copper Furnace. The Department received the request to administratively open their current MAQP for the May 18, 2017, de minimis on June 1, 2017. This permit clarified the #2 Copper Furnace is now routed through the #27 Baghouse. **MAQP #1993-19** replaced MAQP #1993-18.

On July 20, 2020, the Department received a de minimis notification from American Chemet. The request provided for replacing the #4 Copper Furnace with a new copper furnace identified as the #73 Copper Furnace. It also clarified that the #40 Copper Sizer and the #28 Stack Baghouse have been removed which will make physical space available for the new #73 Copper furnace. The existing #27 baghouse will collect exhaust from the #2, #3 and #73 Copper Furnaces. There was no change in the potential to emit (PTE) as the #27 baghouse PTE is defined by the existing flowrate and existing grain loading limit.

The de minimis request was approved pending receipt of a request to administratively update the permit to reflect the new #73 Copper Furnace and decommissioned units being removed from the permit. The administrative amendment was received on October 20th, to incorporate the necessary changes. With the removal of the #40 Copper Sizer and #28 Stack Baghouse, condition Section II.A.6 was removed from MAQP 1993-19, and Section II.A.10 was modified to reference the #73 Copper Furnace and this condition has been replaced by Section II.A.9 within the updated MAQP. Section II.B.3 and Section II.B.4 were also updated to reflect the revised numbering within Section II.A.

On October 9, 2020, the Department received de minimis notification received from American Chemet. According to the proposed project, a new #74 Copper Furnace would be installed and connected to an upgraded baghouse associated with stack #21 with an up-sized fan to

accommodate the additional airflow. The #21 stack would continue to exhaust airflow from both the #28 Copper Furnace and in the future also from the new #74 Copper Furnace. The proposed project would upgrade the existing 20 horsepower (hp) fan to 40 hp and the baghouse modified to accept pleated cartridge filters instead of bags. The #21 stack would also be modified from a horizontal discharge to a vertical discharge with stack height extending to approximately 45 feet. The October 9, 2020, de minimis was not included in the update to the MAQP.

MAQP #1993-20 replaced MAQP #1993-19.

On November 23, 2020, the Department received a request for an administrative amendment (AA) to correct a mis-identified emitting unit issued as part of MAQP #1993-20 and to add the de minimis request received on October 9, 2020. This AA updated all references to the #73 and #74 copper furnaces which were recently added under de minimis actions. Additionally, several previous de minimis changes were not updated in the permit analysis section of the permit and those updates were also made with the issuance of MAQP #1993-21. **MAQP #1993-21** replaced MAQP #1993-20.

D. Current Permit Action

On March 26, 2021, the Department received an application from American Chemet to install and operate new process equipment associated with the new Basic Copper Carbonate Plant. The new process includes a new copper feed hopper, a new duct burner (Stack 48 Duct Burner), a new baghouse (Stack 48 Baghouse), a new copper furnace (#75 Copper Furnace) and a new packer (#76 Copper Packer) as well as various other process vessels. In order to accommodate the new equipment, several existing production units must also be rerouted from their existing baghouses to alternate baghouses with equivalent control. In addition, American Chemet is requesting the list of permitted equipment in Section I.A. of the Permit Analysis for MAQP #1993-21 be updated to reflect changes and updates. The application also requests the removal of equipment identified as the Control Unit Stack #13, and the #65 Copper Furnace which are being removed from service. Permit conditions Section II.A.13 and II.A.14 in MAQP #1993-21 have also been removed from the permit as they were specific to the equipment being removed. **MAQP #1993-22** replaces MAQP #1993-21.

E. Response to Public Comments (None Received)

F. Response to American Chemet Comments

Reference to Draft PD	Comment	Department Response
Section C.1.a, Page 6 and 7	#38 Copper Mill and #65 Copper Furnace need to be removed from list	Updated

G. Additional Information

Additional information, such as applicable rules and regulations, BACT/Reasonably Available Control Technologies (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).

American Chemet shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited, 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 (SO₂)
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide (NO₂)
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide (CO)
5. ARM 17.8.213 Ambient Air Quality Standards for Ozone (O₃)
6. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter (PM)
7. ARM 17.8.222 Ambient Air Quality Standards for Lead
8. ARM 17.8.223 Ambient Air Quality Standard for Particulate Matter with an Aerodynamic Diameter of Ten Microns or Less (PM₁₀)

American Chemet must demonstrate compliance with the applicable ambient air quality standards.

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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions are taken to control emissions of airborne particulate matter. (2) Under this rule, American Chemet 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 Processes. 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. This rule applies to the #19 Copper Furnace. For the afterburners permitted under #1993-10 these requirements are superseded by the requirements in MCA 75-2-215.
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 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). The owner and operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, shall comply with the NSPS. The American Chemet facility is not an NSPS affected source because it does not meet any of the definitions in 40 CFR Part 60; therefore, this rule does not apply to this facility.

D. ARM 17.8, Subchapter 4 – Stack Height and Dispersion Techniques, including, but not limited to:

1. ARM 17.8.401 Definitions. This rule includes a list of definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.402 Requirements. American Chemet must demonstrate compliance with the ambient air quality standards with a stack height that does not exceed Good Engineering

Practices (GEP). The proposed height of the new or modified stack for American Chemet is below the allowable 65-meter GEP stack height.

E. 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. American Chemet 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. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

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

F. 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 to construct, modify, or use an air contaminant source, which has the PTE more than 25 tons per year (tpy) of any pollutant. American Chemet has the PTE more than 25 tpy of PM, PM₁₀, and CO; therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits-- General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit Program.
4. ARM 17.8.745 When Permit Required--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. American Chemet 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. American Chemet submitted an affidavit of publication of public notice for the March 26, 2021, issue of

the Helena Independent Record, a newspaper of general circulation in the City of Helena in Lewis and Clark 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. American Chemet is required to 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 discussion of the BACT Analysis is contained in Section III of this 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 American Chemet 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 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment of 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 in emissions because 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 17.8.734 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, are sent to the Department.
15. ARM 17.8.770 Additional Requirements for Incinerators. This rule specifies the additional information that must be submitted to the Department for incineration facilities subject to 75-2-215, MCA.

G. 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 sub-chapter.

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.

American Chemet is not a major stationary source since this facility is not a listed source and the facility's PTE is below 250 tons per year of any pollutant (excluding fugitive emissions). Therefore, a New Source Review (NSR) analysis is not required.

H. 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), or PTE > 25 tpy of any combination of HAP's, or lesser quantity as the Department may establish by rule.
 - c. PTE > 70 tpy of PM₁₀ in a serious PM₁₀ non-attainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #1993-19 for American Chemet, the following conclusions were made:
 - a. The facility's PTE is less than 100 tpy for any pollutant.
 - b. The facility's PTE is less than 10 tpy for any single HAP and less than 25 tpy of combined HAPs.
 - c. This source is not located in a serious PM₁₀ non-attainment area.
 - d. This facility is not subject to any current NSPS.

- e. This facility is not subject to any current NESHAP.
- f. This source is not a Title IV affected source.
- g. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that American Chemet will be a minor source of emissions as defined under Title V.

I. MCA 75-2-215, Solid or Hazardous Waste Incineration - additional permit requirements:

1. MCA 75-2-215 requires air quality permits for all new commercial solid waste incinerators. In a previous permitting action, American Chemet complied with this requirement. In accordance with MCA 75-2-211(9)(b), the current permit action does not require the preparation of an environmental impact statement, and therefore is not subject to the provisions of MCA 75-2-215.
2. MCA 75-2-215 requires the applicant to provide, to the Department's satisfaction, a characterization and estimate of emissions and ambient concentrations of air pollutants, including HAPs from the incineration of solid or hazardous waste. The Department determined that the information submitted in a previous permit application fulfilled this requirement. The current permit action does not require the preparation of an environmental impact statement, and therefore is not subject to the provisions of MCA 75-2-215.
3. MCA 75-2-215 requires that the Department reach a determination that the projected emissions and ambient concentrations constitute a negligible risk to public health, safety, and welfare. The Department previously determined negligible risk through a health risk assessment. The current permit action does not require the preparation of an environmental impact statement, and therefore is not subject to the provisions of MCA 75-2-215.
4. MCA 75-2-215 requires the application of pollution control equipment or procedures that meet or exceed BACT. The current permit action does not require BACT because the action is an administrative amendment.

III. BACT Determination

A BACT determination is required for each new or modified source. American Chemet 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.

American Chemet provided a BACT analysis for the process units, new furnace and duct burner.

American Chemet proposes that baghouses with a grain loading limit of 0.010 grains per dry standard cubic foot of PM with respect to filterable emissions, which uses the conservative approach of equating PM₁₀ with PM would constitute BACT for the new Stack 48 and 49 baghouses. The grain loading value is consistent with recent MDEQ-permitted small baghouses/dust collectors installed in Montana. A review of the EPA RACT/BACT/LAER Clearinghouse (RBLC) results in the Metallic Mineral/Ore Processing Type shows the fabric filter dust collector technology to be consistent with metallic mineral/ore processing determinations.

In addition, baghouses are the most effective control for process particulate emissions, so no further analysis is required.

American Chemet is proposing natural gas combustion as BACT for their proposed #48 Duct Burner and #75 Furnace. Natural gas is a clean and low emission fuel. In addition, those units would be vented through the two new baghouses.

The BACT determinations for baghouse control for particulate emissions and the use of clean burning natural gas are consistent with previous DEQ BACT determinations.

IV. Emission Inventory

The potential emissions associated with the Basic Copper Carbonate Plant come from a new #48 duct burner, new #75 copper furnace and emissions exiting from two new baghouses associated with Stack #48 and Stack #49 (#75 Copper Furnace). Emission totals are as follows.

Pollutant	TPY
PM ₁₀	3.55
PM _{2.5}	0.23
NO _x	3.07
CO	2.57
VOC	0.17
SO ₂	0.018

The two new baghouses identified with Stack #48 and Stack #49 being incorporated have the following design characteristics.

INPUTS AND ASSUMPTIONS:

1. Emission factor (EF) for the manual filling of the product packages was taken from AP-42, Section 11.19.1 (1/95), Table 11.19.1-1 EMISSION FACTORS FOR INDUSTRIAL SAND AND GRAVEL PROCESSING, where:

Sand dryer with fabric filter (SCC 3-05-027-20)
 EF (PM) = 0.010 lbs-PM/Ton
2. Control efficiency for 4-sided, roofed enclosure (i.e., building): PM₁₀ = 90%
3. Control efficiency for PM/PM₁₀ emission control at Stack 48 Process using local exhaust ventilation = 90%
4. Control efficiency for PM/PM₁₀ emission control at #75 Copper Furnace using local exhaust ventilation = 90%
 Baghouse (Stack 48): = 6,000 acfm
5. Max. Volumetric flow rate for the #75 Copper Furnace Baghouse (Stack 49): = 10,500 acfm
6. Outlet grain loading from the Stack 48 Process Baghouse (Stack 48) = 0.010 grains/dscf
7. Outlet grain loading from the #75 Copper Furnace Baghouse (Stack 49) = 0.010 grains/dscf
8. Standard conditions:

Temperature = 68°F
 Pressure = 29.92" Hg
9. Stack 48 Process Baghouse Exhaust conditions:

Temperature = 275 °F
 Pressure = 26.00" Hg
 Moisture = 5.0%
10. #75 Copper Furnace Baghouse Exhaust conditions:

Temperature = 275 °F
 Pressure = 26.00" Hg
 Moisture = 30.0%

11. All PM emitted from the Stack 48 Process Baghouse will be PM10.
12. All PM emitted from the #75 Copper Furnace Baghouse will be PM10.

PM₁₀ for #48 Duct Burner Baghouse and #75 Copper Furnace Baghouse

Stack ID	Emitting Unit(s)	Local Exhaust Parameters				Particulate Emission Rate			
		acfm	dscfm	Temp (°F)	Moisture Content %	Pressure "Hg	(gr/dscf)	(lbs/hr)	(tpy)
#48	#48 Duct Burner	6000	3571.7	275	5	26	0.01	0.31	1.34
#49	#75 Copper Furnace	10500	4605.6	275	30	26	0.01	0.39	1.73

EMISSION CALCULATIONS - NATURAL

**GAS USAGE BCC PLANT
 MAXIMUM ANNUAL**

INPUTS AND ASSUMPTIONS:

1. BCC Plant operating schedule = 8,760 hrs/yr
2. Design natural gas firing rate of all process units = 61.32 MMscf/yr
3. Factor = 0.0005 ton/lb
4. Per AP-42, Section 1.4 (7/98), the following emission factors apply to natural gas firing and were used to calculate combustion product emission rates for the BCC Plant:
 - a. From Table 1.4-1, the emission factor for uncontrolled carbon monoxide (CO) = 84 lbs-CO/MMscf
 - b. From Table 1.4-1, the emission factor for uncontrolled nitrogen oxide (NO_x) = 100 lbs-NO_x/MMscf
 - c. From Table 1.4-2, the emission factor for uncontrolled particulate matter (PM_{2.5}) = 7.6 lbs- PM_{2.5}/MMscf
 - d. From Table 1.4-2, the emission factor for sulfur dioxide (SO₂) = 0.6 lbs-SO₂/MMscf
 - e. From Table 1.4-2, the emission factor for volatile organic compounds (VOC) = 5.5 lbs-VOC/MMscf

New Basic Copper Carbonate Plant Natural Gas Emissions (tpy)				
CO	NO _x	PM _{2.5}	SO ₂	VOC
2.58	3.07	2.33	0.02	0.17

V. Existing Air Quality

The air quality of the area is currently classified as "Better than National Standards" or unclassifiable/attainment of the National Ambient Air Quality Standards (NAAQS) for criteria pollutants (40 CFR 81.327). ARM Chapter 17.8, Subchapter 2, establishes the Montana Ambient Air Quality Standards (MAAQS). East Helena (including the American Chemet site) was previously designated as nonattainment for SO₂ and lead (Pb). Both of those nonattainment areas were associated with the now-closed ASARCO lead smelter. Both nonattainment areas were redesignated to attainment by the US EPA on October 11, 2019. American Chemet will continue to comply with stipulation provisions associated with the Pb Nonattainment Area plans.

VI. Air Quality Impacts

The current permitting action added additional equipment with expected emission increases well below 5 tons per year but could not be approved separately as a de minimis project without addressing several permit condition conflicts. The Department believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a 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?

YES	NO	
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

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

VIII. Environmental Assessment

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

Analysis Prepared by: C. Henrikson

Date: 3/29/2021

DEPARTMENT OF ENVIRONMENTAL QUALITY
Air, Energy & Mining Division
Air Quality Bureau
P.O. Box 200901, Helena, Montana 59620
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ENVIRONMENTAL ASSESSMENT (EA)

Issued To: American Chemet Corporation

Montana Air Quality Permit Number: #1993-22

Draft EA Issued: 04/1/2021

Final EA Issued: 04/20/2021

Permit Final: 05/06/2021

1. *Legal Description of Site:* American Chemet Corporation (American Chemet) submitted an application to install and operate new process equipment associated with the new Basic Copper Carbonate Plant. The new process includes a new copper feed hopper, a new duct burner (Stack 48 Duct Burner), a new baghouse (Stack 48 Baghouse), a new copper furnace (#75 Copper Furnace with associated baghouse) and a new packer (#76 Copper Packer) as well as various other process vessels. The American Chemet is located immediately south of State Highway 12, within the city limits of East Helena. The legal description is the Northeast ¼ of Section 36, Township 10 North, Range 3 West, Lewis and Clark County, Montana.
2. *Description of Project:* The permit application is for the addition of new process equipment associated with the new Basic Copper Carbonate Plant.
3. *Objectives of Project:* The objective of the project would be to make a new product to generate profit.
4. *Alternatives Considered:* In addition to the proposed action, the Department considered the "no-action" alternative. The "no-action" alternative would deny issuance of the MAQP for the proposed modification. However, the Department does not consider the "no-action" alternative to be appropriate because American Chemet would be expected to operate all equipment in 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 listing of the enforceable permit conditions and a permit analysis, including a Best Available Control Technology (BACT) analysis, is included in this permit action.
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 the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and would not unduly restrict private property rights.

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 operation of the proposed new Basic Copper Carbonate Plant would result in minor impacts as the site is already an industrial site making similar metal oxide products. The new process will be located indoors and will be controlled with existing baghouses and with a new baghouse. Therefore, the operation of the equipment would present minor impacts on terrestrial and aquatic life is present in the area of potential operation.

B. Water Quality, Quantity, and Distribution

Although there would be a small increase in particulate emissions in air emissions with the construction and operation of new Basic Copper Carbonate Plant there would only be minor impacts on water quality, quantity, and distribution because of the nature, size, operational requirements, and conditions placed in MAQP #1993-22 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 operation of the Basic Copper Carbonate Plant 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 construction and operation of a new Basic Copper Carbonate Plant there would be minor impacts to the geology and soil quality, stability, and moisture near the equipment's operational area because of the increased deposition of pollutants from the facility. As explained in Section 7.F. of this EA, the facility's size, operational requirements, nature of the operation being located at an existing industrial site and conditions placed in MAQP #1993-22 would minimize the impacts from deposition.

D. Vegetation Cover, Quantity, and Quality

As a result of the construction and operation of new Basic Copper Carbonate Plant would result in no impacts to the vegetative cover, quantity, and quality because the proposed operation would be located at the site of an existing industrial site. As explained in Section 7.F. of this EA, the Department determined that, due to the nature of the operation, conditions placed in MAQP #1993-22, and dispersion characteristics of the emissions, any impacts from deposition would not be expected. There is no new surface disturbance planned with the new Basic Copper Carbonate Plant.

E. Aesthetics

MAQP #1993-22 would include conditions to control emissions (including visible emissions) from the equipment and the facility. The new Basic Copper Carbonate Plant

would be a minor addition to the existing process equipment. The new equipment would be located indoors and therefore, any aesthetic impact would be minor.

F. Air Quality

Air quality impacts from the construction and operation activities of new Basic Copper Carbonate Plant would be minor because emissions from the new process would be relatively small when controls are applied to the equipment. The Department determined that any air quality impacts from the pollutants would be minor due to dispersion characteristics and conditions placed in MAQP #1993-22.

MAQP #1993-22 would include conditions limiting opacity and particulate matter from the new Basic Copper Carbonate Plant and would require that reasonable precautions be taken to control emissions from the facility.

G. Unique Endangered, Fragile, or Limited Environmental Resources

Issuance of this permit would increase emissions to the atmosphere at the current industrial site. However, the emission increases associated with the proposed new Basic Copper Carbonate Plant are considered minor. As explained in Section 7.F. of this EA, because of the nature of the industrial facility and conditions placed in MAQP #1993-22, any impacts to unique endangered, fragile, or limited environmental resources from the deposition of pollutants would not be expected given the location of the equipment located indoors and using baghouse control for process units.

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

The new Basic Copper Carbonate Plant would use natural gas for fuel in the duct burner and in the new copper furnace. Only minor increases for water, air and energy resources would occur.

I. Historical and Archaeological Sites

Given the site is an existing industrial facility, no impact to historical or archaeological sites would likely occur. No new land disturbance is expected with the addition of the new Basic Copper Carbonate Plant facility. Therefore, it is unlikely that the project would affect any historic or archaeological site and no resulting impacts would be expected.

J. Cumulative and Secondary Impacts

The operation of the new Basic Copper Carbonate Plant would cause minor effects to the physical and biological environment because the new process would result in a small increase in particulate emissions. However, the addition of the new process to the existing permitted equipment would have a minor impact versus the operation of the entire facility. The permits would address the environmental impacts associated with the new Basic Copper Carbonate Plant at the site.

The new Basic Copper Carbonate Plant would be limited by MAQP #1993-22 to control opacity and particulate emissions.

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 new Basic Copper Carbonate Plant would not likely alter or disrupt any local lifestyles or communities (social structures and mores) in the area of operation because the new process is limited to an increase in particulate emissions and use at an existing industrial site.

B. Cultural Uniqueness and Diversity

The operation of the new Basic Copper Carbonate Plant would have no impact on the cultural uniqueness and diversity because the equipment operations would be at an existing industrial site.

C. Local and State Tax Base and Tax Revenue

The proposed operation of the new Basic Copper Carbonate Plant would have a minor impact on local and state tax base and tax revenue as the operation would increase employment both during construction and for ongoing activities.

D. Agricultural or Industrial Production

No impact on agricultural or industrial production would occur as the proposed site for the new Basic Copper Carbonate Plant would be located at an existing industrial site.

E. Human Health

MAQP #1993-22 would incorporate conditions to ensure that the facility 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 #1993-22. The air emissions from this facility would be minimized by opacity limitations on the new Basic Copper Carbonate Plant and the surrounding area of operation.

F. Access to and Quality of Recreational and Wilderness Activities

The new Basic Copper Carbonate Plant will be located within an existing building, and at an existing industrial site and therefore does not impact access to recreational and wilderness activities.

G. Quantity and Distribution of Employment

Given the relatively small change in capacity with the addition of the new Basic Copper Carbonate Plant, it is not expected that the activities from the operation of the facility would significantly affect the quantity and distribution of employment in any given area.

Some new jobs for construction would be created as well as permanent jobs with the new Basic Copper Carbonate Plant.

H. Distribution of Population

Given the relatively small change in capacity with the addition of the new Basic Copper Carbonate Plant, it is not expected that the activities from operation of the facility would disrupt the normal population distribution of any given area. No secondary activities are identified to move to the current proposed area as a result of the current project.

I. Demands of Government Services

Government services may 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 new Basic Copper Carbonate Plant would represent only a minor increase in the industrial activity in the area. No additional industrial or commercial activities are identified from the operation of the new process and secondary activities are not expected from the facility operation. Therefore, no industrial and commercial activity resulting from the current permit action is expected.

K. Locally Adopted Environmental Plans and Goals

The Department is unaware of any locally adopted environmental plans or goals site that the facility may be operated at under MAQP #1993-22. MAQP #1993-22 continues to incorporate permit conditions which were related to a previous Board stipulation related to ambient lead conditions.

L. Cumulative and Secondary Impacts

Overall, the cumulative and secondary social and economic impacts from this project would be minor because the addition of the new Basic Copper Carbonate Plant is a minor addition to the existing site. No new businesses are expected to be drawn to the area as a result of the operation. In addition, any social and economic impacts that are created would be minor because of the relatively small size and 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: Because this new Basic Copper Carbonate Plant is relatively small operation as compared to the existing facility and must use reasonable precautions to control emissions, any impacts created would be minor impacts.

Individuals or groups contributing to this EA: *Department of Environmental Quality – Air Quality Bureau*

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