



Montana Department of  
**ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor

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February 28, 2012

Brian Wixom  
United Grain Corporation  
1366 Harvest Rd  
Moccasin, MT 59462

Dear Mr. Wixom:

Montana Air Quality Permit #3125-02 is deemed final as of February 28, 2012, by the Department of Environmental Quality (Department). This permit is for a grain storage elevator. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh  
Air Permitting Program Supervisor  
Air Resources Management Bureau  
(406) 444-9741

Stephen Coe P.E.  
Environmental Engineer  
Air Resources Management Bureau  
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VW:SC  
Enclosure

Montana Department of Environmental Quality  
Permitting and Compliance Division

Montana Air Quality Permit #3125-02

United Grain Corporation  
1366 Harvest Rd  
Moccasin, MT 59462

February 28, 2012



## MONTANA AIR QUALITY PERMIT

Issued to: United Grain Corporation  
Moccasin Elevator  
1366 Harvest Road  
Moccasin, MT 59462

Permit: #3125-02  
Administrative Amendment: 01/19/2012  
Department Decision Issued: 02/10/2012  
Final Permit Issued: 02/28/2012  
AFS#: 045-0001

An air quality permit, with conditions, is hereby granted to the United Grain Corporation - Moccasin Elevator, hereinafter referred to as "United Grain," pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

### SECTION I: Permitted Facilities

#### A. Plant Location

United Grain's rail loadout grain sub-terminal is located approximately 1 mile north of State Highway 87 and approximately 1.25 miles east-southeast of Moccasin, Montana. The legal description of the facility is the NW ¼ of Section 19, Township 15 North, Range 15 East, Judith Basin County, Montana. A complete list of permitted equipment is contained in the Permit Analysis to this permit.

#### B. Current Permit Action

On January 19, 2012, the Montana Department of Environmental Quality (Department) received a complete application for an administrative amendment to change the name from United Harvest LLC to United Grain Corporation

### SECTION II: Conditions and Limitations

#### A. Emission Control Requirements and Limitations

1. United Grain shall operate and maintain the negative air fan and cyclone as specified in their application for an air quality permit and all supporting documentation (ARM 17.8.752).
2. United Grain shall not cause or authorize emissions to be discharged into the outdoor atmosphere, that exhibit an opacity of 20% or greater (ARM 17.8.304).
3. Rail loadout grain sub-terminal production shall not exceed 10,000,000 bushels during any rolling 12-month time period (ARM 17.8.749).
4. United Grain shall not cause or authorize the use of any street, road, or parking area without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
5. United Grain shall treat all unpaved portions of the haul roads, access roads, and the general plant property with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 17.8.749).

## B. Testing Requirements

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

## C. Operational Reporting Requirements

1. United Grain 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 equipment list contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. United Grain shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to 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(1)(d) (ARM 17.8.745).
3. United Grain shall document, by month, the total production from the rail loadout grain sub-terminal. By the 25<sup>th</sup> day of each month, United Grain shall total the production from the rail loadout grain sub-terminal for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.3. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
4. All records compiled in accordance with this permit must be maintained by United Grain 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

United Grain shall provide the Department with written notification of all compliance source tests, as required by the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.749).

## SECTION III: General Conditions

- A. Inspection – United Grain 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 (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if United Grain fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving United Grain of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by 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 the Department at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by United Grain may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

MONTANA AIR QUALITY PERMIT ANALYSIS  
United Grain Corporation – Moccasin Elevator  
Permit #3125-02

I. Introduction/Process Description

United Grain Corporation (United Grain) owns and operates a rail loadout grain sub-terminal that is located approximately 1 mile north of State Highway 87 and approximately 1.25 miles east-southeast of Moccasin, Montana. The legal description of the facility is the NW ¼ of Section 19, Township 15 North, Range 15 East, Judith Basin County, Montana.

A. Permitted Equipment

Equipment used at this facility includes all equipment listed in permit application #3125-00 including, but not limited to:

1. Truck Receiving Pit
2. Rail Reclaim Hopper Pit
3. Receiving Drag Conveyor - 20,000 bushels per hour (bph)
4. Receiving Leg - 20,000 bph
5. Distribution Top Binfill Drag Conveyor - 20,000 bph
6. Bottom Reclaim Drag Conveyor - 50,000 bph
7. Loadout Shipping Leg - 50,000 bph
8. Loadout Bulkweigher - 50,000 bph
9. Four Silo Bins with Vents - 164,500 bushels each
10. Auto Grain Sample & Collection System
11. Rail Loadout Spout - 50,000 bph
12. Negative Air/Cyclone Dust Control System

B. Source Description

The United Grain rail loadout grain sub-terminal is designed to receive grain from local farmers and country elevators and then store the grain until it is shipped to market. The storage capacity of the facility is approximately 658,000 bushels and the allowable production rate at the rail loadout grain sub-terminal is a maximum of 10,000,000 bushels per year (bu/yr).

Locally grown grains are trucked in by hopper truck. Each truck is weighed on a platform scale and a probe takes a sample of the inbound grain for quality assurance measures. The trucks are then routed to the receiving building where both truck hoppers can be simultaneously discharged into an elongated receiving pit. Particulate matter emissions from the unloading operation are collected by a negative air system and routed to a cyclone for control. Enclosed drag conveyors and a bucket elevator, rated at 20,000 bushels per hour, route the grain into concrete storage silos, or to a bulk weigher located over the railroad track. An enclosed drag conveyor is used to transport grain from below the storage silos. Both the reclaim conveyor and the shipping leg are sized to handle 50,000 bushels per hour. The bulk loadout scale is sized to allow a 110-car unit train to be loaded in a 12-hour shift. Maximum allowable production at the rail loadout sub-terminal is limited to 10,000,000 bushels (bu) during any rolling 12-month time period.

### C. Permit History

On October 7, 2000, United Grain was issued **MAQP #3125-00** for the installation and operation of a rail loadout grain sub-terminal and associated equipment to receive, store, and ship grain for nearby farmers. The rail loadout grain sub-terminal had a storage capacity of approximately 658,000 bushels and a permitted maximum allowable production rate of 8,000,000 bu/yr.

On November 19, 2007, the Montana Department of Environmental Quality (Department) received a complete application for permit modification from United Grain. Specifically, the current permit action increases the allowable production rate at the rail loadout grain sub-terminal from a maximum of 8,000,000 bu/yr to a maximum of 10,000,000 bu/yr. **MAQP #3125-01** replaced MAQP #3125-00.

### D. Current Permit Action

On January 19, 2012, the Department received a request to change the legal name of the facility from United Harvest LLC to United Grain Corporation. MAQP #3125-02 replaces MAQP #3125-01

### E. Additional Information

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

## II. Applicable Rules and Regulations

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

### A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

United Grain shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
  5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.
- B. ARM 17.8, Sub-Chapter 2, Ambient Air Quality, including, but not limited to:
1. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter, and
  2. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>.

United Grain must maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8, Sub-Chapter 3, Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
  2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, United Grain 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 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
  4. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of any NSPS subpart defined in 40 CFR Part 60.

40 CFR 60, Subpart DD, Standards of Performance for Grain Elevators

This subpart states that grain terminal elevators that have a storage capacity of more than 2.5 million U.S. bushels are subject to the requirements of this subpart. United Grain does not have a permanent storage capacity of 2.5 million bushels or more; therefore, 40 CFR 60, Subpart DD, does not apply to this facility.



D. ARM 17.8, Sub-Chapter 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. United Grain submitted the required 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.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter, or use any air contaminant sources that have the potential to emit (PTE) greater than 25 tons per year of any pollutant. United Grain has a PTE greater than 25 tons per year of particulate matter (PM); therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. United Grain 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. United Grain is not required to submit notification because this permit change is considered an administrative amendment.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
  8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
  9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving United Grain of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
  10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
  11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
  12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
  13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
  14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.
- F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

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

This facility 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).

### III. Emission Inventory

Emission Inventory (tons pollutant/year)*			
Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Grain Receiving	10.8	3.52	0.60
Enclosed Material Handling	9.11	5.08	0.90
Grain Shipping	12.84	4.33	0.73
<b>Total Emissions</b>	<b>32.75</b>	<b>12.93</b>	<b>2.23</b>

\* Facility does not incorporate any combustion sources; therefore, only PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions resulting from material handling/processing activities have been quantified.

Maximum Annual Throughput = 10,000,000 bushels/year (Permit Limit)

Product Density = 59.73 lb/bushel (AP-42, Appendix A)

Process Rate Calculation = 59.73 lb/bushel \* 10.0 x 10<sup>6</sup> bushel/yr \* 0.0005 ton/lb = 298,650 tons/year

#### Grain Receiving

##### PM Emissions

Emission Factor = 0.18 lb/ton {AP-42, Table 9.9.1-1, 3/03, Straight Truck}

Control Efficiency = 60 % {Negative Air / Cyclone}

Calculations: 298,650 ton/yr \* 0.18 lb/ton \* (1 - 0.60) \* 0.0005 ton/lb = 10.75 tons/year

##### PM<sub>10</sub> Emissions

Emission Factor = 0.059 lb/ton {AP-42, Table 9.9.1-1, 3/03, Straight Truck}

Control Efficiency = 60 % {Negative Air / Cyclone}

Calculations: 298,650 ton/yr \* 0.059 lb/ton \* (1 - 0.60) \* 0.0005 ton/lb = 3.52 tons/year

##### PM<sub>2.5</sub> Emissions

Emission Factor = 0.010 lb/ton {AP-42, Table 9.9.1-1, 3/03, Straight Truck}

Control Efficiency = 60 % {Negative Air / Cyclone}

Calculations: 298,650 ton/yr \* 0.010 lb/ton \* (1 - 0.60) \* 1 ton / 2,000 lb = 0.60 tons/year

#### Enclosed Material Handling

##### PM Emissions

Emission Factor = 0.061 lb/ton {AP-42, Table 9.9.1-1, 3/03}

Control Efficiency = 0 %

Calculations: 298,650 ton/yr \* 0.061 lb/ton \* 0.0005 ton/lb = 9.11 tons/year

##### PM<sub>10</sub> Emissions

Emission Factor = 0.034 lb/ton {AP-42, Table 9.9.1-1, 3/03}

Control Efficiency = 0 %

Calculations: 298,650 ton/yr \* 0.034 lb/ton \* 0.0005 ton/lb = 5.08 tons/year

##### PM<sub>2.5</sub> Emissions

Emission Factor = 0.0058 lb/ton {AP-42, Table 9.9.1-1, 3/03}

Control Efficiency = 0 %

Calculations: 298,650 ton/yr \* 0.0058 lb/ton \* 0.0005 ton/lb = 0.90 tons/year

## Grain Shipping

### PM Emissions

Emission Factor = 0.086 lb/ton {AP-42, Table 9.9.1-1, 3/03, Truck}

Control Efficiency = 0 %

Calculations:  $298,650 \text{ ton/yr} * 0.086 \text{ lb/ton} * 0.0005 \text{ ton/lb} = 12.84 \text{ tons/year}$

### PM<sub>10</sub> Emissions

Emission Factor = 0.029 lb/ton {AP-42, Table 9.9.1-1, 3/03, Truck}

Control Efficiency = 0 %

Calculations:  $298,650 \text{ ton/yr} * 0.029 \text{ lb/ton} * 0.0005 \text{ ton/lb} = 4.33 \text{ tons/year}$

### PM<sub>2.5</sub> Emissions

Emission Factor = 0.034 lb/ton {AP-42, Table 9.9.1-1, 3/03}

Control Efficiency = 0 %

Calculations:  $298,650 \text{ ton/yr} * 0.0049 \text{ lb/ton} * 0.0005 \text{ ton/lb} = 0.73 \text{ tons/year}$

## IV. Best Available Control Technology Analysis

A BACT analysis is required for any new or altered source. United Grain shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be used. United Grain is not required to submit a BACT determination for this permit action as it is considered an administrative amendment.

## V. Existing Air Quality and Impacts

The area surrounding the proposed facility is predominantly agricultural and rural in nature. The emissions from the proposed modification would be similar to those impacts associated with the initial permit, would be seasonal in nature, and there is generally good dispersion in the area. Therefore, in the view of the Department, the amount of controlled emissions from this facility will not cause an exceedance of any ambient air quality standard.

## VI. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications.

## VII. Environmental Assessment

An environmental assessment was not completed for this permit action as it is considered an administrative amendment.