



Montana Department of  
**ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor

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April 7, 2010

Chris Johnson  
Glacier Gold LLC  
P.O. Box 260  
Olney, MT 59927

Dear Mr. Johnson:

Montana Air Quality Permit #4250-01 is deemed final as of April 7, 2010, by the Department of Environmental Quality (Department). This permit is for the Glacier Gold, LLC portable whole tree wood chipper facility. 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

Paul Skubinna  
Environmental Engineer  
Air Resources Management Bureau  
(406) 444-6711

VW:PS

Enclosure

CC: Christine Johnson, Missoula Office, Via Electronic Mail

Montana Department of Environmental Quality  
Permitting and Compliance Division

Montana Air Quality Permit #4250-01

Glacier Gold LLC  
P.O. Box 260  
Olney, MT 59927

April 7, 2010



## MONTANA AIR QUALITY PERMIT

Issued To: Glacier Gold LLC  
P.O. Box 260  
Olney, MT 59927

Montana Air Quality Permit: #4250-01  
Administrative Amendment (AA)  
Request Received: February 26, 2010  
Department's Decision on AA: March 22, 2010  
Permit Final: April 7, 2010  
AFS #: 777-4250

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Glacier Gold LLC (Glacier Gold) 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

Glacier Gold operates a portable wood chipping facility originally located in Section 8, Township 32 North, Range 23 West, in Flathead County. The facility is located in a log yard near Olney and Stillwater Lake. However, MAQP #4250-01 applies while operating at any location in Montana, except those areas having a Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Addendum 1 will apply to the Glacier Gold facility while operating at any location in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months (April 1 – September 30) and at sites approved by the Department of Environmental Quality – Air Resources Management Bureau (Department) during the winter months (October 1 – March 31).

#### B. Current Permitting Action

On February 26, 2010, the Department received an amendment request from Glacier Gold to allow operations in or within 10 km of the Columbia Falls PM<sub>10</sub> nonattainment area, specifically the NW ¼ of Section 9, Township 30 North, Range 20 West in Flathead County. This permit action amends MAQP #4250-00 by including Addendum 1 with conditions authorizing Glacier Gold to operate in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months and the above-mentioned location within the Columbia Falls nonattainment area during the winter months.

### SECTION II: Conditions and Limitations

#### A. Emission Limitations

1. Glacier Gold shall not cause or authorize to be discharged into the atmosphere, from the portable whole tree chipper and any other associated equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
2. Water and spray bars shall be available on site at all times and operated as necessary to maintain compliance with the opacity limitations in Section II.A.1 (ARM 17.8.749).

3. Glacier Gold shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
4. Glacier Gold shall treat all unpaved portions of the haul roads, access roads, parking lots, or the general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.3 (ARM 17.8.749).
5. Wood chipping production is limited to 525,600 tons during any rolling 12-month time period (ARM 17.8.749).
6. The material input process rate of the portable whole tree chipper shall not exceed 60 TPH (ARM 17.8.749).
7. Glacier Gold shall not operate more than one diesel-fired engine at any given time and the maximum rated design capacity shall not exceed 700 hp (ARM 17.8.749).
8. If the permitted equipment is used in conjunction with any other equipment owned or operated by Glacier Gold, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
9. Glacier Gold shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart III; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

#### B. Testing Requirements

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

#### C. Operational Reporting Requirements

1. If this wood chipping plant is moved to another location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Glacier Gold shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but not be limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

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

3. Glacier Gold shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include *the addition of a new emissions unit*, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
4. Glacier Gold shall maintain records, either on-site or at the main office, showing daily hours of operation and daily production rates for the last 12 months. The records compiled in accordance with this permit shall be maintained 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).
5. Glacier Gold shall document, by month, the chipping production from the facility. By the 25<sup>th</sup> day of each month, Glacier Gold shall calculate the chipping production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.5. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

#### D. Notification

Glacier Gold shall provide the Department with written notification of the actual start-up date, engine model, hp, and model year of a new engine within 15 days after the actual start-up date (ARM 17.8.749).

### SECTION III: General Conditions

- A. Inspection – Glacier Gold 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 all the terms, conditions, and matters stated herein shall be deemed accepted if Glacier Gold fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Glacier Gold of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department’s decision on the application is final 16 days after the Department’s decision is made.

- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Glacier Gold may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).
- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Glacier Gold shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program or areas considered tribal lands.

Montana Air Quality Permit (MAQP) Analysis  
Glacier Gold LLC  
MAQP #4250-01

I. Introduction/Process Description

A. Permitted Equipment

Glacier Gold LLC (Glacier Gold) operates a portable whole tree chipper with a maximum input process rate of 60 tons/hour (TPH), powered by a diesel engine not to exceed 700-horsepower (hp). The facility is originally located in Section 8, Township 32 North, Range 23 West, in Flathead County. The facility originally located in a log yard near Olney and Stillwater Lake. However, MAQP #4250-01 applies while operating at any location in Montana, except those areas having a Department of Environmental Quality (Department)-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Addendum 1 will apply to the Glacier Gold facility while operating at any location in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months (April 1 – September 30) and at sites approved by the Department during the winter months (October 1 – March 31).

B. Source Description

Glacier Gold operates a portable wood chipping facility to chip waste-wood products for various purposes. For a typical operational set-up, whole tree logs are fed into a feed hopper, and then conveyed via feed rollers into a chipper hammermill. The wood is cut into chips, and then deposited to a pile where it is loaded on to haul trucks.

C. Permit History

On October 23, 2008, the Department issued **MAQP #4250-00**. MAQP #4250-00 authorized Glacier Gold to operate a portable 60 TPH whole tree wood chipping operation and associated equipment at various locations throughout Montana.

D. Current Permitting Action.

On February 26, 2010, the Department received an amendment request from Glacier Gold to allow operations in or within 10 km of the Columbia Falls PM<sub>10</sub> nonattainment area, specifically the NW ¼ of Section 9, Township 30 North, Range 20 West in Flathead County. This permit action amends MAQP #4250-00 by including Addendum 1 with conditions authorizing Glacier Gold to operate in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months and the above-mentioned location within the Columbia Falls nonattainment area during the winter months. **MAQP #4250-01** and **Addendum 1** replace MAQP #4250-00.

E. Additional Information

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

## II. Applicable Rules and Regulations

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

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

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

### B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
7. ARM 17.8.221 Ambient Air Quality Standard for Visibility
8. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Glacier Gold must maintain compliance with the applicable ambient air quality standards.



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

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Glacier Gold shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
6. ARM 17.8.324 Hydrocarbon Emissions – Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS).
  - a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
  - b. 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). NSPS requirements apply to owners or operators of stationary CI ICE that commence construction, modification, or reconstruction after July 11, 2005, where the stationary CI ICE is manufactured after April 1, 2006, and is not a fire pump engine. CI ICE will be subject to this NSPS standard only if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year.

The proposed portable whole tree chipper includes a diesel engine that is a CI ICE manufactured before April 1, 2006, and is therefore not subject to this NSPS. However, since this permit is written in a de minimis friendly manner, should the proposed diesel engine be replaced with an engine manufactured after April 1, 2006, NSPS requirements would apply to that engine.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
  - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a Maximum Achievable Control Technology (MACT) Subpart as listed below:
  - b. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). As an area source, any diesel RICE engine operated by Glacier Gold that is new or reconstructed after June 12, 2006, will be subject to this MACT standard if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year.

The proposed portable whole tree chipper includes a diesel engine that was not manufactured after June 12, 2006. However, since this permit is written in a de minimis friendly manner, should the proposed diesel engine be replaced with one manufactured after June 12, 2006, MACT requirements would apply to that engine.

- D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A permit fee is not required for the current permit action because the permit action is considered an administrative permit change.
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 pro-rate the required fee amount.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits – When Required. This rule requires a person to obtain an air quality permit or permit 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. Glacier Gold has a PTE greater than 25 tons per year of nitrogen oxides (NO<sub>x</sub>); 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. A permit application was not required for the current permit action because the permit change is considered an administrative permit change. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative permit change.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Glacier Gold of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department’s responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an Environmental Impact Statement (EIS).
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or 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. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of intent to transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.

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

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

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

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

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

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

- a. PTE > 100 tons/year of any pollutant;
- b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
- c. PTE > 70 tons/year of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP#4250-01 for Glacier Gold, the following conclusions were made:

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

- b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.
- c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
- d. This facility is not subject to any current NSPS; however, 40 CFR 60, Subpart IIII may become applicable to the facility in the future because of the de minimis-friendly nature of the permit with respect to the diesel engine.
- e. This facility is not subject to any current NESHAP standards; however, the area source provisions of 40 CFR 63, Subpart ZZZZ may become applicable to the facility in the future because of the de minimis-friendly nature of the permit with respect to the diesel engine.
- f. This source is not a Title IV affected source or a solid waste combustion unit.
- g. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that Glacier Gold will be a minor source of emissions as defined under Title V. However, if in the future minor sources subject to NSPS are required to obtain a Title V Operating Permit, Glacier Gold may be required to obtain a Title V Operating Permit.

### III. BACT Determination

A BACT determination is required for each new or altered source. Glacier Gold 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 utilized.

A BACT determination was not required for the current permit action because the permit change is considered an administrative permit change.

### IV. Emission Inventory

| Emission Source        | tons/year    |                  |                 |              |             |                 |
|------------------------|--------------|------------------|-----------------|--------------|-------------|-----------------|
|                        | PM           | PM <sub>10</sub> | NO <sub>x</sub> | CO           | VOC         | SO <sub>2</sub> |
| Bulk Loading           | 2.63         | 1.31             | --              | --           | --          | --              |
| Conveyor Transfer      | 2.63         | 1.31             |                 |              |             |                 |
| Chipping               | 2.63         | 1.31             | --              | --           | --          | --              |
| Pile Forming           | 2.63         | 1.31             | --              | --           | --          | --              |
| Diesel Engine          | 6.75         | 6.75             | 95.05           | 20.48        | 7.57        | 6.29            |
| Haul Roads             | 6.40         | 1.83             | --              | --           | --          | --              |
| <b>Total Emissions</b> | <b>23.67</b> | <b>13.82</b>     | <b>95.05</b>    | <b>20.48</b> | <b>7.57</b> | <b>6.29</b>     |

#### **Bulk Loading**

Max Input Process Rate: 60 tons/hr (Company-provided information)  
 Max Hours of Operation: 8760 hr/yr  
 Annual Process Rate: 525,600 tons/yr (= 60 tons/hr \* 8760 hr/yr)

#### **PM Emissions:**

Emission Factor: 0.02 lbs/ton (Department Emission Factor – Similar Source Wood Debarking)  
 Control Efficiency: 50% (Water spray)  
 Calculations: 0.02 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 2.63 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor: 0.01 lbs/ton (Assume 50% of PM is PM<sub>10</sub>)  
Control Efficiency: 50% (Water spray)  
Calculations: 0.01 lbs/ton \* 60 tons/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 1.31 ton/yr

**Conveyor Transfer**

Max Input Process Rate: 60 tons/hr (Company-provided information)  
Max Hours of Operation: 8760 hr/yr  
Annual Process Rate: 525,600 tons/yr (= 60 tons/hr \* 8760 hr/yr )

**PM Emissions:**

Emission Factor: 0.02 lbs/ton (Department Emission Factor – Similar Source Wood Debarking)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.02 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 2.63 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor: 0.01 lbs/ton (Assume 50% of PM is PM<sub>10</sub>)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.01 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 1.31 ton/yr

**Chipping**

Max Input Process Rate: 60 tons/hr (Company-provided information)  
Max Hours of Operation: 8760 hr/yr  
Annual Process Rate: 525,600 tons/yr (= 60 tons/hr \* 8760 hr/yr)

**PM Emissions:**

Emission Factor: 0.02 lbs/ton (Department Emission Factor – Similar Source Wood Debarking)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.02 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 2.63 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor: 0.01 lbs/ton (Assume 50% of PM is PM<sub>10</sub>)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.01 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 1.31 ton/yr

**Pile Forming**

Max Input Process Rate: 60 ton/hr (Company-provided information)  
Max Hours of Operation: 8760 hr/yr  
Annual Process Rate: 525,600 ton/yr (= 60 tons/hr \* 8760 hr/yr)

**PM Emissions:**

Emission Factor: 0.02 lbs/ton (Department Emission Factor – Similar Source Wood Debarking)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.02 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 2.63 ton/yr

**PM<sub>10</sub> Emissions:**

Emission Factor: 0.01 lbs/ton (Assume 50% of PM is PM<sub>10</sub>)  
Control Efficiency: 50% (Equipment design enclosure)  
Calculations: 0.01 lbs/ton \* 60 ton/hr \* 8760 hr/yr \* 0.0005 ton/lb \* (1-50/100) = 1.31 ton/yr

**Diesel Engine**

Output Capacity of Engine: 700 hp (Power output capacity of engine powering generator)  
Max Hours of Operation: 8760 hr/yr

PM Emissions:

Assume all PM emissions are PM10 emissions: 6.75 tons/yr (Conservative estimate for PM)

PM<sub>10</sub> Emissions:

Emission Factor: 0.0022 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculations: 700 hp \* 8760 hr/yr \* 0.0022 lbs/hp-hr \* 0.0005 ton/lb = 6.75 ton/yr

NO<sub>x</sub> Emissions:

Emission Factor: 0.031 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculations: 700 hp \* 8760 hr/yr \* 0.031 lb/hp-hr \* 0.0005 ton/lb = 95.05 ton/yr

CO Emissions:

Emission Factor: 0.00668 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculations: 700 hp \* 8760 hr/yr \* 0.00668 lb/hp-hr \* 0.0005 ton/lb = 20.48 ton/yr

VOC Emissions:

Emission Factor: 0.00247 lbs/hp-hr (as exhaust only TOC, AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculations: 700 hp \* 8760 hr/yr \* 0.00247 lb/hp-hr \* 0.0005 ton/lb = 7.57 ton/yr

SO<sub>2</sub> Emissions:

Emission Factor: 0.00205 lbs/hp-hr (AP-42, Sec. 3.3, Table 3.3-1, 10/96)

Calculations: 700 hp \* 8760 hr/yr \* 0.00205 lb/hp-hr \* 0.0005 ton/lb = 6.29 ton/yr

**Haul Roads**

Vehicle Miles Traveled: 5 VMT/day (Estimate)

Max Days of Operation: 365 days/yr

Emission Factor (lbs/VMT):  $EF = k(s/12)^a(W/3)^b$ ; (Unpaved roads at industrial sites; AP-42, Ch. 13.2.2, 11/06)

PM Emissions:

Emission Factor: 14.02 lb/VMT

k = 4.9 lb/VMT (constant; value for TSP; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

s = 8.4% (surface silt content; mean value for log yards; AP-42, Ch. 13.2.2, Table 13.2.2-1, 11/06)

W = 54 tons (mean vehicle weight; 1994 average loaded/unloaded or a 40 ton truck)

a = 0.7 (constant; value for TSP; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

b = 0.45 (constant; value for TSP; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

Control Efficiency: 50% (Water Spray / Chemical Dust Suppressant)

Calculations: 14.02 lb/VMT \* 5 VMT/day \* 365 day/yr \* 0.0005 ton/lb \* (1-50/100) = 6.40 ton/yr

PM<sub>10</sub> Emissions:

Emission Factor: 4.00 lb/VMT

k = 1.5lb/VMT (constant; value for PM10; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

s = 8.4% (surface silt content; mean value for log yards; AP-42, Ch. 13.2.2, Table 13.2.2-1, 11/06)

W = 54 tons (mean vehicle weight; 1994 average loaded/unloaded or a 40 ton truck)

a = 0.9 (constant; value for TSP; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

b = 0.45 (constant; value for TSP; AP-42, Ch. 13.2.2, Table 13.2.2-2, 11/06)

Control Efficiency: 50% (Water Spray / Chemical Dust Suppressant)

Calculations: 4 lb/VMT \* 5 VMT/day \* 365 day/yr \* 0.0005 ton/lb \* (1-50/100) = 1.83 ton/yr

## V. Existing Air Quality

MAQP #4250-01 authorizes Glacier Gold to construct and operate the wood chipping facility at various locations throughout Montana. The areas of operation authorized by MAQP #4250-01 are limited to areas designated as attainment/unclassified for the ambient air quality standards. Addendum 1 to MAQP #4250-01 authorizes Glacier Gold to operate in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months and at sites approved by the Department during the winter months.

## VI. Air Quality Impacts

MAQP #4250-01 is issued for the operation of a portable wood chipping plant to be initially located in Section 8, Township 32 North, Range 23 West, in Flathead County. MAQP #4250-01 also authorizes operation at any location within Montana, excluding those counties that have a Department approved permitting program, those areas considered tribal lands, or those areas in or within 10 km of certain PM<sub>10</sub> nonattainment areas. The Department has determined that the impact from operation of this facility under MAQP #4250-01 will be minor.

Addendum 1 to MAQP #4250-01, includes conditions and requirements to protect the nonattainment areas, has been developed and is included for when the facility operates at locations in or within 10 km of certain PM<sub>10</sub> nonattainment areas. The Department has determined, that the impact from operation of this facility under Addendum 1 to MAQP #4250-01 will also be minor and temporary.

## VI. Ambient Air Impact Analysis

Potential PM<sub>10</sub> emissions from the proposed wood chipping operations are minor. The Department determined, based on the size of the facility and its estimated emissions, that emissions from the proposed facility and associated equipment will not significantly impact the area of operation. Based on its analysis the Department does not believe that operation of the facility and associated equipment under either MAQP #4250-01 or Addendum 1 will cause or contribute to any exceedances of the National Ambient Air Quality Standard (NAAQS).



## VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

| YES | NO |   |
|-----|----|---|
| X   |    | 1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?   |
|     | X  | 2. Does the action result in either a permanent or indefinite physical occupation of private property?  |
|     | X  | 3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)  |
|     | X  | 4. Does the action deprive the owner of all economically viable uses of the property?   |
|     | X  | 5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].  |
| X   |    | 5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?   |
| X   |    | 5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?   |
|     | X  | 6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)  |
|     | X  | 7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?   |
|     | X  | 7a. Is the impact of government action direct, peculiar, and significant?   |
|     | X  | 7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?   |
|     | X  | 7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?   |
|     | X  | Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas) |

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

## VIII. Environmental Assessment

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

Addendum 1  
Glacier Gold, LLC  
Montana Air Quality Permit #4250-01

An addendum to Montana Air Quality Permit (MAQP) #4250-01 is hereby granted to Glacier Gold LLC (Glacier Gold) pursuant to Section 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.765, as amended, for the following:

I. Permitted Equipment:

Glacier Gold owns and operates a portable whole tree chipping and processing facility consisting of a whole tree wood chipper with a maximum capacity of 60 tons per hour (TPH) that is powered by a 700 horsepower, (hp) diesel engine, and associated material handling and processing equipment.

II. Seasonal and Site Restrictions – **Winter and Summer Seasons**

Addendum 1 applies to the Glacier Gold facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1-March 31) - The only location in or within 10 km of a PM<sub>10</sub> nonattainment area where Glacier Gold may operate is:
  - 1. The Mountain West location within the Columbia Falls Nonattainment area - NW¼ of Section 9, Township 30 North, Range 20 West, in Flathead County; and
  - 2. Any other site that may be approved, in writing, by the Department of Environmental Quality (Department).
- B. During the summer season (April 1-September 30) – Glacier Gold may operate at any location in or within 10 km of the Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas.
- C. Glacier Gold shall comply with the limitations and conditions contained in Addendum 1 to MAQP #4250-01 while operating in or within 10 km of any of the previously identified PM<sub>10</sub> nonattainment areas. Addendum 1 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum 1 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

A. Operational Limitations and Conditions

- 1. Water spray bars must be available and operated, as necessary, on the chipper, and all transfer points whenever the plant is in operation (ARM 17.8.749).
- 2. Glacier Gold shall not cause or authorize to be discharged into the atmosphere from any equipment, such as screens or transfer points, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).

3. Glacier Gold shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit an opacity of 10% or greater (ARM 17.8.749).
4. Glacier Gold shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 10% opacity limitation (ARM 17.8.749).
5. Glacier Gold shall not operate more than one wood chipper at any one time. Total chipping production shall not exceed 1,440 tons per day (ARM 17.8.749).

B. Operational Reporting Requirements

1. If this wood chipping plant is moved to another nonattainment location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Production information for the sites covered by this addendum must be maintained for 5 years and submitted to the Department upon request. The information must include (ARM 17.8.749):
  - a. Tons of material chipped by the chipper at each site (including amount of recirculated/rerun material),
  - b. Tons of bulk wood material loaded in to the chipper at each site (production),
  - c. Daily hours of operation at each site,
  - d. Gallons of diesel used by each engine/generator at each site,
  - e. Hours of operation and sizes of each engine/generator at each site, and
  - f. Fugitive dust information consisting of the total miles driven on unpaved roads for all plant vehicles.
3. Glacier Gold shall document, by day, the total chipping production. Glacier Gold shall sum the total chipping production for the previous day to verify compliance with the limitation in Section III.A.5. A written report of compliance and the emissions inventory shall be submitted to the Department annually. The report for the previous calendar year shall be submitted and may be submitted along with the annual emissions inventory (ARM 17.8.749).

Addendum 1 Analysis  
Glacier Gold, LLC  
Montana Air Quality Permit (MAQP) #4250-01

I. Permitted Equipment

Glacier Gold LLC (Glacier Gold) operates a portable whole tree chipper with a maximum input process rate of 60 tons/hour (TPH), powered by a diesel engine not to exceed 700-horsepower (hp).

II. Source Description

Glacier Gold uses the portable wood chipping facility to chip waste-wood products for various purposes. For a typical operational set-up, whole tree logs are fed into a feed hopper, and then conveyed via feed rollers into a chipper hammermill. The wood is cut into chips, and then deposited to a pile where it is loaded on to haul trucks.

III. Applicable Rules and Regulations

The following are partial quotations 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 of Environmental Quality (Department). Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

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

- A. ARM 17.8.749 Conditions for Issuance 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.
- B. 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. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one location to another if:
  - 1. Written notice of intent to transfer location and proof of public notice are sent to the Department;
  - 2. The source will operate in the new location for a period of less than 1 year; and
  - 3. The source will not have any significant impact on any nonattainment area or any Class I area.

#### IV. Emission Inventory

| Emission Source        | Lbs/Day <sup>(1)</sup> |                  |                 |               |              |                 |
|------------------------|------------------------|------------------|-----------------|---------------|--------------|-----------------|
|                        | PM                     | PM <sub>10</sub> | NO <sub>x</sub> | CO            | VOC          | SO <sub>2</sub> |
| Bulk Loading           | 14.40                  | 7.20             | --              | --            | --           | --              |
| Conveyor Transfer      | 14.40                  | 7.20             | --              | --            | --           | --              |
| Chipping/Grinding      | 14.40                  | 7.20             | --              | --            | --           | --              |
| Pile Forming           | 14.40                  | 7.20             | --              | --            | --           | --              |
| Diesel Engine          | 36.96                  | 36.96            | 520.80          | 112.22        | 41.50        | 34.44           |
| Haul Roads             | 35.05                  | 10.00            | --              | --            | --           | --              |
| <b>Total Emissions</b> | <b>129.61</b>          | <b>75.76</b>     | <b>520.80</b>   | <b>112.22</b> | <b>41.50</b> | <b>34.44</b>    |

(1) No additional limitations to production capability or hours of operations were required for nonattainment operation; therefore, emission inventory is based on emission inventory in the MAQP.

#### V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>). Due to exceedances of the national standards for PM<sub>10</sub>, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM<sub>10</sub>. As a result of this designation, the EPA required the Department and the City-County Health Departments to submit PM<sub>10</sub> State Implementation Plans (SIP). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies identified these sources to be the major contributors to PM<sub>10</sub> emissions.

MAQP #4250-01 and Addendum 1 are for a portable wood chipping plant that will locate at sites in or within 10 kilometers (km) of certain PM<sub>10</sub> nonattainment areas. The operating conditions contained in the addendum will minimize any potential impact on the nonattainment areas and will protect the national ambient air quality standards. Also, this facility is a portable source that would operate on an intermittent and temporary basis and any effects on air quality will be minor and short-lived.

#### VI. Air Quality Impacts

MAQP #4250-01 and Addendum 1 will cover the operations of this portable wood chipping plant while operating at any location within Montana, excluding those counties that have a Department approved permitting program and those areas that are tribal lands.

Addendum 1 will cover the operations of this portable wood chipping plant, while operating in or within 10 km of the Columbia Falls PM<sub>10</sub> nonattainment area (the Mountain West site) and any other site that may be approved by the Department during the winter months (October 1 through March 31). Additionally, the facility will also be allowed to operate in or within 10 km of PM<sub>10</sub> nonattainment areas during the summer months (April 1 through September 30).

Based on the information provided and the limits established in this addendum, the Department believes the amount of controlled emissions generated by this facility will not cause or contribute to an exceedance of any ambient air quality standard. Therefore, any air quality impacts will be minimal.

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 as listed in the MAQP Analysis for MAQP #4250-01 and determined there are no taking or damaging implications.

VIII. Environmental Assessment

The current permit action is an administrative amendment and does not constitute a state action; therefore, an environmental assessment is not required for the proposed project.

Permit Analysis Prepared by: P. Skubinna

Date: March 15, 2010