

Date of Posting: December 22, 2025

Scott Kerr  
True Companies  
Bridger Pipeline Sandstone Station  
PO Drawer 2360  
Casper, WY 82601

**RE: Final and Effective Montana Air Quality Permit #5242-01**

Sent via email: [Scott.Kerr@truecos.com](mailto:Scott.Kerr@truecos.com)

Dear Mr. Kerr:

Montana Air Quality Permit (MAQP) #5242-01 for the above-named permittee is deemed final and effective as of December 21, 2025, by the Montana Department of Environmental Quality. All conditions of the Decision remain the same. A copy of final MAQP #5242-01 is enclosed.

For DEQ,



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



Troy M. Burrows  
Air Quality Scientist  
Air Quality Bureau  
(406) 444-1452

Enclosures: EM:TMB

## MONTANA AIR QUALITY PERMIT

Issued To:  
Bridger Pipeline, LLC  
Sandstone Station  
PO Drawer 2360  
Casper, WY 82601

MAQP: #5242-01  
Application Complete: 10/06/2025  
Preliminary Determination Issued: 11/13/2025  
Department's Decision Issued: 12/5/2025  
Permit Final: 12/21/2025

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Bridger Pipeline, LLC (Bridger), pursuant to Sections 75-2-204, 211, and 213 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

The Sandstone Station is located approximately nine miles west of Baker, Montana, on the north side of US Highway 12. The legal description of the facility site is the SE ¼ of the NE ¼ of Section 4, Township 7 North, Range 58 East, in Fallon County, Montana.

#### B. Current Permit Action

On October 6, 2025, pursuant to the applicable requirements of ARM 17.8.748 and ARM 17.8.762, the Montana Department of Environmental Quality (DEQ) received an application for modification of MAQP #5242-00 from Bridger Pipeline, LLC (Bridger). Bridger proposes to construct a new 216,000-barrel (bbl) internal floating roof (IFR) crude storage tank (Tank 2) and requested an increase in overall crude throughput to existing operations at the facility.

### Section II: Conditions and Limitations

#### C. Emission Limitations

1. Tank 1 shall utilize internal floating roof design (ARM 17.8.752).
2. Tank 2 shall utilize internal floating roof design (ARM 17.8.752).
3. Bridger shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
4. Bridger 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).

5. Bridger shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 17.8.749).
6. Bridger shall comply with all applicable standards and limitations, and the reporting, recordkeeping and notification requirements contained in 40 CFR 60, Subpart Kb (ARM 17.8.340 and 40 CFR 60, Subpart Kb).

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

#### E. Operational Reporting Requirements

1. Bridger shall supply DEQ with annual production information for all emission points, as required by DEQ 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.

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

2. Bridger shall notify DEQ of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include ***the addition of a new emissions unit***, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to DEQ, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
3. All records compiled in accordance with this permit must be maintained by Bridger as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by DEQ, and must be submitted to DEQ upon request. These records may be stored at a location other than the plant site upon approval by DEQ (ARM 17.8.749).

#### F. Notification

1. Bridger shall provide DEQ with written notification of the actual start-up date of Tank 2 within 15 days after the actual start-up date (ARM 17.8.749).

### SECTION III: General Conditions

- A. Inspection – Bridger shall allow DEQ’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment such as Continuous Emission Monitoring Systems (CEMS) or Continuous Emission Rate Monitoring Systems (CERMS), or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if Bridger fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Bridger of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by DEQ’s decision may request, within 15 days after DEQ renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay DEQ’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of DEQ’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, DEQ’s decision on the application is final 16 days after DEQ’s decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by DEQ at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Bridger may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin, or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762)

Montana Air Quality Permit Analysis  
Bridger Pipeline, LLC – Sandstone Station  
MAQP #5242-01

I. Introduction/Process Description

Bridger Pipeline, LLC (Bridger) owns and operates a crude oil storage facility referred to as the Sandstone Station. The Sandstone Station is located approximately 9 miles west of Baker, Montana, in the SE ¼ of the NE ¼ of Section 4, Township 7 N, Range 58 E, in Fallon County, Montana.

A. Permitted Equipment

Two 216,000-barrel (bbl) Internal Floating Roof (IFR) crude oil storage tanks.

B. Source Description

Sandstone Station is a crude oil storage facility supporting the Bridger pipeline.

C. Permit History

On October 2, 2020, the Montana Department of Environmental Quality (DEQ) issued **MAQP #5242-00** to Bridger Pipeline, LLC (Bridger), for two floating roof crude oil storage tanks at the Sandstone Station Crude Oil Storage Facility. Only one of the permitted tanks was installed and operated at that time.

D. Current Permit Action

On October 6, 2025, pursuant to the applicable requirements of ARM 17.8.748 and ARM 17.8.762, DEQ received an application for modification of MAQP #5242-00 from Bridger. Pursuant to the applicable requirements of ARM 17.8.748, Bridger proposes to construct a 216,000-barrel (bbl) IFR crude storage tank (Tank 2) and requested an increase in overall crude throughput to existing operations at the facility. The application was assigned MAQP #5242-01.

Tank 2 was initially approved under MAQP #5242-00; however, pursuant to ARM 17.8.62(2), a permit issued prior to construction or installation of a new or modified emitting unit provides that the permit, or the affected portion of the permit, will expire unless construction or installation is commenced within the time specified in the permit, which may not be less than one year or more than three years after the permit is issued. Because Tank 2 was not constructed within three years of issuance of MAQP #5242-00, the current permit action is required to construct and operate Tank 2. **MAQP #5242-01** replaces MAQP #5242-00.

E. Response to Public Comments

No comments were received on the PD on MAQP #5242-01.

Person/Group Commenting	Permit Reference	Comment	Department Response
NA	NA	NA	NA

F. Additional Information

Bridger determined a floating roof tank design utilizing an internal floating roof (IFR) constitutes Best Available Control Technology or BACT for both permitted tanks, and DEQ concurs. See Section III of the Permit Analysis, BACT Analysis and Determination. IFR is also an available option for compliance with 40 CFR 60, Subpart Kb, for tanks meeting specific capacity and pressure criteria, such as the tanks proposed by Bridger.

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 of Environmental Quality (DEQ). Upon request, DEQ 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 DEQ, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by DEQ.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

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

4. ARM 17.8.110 Malfunctions. (2) DEQ must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that

would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

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

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Bridger 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, Bridger shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
7. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged

fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.

8. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is considered an NSPS affected facility under 40 CFR Part 60 and is subject to the requirements of the following subparts.

- a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
- b. 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels). This regulation applies to storage vessels with a capacity of ~75 cubic meters (m<sup>3</sup>), which is approximately 471 barrels (bbl), that are used to store Volatile Organic Liquids (VOL) for which construction, reconstruction or modification commenced after July 23, 1984. Storage vessels are exempt if they have a capacity greater than 151 m<sup>3</sup> (approximately 950 bbl) and store liquids with a maximum true vapor pressure less than 3.5 kilopascals (kPa). This facility contains two vessels for storing VOLs (petroleum) constructed after July 23, 1984 and have a maximum true vapor pressure greater than 3.5 kPa. Therefore, both storage vessels are subject to 40 CFR 60, Subpart Kb.

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

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to DEQ. Bridger submitted the appropriate permit application fee for the current permit action.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by DEQ. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

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

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



1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the potential to emit (PTE) greater than 25 tons per year of any pollutant. Bridger has a PTE greater than 25 tons per year of volatile organic compounds (VOC); therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements.  
(1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Bridger 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. Bridger submitted an affidavit of publication of public notice for the *September 12, 2025*, issue of the *Fallon County Times*, a newspaper of general circulation in the Town of Baker in Fallon County, Montana, as proof of compliance with the public notice requirements.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by DEQ must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by DEQ at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Bridger of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes DEQ's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 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 or more than three years 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 DEQ.

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

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

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

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

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

- a. PTE > 100 tons/year of any pollutant;
  - b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as DEQ may establish by rule; or
  - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) in a serious PM<sub>10</sub> nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #5242-01 for Bridger, 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 for all HAPs.
  - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
  - d. This facility is subject to a current NSPS (40 CFR 60, Subparts A and Kb).
  - e. This facility is not subject to any current NESHAP.
  - f. This source is not a Title IV affected source, or a solid waste combustion unit.
  - g. This source is not an EPA designated Title V source.

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

### III. BACT Analysis and Determination

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

A BACT analysis was submitted by Bridger in permit application MAQP #5242-01, addressing some available methods of controlling VOC emissions from the crude oil storage tanks. DEQ reviewed these methods, as well as previous BACT determinations. The following control options have been reviewed by DEQ in order to make the following BACT determination.

The facility includes an existing 216,000 bbl tank with an IFR and the proposed construction of a second 216,000 bbl tank with an IFR. The facility is used for crude oil storage and transmission. Emissions from IFR tanks occur because of the displacement of headspace vapor during filling operations (working losses). And, to a lesser degree, diurnal

temperature variations and solar heating cycles also result in emissions from storage tanks (breathing losses).

The existing and proposed storage tanks are potential sources of VOC emissions. As noted in Section 4.2, NSPS Subpart Kb is applicable to both tanks and regulate VOC emissions.

### **Step 1 - Identify Available Control Options**

Several potential control options for storage tanks were identified by reviewing information from the following sources:

- Technologies defined in 40 CFR 60, Subpart Kb;
- Technologies applied to similar types of sources in practice (as determined by the EPA's RACT/BACT/LAER Clearinghouse (RBLC) and other sources of information); and
- Technologies that could reasonably be applied to this source type via technology transfer.

Technologies identified as a result of this search can be divided into two general categories:

- 1) Design and/or work practice standards, and
- 2) Add-on controls.

Based on these categories, the technologies assessed for BACT include:

- Fixed roof tanks;
- Fixed roof with submerged fill;
- Fixed roof tanks equipped with conservation (pressure/vacuum) vents;
- Floating roof tanks (internal or external);
- Fixed roof tanks equipped with vapor collection and control equipment.

### **Steps 2 & 3 - Eliminate Technically Infeasible Options and Rank Remaining Options**

This section describes the controls listed and evaluates the technical feasibility of each option. Control technology for tanks is mainly dependent upon the overall tank design. Many factors influence tank selection and design, including:

- Stored material - organic liquids, non-organic liquids, and vapors;
- Capacity - design volume; and
- Environmental conditions - seasonal variability, temperature.

Due to the variability in tank design parameters and the industry-wide rationale for tank selection, it is not practical to rank the remaining options like in a traditional top-down BACT analysis. Therefore, this analysis discusses the technical feasibility based on the design requirements but does not provide a ranked selection.

Fixed Roof Tanks: 40 CFR 60, Subpart Kb regulates the existing and new storage tanks as detailed in Section 4.2. The only requirement of Subpart Kb for large tanks that store

liquids with vapor pressures below 3.5 kPa (about 0.5 psi) is that records of the dimensions of the storage tanks and an analysis of the storage tank capacity must be maintained for the life of the sources. No other requirements are imposed by Subpart Kb. Therefore, this provides the BACT floor for the facility's storage tanks.

Fixed Roof Tank with Submerged Fill: The splash that results from loading a tank via an elevated inlet results in an increased level of vapor emission from the tank's vent. Application of this control to both the existing and new storage tanks is considered technically feasible.

Fixed Roof Tanks with Conservation Vents: A common addition to an atmospheric fixed roof tank is a conservation or pressure/vacuum vent. These vents prevent vapors from escaping a tank over a small pressure range (e.g., -0.5 to + 0.5 pounds per square inch, gauge). By equipping a tank with a conservation vent, emissions of VOC are reduced slightly as tank breathing losses tend to be suppressed. Installation of conservation vents on existing or new storage tanks is considered technically feasible.

Floating Roof Tanks: Floating roof tanks are commonly used to control emissions from tanks that store light liquids, such as petroleum products. In fact, this storage method is required by 40 CFR 60, Subpart Kb for tanks holding such liquids. Installation of floating roof tanks at the facility is technically feasible, and the existing 216,000 bbl tank is already an internal floating roof (IFR) tank.

Fixed Roof Tanks with Vapor Collection and Control: A final control option available for these storage tanks is the use of a vapor collection and control system. Such a system collects vapors that are displaced from the storage tank as it is filled, or as it "breathes." Collected vapors can be routed from the tanks through piping back to the process or to a central control device where they are either recovered (e.g., using a vapor-solid adsorption system such as carbon adsorption), or incinerated (e.g., using a flare). The use of a fixed roof with vapor collection by a closed vent system routed to a control device (e.g., thermal incinerator) is considered technically feasible for the proposed, new 216,000 bbl tank. This control option is also technically feasible for the existing 216,000 bbl tank; however, the tank is already an IFR design, and utilization of this control would require the removal and installation of a completely new fixed roof tank.

#### **Steps 4 & 5 - Evaluate Most Effective Controls and Select BACT**

Bridger selects the floating roof tank design utilizing IFR as BACT for both tanks. The existing 216,000 bbl tank is already constructed as an IFR tank and the proposed new 216,000 bbl tank is planned to be installed with the same inherent control technology. As stated previously, this storage method is required by 40 CFR 60, Subpart Kb for tanks meeting specific capacity and pressure criteria. Therefore, IFR tank design is considered BACT for both tanks and Bridger has proposed IFR tank design as BACT for the current permit action.

#### **IV. Emission Inventory**

VOC and HAPs emissions were calculated using Tanks ESP. Documentation of the program inputs and outputs were included in the permit application and are available at DEQ.

Emitting Unit	PM(fil)	PM <sub>10</sub> (fil)	PM <sub>2.5</sub> (fil)	PM(cond)	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	HAPs
Tank 1	--	--	--	--	--	--	36.51	--	1.13
Tank 2	--	--	--	--	--	--	25.50	--	0.79
Fugitive Leaks (Valves, fittings, components)	--	--	--	--	--	--	1.06	--	0.031
Fugitive Road Dust	0.07	0.02	0.002	--	--	--	--	--	--
Totals	0.07	0.02	0.002	0.00	0.00	0.00	64.07	0.00	1.951

- Total PM<sub>10</sub> emissions are 0.02 TPY, determined by the sum of PM<sub>10</sub>(fil) + PM(cond)
- Total PM<sub>2.5</sub> emissions are 0.002 TPY, determined by the sum of PM<sub>2.5</sub>(fil) + PM(cond)
- Total Particulate Matter emissions are 0.07 TPY, determined by the sum of PM(fil) + PM(cond)

\*\* CO = carbon monoxide

(fil) = filterable

HAPs = hazardous air pollutants

hp = horsepower

lb = pound

N/A = not applicable

ND = no data available

NO<sub>x</sub> = oxides of nitrogen

PM = particulate matter

PM<sub>10</sub> = particulate matter with an aerodynamic diameter of 10 microns or less

PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter of 2.5 microns or less

SO<sub>2</sub> = sulfur dioxide

TPH = tons per hour

TPY = tons per year

VOC = volatile organic compounds

yr = year

Inventory reflects maximum allowable emissions for all pollutants based on maximum production and year-round operation (8,760 hours). The facility did not take limits on production or hours of operation.

EU01 Calculations: Existing 216,000 bbl IFR Tank	
Tank Data	
Tank Type	IFRT
Average Alpha	0.17
Diameter, D (ft)	180
Tank Construction (Welded/Riveted)	Welded
Rim Seal Type	Mechanical-Shoe Primary - No Secondary
Shell Color	White Paint
Shell Condition	Good
Shell Alpha	0.17
Roof Color	White Paint
Roof Condition	Good
Roof Alpha	0.17
Zero Wind Speed Loss Factor, Kra (lb-mole/ft-yr)	5.8
Wind Dependent Loss Factor, Krb (lb-mole/(mph^n)-ft-yr)	0.3
Wind Dependent Loss Exponent, n	2.1
Deck Seam Loss per unit seam length, Kd (lb-mole/ft-yr)	0
Number of Deck Fittings, Nfi	1
Fitting Wind Speed Correction Factor, Kv	0
Number of Columns, Nc	27
Effective Column Diameter, FC (ft)	1
Tank Calculations:	
Rim Seal Emission Factor (Fr) (lb-mol/yr)	8291.706521
Deck Seam Emission Factor (Fd) (lb-mol/yr)	0
Deck Fittings Emission Factor (Ff) (lb-mol/yr)	2596
Service Data:	
Product Factor, Kc	0.4
Reid Vapor Pressure, RVP (psi)	10
ASTM Distillation Slope	0
Molecular Weight, Mv (lb/lb-mol)	66
Liquid Bulk Temp, Tb (F)	46.5
Constant Temp Tank?	No
Liquid Bulk Temp Basis	AP-42
Liquid Surface Temp, Ta (F)	47.3
True Vapor Pressure, Pva (psia)	6.009
Vapor Pressure Function, P*	0.1481
Liquid Density, WI (lb/gal)	7.1
Clinage Factor, Cs (bbl/1000sqft)	0.006
Throughput, Q (bbl/yr)	118,625,000
Days	365
Emissions Estimate:	
Standing Storage Loss (lb/yr)	42569.19047
Withdrawal Loss, Lwd (lb/yr)	30445.4819
Total Emissions (lb/yr)	73014.67236
Total VOC Emissions (ton/yr)	36.50733618

EU02 Calculations: Proposed 216,000 bbl IFR Tank	
Tank Data	
Tank Type	IFRT
Average Alpha	0.17
Diameter, D (ft)	180
Tank Construction (Welded/Riveted)	Welded
Rim Seal Type	Mechanical-Shoe Primary - No Secondary
Shell Color	White Paint
Shell Condition	New
Shell Alpha	0.17
Roof Color	White Paint
Roof Condition	New
Roof Alpha	0.17
Zero Wind Speed Loss Factor, Kra (lb-mole/ft-yr)	5.8
Wind Dependent Loss Factor, Krb (lb-mole/(mph^n)-ft-yr)	0.3
Wind Dependent Loss Exponent, n	2.1
Deck Seam Loss per unit seam length, Kd (lb-mole/ft-yr)	0
Number of Deck Fittings, Nfi	1
Fitting Wind Speed Correction Factor, Kv	0
Number of Columns, Nc	27
Effective Column Diameter, FC (ft)	1
Tank Calculations:	
Rim Seal Emission Factor (Fr) (lb-mol/yr)	8291.706521
Deck Seam Emission Factor (Fd) (lb-mol/yr)	0
Deck Fittings Emission Factor (Ff) (lb-mol/yr)	2596
Service Data:	
Product Factor, Kc	0.4
Reid Vapor Pressure, RVP (psi)	10
ASTM Distillation Slope	0
Molecular Weight, Mv (lb/lb-mol)	66
Liquid Bulk Temp, Tb (F)	46.5
Constant Temp Tank?	No
Liquid Bulk Temp Basis	AP-42
Liquid Surface Temp, Ta (F)	47.3
True Vapor Pressure, Pva (psia)	6.009
Vapor Pressure Function, P*	0.1481
Liquid Density, WI (lb/gal)	7.1
Clinage Factor, Cs (bbl/1000sqft)	0.006
Throughput, Q (bbl/yr)	32,850,000
Days	365
Emissions Estimate:	
Standing Storage Loss (lb/yr)	42569.19047
Withdrawal Loss, Lwd (lb/yr)	8431.056525
Total Emissions (lb/yr)	51000.24699
Total VOC Emissions (ton/yr)	25.5001235



Bridger Pipeline, LLC  
 Fallon County  
 Sandstone Station  
 EU04: Fugitive Emissions - Vehicle Traffic

These emissions are fugitive emissions which result from vehicle traffic inside the plant boundaries.  
 All roads at this facility are assumed to be unpaved.

For Unpaved Roads

Using: Equation (1a) of AP-42 Chapter 13.2.2 including precipitation mitigation

$$E = k * (s/12)^a * (W/3)^b$$

E = emission factor, (lb/vmt)

k = particle size multiplier (dimensionless), TSP = 4.9, PM<sub>10</sub> = 1.5, PM<sub>2.5</sub> = 0.15

a = particle size multiplier (dimensionless), TSP = 0.7, PM<sub>10</sub> = 0.9, PM<sub>2.5</sub> = 0.9

b = particle size multiplier (dimensionless), TSP = 0.45, PM<sub>10</sub> = 0.45, PM<sub>2.5</sub> = 0.45

s = silt content of road surface material (%)

W = mean vehicle weight, (ton)

p = number of days of precipitation

Plant Road silt content averaging<sup>1</sup>

Industry	Road Use	No. Samples	Silt Content % (Mean)	Weighted Sums
Copper smelting	Plant Road	3	17	51
Iron and steel production	Plant Road	135	6	810
Sand and gravel processing	Plant Road	3	4.8	14
Stone quarrying and processing	Plant Road	10	10	100
Western surface coal mining	Plant Road	2	5.1	10
	Totals:	153	---	985
	Weighted Average:			6.4

Emission Factor Determination

Source	Particle Size Multiplier			Surface Silt Content % s	Empirical Constant		Mean Vehicle Weight ton W	Empirical Constant (All) b	# of days >0.01 in. Precip. <sup>2</sup> p*	Emission Factors		
	PM k	PM <sub>10</sub> k	PM <sub>2.5</sub> k		PM a	PM <sub>10</sub> , PM <sub>2.5</sub> a				PM (lb/VMT)	PM <sub>10</sub> (lb/VMT)	PM <sub>2.5</sub> (lb/VMT)
Maintenance Vehicles	4.90	1.50	0.15	6.4	0.7	0.9	4.25	0.45	63	2.9	0.8	0.08

Source	Trips Per Day <sup>3</sup>	Trips Per Year	Distance per Trip <sup>4</sup> (miles)	VMT	Control Efficiency <sup>5</sup>	Emission Rates					
						PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)
Maintenance Vehicles	1	365	0.13	47.45	0%	0.38	0.10	0.010	0.07	0.02	0.002

#### Notes

General Note: Haul road emissions based on fugitive emissions from regular work truck travel (approx. 4.25 ton trucks - i.e., Ford F250).

VMTs on personal vehicle travel within the Sandstone Station property boundary for the purpose of operation and maintenance.

The updated emissions calculations are equivalent to the original application.

1) Data from AP-42 Table 13.2.2-1. No industry listed represents the Sandstone Station, therefore a weighted average has been determined from all plant roads listed in the table.

2) Mean Precipitation days >0.01in from <https://www.currentresults.com/Weather/Montana/average-yearly-precipitation.php> for Glendive, MT.

3) Estimate average number of trips.

4) Distance traveled per trip measured via Google Earth aerial imagery. Accounts for travel throughout property boundary.

5) No routine road watering is expected due to low traffic counts expected

V. Existing Air Quality

The air quality in the area is classified as “Better than National Standards” or unclassifiable/attainment of the NAAQS for criteria pollutants (40 CFR 81.327). There are no nonattainment areas located within a reasonable distance of the Bridger site.

VI. Ambient Air Impact Analysis

DEQ determined, based on NRIS and SHPO reports, existing facilities, and current air quality data that the impacts from this permitting action will be minor. DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

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

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

The proposed project would take place on private land. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ’s approval of MAQP #5242-01 would not have private property-taking or damaging implications.

VIII. Environmental Assessment

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



## **DRAFT ENVIRONMENTAL ASSESSMENT**

**December 5, 2025**

**Air Quality Permitting Services Section  
Air Quality Bureau  
Air, Energy and Mining Division  
Montana Department of Environmental Quality**

**PROJECT/SITE NAME: Sandstone Station**

**APPLICANT/COMPANY NAME: Bridger Pipeline, LLC.**

**Montana Air Quality Permit #5242-01**

**LOCATION: Section 4, Township 7 North, Range 58 East**

**COUNTY: Fallon**

**PROPERTY OWNERSHIP: FEDERAL      STATE      PRIVATE X**

## Table of Contents

Overview of Proposed Action.....	3
Purpose, Need, and Benefits.....	4
Other Governmental Agencies and Programs with Jurisdiction.....	4
Evaluation of Affected Environment And Impact by Resource.....	5
1. Geology and Soil Quality, Stability and Moisture .....	6
2. Water Quality, Quantity, And Distribution .....	6
3. Air Quality .....	7
4. Vegetation Cover, Quantity, and Quality.....	8
5. Terrestrial, Avian, and Aquatic Life and Habitats .....	9
6. Unique, Endangered, Fragile, or Limited Environmental Resources .....	10
7. Historical and Archaeological Sites .....	10
8. Aesthetics .....	11
9. Demands on Environmental Resources of Land, Water, Air, or Energy .....	12
10. Impacts on Other Environmental Resources .....	13
11. Human Health and Safety.....	14
12. Industrial, Commercial, and Agricultural Activities and Production.....	15
13. Quantity and Distribution of Employment.....	16
14. Local and State Tax Base and Tax Revenue.....	16
15. Demand for Government Services.....	17
16. Locally Adopted Environmental Plans and Goals.....	18
17. Access to and Quality of Recreational and Wilderness Activities.....	18
18. Density and Distribution of Population and Housing .....	19
19. Social Structures and Mores .....	19
20. Cultural Uniqueness and Diversity .....	20
21. Private Property Impacts .....	21
22. Other Appropriate Social and Economic Circumstances .....	21
23. Greenhouse Gas Assessment .....	21
24. Description of Alternatives.....	23
25. Consultation.....	23
Public Involvement .....	24
Significance of Potential Impacts and Need for Further Analysis .....	24
Conclusions and Findings.....	24
Preparation.....	26
References.....	26

## **Overview of Proposed Action**

### **Authorizing Action**

Pursuant to the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the Montana environment. The Proposed Action is a state action that may have an impact on the Montana environment; therefore, the Montana Department of Environmental Quality (DEQ) must prepare an environmental review. This EA will examine the proposed action and alternatives to the proposed action and disclose potential and proximate impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

### **Description of DEQ Regulatory Oversight**

DEQ implements the Clean Air Act of Montana, overseeing the construction and operation of Bridger Pipeline, LLC. (Bridger) and associated facilities. DEQ has authority to analyze the installation of tanks for storing crude oil.

### **Proposed Action**

Bridger has applied for a Montana Air Quality Permit (MAQP) under the Clean Air Act of Montana, § 75-2-101, et. seq, the proposed action is to construct a new 216,000 barrel (bbl) crude oil storage tank. The proposed action would be located on private land in Fallon County, Montana. All information included in this EA is derived from the permit application, discussions with the applicant, analysis of aerial photography, topographic maps, and other research tools.

**Table 1. Summary of Proposed Action**

<b>General Overview</b>	The proposed action is for the construction of a new 216,000 bbl crude oil storage tank. The proposed action is not a fossil fuel activity.
<b>Duration &amp; Hours of Operation</b>	Construction: Commissioning will commence after the MAQP is issued as final and last for approximately 2 to 3 months. Operation: Operation will continue until the facility is permanently closed.
<b>Estimated Disturbance</b>	Bridger has stated that no new land will be disturbed.
<b>Construction Equipment</b>	Construction equipment may include, but is not limited to, cranes, delivery trucks, and forklifts.
<b>Personnel Onsite</b>	Construction: Various number of personnel will be present, including, but not limited to pipe fitters, electricians, technicians, consulting engineering staff, and full-time employees. Operation: The facility will have 1 to 2 employees.
<b>Location and Analysis Area</b>	Location: Section 4, Township 7N, Range 58 East. Analysis Area: The area being analyzed as part of this environmental review includes the immediate project area (Figure 1), as well as neighboring lands surrounding the analysis area, as reasonably appropriate for the impacts being considered.

**Table 2. The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.**

<b>Air Quality</b>	The applicant proposes to install and operate a new 216,000 bbl crude oil storage tank.
<b>Water Quality</b>	There will be no impact to water quality associated with the proposed action.
<b>Erosion Control and Sediment Transport</b>	There will be no intentional erosion associated with the proposed action because the area is an already developed facility and does not require any new ground disturbance.
<b>Solid Waste</b>	Any solid waste produced from the proposed project would be disposed of properly.
<b>Cultural Resources</b>	There will be no cultural resources associated with the proposed action because the area is an already developed facility and does not require any new ground disturbance.
<b>Hazardous Substances</b>	Any hazardous substances that could result from the proposed action would be disposed appropriately.
<b>Reclamation</b>	There will be no reclamation conducted as a result of the proposed action because the site is an already developed site with no new disturbances expected.

**Table 3. Cumulative Impacts**

<b>Past Actions</b>	n Proposed Tank 2 was initially approved under MAQP #5242-00; however, pursuant to ARM 17.8.62(2), because the tank was not constructed within 3 years a new permit is required.
<b>Present Actions</b>	Installing and operating a new 216,000 bbl crude oil storage tank.
<b>Related Future Actions</b>	No future related projects have been identified at the time of this Environmental Assessment.

### **Purpose, Need, and Benefits**

DEQ's purpose in conducting this environmental review is to act upon Bridger's application for a MAQP to install and operate a new oil storage tank. DEQ's action on the permit application is governed by § 75-2-201, et seq., Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM) 17.8.740, et seq.

The applicant's purpose and need, as expressed to DEQ in seeking this action, is to install an additional floating roof crude oil storage tank to increase the facility throughput.

### **Other Governmental Agencies and Programs with Jurisdiction**

The proposed action would be located on private land. All applicable local, state, and federal rules must be adhered to, which may include other local, state, federal, or tribal agency jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: US EPA, MSHA, OSHA, Fallon County.

## Evaluation of Affected Environment And Impact by Resource

The impact analysis will identify and evaluate the proximate direct and secondary impacts TO THE PHYSICAL ENVIRONMENT AND POPULATION IN THE AREA TO BE AFFECTED BY THE PROPOSED PROJECT. *Direct impacts* occur at the same time and place as the action that causes the impact. *Secondary impacts* are a further impact to Montana's environment that may be stimulated, induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts will be described in this analysis. When the analysis discloses environmental impacts, these are proximate impacts pursuant to 75-1-201(1)(b)(iv)(A), MCA.

*Cumulative impacts* are the collective impacts on Montana's environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures (ARM 17.4.603(7)). The project identified in Table 1 was analyzed as part of the cumulative impacts assessment for each resource subject to review, pursuant to MEPA (75-1-101, et. seq).

The duration of the proposed action is quantified as follows:

- **Construction Impacts (short-term):** These are impacts to the environment that would occur during the construction period, including the specific range of time.
- **Operation Impacts (long-term):** These are impacts to the environment during the operational period of the proposed action, including the anticipated range of operational time.

The intensity of the impacts is measured using the following:

- **No impact:** There would be no change from current conditions.
- **Negligible:** An adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor:** The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate:** The effect would be easily identifiable and would change the function or integrity of the resource.
- **Major:** The effect would alter the resource.

## **1. Geology and Soil Quality, Stability and Moisture**

***This section includes the following resource areas, as required in ARM 17.4.609: Geology; Soil Quality, Stability, and Moisture***

### ***Affected Environment***

Fallon County lies in the Great Plains portion of Eastern Montana. The county is drained by O'Fallon Creek and Cabin Creek Tributaries of the Yellowstone River, and Beaver Creek, a tributary of the Little Missouri River. Physiographically the county consists of eroded shale plains with a few sandstone buttes and remnants of old alluvial deposits which occur as gravel capped table lands. Alluvial soils occur as relatively narrow bands along streams. Clay loams, loams, and sandy textures are predominate but some clay soils are found. Soils are intermediate in character between Brown and Chestnut Zonal soils.

### ***Direct Impacts***

*Proposed Action:* There will be minor direct construction and operational impacts to geology, soil quality, stability, or moisture as a result of the proposed action. The proposed action will mainly be located within the Bridger property footprint with the new crude oil storage tank constructed within the Bridger property boundary.

### ***Secondary Impacts***

*Proposed Action:* There will be no secondary construction or operational impacts to geology or soil quality, stability, and moisture. The current site is an already developed crude oil storage facility.

### ***Cumulative Impacts***

*Proposed Action:* There will be minor cumulative impacts to geology or soil quality, stability, and moisture. The current site is an already developed crude oil storage site with minor ground disturbances associated with the installation of an additional floating roof tank.

## **2. Water Quality, Quantity, And Distribution**

***This section includes the following resource areas, as required in ARM 17.4.609: Water Quality, Quantity and Distribution***

### ***Affected Environment***

Fallon County has a semi-arid climate with hot summers and cold winters. On average, Fallon County receives 13 inches of rain and 22 inches of snow. The nearest waterbody to the proposed project site is approximately 2,000 feet to the southwest.

### ***Direct Impacts***

*Proposed Action:* There will be no direct construction or operational impacts to water quality, quantity, and distribution associated with the proposed action. The proposed action will mainly be located within the Bridger property boundary with the new crude oil storage tank constructed within the property boundary. The construction phase of the proposed action will take place in the winter months where any precipitation is expected to be in the form of snow and be completed before the spring thaw.



### ***Secondary Impacts***

*Proposed Action:* There will be no secondary construction or operational impacts to water quality, quantity, and distribution associated with the proposed action. Any overland transport of water would occur after the proposed project is completed during the spring melt.

### ***Cumulative Impacts***

*Proposed Action:* There will be no cumulative construction or operational impacts to water quality, quantity, or distribution. The current site is an already developed crude oil storage facility where all of the proposed actions will take place inside the facility or in the immediate vicinity of the facility during with winter months when overland flow is not expected.

## **3. Air Quality**

***This section includes the following resource areas, as required in ARM 17.4.609: Air Quality***

### ***Affected Environment***

The proposed project is located in located in Section 4, Township 7 North, Range 58 East, in Fallon County, Montana. The immediate area in which the facility is constructed is designated attainment/unclassified.

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

In addition, MAQP #5242-01 provides legally enforceable conditions regarding the emitting units themselves, pollution controls, and requires the applicant to take reasonable precautions to limit fugitive dust from this location.

### ***Direct Impacts***

*Proposed Action:* Direct construction impacts are expected to be minor and short-term. Emissions resulting from the proposed action would be limited based on the scope of work and be mostly contained inside the property boundary. Limited external emissions may result from the transport of equipment to and from the facility.

Direct operational impacts are expected to be minor and long term based on the allowable increase in the facilities' potential to emit. See permit analysis for more information regarding air quality impacts. The majority of pollutants from the proposed project would be related to the tank "breathing" fumes. This would result in an increase in emissions of VOCs. Emissions for the proposed project are located in Figure 2. below.

Figure 2.

Emission Unit ID	Emitting Unit Description	PM (tpy)	PM-10 (tpy)	PM-2.5 (tpy)	NOx (tpy)	CO (tpy)	SOx (tpy)	VOC (tpy)
EU01	216,000 bbl Storage tank (IFR)	--	--	--	--	--	--	36.51
EU02	216,000 bbl Storage tank (IFR)	--	--	--	--	--	--	25.50
EU03	Fugitive Leaks (Valves, Fittings, Components)	--	--	--	--	--	--	1.06
EU04	Fugitive Road Dust – Vehicle Travel	0.07	0.02	0.0002	--	--	--	
	<b>Total</b>	<b>0.07</b>	<b>0.02</b>	<b>0.0002</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>64.07</b>

### **Secondary Impacts**

*Proposed Action:* Secondary construction and operational impacts from the proposed project are expected to be negligible and short-term. Emissions would not be expected to cause or contribute to a violation of health and welfare-based primary and secondary NAAQS. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. See permit analysis for more detailed information regarding air quality impacts. Any adverse impacts would be long-term and minor. No beneficial secondary impacts would be expected because of the proposed project.

### **Cumulative Impacts**

*Proposed Action:* Conditions and limits contained in the MAQP would limit emissions; therefore, any expected cumulative air quality impacts would be minor and short-term. Fallon County and the surrounding area has other minor stationary sources that contribute to the overall air quality in Fallon County, Montana. The cumulative impacts of these other emitters and the proposed action would not have an adverse impact to air quality.

## **4. Vegetation Cover, Quantity, and Quality**

***This section includes the following resource areas, as required in ARM 17.4.609: Vegetation Cover, Quantity and Quality***

### ***Affected Environment***

The affected area is an already developed crude oil storage facility. Satellite imagery shows there is little to no vegetative cover within the project area. The proposed project will be confined within the existing property boundary.

### ***Direct Impacts***

*Proposed Action:* Negligible and short-term direct construction or operational impacts to vegetative cover, quantity, or quality would be expected as a result of the proposed project. The affected area is an existing industrial site and there is little to no vegetative cover within the project boundary. A limited amount of new ground disturbances would occur because of the proposed action to accommodate the new tank.

### ***Secondary Impacts***

*Proposed Action:* No secondary construction or operational impacts to vegetative cover, quantity, or quality will occur as a result of the proposed project because it is an existing industrial site with limited vegetative cover within the property boundary.

### ***Cumulative Impacts***

*Proposed Action:* No cumulative impacts to vegetative cover, quantity, or quality will occur as a result of the current proposed project because it is an existing industrial site with limited vegetative cover within the property boundary.

## **5. Terrestrial, Avian, and Aquatic Life and Habitats**

***This section includes the following resource areas, as required in ARM 17.4.609: Terrestrial and Aquatic Life and Habitats; Unique, Endangered, Fragile, or Limited Environmental Resources***

### ***Affected Environment***

*Is there substantial use of the area by important wildlife, birds, or fish? Characterize wildlife in the area. Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern? Impacts related to the Montana Sage Grouse Executive Order?*

As required under the Sage Grouse Executive Order, the proposed project information was reviewed and deemed not subject to review by the Montana Sage Grouse Oversight Team (MSGOT). Reference Section 7.H for details. The proposed project represents a small level of air emissions by industrial standards. Ground disturbance would occur to install a concrete pad upon which the new storage tank would be installed; however, the disturbance would occur on private property at the existing Bridger facility.

### ***Direct Impacts***

*Proposed Action:* No direct impacts from construction or operation are expected as a result of the proposed project.

The affected area is an already developed crude oil storage facility with no unique or important terrestrial, avian, or aquatic life or habitats located directly within the property boundary where the project would occur. There may be terrestrial, avian, or aquatic life and habitats present on the property; however, because the proposed action would occur within an existing industrial site, any impacts would be short- and long-term, negligible, and consistent with existing impacts. Any species identified in the MTNHP reports, as discussed in Section 6, are unlikely to be displaced by construction or operation of the modified facility as any such species would likely relocate to nearby, similar habitats, during the construction phase and any impacts from operation would be consistent with existing impacts at the site.

### ***Secondary Impacts***

*Proposed Action:* Short- and long-term, negligible, impacts from construction or operations are expected as a result of the proposed project. The affected area is an already developed crude oil storage facility; therefore, any impacts to terrestrial, avian, or aquatic life or habitats located within the property boundary would be consistent with existing impacts at the site..

### ***Cumulative Impacts***

*Proposed Action:* Because the affected area is an existing industrial site, any cumulative impacts to terrestrial, avian and aquatic life would be short- and long-term, negligible, and consistent with existing impacts.

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

*This section includes the following resource areas, as required in ARM 17.4.609: Unique, Endangered, Fragile, or Limited Environmental Resources.*

### ***Affected Environment***

*NRIS was consulted on this permit, and a few species of concern were addressed in that report. These included the Bobolink, non-cave bat roosts, Greater Sage Grouse, and the Great Blue Heron. As required under the Sage Grouse Executive Order, the proposed project information was reviewed and deemed not required to submit this application to the Sage Grouse Program.*

*All of these species are or may be found within the MTNHP polygon area but it is unlikely they would be located within the boundary of the existing industrial site.*

### ***Direct Impacts***

*Proposed Action:* No direct construction or operational impacts to unique, endangered, and fragile species or limited environmental resources are expected because of the proposed project. The affected area is an already developed crude oil storage facility. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary or more specifically, the storage tank pad where the project is proposed to occur. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

### ***Secondary Impacts***

*Proposed Action:* No secondary impacts from construction or operations are expected as a result of the proposed project. The affected area is an already developed crude oil storage facility. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary or more specifically, the storage pad where the project is proposed to occur. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

### ***Cumulative Impacts***

No cumulative impacts would be expected to unique, endangered, fragile, or limited environmental resources. The affected area is an already developed crude oil storage facility. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary or more specifically, the storage pad where the project is proposed to occur. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

## **7. Historical and Archaeological Sites**

*This section includes the following resource areas, as required in ARM 17.4.609: Historical and Archaeological Sites*

### **Affected Environment**

*Are there any historical, archaeological or paleontological resources present? Will the action cause a shift in some unique quality of the area?*

*According to the State Historic Preservation Office (SHPO), there has been one previously recorded site within the designated search locale (SE ¼ of the NE ¼ of Section 4, Township 7 N, Range 58 E, in Fallon County, Montana). This is for some buried phone lines that are off the property site. It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, SHPO recommends that they be recorded and a determination of their eligibility be made. As long as there will be no disturbance or alteration to structures over fifty years of age, there is a low likelihood that cultural properties would be impacted.*

The proposed action would include limited new ground disturbance within an existing industrial property.

### **Direct Impacts**

*Proposed Action:* No direct construction or operational impacts to historical or archaeological sites are expected because of the proposed action. According to SHPO, there is one (1) previously recorded historical or archaeological site identified within the search area. However, the identified site is not located within the existing Bridger property boundary. Therefore, while some on-site ground disturbance would occur to accommodate the proposed action, no direct impacts would be expected because of the proposed project.

### **Secondary Impacts**

*Proposed Action:* No secondary construction or operational impacts to historical or archaeological are expected because of the proposed project. According to SHPO, there is one (1) previously recorded historical or archaeological site identified within the search area. However, the identified site is not located within the existing Bridger property boundary. Therefore, while some on-site ground disturbance would occur to accommodate the proposed action, no secondary impacts would be expected because of the proposed project.

### **Cumulative Impacts**

*Proposed Action:* No cumulative impacts are expected as a result of the proposed project. According to SHPO, there is one (1) previously recorded historical or archaeological site identified within the search area. However, the identified site is not located within the existing Bridger property boundary. Therefore, while some on-site ground disturbance would occur during the construction phase, and industrial operations would be increased because of the proposed action, no direct impacts would be expected because of the proposed project.

## **8. Aesthetics**

***This section includes the following resource areas, as required in ARM 17.4.609: Aesthetics***

### **Affected Environment**

*The effected area is an already developed crude oil storage facility. The proposed action would construct a new 216,000 bbl crude oil storage tank within the property boundary. Figure 1. shows the facility is located on US Highway (Hwy) 12 in eastern Montana. The area consists of rolling hills and farmland.*

### ***Direct Impacts***

*Proposed Action:* Minor and short-term impacts to aesthetics are assumed during the construction phase of the proposed action due to increased traffic and noise associated with construction equipment and traffic, both to and from the site.

Minor and long-term direct operational impacts to aesthetics are associated with the proposed actions. There is currently one existing crude oil storage tank on the north side of Hwy 12 and numerous smaller tanks and building facilities located on the south side of Hwy 12. The proposed project will occur inside the Bridger property boundary and add a new crude oil storage tank that will be visible from Hwy 12. The proposed action will add another tank to the site which will be visible from Hwy 12. Therefore, any direct impacts would be short- and long-term, negligible and consistent with existing impacts.

### ***Secondary Impacts***

*Proposed Action:* There is currently one existing crude oil storage tank on the north side of Hwy 12 and numerous smaller tanks and building facilities located on the south side of Hwy 12. The proposed project will occur inside the Bridger property boundary and add a new crude oil storage tank that will be visible from Hwy 12. The proposed action will add another tank to the site which will be visible from Hwy 12. Therefore, any secondary impacts would be long-term, negligible and consistent with existing impacts.

### ***Cumulative Impacts***

*Proposed Action:* With this permitting action, minor long-term cumulative impacts on the aesthetics are anticipated with the proposed project as the site is an already developed crude oil storage facility with existing crude oil storage tanks and building facilities.

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

***This section includes the following resource areas, as required in ARM 17.4.609: Demands on Environmental Resources of Land, Water, Air, or Energy***

### ***Affected Environment***

*The proposed project is small by industrial standards and is located within the Bridger property boundary.*

### ***Direct Impacts***

*Proposed Action:* Any construction impacts to demands on the environmental resources of land, water, air, and energy would be short-term, negligible, and consistent with existing impacts. During the construction phase, Bridger would be required to use reasonable precautions to limit fugitive dust emissions. Water may be necessary to control dust from roadways and ground disturbance necessary to construct the new tank. Because no water is present on site, Bridger would likely source water from an off-site resource. Further, the construction phase of the proposed project would require a limited amount of ground disturbance within an existing, private industrial site. In addition, impacts to air quality may occur from fugitive dust emissions generated by land disturbance and vehicle travel on unpaved roads during the construction phase; however, again, Bridger would be required to use reasonable precautions to control fugitive dust emissions during the construction and operational phases of the proposed project. Finally, heavy equipment necessary to construct

the proposed new tank would require fuel to operate; however, the amount of fuel necessary to accommodate construction operations would be minimal.

Minor, long-term operational direct impacts are expected to the environmental resources of water, air and energy. The proposed permit action would emit additional pollutants (air) associated with crude oil storage tanks (VOCs) and ongoing use of water to meet reasonable precautions requirements would occur. Further, a limited amount of fuel use may be necessary to maintain the enhanced industrial operations at the site.

Emissions estimates are included in Section 3, Air Quality of this assessment as well as the Section 4 – Emissions Inventory of the MAQP Analysis.

### ***Secondary Impacts***

*Proposed Action:* No secondary impacts to demands on the environmental resource of land are expected because of the proposed project. The proposed project would occur on private land currently used for industrial purposes.

Minor and long-term secondary, operational impacts are expected on demands for the environmental resources of water, air and energy. The ongoing use of water to meet reasonable precautions requirements would occur. Further, the proposed permit action would emit additional air pollutants associated with the proposed new crude oil storage tank (VOCs). Also, the proposed project would increase crude oil storage capacity at the existing facility, thereby increasing energy production capacity.

### ***Cumulative Impacts***

*Proposed Action:* Negligible, long-term cumulative impacts on environmental resources of air and energy are anticipated as a result of this permitting action because the proposed project would increase emissions (VOC) and crude oil storage capacity would increase because of the proposed action.

No cumulative impacts to land and water are expected because of the proposed project.

## **10. Impacts on Other Environmental Resources**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Other Environmental Resources***

### ***Affected Environment***

*As described in Section 8. – Aesthetics, of this environmental assessment, there will be noise associated with the proposed action. Increases in fugitive dust may be a result of increased vehicle and equipment use during the construction phase. As this is an already developed site, the need for exterior lighting is unnecessary.*

### ***Direct Impacts***

*Proposed Action:* Minor and short-term construction impacts are expected during the construction phase of the proposed action. Fugitive dust emissions resulting from construction of the proposed facility may adversely impact air quality in the affected area. However, Bridger must use reasonable precautions to limit fugitive dust generated from construction activities; therefore, the proposed project would not be expected to cause or

contribute to a violation of the applicable NAAQS for particulate matter (fugitive dust). See permit analysis for more detailed information regarding air quality impacts.

Secondary, NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Therefore, any adverse direct impacts to other environmental resources would be short-term and minor. No beneficial direct impacts would be expected because of the proposed project. Any temporary light pods would be removed at the end of the construction phase.

No operational impacts on other environmental resources are expected with the proposed action.

#### ***Secondary Impacts***

*Proposed Action:* Proposed operations would not be expected to cause or contribute to a violation of the public welfare-based Secondary NAAQS. See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provides public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Therefore, any adverse secondary impacts to other environmental resources would be long-term and minor. No beneficial secondary impacts would be expected because of the proposed project.

#### ***Cumulative Impacts***

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

## **11. Human Health and Safety**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Human Health and Safety***

### ***Affected Environment***

*Will this project add to health and safety risks in the area?*

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor. Few, if any, members of the public would be in immediate proximity to the project during construction or operations.

### ***Direct Impacts***

*Proposed Action:* Construction activities involve the potential for adverse direct impacts to human health and safety. However, construction operations would be subject to OSHA standards, which are designed to be protective of human health and safety. Further, residents of the affected area would not be allowed on-site during construction of the proposed facility.

Also, fugitive dust emissions resulting from construction of the proposed facility may adversely impact air quality in the affected area. However, Bridger must use reasonable precautions to limit fugitive dust generated from construction activities; therefore, the proposed project would not be expected to cause or contribute to a violation of the applicable NAAQS for particulate matter (fugitive dust). See permit analysis for more detailed



information regarding air quality impacts. Primary NAAQS provides public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Therefore, any adverse direct impacts to human health and safety would be short-term and negligible to minor.

### ***Secondary Impacts***

*Proposed Action:* Operation of the proposed facility would be subject to OSHA standards. OSHA standards are designed to be protective of human health and safety. Further, operation of the furnace would emit regulated air pollutants. However, emissions from the proposed project would use BACT and thus would not be expected to cause or contribute to a violation of the human health-based Primary NAAQS.

See permit analysis for more information regarding air quality impacts. Primary NAAQS provides public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Therefore, any adverse secondary impacts to human health and safety would be long-term and negligible to minor. No beneficial secondary impacts would be expected because of the proposed project.

### ***Cumulative Impacts***

*Proposed Action:* No cumulative impacts to human health and safety are anticipated as a result of the proposed permitting action because the emissions as described in Section IV of the Permit Analysis would be considered small by industrial standards.

## **12. Industrial, Commercial, and Agricultural Activities and Production**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Human Health and Safety***

### ***Affected Environment***

The affected area constitutes an existing industrial site. The proposed action will add an additional 216,000 bbl crude oil storage tank to an already existing crude oil storage facility.

### ***Direct Impacts***

*Proposed Action:* No construction or operational direct impacts to commercial or agricultural activities and production are expected because the site is an industrial site with no commercial, agricultural, or production activities.

Minor and short-term impacts to industrial activities would occur as a result of the construction activities through the use of existing Bridger staff or hired contractors to operate heavy equipment for construction of the proposed new crude oil storage tank.

No direct impacts to industrial production would be expected during the construction phase of the proposed project.

### ***Secondary Impacts***

*Proposed Action:* Industrial activities and production in the affected area would increase because of the proposed project through increased crude oil storage capacity at the existing facility. Therefore, any secondary impacts to industrial activities and production would be long-term, minor, and beneficial. No adverse direct impacts would be expected because of

the proposed project and no secondary impacts to agricultural and commercial activities and production would be expected because of the proposed action.

***Cumulative Impacts***

*Proposed Action:* Cumulatively, these operations provide an important industrial base to the area. These impacts would be long term and beneficial. No Cumulative impacts on agricultural and commercial activities and production would be expected because of the proposed action.

**13. Quantity and Distribution of Employment**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Quantity and Distribution of Employment***

***Affected Environment***

Bridger currently employs 1 to 2 staff on-site, as needed.

***Direct Impacts***

*Proposed Action:* Bridger would use existing employees or contracted services to construct the proposed new crude oil storage tank. Therefore, any direct impacts to the quantity and distribution of employment in the affected area during the construction phase would be short-term, negligible, and beneficial.

No direct impacts to quantity and distribution of employment are expected with the proposed action. Bridger currently employs 1 to 2 staff as needed to operate the facility.

***Secondary Impacts***

*Proposed Action:* Bridger would use existing staff to operate the crude oil storage facility. Therefore, any secondary impacts to the quantity and distribution of employment in the affected area would be long-term, negligible, and beneficial. No adverse secondary impacts would be expected because of the proposed project.

***Cumulative Impacts***

*Proposed Action:* No cumulative impacts are expected on long-term employment as a result of the proposed action because the proposed action does not increase the number of full-time employees.

**14. Local and State Tax Base and Tax Revenue**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Local and State Tax Base and Tax Revenue***

***Affected Environment***

The proposed project would be small by industrial standards and the amount of time and resources necessary to accommodate construction of the proposed facility would be relatively limited.

***Direct Impacts***

*Proposed Action:* Negligible to minor short-term impacts to local and state tax base and revenue may be associated with the proposed action due to an increase in personnel during the construction phase.

No direct construction or operational impacts to local state tax base and tax revenues would be expected with the proposed project once the construction phase is complete because the facility does not offer any services or good to the local community and will not employ any new employees.

***Secondary Impacts***

*Proposed Action:* Local, state and federal governments would be responsible for appraising the property, setting tax rates, collecting taxes, from the companies, employees, or landowners benefiting from the proposed operation. Further, Bridger would be responsible for accommodation of any increased taxes associated with operation of the modified facility. Therefore, any secondary impacts would be negligible to minor, consistent with existing impacts in the affected area, and beneficial. No adverse secondary impacts would be expected because of the proposed project.

***Cumulative Impacts***

*Proposed Action:* Short-term, beneficial, negligible to minor impacts to local and state tax base and tax revenues are anticipated from this permitting action.

**15. Demand for Government Services**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Demands for Government Services***

***Affected Environment***

*Will this project add to health and safety risks in the area?*

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor. Few, if any, members of the public would be in immediate proximity to the project during construction or operations.

***Direct Impacts***

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

***Secondary Impacts***

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

***Cumulative Impacts***

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

## **16. Locally Adopted Environmental Plans and Goals**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Locally Adopted Environmental Plans and Goals***

### ***Affected Environment***

*Will this project affect any identified environmental plans or goals in the area?*

DEQ has reviewed the Fallon County website and found no locally adopted environmental plans and goals for the area. Bridger Pipeline has indicated, in application number 5242-01\_2025\_10\_06\_APP that no known state, county, city, USFS, BLM, or tribal zoning or management plans and goals are known to potentially affect the site.

#### ***Direct Impacts***

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

#### ***Secondary Impacts***

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

#### ***Cumulative Impacts***

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

## **17. Access to and Quality of Recreational and Wilderness Activities**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Access to and Quality of Recreation and Wilderness Activities***

### ***Affected Environment***

*Will this project affect access to and quality of recreational opportunities in the area?*

The Sandstone Station crude oil storage facility is located at nine miles west of Baker, Montana, on the north side on US Highway 12. The area surrounding the facility is open land with multiple county roads providing access to the surrounding area. The area where the proposed action is located is within the existing Bridger property boundary.

#### ***Direct Impacts***

*Proposed Action:* Minor and short-term impacts to the immediate area are expected during the construction phase of the project due to equipment being delivered via local roads. However, no direct impacts to access to and quality of recreational and wilderness activities are expected with the proposed action because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

### ***Secondary Impacts***

*Proposed Action:* No secondary or long-term construction and operational impacts are expected because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

### ***Cumulative Impacts***

*Proposed Action:* No cumulative impacts are expected with the proposed action because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

## **18. Density and Distribution of Population and Housing**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Density and Distribution of Population and Housing***

### ***Affected Environment***

*Will this project affect the human population in the area?*

The affected area is largely industrial and agricultural in nature.

### ***Direct Impacts***

*Proposed Action:* No direct impacts from construction or operation are expected because of the proposed action. Bridger would employ existing staff and/or contracted services to construct the concrete pad, and the proposed project would not be expected to otherwise result in an increase or decrease in the local population and associated need for additional housing resources.

### ***Secondary Impacts***

*Proposed Action:* Bridger would employ existing staff to operate the facility, and the proposed action would not be expected to otherwise result in an increase or decrease in the local population. Therefore, no secondary impacts to density and distribution of population and housing would be expected because of the proposed project.

### ***Cumulative Impacts***

*Proposed Action:* No cumulative impacts to density and distribution of population and housing are anticipated as a result of the proposed permitting. There are no impacts on the density and distribution of population and housing.

## **19. Social Structures and Mores**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Social Structures and Mores***

### ***Affected Environment***

*Will this project affect existing customs and values of the local population in the area?*

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

**Direct Impacts**

*Proposed Action:* No direct impacts to the existing social structures and mores of the affected population would be expected because of the proposed project. The nature of the affected area is largely industrial and agricultural. Construction and operation of the facility would not be expected to affect the existing customs and values of the affected population.

**Secondary Impacts**

*Proposed Action:* No secondary impacts to the existing social structures and mores of the affected population would be expected because of the proposed project. The existing nature of the area affected by the proposed project is industrial (crude oil storage tanks); therefore, operation of the facility would not be expected to affect the existing customs and values of the affected population.

**Cumulative Impacts**

*Proposed Action:* The existing nature of the area affected by the proposed project is industrial (crude oil storage tanks). Therefore, it is not anticipated that this project would impact the existing social structures and mores of the local population in the area.

**20. Cultural Uniqueness and Diversity**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts to Cultural Uniqueness and Diversity***

**Affected Environment**

*Are there any historical, archaeological or paleontological resources present? Will the action cause a shift in some unique quality of the area?*

It is not anticipated that this project would cause a shift in any unique quality of the area. As discussed in Section 7. – Historical and Archaeological Sites, there are no unique resource present in the proposed project area.

**Direct Impacts**

*Proposed Action:* No direct impacts to the existing cultural uniqueness and diversity of the affected population would be expected because of the proposed project. Any construction or operation activities associated with the proposed action will take place within the existing Bridger property boundary.

**Secondary Impacts**

*Proposed Action:* No secondary impacts to the existing cultural uniqueness and diversity of the affected population would be expected because of the proposed project. Any construction or operation activities associated with the proposed action will take place within the existing Bridger property boundary.

**Cumulative Impacts**

*Proposed Action:* No cumulative impacts to the existing cultural uniqueness and diversity of the affected population would be expected. Any construction or operation activities associated with the proposed action will take place within the existing Bridger property boundary.

## **21. Private Property Impacts**

*Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category). If not, no further analysis is required. Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required. Does the agency have Legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternative.*

The proposed project would take place on private land owned by the applicant. DEQ's approval of Bridger Pipeline's permit would affect the applicant's real property. DEQ has determined, however, that the permit conditions are reasonably necessary to ensure compliance with applicable requirements. Therefore, DEQ's approval of Bridger Pipeline's permit would not have private property-taking or damaging implications.

## **22. Other Appropriate Social and Economic Circumstances**

***This section includes the following resource areas, as required in ARM 17.4.609: Impacts to Other Appropriate Social and Economic Circumstances***

### ***Affected Environment***

*Will this project affect social and economic conditions in the area?*

#### ***Direct Impacts***

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

#### ***Secondary Impacts***

*Proposed Action:* The proposed project would add one additional crude oil storage tank and increase overall facility throughput capacity. Any impact to social and economic circumstances in the affected area from the addition of a second tank to existing industrial operations would be long-term, minor, and consistent with existing circumstances.

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

### ***Cumulative Impacts***

*Proposed Action:* No cumulative impacts to any other appropriate social and economic circumstances are anticipated. DEQ is unaware of any other appropriate long-term social and economic circumstances in the affected area that may be impacted by the proposed project.

## **23. Greenhouse Gas Assessment**

The analysis area for this resource is limited to the activities regulated by the issuance of Bridger's permit which installs an additional crude oil storage tank at the existing facility.

DEQ has defined greenhouse gas emissions as the following gas species: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and many species of fluorinated compounds. The range of fluorinated compounds includes numerous chemicals which are used in many household and industrial products. Other pollutants can have some properties that also are similar to those mentioned above, but the EPA has clearly identified the species above as the primary GHGs.

Water vapor is also technically a greenhouse gas, but its properties are controlled by the temperature and pressure within the atmosphere, and it is not considered an anthropogenic species.

The storage of crude oil at the site would release GHGs primarily being methane (CH<sub>4</sub>) and other volatile organic compounds (VOCs).

DEQ has calculated GHG emissions using the EPA Simplified GHG Calculator version May 2023, for the purpose of totaling GHG emissions. This tool totals carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), and **methane (CH<sub>4</sub>)** and reports the total as CO<sub>2</sub> equivalent (CO<sub>2</sub>e) in metric tons CO<sub>2</sub>e. The calculations in this tool are widely accepted to represent reliable calculation approaches for developing a GHG inventory. DEQ has determined EPA's Scope 1 GHG impacts as defined in the Inventory Guidance for Greenhouse Gas Emissions are appropriate under MEPA for this Proposed Action. Scope 1 emissions are defined as direct GHG emissions that occur from sources that are controlled or owned by the organization (EPA Center for Corporate Climate Leadership). DEQ's review of Scope 1 emissions is consistent with the agency not evaluating downstream effects of other types of impacts.

This review does not include an assessment of GHG impacts in quantitative economic terms, otherwise known as evaluating the social cost of carbon. DEQ instead calculates potential GHG emissions and provides a narrative description of GHG impacts. This approach is consistent with Montana Supreme Court caselaw and the agency's discussion of other impacts in this EA. *See Belk v. Mont. DEQ*, 2022 MT 38, ¶ 29.

Applicant estimates that approximately 32,850,000 barrels of crude would be throughput the new tank on an annual basis. Using the Environmental Protection Agency's (EPA) simplified GHG Emissions Calculator for floating roof storage tank sources, 770.88 kilograms (or 0.85 tons) of CO<sub>2</sub>e would be produced on an annual basis, based on the worst-case standing loss calculations.

### ***Secondary Impacts***

GHG emissions contribute to changes in atmospheric radiative forcing, resulting in climate change impacts. GHGs act to contain solar energy loss by trapping longer wave radiation emitted from the Earth's surface and act as a positive radiative forcing component (BLM 2021).

Per EPA's website "Climate Change Indicators", the lifetime of carbon dioxide cannot be represented with a single value because the gas is not destroyed over time. The gas instead moves between air, ocean, and land mediums with atmospheric carbon dioxide remaining in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments. Methane remains in the atmosphere for approximately 12 years. Nitrous oxide has the potential to remain in the atmosphere for about 109 years (EPA, Climate Change Indicators). The impacts of climate change throughout the western region of Montana include changes in flooding and drought, rising temperatures, and the spread of invasive species (BLM 2021).

### ***Cumulative Impacts***

Montana recently used the EPA State Inventory Tool (SIT) to develop a greenhouse gas inventory in conjunction with preparation of a possible grant application for the Community Planning Reduction Grant (CPRG) program. This tool was developed by EPA to help states develop their own greenhouse



gas inventories, and this relies upon data already collected by the federal government through various agencies. The inventory specifically deals with carbon dioxide, methane, and nitrous oxide and reports the total as CO<sub>2</sub>e. The SIT consists of eleven Excel based modules with pre-populated data that can be used with default settings or in some cases, allows states to input their own data when the state believes their own data provides a higher level of quality and accuracy. Once each of the eleven modules is filled out, the data from each module is exported into a final “synthesis” module which summarizes all of the data into a single file. Within the synthesis file, several worksheets display the output data in a number of formats such as GHG emissions by sector and GHG emissions by type of greenhouse gas.

DEQ has determined the use of the default data provides a reasonable representation of the greenhouse gas inventory for the various sectors of the state, and the estimated total annual greenhouse gas inventory by year. The SIT data from EPA is currently only updated through the year 2022, as it takes several years to validate and make new data available within revised modules. DEQ maintains a copy of the output results of the SIT.

DEQ has determined that the use of the default data provides a reasonable representation of the GHG inventory for all of the state sectors, and an estimated total annual GHG inventory by year. At present, Montana accounts for 51.04 million metric tons of CO<sub>2</sub>e based on the EPA SIT for the year 2022. This project may contribute up to 0.00000085 million metric tons per year of CO<sub>2</sub>e. The estimated emission of 0.00000085 metric tons of CO<sub>2</sub>e from this project would contribute 0.00000017% of Montana’s annual CO<sub>2</sub>e emissions.

GHG emissions that would be emitted as a result of the proposed activities would add to GHG emissions from other sources. The No Action Alternative would contribute less than the Proposed Action Alternative of GHG emissions. The current land use of the area is crude oil storage.

## **24. Description of Alternatives**

**No Action Alternative:** In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval of MAQP #5242-01. The applicant would lack the authority to conduct the proposed activity. Any potential impacts that would result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations required for approval, the “no action” alternative would not be appropriate.

**Other Reasonable Alternative(s):** No other reasonable alternatives were considered for the proposed action.

## **Consultation**

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff and Bridger staff.

External scoping efforts included queries to the following websites/databases/personnel: Montana Natural Resource Information System, Montana State Historical Preservation Office.

## **Public Involvement**

The public comment period for this permit action is November 13, 2025, through December 1, 2025.

## **Significance of Potential Impacts and Need for Further Analysis**

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

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

## **Conclusions and Findings**

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

No significant adverse impacts would be expected because of the proposed project. As noted through the draft EA, the severity, duration, geographic extent and frequency of the occurrence of the impacts associated with the proposed air quality project would be limited. The proposed action would result in the new floating roof crude oil storage tank installed in an already existing facility.

The Applicant is proposing to install a new floating roof storage tank in the existing facility. The site would be permitted to operate the crude oil storage tank facility 8,760 hours per calendar year using BACT for the control of emissions from the proposed operations.

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

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

There would be negligible impacts to view-shed aesthetics as the crude oil storage facility is in an area of limited visibility from the highway.

Demands on the environmental resources of land, water, air, or energy would be negligible.

Impacts to human health and safety would be insignificant.

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

Issuance of a Montana Air Quality Permit #5242-01 to the Applicant does not set any precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the Applicant submits another modification or proposes to amend the permit, DEQ is not committed to issuing those revisions.

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

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

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

Based on a consideration of the criteria set forth in ARM 17.4.608, no significant adverse impacts to the affected human environment would be expected because of the proposed project. Therefore, preparation of an Environmental Impact Statement or EIS is not required, and the draft EA is deemed the appropriate level of environmental review pursuant to MEPA.

## **Preparation**

Environmental Assessment and Significance Determination Prepared By:

John P. Proulx  
Air Quality Engineer

Troy Burrows  
Air Quality Scientist

Environmental Assessment Reviewed By:

Eric Merchant, Supervisor  
Air Quality Permitting Services Section  
Air Quality Bureau  
Air, Energy and Mining Division

Approved By:

Eric Merchant, Supervisor  
Air Quality Permitting Services Section  
Air Quality Bureau  
Air, Energy and Mining Division

## **References**

- 5242-01\_2025\_10\_06\_APP – Application received from Bridger Pipeline, LLC.
- EPA GHG Calculator Tool <https://www.epa.gov/statelocalenergy/state-inventory-and-projection-tool>
- EPA State Inventory Tool, <https://www.epa.gov/statelocalenergy/state-inventory-and-projection-tool>
- 2021 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, <https://www.blm.gov/content/ghg/?year=2022>
- 5242-01\_2025\_11\_06\_SHPO – State Historical Preservation Office Investigation
- 5242-01\_NRIS\_MTNHP\_ESR\_Data.xls – Natural Resource Information System Endangered Species Investigation, <https://mtnhp.org>
- Water Resources Survey, [https://dnrc.mt.gov/\\_docs/water/Survey-Books/FallonWRS\\_1960.pdf](https://dnrc.mt.gov/_docs/water/Survey-Books/FallonWRS_1960.pdf)