



Date of Posting March 3, 2026:

Summer Aldrich  
Alpenglow Pet Crematory  
P.O. Box 5427  
Kalispell, Montana 59903

**RE: Final and Effective Montana Air Quality Permit #5297-01**

Sent via email: [summaddi@mac.com](mailto:summaddi@mac.com)

Dear Ms. Aldrich:

Montana Air Quality Permit (MAQP) #5297-01 for the above-named permittee is deemed final and effective as of March 3, 2026, by the Montana Department of Environmental Quality (DEQ). All conditions of the Decision remain the same. A copy of final MAQP #5297-01 is enclosed.

For DEQ,

A handwritten signature in black ink, appearing to read "Eric Merchant".

Eric Merchant, Supervisor  
Air Quality Permitting Services Section  
Air Quality Bureau  
Air, Energy, and Mining Division  
(406) 444-3626  
[eric.merchant2@mt.gov](mailto:eric.merchant2@mt.gov)

A handwritten signature in black ink, appearing to read "Conor Fox".

Conor Fox, AQ Engineering Scientist  
Air Quality Permitting Services Section  
Air Quality Bureau  
Air, Energy, and Mining Division  
(406) 444-4267  
[conor.fox@mt.gov](mailto:conor.fox@mt.gov)

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

Montana Air Quality Permit #5297-01

Alpenglow Pet Crematory  
P.O. Box 5427 Kalispell, MT 59903  
164 Dode Rd Kalispell MT 59901

Final and Effective Date:  
March 3, 2026



## MONTANA AIR QUALITY PERMIT

Issued To: Alpenglow Pet Crematory  
P.O. Box 5427  
Kalispell, MT 59903

MAQP: #5297-01  
Administrative Amendment (AA) Request  
Received: 01/13/2026  
DEQ's Decision on AA: 02/13/2026  
Permit Final: 03/03/2026

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

### Section I: Permitted Facilities

#### A. Plant Location

The APC facility is located at 164 Dode Road in Kalispell, MT. The legal description of the site is the NW  $\frac{1}{4}$  of Section 34, Township 29 N, Range 21 W, in Flathead County, Montana. Coordinates for the site are Latitude 48.23867 degrees and Longitude -114.26254 degrees.

#### B. Current Permit Action

On January 14, 2026, the Montana Department of Environmental Quality – Air Quality Bureau (DEQ) received a request from Alpenglow Pet Crematorium to formally change their business name from Aldrich Pet Crematorium to Alpenglow Pet Crematorium. As requested, the current permit action changes the company name on MAQP #5297-01. The current permit action also updates tables and images to comply with American with Disabilities Act (ADA) requirements and updates the permit to reflect current language and rule references used by DEQ.

### Section II: Conditions and Limitations

#### A. Emission Limitations

1. The design capacity of the APC facility shall not exceed 150 lb/hr (ARM 17.8.749).
2. APC shall not incinerate/cremate any material other than animal remains and/or any corresponding container unless otherwise approved by DEQ in writing (ARM 17.8.749).
3. The secondary chamber shall be maintained above 1500 °F (Fahrenheit) during incineration for any one-hour averaging period with no single reading less than 1450 °F. The operating temperatures shall be maintained during operation and for one half hour after the feed has stopped (ARM 17.8.752).
4. APC shall use pipeline quality natural gas as a supplemental fuel and maintain good combustion practices to minimize emissions (ARM 17.8.752).

5. APC shall develop crematorium operation procedures, print those procedures in a crematorium operation procedures manual, and require all personnel who operate the crematorium to familiarize themselves with the operating procedures. A copy of this manual shall be supplied to DEQ upon request (ARM 17.8.749 and ARM 17.8.752).
6. APC shall not cause or authorize to be discharged to the atmosphere from each incinerator/crematorium:
  - a. Any visible emissions that exhibit an opacity of 10% or greater (ARM 17.8.749 and ARM 17.8.752).
  - b. Any particulate emissions in excess of 0.10 grains per dry standard cubic foot (gr/dscf), corrected to 12% CO<sub>2</sub> (ARM 17.8.749).

B. Testing Requirements

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

C. Monitoring Requirements

1. APC shall install, calibrate, maintain, and operate continuous monitoring and recording equipment to measure the secondary chamber exit temperature of each incinerator (ARM 17.8.752).
2. APC shall record the daily quantity of material incinerated/cremated and the daily hour of operation for the incinerator (ARM 17.8.749).

D. Operational Reporting Requirements

1. APC shall supply the DEQ with annual production information for all emission points, as required by the 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 the DEQ by the date required in the emission inventory request. Information shall be in the units required by the 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).

APC shall submit the following information annually to the DEQ by March 1 of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

- a. Daily quantities of material incinerated/cremated

b. Daily hours of operation for the incinerator

2. APC shall notify the 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 the 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 APC as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the DEQ, and must be submitted to the DEQ upon request. These records may be stored at a location other than the plant site upon approval by the DEQ (ARM 17.8.749).

E. Notification

1. APC shall provide DEQ with written notification of commencement of construction of the new incinerator within 30 days after commencement of construction.
2. APC shall provide DEQ with written notification of the actual start-up date of the new incinerator within 15 days of actual startup.

SECTION III: General Conditions

- A. Inspection – APC shall allow the 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 APC fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving APC of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the DEQ’s decision may request, within 15 days after the 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 the 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 the 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, the DEQ's decision on the application is final 16 days after the 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 the 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 APC 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  
Alpenglow Pet Crematory  
MAQP #5297-01

I. Introduction/Process Description

Alpenglow Pet Crematory (APC) owns and operates a pet crematorium capable of incinerating up to 150 pounds per hour (lb/hr). The facility is located in the NW ¼ of Section 34, Township 29 N, Range 21 W, in Flathead County, Montana. Coordinates for the site are Latitude 48.23867 degrees and Longitude -114.26254 degrees.

A. Permitted Equipment

APC is proposing to install and operate a new Matthews Environmental Solutions multiple chamber cremation unit with a maximum design capacity of 150 pounds per hour (lb/hr).

B. Source Description

The cremation unit uses natural gas as a fuel source and is capable of incinerating up to 150 lb/hr of animal remains.

C. Permit History

On October 20, 2023, the Department of Environmental Quality (DEQ) received a complete application from APC to install and operate a new IEB-20 pet cremation unit. On January 27, 2024, DEQ issued MAQP #5297-00 to Aldrich Pet Crematory.

D. Current Permit Action

On January 14, 2026, DEQ received a request from Alpenglow Pet Crematorium to formally change their business name from Aldrich Pet Crematorium to Alpenglow Pet Crematorium. As requested, the current permit action changes the company name on MAQP #5297-01. The current permit action also updates tables and images to comply with American with Disabilities Act (ADA) requirements and updates the permit to reflect current language and rule references used by DEQ. **MAQP #5297-01** replaces MAQP #5297-00.

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

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the DEQ. Upon request, the 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 the 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 the DEQ.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the 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).

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

4. ARM 17.8.110 Malfunctions. (2) The 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>
11. ARM 17.8.230 Fluoride in Forage

APC 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, APC shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.316 Incinerators. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any incinerator, particulate matter in excess of 0.10 grains per standard cubic foot of dry flue gas, adjusted to 12% carbon dioxide and calculated as if no auxiliary fuel had been used. Further, no person shall cause or authorize to be discharged into the outdoor atmosphere from any incinerator emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes.
6. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
7. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.
8. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of any NSPS subpart defined in 40 CFR Part 60.

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

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the DEQ. APC submitted the appropriate permit application fee for the current permit action.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the 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. The 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. APC does not have a PTE greater than 25 tons per year of any pollutant; however, in accordance with MCA 75-2-215, an air quality permit must be obtained prior to the construction and operation of any incinerator, regardless of potential incinerator emissions. Because APC must obtain an air quality permit, all normally applicable requirements apply in this case.
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. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative permit change.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the 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 the 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 APC of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the 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.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the DEQ.

15. ARM 17.8.770 Additional Requirements for Incinerators. This rule specifies the additional information that must be submitted to the DEQ for incineration facilities subject to 75-2-215, Montana Code Annotated (MCA).
16. ARM 17.8.771 Mercury Emission Standards for Mercury-Emitting Generating Units. This rule identifies mercury emission limitation requirements, mercury control strategy requirements, and application requirements for mercury-emitting generating units.

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

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

This facility is not a major stationary source because this facility is not a listed source and the facility's PTE is below 250 tons per year of any 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 the 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 #5297-00 for APC, 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 located in a serious PM<sub>10</sub> nonattainment area.

- d. This facility is not subject to any current NSPS.
- e. This facility is not subject to any current NESHAP standards.
- f. This source is not a Title IV affected source, or a solid waste combustion unit.
- g. This source is not an EPA designated Title V source.

Based on these facts, the DEQ determined that APC will be a minor source of emissions as defined under Title V.

H. MCA 75-2-103, Definitions provided, in part, as follows:

- 1. "Incinerator" means any single or multiple-chambered combustion device that burns combustible material, alone or with a supplemental fuel or catalytic combustion assistance, primarily for the purpose of removal, destruction, disposal, or volume reduction of all or any portion of the input material.
- 2. "Solid waste" means all putrescible and nonputrescible solid, semisolid, liquid, or gaseous wastes, including, but not limited to...air pollution control facilities.

I. MCA 75-2-215, Solid or hazardous waste incineration – additional permit requirements:

- 1. MCA 75-2-215 requires air quality permits for all new commercial solid waste incinerators; therefore, APC must obtain an air quality permit.
- 2. MCA 75-2-215 requires the applicant to provide, to DEQ's satisfaction, a characterization and estimate of emissions and ambient concentrations of air pollutants, including hazardous air pollutants from the incineration of solid waste.

DEQ determined that the information submitted in the MAQP application was sufficient to fulfill this requirement.

- 3. MCA 75-2-215 requires that DEQ reach a determination that the projected emissions and ambient concentrations constitute a negligible risk to public health, safety, and welfare. DEQ completed a health risk assessment based on an emissions inventory and ambient air quality modeling for this MAQP application. Based on the results of the emission inventory, modeling, and the health risk assessment, DEQ determined that APC complies with this requirement.
- 4. MCA 75-2-215 requires the application of pollution control equipment or procedures that meet or exceed BACT. DEQ determined that the design of the incinerator and operating the incinerator according to the manufacturer-recommended operation procedures constitutes BACT.

### III. BACT Determination

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

A BACT analysis was not required for the current permit action because the current permit action is an administrative permit action.

### IV. Emission Inventory

#### Criteria Pollutant Emissions (TPY)

Source	PM <sub>tot</sub>	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	HAPs
Crematorium	0.37	1.13	0.98	0.98	0.71	0.43
Natural Gas Combustion	0.06	0.79	0.04	0.66	0.00	0.00
<b>Total Criteria Pollutant Potential Emissions</b>	<b>0.43</b>	<b>1.91</b>	<b>1.02</b>	<b>1.63</b>	<b>0.72</b>	<b>0.43</b>

#### Criteria Pollutant Emission Calculations

##### Crematorium

Operating Hours:	8760 hr/yr
Pounds per Ton:	0.0005 lb/ton
Control Efficiency:	0% percent reduction
Pounds per Year of HAPs (from Health Risk Assessment)	14.57 lb/hr

##### PM Emissions

PM Emissions: 0.37 tons/yr

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

Emission Factor = 0.085 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.085lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 0.37 tons/yr

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

Emission Factor = 0.085 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.085lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 0.37 tons/yr

##### NO<sub>x</sub> Emissions:

Emission Factor = 0.257 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.257 lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 1.13 tons/yr

##### CO Emissions:

Emission Factor = 0.221 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.221 lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 0.97 tons/yr

##### VOC Emissions:

Emission Factor = 0.224 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.224 lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 0.98 tons/yr

##### SO<sub>2</sub> Emissions:

Emission Factor = 0.163 lb/150 lb body (AP-42 Chapter 2.3)  
 Calculations = (0.163 lb/150 lb body)\*(8,760 hr/yr)\*(tons/2000 lb)= 0.71 tons/yr

##### HAPs Emissions:

Emission Factor = 14.57 lb/hr Health Risk Assessment Value  
 Calculations = (14.57 lb/hr)\*(8,760 hr/yr)\*(tons/2000 lb)/(150 lb body/lb)= 0.43 tons/yr

Natural Gas Combustion

Maximum Natural Gas Firing Rate: 0.0018 MMBtu/hr  
Natural Gas Heating Value: 1.0 MMBtu/hr  
Maximum Operation PTE: 8,760 hours

PM Total Emissions:  
Assumes PM Total is the sum of PM Condensable and PM Filterable 0.12 tons/yr

PM<sub>cond.</sub> Emissions:  
Emission Factor = 7.6 lb/mmescf AP-42 Chapter 1.4  
Calculations = (7.60 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.06 ton/yr

PM<sub>filt.</sub> Emissions:  
Emission Factor = 7.6 lb/mmescf AP-42 Chapter 1.4  
Calculations = (7.60 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.06 ton/yr

NO<sub>x</sub> Emissions:  
Emission Factor = 100 lb/mmescf AP-42 Chapter 1.4  
Calculations = (100 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.79 ton/yr

CO Emissions:  
Emission Factor = 84 lb/mmescf AP-42 Chapter 1.4  
Calculations = (84 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.66 ton/yr

VOC Emissions:  
Emission Factor = 5.5 lb/mmescf AP-42 Chapter 1.4  
Calculations = (5.5 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.04 ton/yr

SO<sub>x</sub> Emissions:  
Emission Factor = 0.6 lb/mmescf AP-42 Chapter 1.4  
Calculations = (0.6 lb/mmescf)\*(8,760 hours)\*(1.8\*10<sup>-3</sup> mmbtu/hr)\*(ton/2000 lb)= 0.00 ton/yr

V. Existing Air Quality

The APC facility is located in the NW ¼ of Section 34, Township 29 N, Range 21 W, in Flathead County, Montana. Coordinates for the site are Latitude 48.23867 degrees and Longitude -114.26254 degrees. The immediate area in which the proposed facility is planned is designated as a serious nonattainment area for PM<sub>10</sub>. APC's maximum potential emissions of any pollutant, including PM<sub>10</sub>, are not expected to have an impact on existing air quality.

VI. Ambient Air Impact Analysis

Potential emissions from the proposed facility are significantly less than DEQ's regulatory permitting threshold; therefore a comprehensive impact analysis is not required to ensure associated emissions do not negatively affect or impede conformance to the Nonattainment or Maintenance Area compliance plans. APC applied for this MAQP in accordance with ARM 17.8.770 and MCA 75-2-215 for this unit.

The Health Risk Assessment in Section VII of this permit analysis showed that there is a negligible human health risk associated with the proposed project. The DEQ determined, based on the Health Risk Assessment and the small potential to emit for all criteria pollutants, that the impacts from this permitting action will be minor. The DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Human Health Risk Assessment

The current permit action is considered an administrative amendment and does not change emissions and the associated human health risk assessment previously prepared by DEQ. A health risk assessment was conducted for the permit analysis during the initial MAQP #5297-00 application to determine if APC incinerator/crematorium complies with the negligible risk requirement of MCA 75-2-215. The emission inventory did not contain sufficient quantities of any pollutant on DEQ's list of pollutants for which non-inhalation impacts must be considered; therefore, DEQ determined that inhalation risk was the only necessary pathway to consider. Only those hazardous air pollutants for which there were established emission factors were considered in the emission inventory.

VIII. 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 determined the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ's approval of MAQP #5297-01 would not have private property-taking or damaging implications.

IX. Environmental Assessment

The current permit action is an administrative amendment that will not result in an increase of emissions from the facility; therefore, an Environmental Assessment is not required.

Analysis Prepared By: Conor Fox

Date: March 3, 2026