May 5, 2025

Jim Kenneally
Town Pump
600 South Main
Butte, Montana 59701

RE: Final and Effective Montana Air Quality Permit #5332-00

Sent via email: jimk@townpump.com

Dear Mr. Keneally:

Montana Air Quality Permit (MAQP) #5332-00 for the above-named permittee is deemed final and effective as of May 3, 2025, by the Montana Department of Environmental Quality (DEQ). All conditions of the Decision remain the same. A copy of final MAQP #5332-00 is enclosed.

For DEQ,

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EM:CH
Enclosures

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

Montana Air Quality Permit #5332-00

Town Pump
600 South Main
Butte, Montana 59701

Final and Effective Date:
May 03, 2025

MONTANA AIR QUALITY PERMIT

Issued To:
Town Pump
600 South Main
Butte, Montana 59701

MAQP: #5332-00
Application Complete: 02/19/2025
Preliminary Determination Issued: 03/13/2025
DEQ's Decision Issued: 04/17/2025
Permit Final: 05/03/2025

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Town Pump, 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. Permitted Equipment

- Two Diesel Storage Tanks each sized up to 975,000 gallons
- One Gasoline Storage Tank sized up to 495,000 gallons
- One Ethanol Storage Tank sized up to 495,000 gallons
- Vapor Combustion Unit for up to 31.5 MMBtu/hr output heat release
- Railcar Unloading Rack with associated piping
- Truck Loading Rack with associated pumps and piping

B. Plant Location

This facility is located in Section 24, Township 3 North, Range 9 West, in Silver Bow County, Montana. Coordinates are latitude 45.995836 N and longitude -112.670889 W. The physical address of this facility is Rick Jones Way in Butte, Montana. It is located approximately 5 miles west of Butte, Montana, and the site name is the Port of Montana Bulk Loading Facility.

Section II: Conditions and Limitations

A. Emission Limitations

1. Unloading of rail car trucks shall utilize vapor return control from the storage tanks to the railcar (ARM 17.8.749 and ARM 17.8.752).

2. Loading of tanker trucks shall be restricted to the use of submerged fill (ARM 17.8.749).

3. Town Pump shall be limited to a maximum of 30,000,000 gallons of gasoline throughput for the truck loadout operation during any rolling 12-month period (ARM 17.8.749).

4. Town Pump shall be limited to a maximum of 180,000,000 gallons of diesel product throughput for the truck loadout operation during any rolling 12-month period (ARM 17.8.749).

5. Town Pump shall be limited to a maximum of 30,000,000 gallons of ethanol product throughput for the truck loadout operation during any rolling 12-month period (ARM 17.8.749).

6. The Town Pump truck loadout rack shall be equipped with a vapor combustion unit (VCU) to control volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions during the loading of gasoline and ethanol (ARM 17.8.749 and ARM 17.8.752).

7. The VCU shall be designed to provide a destruction efficiency of 98 percent when controlling VOC vapors from gasoline and ethanol loading (ARM 17.8.749 and ARM 17.8.752).

8. Town Pump 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).

9. The total emissions discharged to the atmosphere during gasoline and ethanol loading from the VCU shall not exceed the following:

   VOC emissions of 1.0 milligrams per liter (mg/L) of gasoline loaded (ARM 17.8.749 and 40 CFR 60 Subpart XXa).

10. Town Pump shall not cause or authorize the use of any haul roads, access roads, parking lots, or the general plant property without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).

11. Town Pump shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.10 (ARM 17.8.749).

12. Town Pump shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the VCU, emissions which exhibit an opacity of 10% or greater averaged over six consecutive minutes (ARM 17.8.749).

13. Town Pump shall comply with all applicable standards and limitations, and the reporting, recordkeeping and notification requirements contained in 40 CFR 60 Subpart XXa – Standards of Performance for Bulk Gasoline Terminals that Commenced Construction, Modification, or Reconstruction After June 10, 2022 (ARM 17.8.340 and 40 CFR 60, Subpart XXa).

14. Town Pump shall comply with all applicable standards and limitations, and the reporting, recordkeeping and notification requirements contained in 40 CFR 60, Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage

Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (ARM 17.8.340 and 40 CFR 60, Subpart Kc).

A. Testing Requirements

1. Within 180 days of the initial startup of the Truck Loading Rack and VCU, the VCU shall be tested for total VOC emissions to demonstrate compliance with the emission limitation stated in Section II.A.9. The VCU shall be tested for total VOC emissions every 5 years or according to another testing/monitoring schedule as may be approved by DEQ (ARM 17.8.105 and 40 CFR 60 Subpart XXa).

2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

3. DEQ may require further testing (ARM 17.8.105).

B. Operational Reporting Requirements

1. Town Pump 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. Town Pump 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 Town Pump 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 the DEQ upon request. These records may be stored at a location other than the plant site upon approval by DEQ (ARM 17.8.749).

C. Continuous Emissions Monitoring Systems

Town Pump shall maintain the combustion zone temperature of the VCU at or above the 3-hour rolling average operating limit established during the most recent performance test when loading liquid product into gasoline cargo tanks (ARM 17.8.749 and 40 CFR 60 Subpart XXa).

D. Notification

1. Town Pump shall provide DEQ with written notification of the initial product loading of Tanks 1-4 within 15 days after fuels are introduced to the tanks (ARM 17.8.749).

2. Town Pump shall provide DEQ with written notification of the start-up date of the vapor combustion unit within 15 days after start-up (ARM 17.8.749).

SECTION III: General Conditions

A. Inspection –Town Pump 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 Town Pump fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Town Pump 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 Town Pump 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
Town Pump
Port of Montana Bulk Loading Facility
MAQP #5332-00

I. Introduction/Process Description

Town Pump proposed to construct and operate an unloading/loading refined fuels facility to allow rail unloading and truck loading of diesel, gasoline, and ethanol. For unloading, the facility would utilize vapor return back to the rail cars. For tank loading of ethanol and gasoline, the facility would utilize a vapor combustion unit to control volatile organic compounds (VOCs) for fugitives from the tanks and piping. The facility is located approximately 5 miles west of Butte, Montana, in Silver Bow County, Section 24, Township 3 North, Range 9 West. This facility is known as the Port of Montana Bulk Loading Facility.

A. Permitted Equipment

- Two Diesel Storage Tanks each sized up to 975,000 gallons
- One Gasoline Storage Tank sized up to 495,000 gallons
- One Ethanol Storage Tank sized up to 495,000 gallons
- Vapor Combustion Unit rated for up to 31.5 MMBtu/hr output heat release
- Railcar Unloading Rack with associated piping
- Truck Loading Rack and 2-bay truck loading with associated pumps and piping

B. Source Description

Refined fuels would be off-loaded from rail tanker cars into one of four storage tanks. Two tanks would store diesel, one would store gasoline and one would store ethanol. Loading would occur from the storage tanks into over-the-road tanker trucks. Fugitive emissions for gasoline and ethanol would be combusted in a vapor combustion unit (VCU) with assist natural gas. Design combustion of the VCU by the manufacturer would be 98 percent destruction for volatile organic compounds (VOCs).

C. Response to Public Comment (No comments were received).

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 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).

   Town Pump 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_{10}
11. ARM 17.8.230 Fluoride in Forage

Town Pump 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, Town Pump 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.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standard of Performance for New Stationary Sources 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 an NSPS affected source because meet the definition under 40 CFR Part 60, Subpart XXa and 40 CFR 60, Subpart Kc.

8. ARM 17.8.341 Emission Standards for Hazardous Air Pollutants. This source shall comply with the standards and provisions of 40 CFR Part 61, as appropriate.

   Town Pump is not a NESHAP affected source, therefore it is not an affected facility under this subpart.

9. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of any applicable 40 CFR Part 63, as listed below:

   No applicable subparts were identified.

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

1. ARM 17.8.401 Definitions. This rule includes a list of definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.402 Requirements. Town Pump must demonstrate compliance with the ambient air quality standards with a stack height that does not exceed Good Engineering Practices (GEP). The proposed height of the new or modified stack for Town Pump is below the allowable 65-meter GEP stack height.

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

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to DEQ. Town Pump 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.

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

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit 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. In accordance with MCA 75-2-215, an air permit must be obtained prior to the construction and operation of an incinerator, regardless of potential to emit. Town Pump also has a PTE over 25 tpy for VOCs. Vapor combustion units for routine combustion of process vapors are subject to triggering permitting under the incinerator rule. Since Town Pump must obtain an air quality permit, all normally applicable requirements apply.

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. Town Pump 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. Town Pump submitted an affidavit of publication of public notice for the January 25, 2025, issue of the *Montana Standard*, a newspaper of general circulation in the Town of Butte in Silver Bow County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by 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 Town Pump 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.

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.

15. ARM 17.8.770 Additional Requirements for Incinerators. This rule specifies the additional information that must be submitted to DEQ for incineration facilities subject to 75-2-215, Montana Code Annotated (MCA).

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

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

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

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any 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_{10}) in a serious PM_{10} 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 #5332-00 for Town Pump, 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_{10} nonattainment area.

d. This facility is subject to NSPS, 40 CFR 60 Subpart XXa, and 40 CFR 60, Subpart Kc.

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, DEQ determined that Town Pump 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, Town Pump will be required to obtain a Title V Operating Permit.

III. BACT Determination

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

Town Pump provided a BACT analysis for the permitting action. The BACT analysis follows the traditional 1990 draft New Source Review (NSR) five step BACT methodology. The analysis will be presented using the following steps for each pollutant and emitting unit.

Step 1: Identify All Available Control Technologies
Step 2: Eliminate Technically Infeasible Control Options
Step 3: Rank Remaining Control Technologies by Control Effectiveness
Step 4: Evaluate Most Effective Controls and Document Results
Step 5: Select BACT

VOC BACT Analysis for Loading of Gasoline and Ethanol

The following control options have been reviewed and analyzed by DEQ in order to determine BACT.

VOC Emissions from Storage Tanks and Tanker Loading

Step 1: Identify All Available Control Technologies

Town Pump has identified the following available technologies

Table 1. Technologies Available

Technology	Description
No Add-on Control	This is the base case for proposed new sources. This produces the highest level of emissions. This approach would provide no control for fugitive emissions.
Activated Carbon Collection	Enclosures can either fully or partially surround the source and direct VOCs through media containing activated carbon. More often in-line activated carbon canisters are installed to capture VOCs by adsorption and absorption into the pores of the activated carbon. Capture efficiencies are generally a function of the concentration of the VOC, gas stream temperature and moisture content. Capture efficiencies generally are 90 to 95 percent.
Vapor Condensing	A vapor condensing system captures and condenses vapors emitted during the loading of fuel into storage tanks or transport vehicles. It operates by cooling the vapor stream to a temperature where the VOC concentration becomes saturated, causing the VOCs to condense into a liquid phase. Recovered liquids can then be collected and either reused or disposed of properly. Capture efficiencies can achieve from 90 to 98 percent and are most dependent upon the condensing temperature surface.
Vapor Combustion Unit	A vapor combustion unit (VCU) captures and combusts vapors emitted during the loading of fuel into storage tanks or transport vehicles. It operates by burning the VOC-laden vapors at high temperatures, converting them into less harmful substances primarily as carbon dioxide and water vapor. Destruction efficiencies for combustion devices most often run a minimum of 98 percent and can often achieve well over 99 percent. Destruction efficiencies are most dependent upon temperature, residence time, and turbulence in the combustion device.

Each of the three control options are identified in further detail as described.

Activated Carbon Collection System

- Adsorption Vessels: Contain the activated carbon where VOCs are adsorbed.
- Blower/Fan: Draws or pushes the vapor stream through the adsorption vessels.

- Control System: Monitors and regulates the operation of the system to ensure optimal performance and compliance with emission standards. Alternatively, fixed adsorption times can be used to prevent VOC breakthrough on the carbon.
- Regeneration System (optional): Allows for the regeneration of activated carbon, extending its useful life and reducing waste.

Vapor Condensing System

- Heat Exchanger: Cools the vapor stream, causing VOCs to condense.
- Condensate Collection System: Collects the condensed VOCs for recovery or disposal.
- Refrigeration System: Provides the necessary cooling to achieve condensation.
- Control System: Monitors and regulates the operation of the VCU to ensure optimal performance and compliance with emission standards. Most often control efficiency compliance is achieved by maintaining a target outlet temperature.

Vapor Combustion Unit

- Combustion Chamber: Where the VOCs are burned.
- Burners: Provide the necessary heat for combustion, often using natural gas or propane as assist fuel particularly when VOC concentrations are too low for combustion.
- Pilot Ignition System: Ensures continuous ignition of the burners.
- Control System: Monitors and regulates the operation of the VCU to maintain optimal combustion conditions and compliance with emission standards. Compliance demonstration is most often demonstrated by the outlet temperature from the system.

Step 2: Eliminate Technically Infeasible Control Options

Control designs using activated carbon, condensation, as well as vapor combustion are all technically feasible. Therefore, all three control options identified are brought forward to Step 3.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

Table 2. Ranked Control Technologies

Technology	Control Efficiency	Ranking
Activated Carbon Collection	90% - 95%	3
Vapor Condensing System	90% - 98%	2
Vapor Combustion Unit	98% - 99.5%	1

As shown in Table 2, vapor combustion has the highest control efficiency with a minimum of 98 percent destruction efficiency.

Step 4: Evaluate Most Effective Controls and Document Results

Activated Carbon

Activated carbon works well for VOC control and can achieve efficiencies of 90 to 95 percent, but efficiencies can vary depending upon the inlet concentrations to the system. Activated carbon systems can provide static systems and low maintenance while providing effective control. More complicated versions can utilize regeneration of the activated carbon and allow reuse of the carbon for repeated cycles and avoid single use helping to reduce capital costs and waste.

Vapor Condensation System

Vapor condensation systems can achieve VOC reductions of 90 to 98 percent. Depending upon the temperature of the cooling medium, direct condensation can allow for recovery of the VOCs for possible reuse. Low temperature refrigerant systems can be subject to icing and loss of cooling caused by buildup on the cooling surfaces. Condensation systems are a known effective means of meeting stringent air quality regulations including for BACT requirements.

Vapor Combustion Unit

Vapor combustion processes are thermal oxidation processes where based on temperature, residence time and turbulence, all VOCs can be effectively converted to CO_2 and water. Compliance demonstrations can be achieved by monitoring the combustion chamber and maintaining a minimum determined temperature for adequate destruction. Most often compliance tests are initially completed, and source testing data used to determine the minimum temperature that must be achieved for future operation. Vapor combustors are a proven reliable method to destroy VOCs in many industrial applications. Flares can also provide relatively good destruction efficiencies but often open-flare designs are not able to adequately be tested. Combustors with stacks and sampling ports are able to be tested to demonstrate effective destruction.

Step 5: Select BACT

Town Pump proposes to select a VCU for BACT for VOCs when pumping gasoline and ethanol into tanker trucks. The VCU shall be designed for a minimum destruction efficiency of 98 percent. This control option provides the highest level of control while minimizing the level of required maintenance for support of the system. Town Pump has selected a design with the appropriate level of safety functions to ensure reliable combustion for fugitive VOC control.

VOC BACT Analysis for Truck Loading of Diesel

Diesel pumping activities are inherently low in the release of VOCs due to the low vapor pressure of diesel fuel. The emission factor for diesel fuel as compared to gasoline is shown in Section IV. Emissions Inventory Table 1.

Step 1: Identify All Available Control Technologies

Each of the control technologies located above for gasoline and ethanol is equally applicable to control of VOCs from diesel loading.

Step 2: Eliminate Technically Infeasible Control Options

Control designs using activated carbon, condensation, as well as vapor combustion are all technically feasible. Therefore, all three control options identified are brought forward to Step 3.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

Control effectiveness is identical to that previously identified for gasoline and ethanol.

Technology	Control Efficiency	Ranking
Activated Carbon Collection	90% - 95%	3
Vapor Condensing System	90% - 98%	2
Vapor Combustion Unit	98% - 99.5%	1

Step 4: Evaluate Most Effective Controls and Document Results

As identified for gasoline and ethanol loading, a VCU provides the highest control efficiency while minimizing maintenance downtime. However, due to the lower emission rate of VOCs for diesel and no equivalent NSPS standards for diesel handling, a BACT determination of no additional control is warranted specific to diesel loading. This is based on the low VOC emission factor for diesel loading from AP-42 Table 5.2-5 resulting in a potential to emit of less than 1.5 tpy.

Step 5 Select BACT

No additional control for diesel loading is selected as BACT due to the low emission rates as documented by AP-42. This is further justified by recognizing that with a low fugitive VOC emission rate, make-up natural gas for the VCU would otherwise be required to combust the small VOC load.

VOC Emissions from Railcar Unloading

Step 1 thru Step 4

In correspondence with Town Pump, DEQ has confirmed that the railcar unloading to storage tanks design occurs within a closed-loop vapor system ensuring VOC capture within the shared vapor system. Therefore, emissions are limited to fugitives from piping, fittings and valves. Therefore, emissions are already controlled by the system design.

Step 5 Select BACT

A closed loop system is selected as a BACT unloading requirement from railcars into the storage tanks.

No other pollutants beyond VOCs require a BACT analysis for the proposed project as VOCs are the pollutants released from the bulk loading station.

The BACT conclusions prescribed under MAQP #5332-00 provide comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

IV. Emission Inventory

The emission inventory for VOC losses from gasoline, ethanol and diesel truck loading is shown below in Table 1. The column titled Controlled VOC Emissions represents the maximum amount of VOCs that would be combusted in the vapor combustion unit based on 98 percent destruction efficiency.

Table 1. Tank Loading Emissions

Loading Vapor Capture	Short Term Loading Rate	Permitted Limit	Loading Losses Emission Factor	Instantaneous Emissions Prior to Control	Controlled VOC Emissions	Remaining VOC Emissions
	(GPM)	Gal/yr	Without Control (lb/1000 Gal)	TPY	TPY	TPY
Gas	2600	30,000,000	6.03	90.45	88.641	1.81
Ethanol	2600	30,000,000	6.03	90.45	88.641	1.81
Diesel	2600	180,000,000	0.014	1.26	0	1.26

The emission inventory for combustion of the natural gas is shown below in Table 2. Natural gas combustion is based on the burner firing rate of the vapor combustion unit at 31.5 MMBtu/hr (275,940,000 ft3/year).

Table 2. Natural Gas Combustion Inventory

Natural Gas Throughput	AP42 Emission Factors	
10^6 ft3	lbs/ft3	tpy
275.94 ft^3		
PM	7.6	1.05
PM10	7.6	1.05
CO	84	11.59
NOX	100	13.80
SO2	0.6	0.08
VOC	5.5	0.76

Table 3. Facility Wide Emissions

Facility Wide Criteria Pollutant Emissions

Emission Source	PM	PM 10	CO	NOx	SO2	VOC
	t/yr	t/yr	t/yr	t/yr	t/yr	t/yr
VCU (NG Combustion)	1.049	1.049	11.59	13.80	0.083	0.759
VCU VOC (HAPs in Health Assessment)						14.5
Tank Losses						15.7
Fugitive Leaks						0.000023
Total Facility Wide Emissions	*1.05*	*1.05*	*11.59*	*13.80*	*0.08*	*30.98*

V. Existing Air Quality

The Town Pump facility would be located in Section 24 Township 3 North, Range 9 West, in Silver Bow County. Silver Bow County is classified as Unclassifiable/Attainment for all criteria pollutants, except PM_{10}, which it is classified as Attainment, of the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants, as of February 27, 2025. The site would be located 1.6 miles directly west of the nearest boundary of the PM_{10} Limited Maintenance Plan Area for the State of Montana (Montana DEQ GIS).

VI. Air Quality Impacts

DEQ determined that there will be minor impacts from this permitting action because of the low level of emissions. Therefore, DEQ believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Ambient Air Impact Analysis

Based on the information provided and the conditions established in MAQP #5332-00, DEQ determined that the impact from this permitting action will be minor.

VIII. Human Health Risk Assessment

A health risk assessment was conducted by Town Pump to determine if the proposed vapor combustion unit complies with the negligible risk requirement of MCA 75-2-215.

The environmental effects unrelated to human health were not considered in determining compliance with the negligible risk standard but were evaluated as required by the Montana Environmental Policy Act, in determining compliance with all applicable rules or other requirements requiring protection of public health, safety, welfare, and the environment.

Pursuant to ARM 17.8.770(1)(c), pollutants may be excluded from the human health risk assessment if DEQ determines that exposure from inhalation is the only appropriate pathway to consider in the human health risk assessment and if the ambient concentrations of the pollutants (calculated using the potential to emit; enforceable limits or controls) are less than the levels specified in Table 1 or Table 2 of ARM 17.8.770. Even though most of the estimated HAP species calculated in the emission inventory fell below the de minimis levels in Table 1 or Table 2 of ARM 17.8.770, Town Pump elected to conduct the human health risk assessment by contemplating all the estimated HAP species. The results of the human health risk assessment pursuant to ARM 17.8.770 are shown in the following table.

Modeled VOC Concentration (µg/m^3) 30.909

Compound	% of Compound in Fuel [a]	Maximum Annual Impact [b]	Maximum 1-hour Impact [c]	Table 1 Cancer Screen Level [d]	Table 2 Non-Cancer Chronic Screen Level [e]	Table 2 Non-Cancer Acute Screen Level	Maximum Impact Below Table 1 Cancer Screen Level	Maximum Impact Below Table 2 Non-Cancer Chronic Screen Level	Maximum Impact Below Table 2 Non-Cancer Acute Screen Level
	(%)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(Yes/No)	(Yes/No)	(Yes/No)
Arsenic Compounds	0.00013%	3.89E-06	3.89E-05	2.33E-05	3.00E+00	4.40E+01	No	Yes	Yes
Benzene	0.65%	2.00E-02	2.00E-01	1.20E-02	7.10E-01		No	Yes	
Benz(a)anthracene	0.0000011%	3.48E-08	3.48E-07	5.88E-05			Yes		
Benzo(b)fluoranthene	0.0000011%	3.48E-08	3.48E-07	5.88E-05	3.70E+00		Yes	Yes	
Benzo(k)fluoranthene	0.0000011%	3.48E-08	3.48E-07	5.88E-05			Yes		
Benzo(a)pyrene	0.00000075%	2.33E-08	2.33E-07	5.88E-05	1.50E+01		Yes	Yes	
Beryllium Compounds	0.0000075%	2.33E-07	2.33E-06	4.17E-05	2.00E-03		Yes	Yes	
Cadmium Compounds	0.00069%	2.13E-05	2.13E-04	5.56E-05	5.00E-03		No	Yes	
Chromium Compounds	0.000035%	1.09E-06	1.09E-05	8.33E-06	4.80E-05		No	Yes	
Chrysene	0.0000011%	3.48E-08	3.48E-07						
Cobalt	0.000053%	1.63E-06	1.63E-05						
Ethylbenzene	0.12%	3.70E-03	3.70E-02	1.00E+01			Yes		
Fluoranthene	0.0000019%	5.82E-08	5.82E-07						
Fluorene	0.0000018%	5.44E-08	5.44E-07						
Formaldehyde	0.047%	1.45E-03	1.45E-02	7.69E-03	3.60E-02	3.70E+00	No	Yes	Yes
Hexane	1.13%	3.48E-02	3.48E-01		2.00E+00			Yes	
Indeno(1,2,3-cd)pyrene	0.0000011%	3.48E-08	3.48E-07	5.88E-05			Yes		
Isopropylbenzene	0.0035%	1.08E-04	1.08E-03						
Lead	0.00031%	9.71E-06	9.71E-05		1.50E-02			Yes	
Manganese	0.00024%	7.37E-06	7.37E-05		5.00E-04			Yes	
Mercury	0.00016%	5.06E-06	5.06E-05		3.00E-03	3.00E-01		Yes	Yes
m-xylene	0.29%	9.09E-03	9.09E-02						
Napthalene	0.00088%	2.72E-05	2.72E-04		1.40E-01			Yes	
n-hexane	2.31%	7.15E-02	7.15E-01		2.00E+00			Yes	
Nickel Compounds	0.0013%	4.08E-05	4.08E-04	3.85E-04	2.00E-05	3.30E+01	No	No	Yes
o-xylene	0.13%	3.93E-03	3.93E-02						
Phenanthrene	0.000011%	3.29E-07	3.29E-06						
p-xylene	0.14%	4.32E-03	4.32E-02						
Pyrene	0.0000031%	9.71E-08	9.71E-07						
Selenium	0.000015%	4.65E-07	4.65E-06		5.00E-03	2.00E-02		Yes	Yes
Toluene	1.97%	6.10E-02	6.10E-01		4.00E+00			Yes	

Modeled VOC Concentration ($\mu g/m^3$) *30.909*

Compound	% of Compound in Fuel [a]	Maximum annual Impact [b]	Maximum 1-hour Impact [c]	Chronic Inhalation Cancer Dose Response Value [d]	Calculated Cancer Risk	Increase In Excess lifetime Cancer Risk Less than 1.0 x 10^{-6}	Chronic Inhalation Non-Cancer Dose Response Value (RFC) [d]	Acute Inhalation Non-Cancer Dose Response Value (RFC) [d]	Calculated Non-Cancer Risk	Calculated Acute Non-Cancer Risk
	(%)	($\mu g/m^3$)	($\mu g/m^3$)	($\mu g/m^3$)$^{-1}$		(Yes/No)	($\mu g/m^3$)	($\mu g/m^3$)	(HQ)	(HQ)
Arsenic Compounds	0.00013%	3.89E-06	3.89E-05	4.30E-03	1.67E-08	Yes	1.50E-05	2.00E-04	2.59E-04	1.94E-04
Benzene	0.65%	2.00E-02	2.00E-01	7.80E-06	1.56E-07	Yes	3.00E-02	1.30E+00	6.66E-04	1.54E-04
Benz(a)anthracene	0.0000011%	3.48E-08	3.48E-07	1.10E-04	3.83E-12	Yes		1.00E-01		3.48E-09
Benzo(b)fluoranthene	0.0000011%	3.48E-08	3.48E-07	1.10E-03	3.83E-11	Yes		2.00E-01		1.74E-09
Benzo(k)fluoranthene	0.0000011%	3.48E-08	3.48E-07	1.10E-04	3.83E-12	Yes		2.00E-01		1.74E-09
Benzo(a)pyrene	0.00000075%	2.33E-08	2.33E-07					1.00E+01		2.33E-11
Beryllium Compounds	0.0000075%	2.33E-07	2.33E-06	2.40E-03	5.59E-10	Yes	2.00E-05	2.50E-02	1.16E-05	9.31E-08
Cadmium Compounds	0.00069%	2.13E-05	2.13E-04	1.80E-03	3.84E-08	Yes	1.00E-05	9.00E-01	2.13E-03	2.37E-07
Chromium Compounds	0.000035%	1.09E-06	1.09E-05	1.20E-02	1.30E-08	Yes		1.00E+00		1.09E-08
Chrysene	0.0000011%	3.48E-08	3.48E-07	1.10E-05	3.83E-13	Yes		2.00E-01		1.74E-09
Cobalt	0.000053%	1.63E-06	1.63E-05				1.00E-04	2.00E+00	1.63E-05	8.14E-09
Ethylbenzene	0.12%	3.70E-03	3.70E-02	2.50E-06	9.24E-09	Yes	1.00E+00	1.40E+02	3.70E-06	2.64E-07
Fluoranthene	0.0000019%	5.82E-08	5.82E-07					5.00E-03		1.16E-07
Fluorene	0.0000018%	5.44E-08	5.44E-07					7.50E+00		7.25E-11
Formaldehyde	0.047%	1.45E-03	1.45E-02	1.30E-05	1.89E-08	Yes	9.80E-03	5.50E-02	1.48E-04	2.64E-04
Hexane	1.13%	3.48E-02	3.48E-01			Yes	7.00E-01	3.90E+02	4.97E-05	8.93E-07
Indeno(1,2,3-cd)pyrene	0.0000011%	3.48E-08	3.48E-07	1.10E-04	3.83E-12	Yes		1.50E-01		2.32E-09
Isopropylbenzene	0.0035%	1.08E-04	1.08E-03				2.50E+02	2.50E+02	4.32E-10	4.32E-09
Lead	0.00031%	9.71E-06	9.71E-05				4.00E-01	1.00E+01	2.43E-08	9.71E-09
Manganese	0.00024%	7.37E-06	7.37E-05				3.00E-04	5.00E+01	2.46E-05	1.47E-09
Mercury	0.00016%	5.06E-06	5.06E-05				3.00E-04	6.00E-04	1.69E-05	8.43E-05
m-xylene	0.29%	9.09E-03	9.09E-02					2.20E+01		4.13E-06
Napthalene	0.00088%	2.72E-05	2.72E-04	3.40E-05	9.24E-10	Yes	3.00E-03	1.30E+02	9.06E-06	2.09E-09
n-hexane	2.31%	7.15E-02	7.15E-01				7.00E-01	3.90E+02	1.02E-04	1.83E-06
Nickel Compounds	0.0013%	4.08E-05	4.08E-04				9.00E-05	1.00E+00	4.53E-04	4.08E-07
o-xylene	0.13%	3.93E-03	3.93E-02					2.20E+01		1.79E-06
Phenanthrene	0.000011%	3.29E-07	3.29E-06					4.00E-01		8.23E-09
p-xylene	0.14%	4.32E-03	4.32E-02					2.20E+01		1.96E-06
Pyrene	0.0000031%	9.71E-08	9.71E-07					1.50E+01		6.47E-11
Selenium	0.000015%	4.65E-07	4.65E-06				2.00E-02	1.00E-01	2.32E-08	4.65E-08
Toluene	1.97%	6.10E-02	6.10E-01				5.00E+00	3.70E+01	1.22E-05	1.65E-05
			Total Chronic Cancer Risk		*2.54E-07*		*Sum Non-cancer Hazard Quotients*		*3.91E-03*	*7.25E-04*
				Total Chronic Cancer Risk Less than 1.0 x 10^{-5}	Yes			Sum Non-cancer Hazard Quotients Less than 1.0	Yes	Yes

No individual pollutant concentration exceeds the Cancer Risk threshold of 1.00E-06 and the sum of all Cancer Risks concentrations does not exceed 1.00E-05, and further, the sum of the Chronic Non-cancer Reference Exposure Level hazard quotients is less than 1.0. Therefore, compliance with the negligible risk requirement as outlined in ARM 17.8.770 is demonstrated. Further, such determination is made assuming 8,760 hours of operation per year of the crematory and conservative emissions estimations. The presence or absence of this facility in this area would not be expected to cause a discernable change in human health risks in this area.

Based on the information provided and the conditions established in MAQP #5332-00, DEQ determined that the impact from this permitting action will be minor. DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

```
AERSCREEN 21112 / AERMOD 21112 01/15/25
12:02:11
TITLE: TOWN PUMP BULK LOADING
---------------------------------------------------------------------------
**************************** STACK PARAMETERS ****************************
---------------------------------------------------------------------------
SOURCE EMISSION RATE: 2.3940 g/s 19.000 lb/hr
STACK HEIGHT: 19.81 meters 65.00 feet
STACK INNER DIAMETER: 2.019 meters 79.50 inches
PLUME EXIT TEMPERATURE: 1144.3 K 1600.0 Deg F
PLUME EXIT VELOCITY: 12.192 m/s 40.00 ft/s
STACK AIR FLOW RATE: 82732 ACFM
RURAL OR URBAN: RURAL
INITIAL PROBE DISTANCE = 175. meters 574. feet
---------------------------------------------------------------------------
********************** BUILDING DOWNWASH PARAMETERS **********************
---------------------------------------------------------------------------
NO BUILDING DOWNWASH HAS BEEN REQUESTED FOR THIS ANALYSIS
************************** PROBE ANALYSIS **************************
25 meter receptor spacing: 96. meters - 175. meters
Zo ROUGHNESS 1-HR CONC DIST TEMPORAL
SECTOR LENGTH (ug/m3) (m) PERIOD
-------------------------------------------------------------------
1* 0.200 30.77 175.0 SUM
* = worst case flow sector
---------------------------------------------------------------------------
********************** MAKEMET METEOROLOGY PARAMETERS **********************
---------------------------------------------------------------------------
MIN/MAX TEMPERATURE: 255.4 / 308.1 (K)
MINIMUM WIND SPEED: 0.5 m/s
ANEMOMETER HEIGHT: 10.000 meters
SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES
DOMINANT SURFACE PROFILE: Cultivated Land
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Summer
```

```
ALBEDO: 0.20
BOWEN RATIO: 0.50
ROUGHNESS LENGTH: 0.200 (meters)
SURFACE FRICTION VELOCITY (U*) NOT ADUSTED
METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT
------------------------------------------------------------
YR MO DY JDY HR
-- -- -- --- --
10 06 01 1 01
H0 U* W* DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALBEDO REF WS
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
-64.00 1.838 -9.000 0.020 -999. 4000. 8888.0 0.200 0.50 0.20 18.00
HT REF TA HT
- - - - - - - - - - -
10.0 308.1 2.0
WIND SPEED AT STACK HEIGHT (non-downwash): 21.2 m/s
STACK-TIP DOWNWASH ADJUSTED STACK HEIGHT: 16.1 meters
ESTIMATED FINAL PLUME RISE (non-downwash): 4.3 meters
ESTIMATED FINAL PLUME HEIGHT (non-downwash): 20.4 meters
METEOROLOGY CONDITIONS USED TO PREDICT AMBIENT BOUNDARY IMPACT
------------------------------------------------------------
YR MO DY JDY HR
-- -- -- --- --
10 06 01 1 01
H0 U* W* DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALBEDO REF WS
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
-64.00 1.838 -9.000 0.020 -999. 4000. 8888.0 0.200 0.50 0.20 18.00
HT REF TA HT
- - - - - - - - - - -
10.0 308.1 2.0
WIND SPEED AT STACK HEIGHT (non-downwash): 21.2 m/s
STACK-TIP DOWNWASH ADJUSTED STACK HEIGHT: 16.1 meters
ESTIMATED FINAL PLUME RISE (non-downwash): 4.3 meters
ESTIMATED FINAL PLUME HEIGHT (non-downwash): 20.4 meters
------------------------------------------------------------------------------
********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE
------------------------------------------------------------------------------
MAXIMUM MAXIMUM
DIST 1-HR CONC DIST 1-HR CONC
(m) (ug/m3) (m) (ug/m3)
-------------------- --------------------
96.01 7.143 150.00 30.20
100.00 9.104 175.00 30.77
   125.00 23.00
```

IX. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, DEQ conducted a private property taking and damaging assessment which is located in the attached environmental assessment and is located in the attached environmental assessment.

X. Environmental Assessment

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

FINAL ENVIRONMENTAL ASSESSMENT

April 17, 2025

Air Quality Bureau
Montana Department of Environmental Quality

PROJECT/SITE NAME: Port of Montana Bulk Loading Facility	
APPLICANT/COMPANY NAME: Town Pump	
PROPOSED PERMIT/LICENSE NUMBER: 5332-00	
LOCATION: Section 24, Township 3 North, Range 9 West	**COUNTY:** Silver Bow
PROPERTY OWNERSHIP: FEDERAL ____ STATE ____ PRIVATE _X___	

Contents

PROJECT OVERVIEW

COMPANY NAME:	Town Pump
EA DATE:	March 13, 2025
SITE NAME:	Port of Montana Bulk Loading Facility
MAQP#:	5332
Version #:	00
Application Received Date:	January 21, 2025

Location

Township 3 North, Range 9 West, Section 24
County: Silver Bow
PROPERTY OWNERSHIP: FEDERAL STATE PRIVATE X

Compliance with the Montana Environmental Policy Act

Under 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 human environment. The proposed action is considered a state action that may have an impact on the human environment and, therefore, the Department of Environmental Quality (DEQ) must prepare an environmental review. This Draft Environmental Assessment (EA) will examine the proposed action and alternatives to the proposed action and disclose potential 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. DEQ may not withhold, deny, or impose conditions on the Permit based on the information contained in this EA (§ 75-1- 201(4), MCA).

Proposed Action

Town Pump has applied for a Montana Air Quality Permit (MAQP) under the Clean Air Act of Montana. The MAQP regulates a new unload/loading facility with a vapor combustion unit to combust tank vapors from gasoline and ethanol loading. The state law that regulates air quality permitting in Montana is the Clean Air Act of Montana, §§ 75-2-101, et seq., (CAA) Montana Code Annotated (MCA). DEQ may not approve a proposed project contained in an application for an air quality permit unless the project complies with the requirements set forth in the CAA of Montana and the administrative rules adopted thereunder, ARMs 17.8.101 et. seq. The proposed action would be located on privately owned land, in Silver Bow 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.

Purpose and Need

Under MEPA, Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human environment. The Proposed Action is considered to be a state action that may have an impact on the human environment; therefore, DEQ must prepare an environmental review. This EA will examine the proposed action and alternatives to the proposed action and disclose potential 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 ARM 17.4.608.

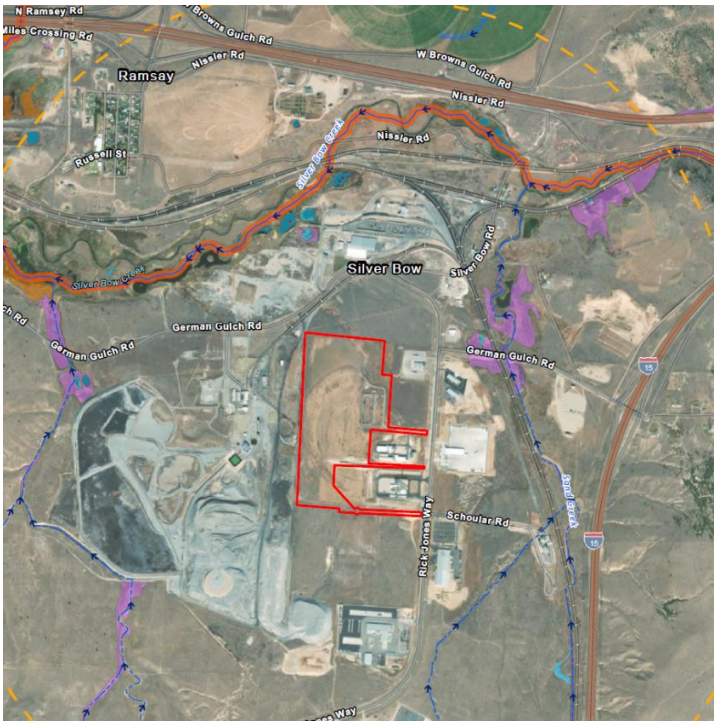
Table 1: Summary of Proposed Action

Proposed Action	
General Overview	This permitting action regulates a new facility with the addition of two diesel tanks, one gasoline tank, one ethanol tank and a vapor combustion unit with natural gas assist to combust flammable vapors. The facility also includes unloading and loading lines with infrastructure to provide for unloading from railcars and loading into on-road tankers.
Duration & Hours of Operation	**Construction:** Approximately three months. **Operation:** Continuous operation with periodic railcar unloading, and more frequent truck loading.
Estimated Disturbance	Minor land disturbance would occur from this permitting action but the parcel is located in an industrial park associated with Butte Silver Bow where the land had previously been prepared for future industrial/commercial operations. Berms and contouring would be required to further prepare the site to have line containment areas and facility infrastructure.
Construction Equipment	The following equipment will be utilized: Numerous dirt moving types of equipment would be used to prepare the site for building construction, tank bases, and containment areas.
Personnel Onsite	**Construction:** Numerous construction personnel would be required to complete the construction project. **Operation:** Full time operation with 3-7 permanent employees.
Location and Analysis Area	**Location**: Section 24 Township 3 North, Range 9 West, in Silver Bow County, Montana **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.
The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.	
Air Quality	The applicant proposes to acquire a new air quality permit for the addition of an unload/load refined fuel transfer station utilizing a vapor combustion unit for VOC control.
Water Quality	This permitting action would not affect water quality. Town Pump is required to comply with the applicable local, county, state and federal requirements pertaining to water quality.
Erosion Control and Sediment Transport	This permitting action would not affect erosion control and sediment transport. Town Pump is required to comply with the applicable local, county, state and federal requirements pertaining to erosion control and sediment transport.

Solid Waste	This permitting action would not affect solid waste in the area. Town Pump is required to comply with the applicable local, county, state and federal requirements pertaining to solid waste.
Cultural Resources	This permitting action would not affect cultural resources. Town Pump is required to comply with the applicable local, county, state and federal requirements pertaining to cultural resources.
Hazardous Substances	This permitting action would not contribute to any hazardous substances. Town Pump is required to comply with the applicable local, county, state and federal requirements pertaining to hazardous substances.
Reclamation	This permitting action would not require any reclamation.
Cumulative Impact Considerations	
Past Actions	There are no past actions as this permitting action is to permit a new facility.
Present Actions	This permitting action regulates a new facility with a vapor combustion unit to control VOCs from gasoline and ethanol loading.
Related Future Actions	DEQ is not currently aware of any future projects from Town Pump for this facility. Any future projects would be subject to a new permit application.

See Figure 1 below for the project location of the Town Pump site.

Figure 1: Site Location Map



EVALUATION OF AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE:

The impact analysis will identify and evaluate whether the impacts are direct or secondary impacts to the physical environment and human population in the area 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 the human environment that may be stimulated, or 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.

Cumulative impacts are the collective impacts on the human environment within the borders of Montana that could result from 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 impacts 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. The activities identified in Table 1 were analyzed as part of the cumulative impacts assessment for each resource.

The duration is quantified as follows:

- Construction Impacts (short-term): These are impacts to the environment during the construction period. When analyzing duration, please include a specific range of time.

• Operation Impacts (long-term): These are impacts to the environment during the operational period. When analyzing duration, please include a specific range of 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

The Town Pump parcel area soil survey is characterized primarily by Varney loam with zero to four percent slopes, and by Varney-Work complex with two to 8 percent slopes, and a small percentage characterization as Varney-Anamac complex. The bulk loading facility is not first-time disturbance for the ground surface. The area surrounding the Town Pump parcel includes other commercial and industrial properties that are also part of the industrial park. Neighboring parcels include land owned by Rhodia Inc. located directly west of the Town Pump parcel which was formerly a phosphorous plant and is an active Superfund site. The closest facilities subject to air quality permitting includes a parcel located 0.4 miles northeast of the Town Pump parcel. This nearest parcel is operated by Pioneer Concrete under the DEQ Portable Registration Program for portable batch plants. The next closest facility is the REC Advanced Silicon Materials plant located southwest approximately 2 miles away. The nearest perennial stream is Silver Bow Creek located directly north approximately 0.65 miles. There would be the addition of a support structure for storage tanks, the vapor combustion unit and lined containment cells for spill control.

Direct Impacts:

The permit application included additional information including aerial photography, a proposed site plan, including identification of nearby intermittent and perennial streams. This permitting action would not be considered a new disturbance, as the land was previously disturbed by human activity for preparation as a parcel in the industrial park. Therefore, minor direct impacts to geology, soil quality, stability and moisture would be expected because of the proposed project due to the industrial nature of the area.

Secondary Impacts:

No secondary impacts to geology, stability, and moisture would be expected because this action is occurring within the Town Pump property boundary and first-time disturbance is not occurring.

Cumulative Impacts:

No cumulative impacts to geology, stability, and moisture would be expected because of this permitting action, as it would take place within an already existing industrial park parcel.

2. Water Quality, Quantity, and Distribution

The Town Pump facility is located approximately 5 miles west of Butte, immediately west of Interstate 15, and south of Interstate 90. The parcel has access to an existing water supply system to provide potable drinking water, and also has a connection available for municipal sewer system. This water and sewer system would provide Town Pump the ability to avoid developing separate water supply sources, and a separate sewer system.

Direct Impacts:

Town Pump has only submitted one other permit application that DEQ is aware of related to this proposed permitting action. Montana Pollution Discharge Elimination System (MPDES) permit number MTR111067 has been issued to allow storm water discharge related to construction activities for development of the project site.

No fragile or unique water resources or values are present in the area affected by the proposed project. Silver Bow Creek located approximately 0.65 miles north, is the nearest perennial stream and has been undergoing superfund cleanup for decades. Further, no water uses or any form of discharge to surface or groundwater would occur because of the proposed project. Therefore, no direct impacts to water quality, quantity or distribution would be expected because of the proposed project.

Secondary Impacts:

During operations, discharges would not be released to ground or surface water because of the proposed project and the use of an existing sewer connection. Further, as permitted, the proposed project would not be expected to cause or contribute to a violation of the applicable primary or secondary NAAQS. 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, no secondary impacts to water quality would be expected because of the proposed project. No new water resources would be required for normal operations of the affected new equipment as an existing potable water connection is available for Town Pump. No secondary impacts to water quality, quantity, and distribution would be expected from this permitting action.

Cumulative Impacts:

No cumulative impacts to water quality, quantity, and distribution are anticipated from this permitting action as Town Pump would utilize existing connections for water and sewer.

3. Air Quality

For details about the existing air quality, see Section V of the Permit Analysis. This facility is located in an Unclassifiable/Attainment category, and the facility parcel is approximately 1.75 miles directly west of a designated area for a PM_{10} Maintenance Plan.

Direct Impacts:

Expected emissions from the construction and operation of this permitting action are shown in the Permit Analysis Section within the Emission Inventory. An assessment of greenhouse gases (GHGs) is described in Section 23 of this draft EA.

Air quality standards, set by the federal government and DEQ are enforced by DEQ's Air Quality Bureau (AQB) and allow for air pollution at the levels permitted by the MAQP. The

Town Pump facility has emissions including particulate matter (PM) species, oxides of nitrogen (NO_X), carbon monoxide (CO), sulfur dioxide (SO_2), volatile organic compounds (VOCs), Hazardous Air Pollutants (HAPs), and GHG emissions. The primary function of the vapor combustion unit is to control VOCs, and with the combustion of the VOCs, combustion byproducts are produced by combusting the fugitive vapors in combination with the assist natural gas.

Air pollution control equipment must be operated at the maximum design for which it is intended. ARM 17.8.752(2). Limitations would be placed on the allowable emissions for the new emission sources. DEQ conducted a Best Available Control Technology (BACT) analysis and made a BACT determination for the unloading of railcars into the tanks, and for loading of tanker trucks from the storage tanks. The proposed emission limits were reviewed by DEQ and incorporated into MAQP #5332-00, if necessary, as federally enforceable conditions.

Air quality standards are regulated by the federal Clean Air Act, 42 U.S.C. 7401 *et seq.* and the Montana CAA, § 50-40-101 *et seq.,* MCA, and are implemented and enforced by DEQ's AQB. As stated above, Town Pump is required to comply with all applicable state and federal laws. Minor air quality impacts would be anticipated from the proposed action.

Secondary Impacts:

Impacts to air quality from the operation of the Town Pump facility are to be restricted by an MAQP and therefore should have minor secondary air quality impacts.

Cumulative Impacts:

Cumulative impacts to air quality from the operation of the Town Pump facility are to be restricted by an MAQP and therefore should have minor air quality impacts. Minor impacts are anticipated from this permitting action. The nearby area also has one other stationary permitted source, REC Advanced Silicon Materials LLC MAQP #2940-07 that contributes to the air quality in the area.

4. Vegetation Cover, Quantity, and Quality

No fragile or unique resources or resources of statewide or societal importance, are present in the affected area. The area around the Town Pump facility is primarily industrial and commercial in use including areas being managed as Superfund sites.

DEQ conducted research using the Montana Natural Heritage Program (MTNHP) website and ran a query titled "Environmental Summary Report" dated February 6, 2025, which identified the following plant Potential Species of Concern (SOC) located in or near the affected facility: Carex occidentalis, Atriplex canescens, Carex idahoa, Margaritifera falcata, Atriplex truncate, Potentilla plattensis, Stellaria crassifolia, Eleocharis rostellata, Erigeron Linearis, and Primula incana.

The proposed action would be located within the parcel boundary purchased by Town Pump from Silver Bow.

The polygon area analyzed using the MTNHP website produces an area inherently larger than the specific disturbance area, so some additional species may be reported that are not necessarily present in the affected area, but nearby.

Direct Impacts:

The information provided above is based on the information that DEQ had available at the time of draft EA preparation and information provided by the applicant. The permit application provided an analysis of aerial photography, proposed site map, and nearby site details to support the EA development. Because the proposed action would occur within the Town Pump facility property boundary, minor impacts to vegetation cover are anticipated, as this permitting action is not considered first time disturbance on the property. There would be the addition of a support structure for storage tanks, the vapor combustion unit and lined containment cells for spill control. Vegetation that is present will be disturbed to accommodate this new infrastructure but would be a minor impact as this is not considered first time disturbance for this site.

Secondary Impacts:

Minor secondary impacts to vegetation cover, quantity, and quality are expected since no new land disturbance would occur because of this permitting action, therefore a small area of the vegetation on the property would be affected.

Cumulative Impacts:

Minor cumulative impacts to vegetation cover, quantity, and quality are expected from this permitting action as it does reduce the amount of vegetation cover by a small amount but is not considered first-time disturbance on the property.

5. Terrestrial, Avian, and Aquatic Life and Habitats

As described in Section 4., Vegetation Cover, the affected area is represented by industrial and commercial operations and DEQ conducted research using the MTNHP website and ran the query titled “Environmental Summary Report” dated February 6, 2025, which identified the following animal Species of Concern (SOC) with observations: Westslope Cutthroat Trout, Preble’s Shrew, Clarks’ Nutcracker, Long-billed Curlew, Northern Hoary Bat, Brewer’s Sparrow, Sage Thrasher, Grizzly Bear, Ferruginous Hawk, Great Blue Heron, Trumpeter Swan, Western Toad, White-faced Ibis, Golden Eagle, Black-necked Stilt, Franklin’s Gull, and Loggerhead Strike.

The polygon area analyzed using the MTNHP website produces an area inherently larger than the specific disturbance area, so some additional species may be reported that are not necessarily present within the Town Pump property, but nearby.

Direct Impacts:

The potential impact to terrestrial, avian and aquatic life and habitats would be negligible to minor, due to the industrial and commercial nature of the area.

Secondary Impacts:

Because the proposed action would occur within the existing industrial park, no secondary impacts to terrestrial, avian and aquatic life and habitats would be stimulated or induced by the direct impacts analyzed above as all actions are occurring within property boundaries and this is not considered first time disturbance

Cumulative Impacts:

No cumulative impacts to terrestrial, avian and aquatic life and habitats would be stimulated or induced by the direct impacts analyzed above. The Town Pump facility is located on land that has already been disturbed by human activities and this is not considered first-time disturbance.

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

As described in Section(s) 4 and 5 above, DEQ conducted a search using the MTNHP webpage. The search used a polygon that overlapped the site and produced the list of species of concern identified in Section 5. The project would not be in core, general, or connectivity sage grouse habitat, as designated by the Sage Grouse Habitat Conservation Program (Program) at: http://sagegrouse.mt.gov. This project is located in an area designated as "Exempt Community Borders" by the Montana Sage Grouse Habitat Conservation Program.

Direct Impacts:

Among the SOC identified by the MTNHP, these species would not be expected to be displaced by the proposed action as the land where the permitting action would occur is owned by Town Pump and was previously disturbed and developed within an industrial park. Therefore, any potential direct impacts would be short-term and negligible.

Secondary Impacts:

The proposed action would have no secondary impacts to the identified species of concern because the permit conditions are protective of human and animal health and welfare, and the surrounding area is currently in use for industrial and commercial use. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Cumulative Impacts:

The proposed action would have negligible cumulative impacts to environmental resources because the permit conditions are protective of human and animal health and all lands involved in the proposed action have already been disturbed by human activities.

7. Historical and Archaeological Sites

The Montana State Historic Preservation Office (SHPO) was contacted to conduct a file search for historical and archaeological sites within Section 24, Township 3 North, Range 9 West which includes the area affected by the proposed project. SHPO provided a letter dated January 24, 2025, stating there have been seven previously recorded sites within the designated search location. Three of the sites were deemed eligible for registry status and the other four were undermined. The sites are characterized by the following descriptions:

Site 24SB0428	Historic Placer Mine	Undetermined
Site 24SB0429	Historic Railroad/Building/Structure	Undetermined
Site 24SB0582	Historic Railroad	Eligible
Site 24SB0625	Historic Railroad	Eligible
Site 24SB0762	Historic Vehicular/Foot Bridge	Eligible
Site 24SB0952	Historic Residence	Undetermined
Site 24SB1078	Historic Commercial Development	Undetermined

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 within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place.

However, should structures need to be altered, or if cultural materials are inadvertently discovered during this proposed action, SHPO requests their office be contacted for further investigation.

Direct Impacts:

The search conducted by SHPO identified seven sites in the search area located near the Town Pump property, however none of these sites are located within the Town Pump parcel. Therefore, no impacts to the identified sites would be expected because of the proposed project. Therefore, no direct impacts to historical and archaeological sites would be expected because of the proposed project.

Secondary Impacts:

No secondary impacts to historical and archaeological sites are anticipated since the proposed action is does not impact any existing historical sites.

Cumulative Impacts:

No cumulative impacts to historical and archaeological sites are anticipated since the proposed action does not impact any existing historical sites.

8. Aesthetics

The proposed action would occur on private land owned by Town Pump and in an area mostly surrounded by other industrial and commercial properties. The closest structure off-property is located approximately 150 feet away from the Town Pump parcel boundary. The facility would be located on approximately a 55-acre lot that was developed as part of the industrial park. Construction of the proposed project would last for several months.

Direct Impacts:

Town Pump's infrastructure would change the visual appearance of the area with the addition of the four storage tanks which are each 40 feet tall. The tanks are set within a containment area but would still be visible due to their large sizes. There would be negligible to minor increase in noise levels from construction and operation of the unit. Once construction was completed, remaining noise would likely be limited to railcar traffic staging for railcar unloading. Existing rail service into the construction park would be utilized for deliveries of fuel to the Town Pump parcel. Therefore, any direct impacts would be long-term and minor, and consistent with existing impacts of an industrial and commercial industrial park.

Secondary Impacts:

There would be minor secondary impacts on the aesthetics due to the addition of the storage tanks, piping and VCU. Impacts would be long-term and minor.

Cumulative Impacts:

Long-term impacts would occur with the addition of the storage tanks, piping and VCU, which creates a change in the appearance of the property. This is not considered first time disturbance as the property has already been disturbed by human activities prior to the construction of the bulk loading station.

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

The site is located on land owned by Town Pump. See Sections 2, 3, and 4 of this EA for details regarding land, water, and air impacts.

Direct Impacts:

There would be a minor increase in demand for the environmental resources of land, air, and energy for these actions. There would be minor impacts on air and energy as the emissions would be increased with the construction and operation of the bulk loading station. Any

direct impacts would be long-term and minor.

Secondary Impacts:

No secondary impacts to demands on land, water, air, and energy are anticipated as a result of this permitting action due to this site already being disturbed by human activities.

Cumulative Impacts:

Minor cumulative impacts to demands on land, water, air, and energy are anticipated as a result of this permitting action. Minor cumulative impacts are anticipated with the addition of the bulk loading station in terms of land, air, and energy, as this causes an increase demand on all of those areas.

10. Impacts on Other Environmental Resources

The site is currently an existing industrial park with other industrial and commercial operations as well as un-occupied parcels.

Direct Impacts:

No other environmental resources are known to have been identified in the area beyond those discussed above. Hence, there is no impact to other environmental resources.

Secondary Impacts:

No secondary impacts to other environmental resources are anticipated as a result of the proposed permitting action. No secondary impacts to human health and safety are anticipated as a result of the proposed permitting action due to the industrial nature of the facility. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Cumulative Impacts:

No cumulative impacts to other environmental resources are anticipated as a result of the proposed permitting action.

11. Human Health and Safety

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. Members of the public would not be allowed in the immediate proximity to the project during construction or operations and access to the public would continue to be restricted to this property.

Direct Impacts:

Negligible changes in impacts to human health and safety are anticipated as a result of this project action due to the industrial nature of the facility. A human health risk assessment

was conducted for the vapor combustion unit, concluding that risks are below levels triggering health concerns. See Section VIII of the attached permit.

Secondary Impacts:

No secondary impacts to human health and safety are anticipated as a result of the proposed permitting action due to the nature of the facility. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Cumulative Impacts:

No cumulative impacts to human health and safety are anticipated as a result of the proposed permitting action due to the nature of the facility.

12. Industrial, Commercial, and Agricultural Activities and Production

This site is privately owned land by Town Pump, and the property has had previous disturbance from human activities.

Direct Impacts:

Any impacts on industrial, commercial, and agricultural activities and production in the area would be long-term and major due to the addition of the bulk loading station which would increase industrial production of the facility and the affected area, and over-the-road truck traffic would increase as a result of the truck loading operations.

Secondary Impacts:

Minor secondary impacts to industrial, commercial, and agricultural activities and production are anticipated as a result of the proposed permitting action as this property would now have equipment which would require maintenance, safety checks and rely upon other resources including railcar and truck hauling.

Cumulative Impacts:

The cumulative impacts would be minor as the property has been previously disturbed with human activities, but would now also function as a new business with the addition of the bulk loading station.

13. Quantity and Distribution of Employment

With the approval of this permit, there would be three to seven employees required for operation of the Town Pump site. Construction of the site would require a number of contract employees which is expected to last several months.

Direct Impacts:

The proposed action would be expected to have minor impact on the overall distribution of

employment as the facility would require three to seven employees, therefore increasing the long-term employment because of this permitting action. Therefore, there would be minor direct impacts.

Secondary Impacts:

Minor secondary impact to the quality and distribution of employment is expected on long-term employment from the proposed action as new employees are being added for operation of the site.

Cumulative Impacts:

There would be minor cumulative impacts on employment for this permitting action because new employees would be added as a result of this permitting action. Once construction was completed, the one-time construction personnel onsite would no longer be onsite.

14. Local and State Tax Base and Tax Revenues

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 this operation.

Direct Impacts:

The proposed action would be expected to have long-term, major impacts on the local and state tax base and tax revenues due to the addition of the new bulk loading facility.

Secondary Impacts:

Town Pump would be responsible for accommodation of taxes associated with the operation of the new facility. Minor secondary impacts to local and state tax base and tax revenues are anticipated as a result of the proposed permitting action.

Cumulative Impacts:

Minor impacts to local and state tax base and tax revenues are anticipated with the construction and operation of a new facility in the area. Town Pump would be responsible for accommodation of any taxes associated with the operation of the new facility. 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 this operation. Therefore, any cumulative impacts would be minor and long-term, consistent with existing impacts in the affected area.

15. Demand for Government Services

The area surrounding the Town Pump site consists of industrial and commercial properties which are part of the industrial park.

Direct Impacts:

The air quality permit has been prepared by DEQ air quality permitting staff as part of their day-to-day, regular responsibilities. Therefore, any direct impacts to demands for government services would be short-term, consistent with existing impacts, and minor. Compliance review and assistance oversight by DEQ AQB would be conducted in concert with other area activities when in the vicinity of the proposed project. Therefore, any direct impacts would be long-term and negligible to minor, mainly through increased regulatory oversight by DEQ.

Secondary Impacts:

Initial and ongoing compliance inspections of facility operations would be accomplished by DEQ Air Quality Staff 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 secondary impacts to demands for government services would be long-term, consistent with existing impacts, and minor.

Cumulative Impacts:

The air quality permit has been prepared by DEQ air quality permitting staff as part of their day-to-day, regular responsibilities. Following construction of the proposed facility, 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 cumulative impacts to demands for government services would be long-term, consistent with existing impacts, and negligible. Minor cumulative impacts are anticipated on government services with the proposed action and a minimal increase in impact would occur from the permitting and compliance needs associated with this permitted facility.

16. Locally Adopted Environmental Plans and Goals

A review was conducted on February 27, 2025, to identify any locally adopted environmental plans or goals. A Butte-Silver Bow Comprehensive Plan Draft (Plan) (adopted in 2020) was located on the City-County of Butte Silver Bow Website. This serves as a guide to understanding the updated community vision, planning principes, and actionable strategies from the previous 2008 Growth Plan update (Long Range Plans). The Plan addresses all of Silver Bow County and is not limited just to the City of Butte.

Direct Impacts:

Town Pump's facility is on property formerly owned by Butte Silver Bow, and cadastral layers still reflect BSB as the current owner. The Plan does address inventory of historic areas near the Town Pump site, so the SHPO inventory referenced in section 17 of the EA is consistent with the Plan.

Secondary Impacts:

Since the Plan covers the entire Silver Bow County, it is expected that the development of the industrial park is consistent with growth policy planning goals. Therefore, minor secondary impacts would be expected because of the proposed project.

Cumulative Impacts:

Consistent with the Plan identified for Silver Bow County, development of the site for industrial and commercial benefit is expected to have minor cumulative impacts consistent with continued development of the industrial park.

17. Access to and Quality of Recreational and Wilderness Activities

The Town Pump facility is located approximately 24 miles directly east of the Anaconda Pintler Wilderness Area and approximately 68 miles southwest of the Gates of the Mountains Wilderness Area.

Direct Impacts:

There would be no impacts to the access to wilderness activities as none are in the vicinity of the proposed action. Therefore, no direct impacts to access to and quality of wilderness activities would be expected because of the proposed project. The affected area is an existing industrial park with little to no recreational opportunities in the area affected by the proposed project. Therefore, no direct impacts would be expected. Access to the wilderness areas would not change with this permitting action.

Secondary Impacts:

No wilderness areas are located nearby or accessed through this land owned by Town Pump. The nearest designated wilderness area is the Anaconda Pintler Wilderness area located approximately 24 miles from the affected site. Therefore, no secondary impacts to access to and quality of wilderness activities would be expected because of the proposed project. No secondary impacts to access and quality of recreational and wilderness activities are anticipated as a result of the proposed permitting action which is wholly contained within the boundary of the Town Pump property.

Cumulative Impacts:

No wilderness areas are located nearby or accessed through this land owned by Town Pump. The nearest designated wilderness area is the Anaconda Pintler Wilderness Area located approximately 24 miles from the affected site. Therefore, no cumulative impacts to access to and quality of wilderness activities would be expected because of the proposed project. No cumulative impacts to access and quality of recreational and wilderness activities are anticipated as a result of the proposed permitting action which is wholly contained within the boundary of the Pump property.

18. Density and Distribution of Population and Housing

Direct Impacts:

Town Pump would employ three to seven employees at this facility. This permitting action would be expected to have a minor increase in employment in the area due to the operation of the Town Pump facility. With it being a minor increase in potential population, it would not require additional housing in the surrounding area. Therefore, negligible direct impacts to density and distribution of population and housing are anticipated because of the proposed action.

Secondary Impacts:

Town Pump would hire several new staff to operate the facility, but the proposed project would not be expected to otherwise result in an increase or decrease in the local population as much of the facility would be serviced by rail and truck traffic which may not necessarily be employed locally. No secondary impacts to density and distribution of population and housing are anticipated as a result of the proposed permitting action.

Cumulative Impacts:

Town Pump would hire new staff to operate the facility, but the proposed project would not be expected to otherwise result in an increase or decrease in the local population as it is a small facility that would only have three to seven employees. Therefore, the proposed project would not be expected to result in an increase or decrease in the local population. No cumulative impacts to density and distribution of population and housing are anticipated.

19. Social Structures and Mores

Based on the required information provided by Town Pump, DEQ is not aware of any native cultural concerns that would be affected by the proposed action on this existing facility. This facility is not located near any Native American Reservations.

Direct Impacts:

The proposed action is located on an existing industrial park site and no changes to or disruption of native or traditional lifestyles would be expected because of the proposed project. Therefore, no impacts to social structure and mores are anticipated.

Secondary Impacts:

No secondary impacts to social structures and mores are anticipated as a result of the proposed actions due to the existing industrial and commercial nature of the area.

Cumulative Impacts:

No cumulative impacts to social structures and mores are anticipated as a result of the proposed actions. Cumulative impacts are anticipated to be negligible as the location was already developed to serve an industrial and commercial function, and this is not considered first-time disturbance.

20. Cultural Uniqueness and Diversity

Based on the required information provided by Town Pump, DEQ is not aware of any unique qualities of the area that would be affected by the proposed action at this existing facility.

Direct Impacts:

Town Pump would employ new employees to accommodate the proposed action. However, the proposed project would not be expected to result in an increase or decrease in the local population as this facility would most likely utilize the existing population of the surrounding area to staff this facility. Therefore, no direct impacts to the existing cultural uniqueness and diversity of the affected population would be expected because of the proposed project.

Secondary Impacts:

The existing nature of the area affected by the proposed project is industrial and commercial. Further, Town Pump would employ new staff to accommodate the proposed action, but the proposed project would not be expected to result in an increase or decrease in the local population due to the nearby city of Butte, with over 30,000 residents. Therefore, no secondary impacts to the existing cultural uniqueness and diversity of the affected population are anticipated as a result of the proposed action.

Cumulative Impacts:

Town Pump would employ new staff to accommodate operation for the proposed action, but the proposed project would not be expected to result in an increase or decrease in the local population due to the nearby city of Butte with over 30,000 residents. Therefore, no cumulative impacts to the existing cultural uniqueness and diversity of the affected population are anticipated as a result of the proposed action.

21. Private Property Impacts

The proposed action would take place on privately-owned land. The analysis below in response to the Private Property Assessment Act indicates no impact. DEQ does not plan to deny the application or impose conditions that would restrict the regulated person's use of private property so as to constitute a taking. Further, if the application is complete, DEQ must take action on the permit pursuant to § 75-2-218(2), MCA. Therefore, DEQ does not have discretion to take the action in another way that would have less impact on private property—its action is bound by a statute.

There are private residences in the nearby area of the proposed action. The closest building, is located approximately 150 feet from the project site.

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)

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

22. Other Appropriate Social and Economic Circumstances

Direct Impacts:

DEQ is unaware of any other appropriate short-term social and economic circumstances in the affected area that may be directly affected by the proposed project. Therefore, no further direct impacts would be anticipated.

Secondary Impacts:

The proposed project would allow for the construction and operation of a bulk loading facility. Any impacts to air quality would be long-term and minor.

DEQ is unaware of any other appropriate short-term social and economic circumstances in the affected area that may be directly affected by the proposed project. Therefore, no further secondary impacts would be anticipated.

Cumulative Impacts:

DEQ is unaware of any other appropriate short-term social and economic circumstances in the affected area that may be directly affected by the proposed project. Therefore, no further cumulative impacts would be anticipated.

23. Greenhouse Gas Assessment

Issuance of this permit would authorize Town Pump to operate a bulk loading facility which would emit volatile organic compounds (VOCs), and due to the use of a vapor combustion unit to control VOCs would also emit a limited amount of greenhouse gases. Estimates are based on VOC combustion and combustion of the natural gas assist fuel.

The analysis area for this resource is limited to the activities regulated by the issuance of MAQP #5332-00, which is to permit a bulk loading facility. The amount of natural gas fuel utilized at this site may be impacted by a number of factors including product fuel demand, seasonal weather impediments and equipment malfunctions. To account for these factors DEQ has calculated the maximum amount of emissions using 8,760 hours per year of operation.

For the purpose of this analysis, DEQ has defined greenhouse gas (GHG) emissions as the following gas species: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), 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 Environmental Protection Agency (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 combustion of diesel fuel at the site would release GHGs primarily being CO_2, N_2O and much smaller concentrations of uncombusted fuel components including CH_4 and other 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 CO_2, N_2O, and CH_4 and reports the total as CO_2 equivalent (CO_2e) in metric tons CO_2e. The calculations in this tool are widely accepted to represent reliable calculation approaches for developing a GHG inventory.

Direct Impacts:

Operation of the natural gas-fired vapor combustor unit at the Town Pump facility would produce exhaust fumes containing GHGs.

DEQ estimates that approximately 15,038 metric tons of CO_2e would be produced per year. To account for variability due to the factors described above, DEQ has calculated the maximum amount of emissions using a factor of 8760 hours per year for operation. Using the EPA simplified GHG Emissions Calculator for mobile sources, approximately 81 metric tons of CO_2e would be produced during construction.

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 CO_2 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. CH_4 remains in the atmosphere for approximately 12 years. N_2O has the potential to remain in the atmosphere for about 109 years (EPA, Climate Change Indictors). The impacts of climate change throughout the southeastern area 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 GHG 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 CO_2, CH_4, and N_2O and reports the total as CO_2e. 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 GHG.

DEQ has determined the use of the default data provides a reasonable representation of the GHG inventory for the various sectors of the state, and the estimated total annual GHG inventory by year. The SIT data from EPA is currently only updated through the year 2021, 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. EPA has released a new version of the SIT tool which is now updated through 2022, but DEQ has not yet validated a new Montana inventory for the year 2022 data.

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 47.77 million metric tons of CO_2e based on the EPA SIT for the year 2021. This project may contribute up to 15,038 metric tons per year of CO_2e. The construction phase of this project would contribute less than 81 metric tons of CO_2e. The estimated emission of 15,038 metric tons of CO_2e from this project would contribute 0.031% of Montana's annual CO_2e 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 not contribute approximately any GHG emissions, as the proposed No Action Alternative would be to deny the permit and not allow the operation of the cremation unit on site. The current land use of the area is industrial and commercial.

Reference:

Bureau of Land Management (BLM) 2021. Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends from Coal, Oil, and Gas Exploration and Development on the Federal Mineral Estate. Available at: https://www.blm.gov/content/ghg/2021/. Accessed February 28, 2024.

PROPOSED ACTION ALTERNATIVES:

No Action Alternative:

In addition to the analysis above for the proposed action, DEQ is considering a "no action" alternative. The "no action" alternative would deny the approval of the proposed permitting action. 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.

Other Ways to Accomplish the Action:

In order to meet the project objective to permit this facility as a bulk fuel loading, the project has no other way to accomplish this action. The project could have been permitted in other locations, but likely was selected for its geographic importance including access to rail and major highways as well as the parcel being available within the industrial park.

If the applicant demonstrates compliance with all applicable rules and regulations as required for approval, the "no action" alternative would not be appropriate. Pursuant to, § 75-1-201(4)(a), (MCA) DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment.

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. External scoping efforts also included queries to the following websites/databases/personnel:

Application for MAQP #5332-00, EPA State Inventory Tool, the EPA GHG Calculator Tool, the Montana Natural Heritage Program Website, the State of Montana GIS Mapping Program, the City-County of Butte Silver Bow website, and the State Historical Preservation Office.

PUBLIC INVOLVEMENT:
The public comment period for this permit action will occur from March 13, 2025, through April 14, 2025.

OTHER GOVERNMENTAL AGENCIES WITH JURSIDICTION:
The proposed project would be located on private land. All applicable state and federal rules must be adhered to, which, at some level, may also include other state, or federal agency jurisdiction.

This environmental review analyzes the proposed project submitted by the Applicant. The project would be negligible to minor at the conclusion of the project and thus would not contribute to the long-term cumulative effects of air quality in the area.

NEED FOR FURTHER ANALYSIS AND SIGNIFICANCE OF POTENTIAL IMPACTS:
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 – identify the parameters of the proposed action;
- 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 minor impacts to air quality and GHG emissions in Silver Bow County, Montana.

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 not result in first time disturbance at the Town Pump facility.

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 proposed activities by the Applicant would have any growth-inducing or growth-inhibiting aspects, or contribution to cumulative impacts. The proposed site does not appear to contain known unique or fragile resources.

There are no unique or known endangered fragile resources in the project area. Underground disturbance for this project would primarily occur for creation of containment pits for spill control purposes.

There would be major impacts to view-shed aesthetics as the tanks, vapor combustion unit and piping, would be constructed where none previously existed. However, because the infrastructure would be installed within the footprint of a development intended as an industrial park, any impacts would be consistent with existing impacts.

Demands on the environmental resources of land, water, air, or energy would not be significant.

Impacts to human health and safety would not be significant as access roads would be closed to the public and because the site is on Privately Owned Land. The public would not be allowed on the Town Pump site.

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

Issuance of a Montana Air Quality Permit 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 amendment, DEQ is not committed to issuing those revisions. DEQ would conduct an environmental review for any subsequent permit modifications sought by the Applicant that require environmental review. 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 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, the proposed project is not predicted to significantly impact the quality of the human environment. Therefore, preparation of an EA is the appropriate level of environmental review pursuant to MEPA.

Environmental Assessment and Significance Determination Prepared By:

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Environmental Assessment Reviewed By:

John Proulx
Air Permitting Section

Approved By:

Bo Wilkins
Air Quality Bureau Chief Date: 3/13/2025

REFERENCES

1. Town Pump application for new permit MAQP#5332-00 received January 26, 2025.

2. EPA GHG Calculator Tool https://www.epa.gov/statelocalenergy/state-inventory-and-projection-tool

3. EPA State Inventory Tool, https://www.epa.gov/statelocalenergy/state-inventory-and-projection-tool

4. 2021 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, https://www.blm.gov/

5. https://www.blm.gov/content/ghg/?year=2022

6. SHPO – State Historical Preservation Office Investigation

7. Resource Information System Endangered Species Investigation, https://mtnhp.org

8. City and County of Butte-Silver Bow, MT | Official Website

ABBREVIATIONS and ACRONYMS

AQB – Air Quality Bureau
ARM - Administrative Rules of Montana
BACT – Best Available Control Technology
BMP - Best Management Practices
CAA – Clean Air Act of Montana
CFR - Code of Federal Regulations
CO - Carbon Monoxide
DEQ – Department of Environmental Quality
DNRC – Department of Natural Recourses and Conservation
EA – Environmental Assessment
EIS – Environmental Impact Statement
EPA - U.S. Environmental Protection Agency
FCAA- Federal Clean Air Act
MAQP – Montana Air Quality Permit
MCA – Montana Code Annotated
MEPA – Montana Environmental Policy Act
MTNHP - Montana Natural Heritage Program
NO_X - Oxides of Nitrogen
PM - Particulate Matter
PM_{10} - Particulate Matter with an Aerodynamic Diameter of 10 Microns and Less
$PM_{2.5}$ - Particulate Matter with an Aerodynamic Diameter of 2.5 Microns and Less
PPAA - Private Property Assessment Act
Program - Sage Grouse Habitat Conservation Program
PSD - Prevention of Significant Deterioration
SHPO - Montana State Historic Preservation Office
SOC - Species of Concern
SO_2 - Sulfur Dioxide
TPY – Tons Per Year
U.S.C. - United States Code
VOC - Volatile Organic Compound