PRELIMINARY DETERMINATION
ON PERMIT APPLICATION

Date of Posting: March 10, 2026

Name of Permittee: Montana Department of Livestock

Facility Name: Montana Veterinary Diagnostic Lab

Physical Site Location (Address): 1911 W. Lincoln Street, Bozeman, Montana

Sent via email: Gregory.juda@mt.gov

RE: Preliminary Determination and Draft Environmental Assessment on Montana Air Quality Permit Application #5349-00

Proposed Action: The Department of Environmental Quality (DEQ) proposes to issue a permit, with conditions, to the above-named applicant. The application was assigned Permit Application Number 5349-00.

Proposed Conditions: See attached Preliminary Determination on MAQP #5349-00.

Public Comment: Any member of the public desiring to comment must submit comments to DEQAir@mt.gov or to the address below. Comments may address DEQ's analysis and Preliminary Determination (PD), draft Environmental Assessment (EA), or the information submitted in the application. All comments are due by April 9, 2026. Copies of the application, the PD, including the draft EA, and DEQ's permit analysis may be requested at https://deq.mt.gov (at the bottom of the home page, select *Request Public Records)*. For more information, contact DEQ at (406) 444-3490, or DEQAir@mt.gov.

Department Action: DEQ intends to issue a Decision on the application following the public comment period. A copy of the Decision and associated final Decision on the EA prepared under the Montana Environmental Policy Act ("MEPA") will be available on DEQ's website, https://deq.mt.gov/public/publicnotice (select *AIR)*. The permit shall become final and effective on the date stated in the Decision, unless the Board of Environmental Review (Board) orders a stay on the permit. The EA shall become final on the date stated in the Decision and remains effective unless a court issues relief pursuant to § 75-1-201(5)(c)–(d), MCA.

Procedures for Appeal: The appeal process for the MAQP and EA are informed by separate and distinct statutory processes, as follows.

Montana Air Quality Permit (MAQP). Any person who is directly and adversely affected by DEQ's Decision may request a hearing before the Board. The appeal must be filed by the date that will be stated in the Decision. The request for a hearing must contain an affidavit setting forth the grounds

for the request. The hearing will be held under the provisions of the Montana Administrative Procedures Act. Submit requests for a hearing to: Chairman, Board of Environmental Review, P.O. Box 200901, Helena, MT 59620, or the Board Secretary: DEQBERSecretary@mt.gov.

Environmental Assessment (EA). A challenge to DEQ's EA may only be brought against a final Decision on the EA and may only be brought in district court or in federal court, whichever is appropriate. A challenge may only be brought by a person who submits formal comments on DEQ's draft EA prior to the issuance of the agency's final decision on the EA, and the challenge must be limited to those issues raised in those comments. Any action or proceeding challenging a final agency action alleging failure to comply with or inadequate compliance with a requirement of the Montana Environmental Policy Act ("MEPA") must be brought within 60 days of the action that is the subject of the challenge.

For DEQ,

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

John P. Proulx
Air Quality Engineer
Air Quality Bureau
Air, Energy, and Mining Division
(406) 444-5391
jproulx@mt.gov

MONTANA AIR QUALITY PERMIT

Issued To: Montana Department of Livestock
Montana Veterinary Diagnostic Lab
1911 W Lincoln St.
Bozeman, MT 59718

MAQP#: 5349-00
Application Complete: 02/06/2026
Preliminary Determination Issued: 03/10/2026
DEQ's Decision Issued:
Permit Final:

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Montana Department of Livestock - Montana Veterinary Diagnostic Lab (MVDL), 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

MVDL owns one (1) 7.3 million British thermal unit per hour (MMBtu/hr) natural gas-fired incinerator with a maximum rated charge capacity of 60 pounds per hour (lb/hr).

B. Plant Location

The MVDL facility is located at Section 14, Township 2 North, Range 5 East, in Gallatin County, Montana. The property address is 1911 W. Lincoln Street, Bozeman Montana. The latitude and longitude of the facility is 45.66430, -111.06401.

Section II: Conditions and Limitations

A. Emission Limitations

1. MVDL shall not incinerate/cremate any material other than animal remains and any corresponding container unless an alternative material burn is approved in writing by the Department of Environmental Quality (DEQ) for material other than what would be normally termed animal remains and associated containers (ARM 17.8.749).

2. The incineration unit shall be equipped with a secondary combustion chamber with an afterburner. MVDL shall preheat the cremation unit to a minimum of 1,600 degrees Fahrenheit with a minimum 1/2 second retention time, prior to igniting a charge in the primary chamber burner. MVDL shall maintain the secondary chamber temperature such that no single reading is less than 1,600 degrees Fahrenheit in the secondary chamber during incineration. The minimum operating temperatures shall be achieved prior to initiation of incineration, maintained during operation and for one-half hour after complete combustion of materials has been achieved (ARM 17.8.752).

3. MVDL shall develop procedures (operating procedures manual) for the incineration unit and keep a physical copy of the operating procedures manual onsite at all times. All personnel who operate the incinerator unit shall be trained in the use of the operating procedures manual. MVDL shall document training records and supply those training records and a copy of the operating procedures manual to DEQ upon request (ARM 17.8.749 and 17.8.752).

4. MVDL shall utilize liquified petroleum gas (propane) or pipeline quality natural gas as a fuel source and maintain good combustion practices for the incinerator unit (ARM 17.8.752).

5. MVDL shall not cause or authorize to be discharged into the atmosphere visible emissions that exhibit an opacity of 10% or greater averaged over six (6) consecutive minutes (ARM 17.8.749).

6. MVDL shall not cause or authorize to be discharged into the atmosphere any particulate matter emissions in excess of 0.10 gr/dscf (grains per dry standard cubic foot), corrected to 12% carbon dioxide (CO_2) (ARM 17.8.749).

B. Testing Requirements

1. MVDL shall conduct a visual survey whenever animal remains, or an approved alternative material burn are being incinerated (ARM 17.8.749).

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).

C. Operational Reporting and Recordkeeping Requirements

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

4. All records compiled in accordance with this permit must be maintained by MVDL as a permanent business record for at least 5 years following the date of the measurement, must be available at the facility 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).

5. MVDL shall record the daily quantity (mass) of material incinerated/cremated and the daily hours of operation of the cremation unit (date, start time, end time, and operator) (ARM 17.8.749).

D. Continuous Emissions Monitoring Systems

1. MVDL shall install, calibrate, maintain, and operate continuous monitoring and recording equipment on the incinerator to measure the secondary changer exit gas temperature, as required by Section II.A.2 (ARM 17.8.752).

2. At a minimum, the monitor shall be capable of measuring and documenting temperature in the secondary chamber of the incineration unit. MVDL shall document and maintain such records as required by Section II.C.4 (ARM 17.8.749).

E. Notification

1. MVDL shall provide DEQ with written notification of the start-up date of the cremation unit within 15 days after start-up (ARM 17.8.749).

Section III: General Conditions

A. Inspection – MVDL 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 MVDL fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving MVDL 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 MVDL 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
Montana Department of Livestock
Montana Veterinary Diagnostic Lab
MAQP #5349-00

I. Introduction/Process Description

The Montana Department of Livestock - Montana Veterinary Diagnostic Lab (MVDL) owns and operates an animal remains incinerator/crematory. The facility is located at 1911 E. Lincoln Street in Bozeman, MT and is known as the MVDL Facility.

A. Permitted Equipment

MVDL owns and operates one (1) 7.34 million British thermal unit per hour (MMBtu/hr) incinerator with a maximum rated charge capacity of 60 pounds per hour (lb/hr).

B. Source Description

The incinerator has a maximum charge rate of 60 lb/hr of animal remains and associated containers and utilizes natural gas as a fuel source.

The Belt Facility is located at Section 14, Township 2 North, Range 5 East, in Gallatin County, Montana. The latitude and longitude of the facility is 45.66430, -111.06401.

C. Response to Public Comments (To be included if received)

Person/Group Commenting	Permit Reference	Comment	DEQ Response

D. Additional Information (Changes to an existing permit)

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

II. Applicable Rules and Regulations

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

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

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of DEQ, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by DEQ.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

   MVDL 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

MVDL 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, MVDL shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.

5. ARM 17.8.316 Incinerators. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any incinerator, particulate matter in excess of 0.10 grains per standard cubic foot of dry flue gas, adjusted to 12% carbon dioxide and calculated as if no auxiliary fuel had been used. Further, no person shall cause or authorize to be discharged into the outdoor atmosphere from any incinerator emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes.

6. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.

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

8. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of any NSPS subpart defined in 40 CFR Part 60.

9. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs). MVDL is not a NESHAPs affected source.

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. MVDL 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 MVDL 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. MVDL 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.

MVDL does not have a PTE greater than 25 tons per year of any pollutant. However, MVDL owns and operates an incinerator. Pursuant to ARM 17.8.743(1)(c), all incinerators require an MAQP prior to construction and operation regardless of PTE. Therefore, a MAQP is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the MAQP 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 MAQP 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. MVDL 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. MVDL submitted an affidavit of publication of public notice for the February 6, 2026, issue of *The Bozeman Daily Chronical*, a newspaper of general circulation in the Town of Bozeman in Gallatin 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 MVDL 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).

17. ARM 17.8.771 Mercury Emission Standards for Mercury-Emitting Generating Units. This rule identifies mercury emission limitation requirements, mercury control strategy requirements, and application requirements for mercury-emitting generating units.

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 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 #XXXX-XX for MVDL, 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 not subject to any current NSPS.

   e. This facility is not subject to any current NESHAP standards.

   f. This source is not a Title IV affected source, or a solid waste combustion unit.

   g. This source is not an EPA designated Title V source.

Based on these facts, DEQ determined that MVDL 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, MVDL will be required to obtain a Title V Operating Permit.

III. BACT Determination

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

DEQ prepared the following BACT analysis and determination. The following control options have been reviewed and analyzed by DEQ to determine BACT. The control options selected have controls and control costs comparable to other recently permitted similar sources and can achieve the appropriate emission standards.

MVDL shall develop procedures (operating procedures manual) for the cremation unit and keep a physical copy of the operating procedures manual onsite at all times. All personnel who operate the cremation unit shall be trained in the use of the operating procedures. MVDL shall keep training records and supply those training records and a copy of the operating procedures manual to DEQ upon request.

Carbon Monoxide BACT for the New Incinerator:

Step 1: Identify All Available Control Technologies

By design, the cremation unit will have a secondary afterburner chamber. The following control technologies for Carbon Monoxide (CO) reduction are available and presented top-down by control efficiency:

Technology
Secondary Chamber with Afterburner
Secondary Chamber with Afterburner and Wet Scrubber
Electric Cremation unit (not fossil-fuel combustion)

Electric Cremation Unit: This process uses electricity to cremate human and/or animal remains. The unit consists of an inner and outer chamber, with the remains in the inner chamber and the electrical elements in the outer chamber. After attaching electrodes to the remains, an electrical current passes through the body, which is what causes the process of cremation to occur. This process produces no gas emissions but would fundamentally redefine the source by requiring the purchase and operation of an entirely different type of cremation unit than proposed. EPA has not considered options that fundamentally redefine a source to be "available" at Step 1. Therefore, the use of an Electric Cremation Unit for the purposes of CO reduction, and all other pollutant reduction is outside the scope of this analysis and eliminated from further consideration as BACT.

Step 2: Eliminate Technically Infeasible Control Options

Technology	Technically Feasible
Afterburner	Yes
Afterburner with Wet Scrubber	Yes

Step 3: Rank Remaining Control Technologies by Control Effectiveness

Technology	Ranking
Secondary Chamber with Afterburner and add-on Wet Scrubber	1
Secondary Chamber with Afterburner	2

Because the proposed cremation unit inherently incorporates a secondary chamber and afterburner, the Wet Scrubber constitutes an add-on control resulting in greater CO control effectiveness than a secondary chamber alone.

Step 4: Evaluate Most Effective Controls and Document Results

BACT for products of combustion/incineration for CO resulting from cremation unit operations is typically proper crematorium design and operation, including development of an operations manual and employee training. Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber.

Wet Scrubber: This method utilizes a liquid to remove pollutants from a gaseous exhaust stream through absorption. Most wet scrubbers have a removal efficiency greater than 90%, depending on the pollutant being absorbed. Total cost of a wet scrubber ranges from $20,000 to $100,000 (EPA), depending on the make and model of the wet scrubber selected. Due to MVDL emitting less than 1 TPY of CO, the addition of a wet scrubber is economically infeasible.

Because potential emissions of all regulated air pollutants resulting from natural gas or propane combustion are low (see Section IV, Emission Inventory), incorporation of available add-on pollutant-specific control technologies would result in high cost per ton removed values thereby making pollutant-specific add-on controls for CO economically infeasible in this case.

Proper design includes relying on good turbulence, high temperature and appropriate residence time within the secondary chamber. Turbulence is achieved with proper introduction of air into the combustion chambers. Temperature is achieved by preheating both the primary and secondary chambers to 1,600 degrees Fahrenheit prior to placing the remains and associated container in the cremation unit. The secondary chamber is also required to maintain a minimum operating temperature of 1,600 ºF. Residence time is achieved by sizing the secondary chamber large enough to support final combustion within the secondary combustion chamber. This design incorporates no heat recovery from the secondary combustion chamber and therefore, the stack volume operates effectively as an extension of the secondary combustion chamber volume. When the volume of the secondary combustion chamber and stack are combined the average residence time is over one second.

Step 5: Identify BACT

MVDL proposes to install and operate a natural gas or propane-fired incinerator equipped with a secondary chamber and afterburner designed specifically to reduce CO and other regulated air pollutants, emitted by the incinerator. Previous research done by DEQ, including similar BACT analyses for crematoriums, demonstrates that additional air pollution control equipment beyond

control of the secondary chamber, which maintains a stable temperature and retention of combustion gases within, has not been deemed BACT for similar cremation units.

Based on these conclusions, DEQ determined that proper unit design and operation constitutes BACT for CO. Proper unit design and operation includes the development of an operations manual, training employees in proper operation, preheating both the primary and secondary chamber to 1600 degrees Fahrenheit before inserting the remains, maintaining the secondary chamber at or above 1,600 degrees Fahrenheit, and no additional control.

The BACT determination prescribed by MAQP #5345-00 provides comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

NO_X BACT for the New Incinerator:

Step 1: Identify All Control Technologies

By design, the proposed cremation unit will have a second, afterburner chamber. In addition to the afterburner, the control technologies for Oxides of Nitrogen (NO_x) reduction identified in Table 1 below constitute available technologies, listed top-down by effectiveness:

Technology
Secondary Chamber with Afterburner
Secondary Chamber with Afterburner and add-on Selective Catalytic Reduction

Step 2: Eliminate Technically Infeasible Control Options

Technology	Technically Feasible
Secondary Chamber with Afterburner	Yes
Secondary Chamber with Afterburner and add-on Selective Catalytic Reduction	Yes

Selective Catalytic Reduction (SCR): SCR is a process involving the chemical reduction of NO_x using a metal-based catalyst to increase the rate that NO_x is reduced. Typically, this technology is used in stationary source fossil fuel-fired combustion units, such as the proposed cremation unit. However, SCR is generally used for sources that require a high level of NO_x reduction, potentially reaching up to 100% reduction in NO_x levels. The proposed crematorium uses propane, thus, potential emissions of all regulated pollutants, including NOx, are low.

Step 3: Rank Remaining Control Technologies by Control Effectiveness
The remaining technologies include those listed below.

Technology	Ranking
Secondary Chamber with Afterburner with Selective Catalytic Reduction	1
Secondary Chamber with Afterburner	2

Because the proposed cremation unit inherently incorporates a secondary chamber or afterburner, SCR constitutes an add-on control resulting in greater NO_X control effectiveness than a secondary chamber alone.

Step 4: Evaluate Most Effective Controls and Document Results

BACT for NO_x resulting from crematorium operations is typically proper crematorium design, including a secondary chamber or afterburner, and proper operation.

Since potential emissions of all regulated pollutants, including NO_x, resulting from natural gas or propane combustion are low, incorporation of SCR would result in high cost per ton removed values thereby making pollutant-specific add-on controls for NO_x economically infeasible in this case. Costs vary depending on the type of unit, type of fuel, the NO_x inlet/outlet design level and reactor arrangement. On average, a small unit retrofitted with SCR would cost approximately $100/kilowatt based on costs in 2011 with operational and maintenance costs at approximately 0.11cents/kilowatt-hour (Selective Catalytic Reduction)

Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber. Turbulence is achieved with proper introduction of air into the combustion chambers. Temperature is achieved by preheating the primary and secondary chambers to 1,600 degrees Fahrenheit prior to placing the remains and associated container. The secondary chamber is also required to maintain at a minimum operating temperature of 1,600 ºF. Residence time is achieved by sizing the secondary chamber large enough to support final combustion within the secondary combustion chamber. This design incorporates no heat recovery from the secondary combustion chamber and therefore, the stack volume operates effectively as an extension of the secondary combustion chamber volume. When the volume of the secondary combustion chamber and stack are combined the average residence time is over one second.

Step 5: Identify BACT

MVDL proposes to install and operate a crematorium equipped with a secondary chamber designed specifically to reduce the amount of pollutants, including NO_X, emitted by the cremation unit/incinerator. Previous research by DEQ, including similar BACT analyses for crematoriums, have not required additional air pollution control equipment beyond incorporation of a secondary chamber, which maintains a stable temperature and retention of combustion gases within and effectively reduces NOx emissions.

Based on these conclusions, DEQ determined that proper unit design and operation constitutes BACT for NOx. Proper unit design and operation includes the development of an operations manual, training employees in proper operation, preheating both the primary and secondary chamber to 1600 degrees Fahrenheit before inserting the remains, maintaining the secondary chamber at or above 1,600 degrees Fahrenheit, and no additional control.

The BACT conclusions prescribed under MAQP #5345-00 provide comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards. The control options selected have controls and control costs

comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

PM/PM_{10}/$PM_{2.5}$ BACT for the New Incinerator:

Step 1: Identify All Control Technologies

By design, the proposed cremation unit will have a second, afterburner chamber. In addition to the standard afterburner, the control technologies for particulate matter (PM) reduction identified in Table 1 below constitute available technologies, listed top-down by effectiveness:

Technology
Secondary Chamber with Afterburner
Secondary Chamber with Afterburner and add-on Wet Scrubber
Secondary Chamber Afterburner and add-on Dry Scrubber

Step 2: Eliminate Technically Infeasible Control Options

Technology	Technically Feasible
Secondary Chamber with Afterburner	Yes
Secondary Chamber Afterburner and add-on Wet or Dry Scrubber	Yes

Wet or Dry Scrubber: A wet scrubber process would be technically feasible for the reduction of NOx emissions from the proposed cremation unit. A wet scrubber utilizes a liquid to remove pollutants from an exhaust stream through the process of absorption. Most wet scrubbers operate in an excess of 90% removal efficiencies, depending on pollutant (Scrubber for Gaseous Control).

Step 3: Rank Remaining Control Technologies by Control Effectiveness

Technology	Ranking
Secondary Chamber Afterburner and add-on Wet or Dry Scrubber	1
Secondary Chamber with Afterburner	2

Because the proposed cremation unit inherently incorporates a secondary chamber or afterburner, a Wet or Dry Scrubber constitutes an add-on control resulting in greater PM control effectiveness than a secondary chamber alone.

Step 4: Evaluate Most Effective Controls and Document Results

BACT for products of combustion/incineration PM resulting from crematorium operations is typically proper crematorium design and operation. Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber.

Since the potential emissions of all regulated pollutants, including PM, resulting from natural gas or propane combustion are low, incorporation of available pollutant-specific control technologies would result in high cost per ton removed values thereby making pollutant-specific add-on controls for PM economically infeasible in this case.

Conceptually, the use of a wet or a dry scrubber in addition to a secondary chamber and afterburner is technically feasible. However, total PM emitted is less than 2 TPY; therefore, with a total capital investment ranging from $100,000-$400,000, depending on the type of scrubber selected, the cost associated with the removal of PM makes the use of an add-on scrubber economically infeasible.

Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber. Turbulence is achieved with proper introduction of air into the combustion chambers. Temperature is achieved by preheating the primary chamber to 1,600 degrees Fahrenheit and the secondary chamber to a minimum of 1,600 degrees Fahrenheit prior to placing the remains and associated container. The secondary chamber is required to maintain at a minimum operating temperature of 1,600 ºF. Residence time is achieved by sizing the secondary chamber large enough to support final combustion within the secondary combustion chamber. This design incorporates no heat recovery from the secondary combustion chamber and therefore, the stack volume operates effectively as an extension of the secondary combustion chamber volume. When the volume of the secondary combustion chamber and stack are combined the average residence time is over one second.

Step 5: Identify BACT

MVDL proposes to install and operate a crematorium equipped with a secondary chamber designed specifically to reduce the amount of pollutants, including PM, emitted by the incinerator. Previous research done by DEQ, including similar BACT analyses for crematoriums, have not required additional air pollution control equipment beyond the control of the secondary chamber, which maintains a stable temperature and retention of combustion gases within.

Based on these conclusions, DEQ determined that proper unit design and operation constitutes BACT for $PM/PM_{10}/PM_{2.5}$. Proper unit design and operation includes the development of an operations manual, training employees in proper operation, preheating both the primary and secondary chamber to 1600 degrees Fahrenheit before inserting the remains, maintaining the secondary chamber at or above 1,600 degrees Fahrenheit, and no additional control.

The control options selected have controls and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards. The BACT conclusions prescribed under MAQP #5345-00 provide comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

SO_x BACT for the New Incinerator:

Step 1: Identify All Control Technologies

The incinerator unit must use pipeline quality natural gas or propane, and both constitute low sulfur fuels, thereby limiting potential SOx emissions. In addition to low sulfur fuels, the following control technologies for sulfur oxides (SO_X) reduction are available:

Technology
Natural gas or propane fuel only (low sulfur fuel) with add-on Wet Scrubber
Natural gas or propane fuel only (low sulfur fuel) with add-on Dry Scrubber (CDS and SDA method)
Natural gas or propane fuel only (low sulfur fuel)

Step 2: Eliminate Technically Infeasible Control Options

Technology	Technically Feasible
Wet Scrubber	No
Natural gas or propane fuel only (low sulfur fuel) with add-on Dry Scrubber (SDA and CDS method)	No
Natural gas or propane fuel only (low sulfur fuel)	Yes

Wet Scrubber: A wet scrubber utilizes a liquid to remove pollutants from an exhaust stream through the process of absorption. Most wet scrubbers operate in an excess of 90% removal efficiencies, depending on pollutant (*Scrubber for Gaseous Control*). Typically, the applications that utilize a wet scrubber have an inlet temperature of 700 ºF or less. With this cremation unit, the inlet temperature would be approximately 1,600 ºF. Therefore, the use of a wet scrubber is deemed technically infeasible and will not be evaluated for consideration further.

Dry Scrubber: A dry scrubber injects either dry, powdered sorbent or an aqueous slurry hat contains a high concentration of the sorbent. The water then evaporates in the high temperature of the flue gas, leaving solid sorbent particles that react with the sorbet. Dry scrubbers have lower removal efficiencies than wet scrubbers with efficiencies between 85 and 95% but tend to be lower in costs. Two types of dry scrubbers in the Dry Flue Gas Desulfurization Systems, the Dry Lime FGD/SDA system and the post combustion circulating dry scrubber (CDS), will be compared in this analysis (*Section 5 SO_2 and Acid Gas Controls*). After research done by DEQ, crematoriums do not operate in practice with the addition of a dry scrubber. Montana DEQ has also not required this additional control in similar BACT determinations. Therefore, dry scrubbers, both the SDA and CDS methods, have not been achieved in practice and are deemed technically infeasible. Add-on scrubbers will not be evaluated further as BACT.

Low sulfur fuels only (pipeline quality natural gas or propane). Both fuels are inherently low in sulfur. Therefore, when combusting natural gas or propane for cremation unit operation, potential SOx emissions are inherently low. Using natural gas or propane fuel only is technically feasible for crematorium operations.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

The only remaining available and technically feasible control options is use of low sulfur fuels.

Technology	Ranking
Low sulfur fuel (pipeline quality natural gas or propane only) with no add-on control	1

Step 4: Evaluate Most Effective Controls and Document Results

BACT for SO_X resulting from crematorium operations is typically the combustion of low sulfur fuels such as pipeline quality natural gas and propane, proper design and operation. Both fuels are inherently low in sulfur. Therefore, when combusting natural gas or propane for cremation unit operation, potential SOx emissions are inherently low.

Step 5: Identify BACT

Pipeline quality natural gas and propane are inherently low in sulfur. Therefore, when combusting natural gas or propane for cremation unit operation, SOx emissions are inherently low. These fuels constitute inherently clean fuels that are readily available and commonly used for crematorium operations. Therefore, BACT for SOx emissions from a registered cremation unit is combustion of pipeline quality natural gas or propane only.

The control options selected have controls and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards. The BACT conclusions prescribed under MAQP #5349-00 provide comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

VOC BACT for the New Incinerator:

Step 1: Identify All Control Technologies

The new incinerator will have a second afterburner chamber. In addition to the standard afterburner, the following control technologies for VOC reduction are possible:

Technology
Secondary Chamber with Afterburner
Secondary Chamber with Afterburner and add-on Carbon Adsorber
Secondary Chamber with Afterburner and add-on Condenser

Carbon Adsorber: Carbon adsorbers control VOC emissions through adsorption. Adsorption is a non-destruction control technology utilized to remove VOCs from low to medium concentration gas streams. There are four main types of adsorption equipment and for this analysis a Fixed-Bed Unit will be analyzed due to its capability to handle low VOC concentration streams and that it can be operated intermittently (*Chapter 1 -Carbon Adsorbers*).

Condenser: Two types of condensers categories exist: refrigerated or non-refrigerated. For this, a non-refrigerated system will be analyzed as a non-refrigerated condenser are used prior to control devices. Condenser control technology reduces emissions to the atmosphere and

captures or recovers VOCs. Condensation is a separation technique in which one or more volatile components of a vapor mixture are separated from the remaining vapors through saturation followed by a phase change, from a gas to a liquid. Control efficiencies range from 50-90% depending on the type of coolants used (*Refrigerated Condensers*).

Step 2: Eliminate Technically Infeasible Control Options

Technology	Technically Feasible
Secondary Chamber with Afterburner	Yes
Secondary Chamber with Afterburner and add-on Carbon Adsorber	No
Secondary Chamber with Afterburner and add-on Condenser	No

Carbon Adsorber: After research, it was determined the addition of a carbon adsorber as additional control has not been achieved in practice for a crematorium. The operational temperature for a carbon adsorber is typically less than 100 ºF. The exhaust stream from the cremation unit will be approximately 1,600 ºF. Therefore, the addition of a carbon adsorber is deemed technically infeasible and will not be considered further.

Condenser: Condensers are typically utilized for equipment that have a gas outlet stream with high levels of VOCs. They are also not typically utilized for cremation units (*Monitoring by Control Technique – Condensers*). Based on the low level of VOC emissions, and that Montana DEQ has not achieved this in practice or required it historically, adding a condenser is deemed technically infeasible and will not be considered further.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

Technology	Ranking
Secondary Chamber with Afterburner	1

Step 4: Evaluate Most Effective Controls and Document Results

BACT for products of combustion/incineration, including VOCs, resulting from crematorium operations is typically proper crematorium design and operation. Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber.

Proper design includes relying on good turbulence, high temperature and the residence time within the secondary chamber. Turbulence is achieved with proper introduction of air into the combustion chambers. Temperature is achieved by preheating the primary chamber to 1,400 degrees Fahrenheit and the secondary chamber to a minimum of 1,600 degrees Fahrenheit prior to placing the remains and associated container. The secondary chamber is required to maintain at a minimum operating temperature of 1,600 ºF. Residence time is achieved by sizing the secondary chamber large enough to support final combustion within the secondary combustion chamber. This design incorporates no heat recovery from the secondary

combustion chamber and therefore, the stack volume operates effectively as an extension of the secondary combustion chamber volume. When the volume of the secondary combustion chamber and stack are combined the average residence time is over one second.

Step 5: Identify BACT

MVDL proposes to install and operate a crematorium equipped with a secondary chamber designed specifically to reduce the amount of pollutants emitted by the incinerator, including VOCs. Previous research done by DEQ, including similar BACT analyses for crematoriums, have not required additional air pollution control equipment beyond the control of the secondary chamber, which maintains a stable temperature and retention of combustion gases within.

Based on these conclusions, DEQ determined that proper unit design that includes preheating the primary chamber and the secondary chamber to 1,600 degrees Fahrenheit before inserting the remains and maintaining the secondary chamber at or above 1,600 degrees Fahrenheit, and proper operation and maintenance of the crematorium with no additional control constitutes BACT for VOCs.

The control options selected have controls and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards. The BACT conclusions prescribed under MAQP #5345-00 provide comparable controls and control cost to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

IV. Emission Inventory

PTE from Natural Gas Combustion			
Pollutant	Emission Factor ($lb/MMft^3$)	Annual (lb/yr)	Annual (Ton/yr)
PM10 & PM2.5 (including condensable)	7.6	479.09	0.24
NOx	100	6303.76	3.15
CO	84	5295.16	2.65
SO2	0.6	37.82	0.02
VOC	5.5	346.71	0.17

PTE from Cremation of Body (including case wrappings)			
Pollutant	Emission Factor (lb/150 lb body)	Annual (lb/yr)	Annual (Tons/yr)
PM10 &PM2.5 (including condensable)	8.50E-02	297.84	0.15

NOx	2.57E-01	900.53	0.45
CO	2.21E-01	774.38	0.39
SO2	1.63E-01	571.15	0.29
VOC	2.24E-01	784.90	0.39

Total Criteria Pollutant Emissions			
Pollutant	Nat. Gas (Tons/yr)	Cremation (Tons/yr)	Annual (Tons/yr)
PM10 & PM2.5	0.24	0.15	0.39
NOx	3.15	0.45	3.60
CO	2.65	0.39	3.03
SO2	0.02	0.29	0.30
VOC	0.17	0.39	0.57

V. Existing Air Quality

The MVDL facility is located in Section 14, Township 2 North, Range 5 East, in Gallatin County, Montana. Gallatin County is classified as Unclassifiable/Attainment for all criteria pollutants.

VI. Air Quality Impacts

This permit contains conditions and limitations that would protect air quality for the site and surrounding area. 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 #5349-00, DEQ determined that there will be no impacts from this permitting action.

Therefore, DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VIII. Human Health Risk Analysis

A health risk assessment was conducted to determine if the proposed crematorium 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, DEQ 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.

HAP Category / Pollutant Name	Table 1 Cancer Annual	Table 2 Noncancer Chronic Annual	Table 2 Noncan-cer Acute Annual	Cancer URF (2)	Cancer Risk (3)	CNCREL (4) (ug/m3)	CNCREL Quotient (5)
Heavy Metals	N/A	2.00E-03	N/A	N/A	N/A	N/A	N/A
Antimony (less than)	2.33E-05	5.00E-03	N/A	0.0043	3.78E-11	0.015	5.87E-07
Arsenic (less than)	4.17E-05	N/A	N/A	0.0024	1.93E-12	0.02	4.02E-08
Beryllium	5.56E-05	N/A	N/A	0.0018	1.16E-11	0.01	6.45E-07
Cadmium	8.33E-06	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	0.012	9.50E-11	0.1	7.92E-08
Chromium, hx	N/A	N/A	N/A	N/A	N/A	0.1	5.13E-09
Cobalt (less than)	N/A	1.50E-02	N/A	N/A	N/A	0.15	2.59E-07
Lead	3.85E-04	2.40E-03	1.00E-02	N/A	N/A	0.09	2.49E-07
Nickel	N/A	5.00E-03	2.00E-02	N/A	N/A	20	1.28E-09
Selenium	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Zinc							
Polycyclic Organic Matter (POM)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-methylnaphthalene	N/A	N/A	N/A	0.0063	5.98E-14	N/A	N/A
3-methylchloranthrene (less than)	N/A	N/A	N/A	0.071	6.00E-12	N/A	N/A
7,12 Dibenz(a)anthracene (less than)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene (less than)	1.20E-02	7.10E-01	N/A	7.8E-06	1.73E-13	30	7.39E-10
Benzene	9.09E-03	8.00E+00	N/A	0.000011	1.39E-13	800	1.58E-11
Dichlorobenzene	N/A	2.00E+00	N/A	N/A	N/A	700	2.71E-08
Hexane	N/A	1.40E-01	N/A	0.000034	N/A	3	2.15E-09
Napthalene	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Phenanathrene	N/A	4.00E+00	N/A	N/A	N/A	5000	7.18E-12
Toluene	N/A	N/A	N/A	N/A	N/A	N/A	N/A

HAP Category / Pollutant Name	Table 1 Cancer Annual	Table 2 Noncancer Chronic Annual	Table 2 Noncan-cer Acute Annual	Cancer URF (2)	Cancer Risk (3)	CNCREL (4) (ug/m3)	CNCREL Quotient (5)
Acenaphthene	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthylene	5.88E-05	N/A	N/A	N/A	N/A	N/A	N/A
Benzo(a)anthracene (less than)	5.88E-05	N/A	N/A	0.0011	9.39E-15	N/A	N/A
Benzo(a)pyrene (less than)	5.88E-05	N/A	N/A	0.00011	5.13E-16	N/A	N/A
Benzo(b)fluoranthene (less than)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Benzo(g,h,i)perylene (less than)	5.88E-05	N/A	N/A	0.00011	4.58E-16	N/A	N/A
Benzo(k)fluoranthene (less than)	N/A	N/A	N/A	0.000011	1.74E-16	N/A	N/A
Chrysene (less than)	5.88E-05	N/A	N/A	0.00011	4.10E-16	N/A	N/A
Dibenzo(a,h)anthracene (less than)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fluorene	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fluoranthene	5.88E-05	N/A	N/A	0.00011	4.97E-16	N/A	N/A
Indeno(1,2,3-cd)pyrene (less than)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Phenanthrene	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	2.63E-09	3.50E-08	N/A				
Dibenzofurans							
1,2,3,4,6,7,8-Heptachlorodebenzofuran (less than)	N/A	N/A	N/A				
1,2,3,4,7,8,9-Heptachlofodibenzofuran (less than)	N/A	N/A	N/A				
1,2,3,4,7,8-Hexachlorodibenzofuran	N/A	N/A	N/A				
1,2,3,6,7,8-Hexachlorodibenzofuran	N/A	N/A	N/A				
1,2,3,7,8,9-Hexachlorodibenzofuran	N/A	N/A	N/A				
2,3,4,6,7,8-Hexachlorodibenzofuran	N/A	N/A	N/A				
1,2,3,7,8-Pentachlorodibenzofuran (less than)	N/A	N/A	N/A				
2,3,4,7,8-Pentachlorodibenzofuran (less than)	N/A	N/A	N/A				

HAP Category / Pollutant Name	Table 1 Cancer Annual	Table 2 Noncancer Chronic Annual	Table 2 Noncan-cer Acute Annual	Cancer URF (2)	Cancer Risk (3)	CNCREL (4) (ug/m3)	CNCREL Quotient (5)
2,3,7,8-Tetrachlorodibenzofuran	N/A	N/A	N/A				
Listed Non-POM Organic HAPs							
Acetaldehyde	4.55E-02	9.00E-02	N/A	N/A	N/A	9	8.47E-09
Formaldehyde	7.69E-03	3.60E-02	3.70E+00	0.000013	2.59E-13	9.8	2.04E-09
Listed Acids	N/A	2.00E-01	3.00E+01	N/A	N/A	20	2.11E-06
Hydrogen chloride (hydrochloric acid)	N/A	5.90E-02	5.80E+00	N/A	N/A	14	2.77E-08
Hydrogen fluoride							
Dioxins	N/A	N/A	N/A	33	1.54E-12	0.00004	1.16E-09
2,3,7,8-tetrachlorodibenzo-p-dioxin							
	N/A	N/A	N/A				
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin							
	N/A	N/A	N/A	1.3	8.88E-13	N/A	N/A
SUM of Hexachlorodibenzo-p-dioxin							
	N/A	N/A	N/A				
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	N/A	N/A	N/A				
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	N/A	N/A	N/A				
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin							
	N/A	N/A	N/A				
1,2,3,7,8-Pentachlorodibenzo-p-dioxin					1.56E-10		4.05E-06

02/09/26
13:02:41
*** SCREEN3 MODEL RUN ***
*** VERSION DATED 13043 ***

C:\Users\cb1001\Desktop\MVDL.scr

SIMPLE TERRAIN INPUTS:
SOURCE TYPE = POINT
EMISSION RATE (G/S) = 0.266990E-05
STACK HEIGHT (M) = 10.8204
STK INSIDE DIAM (M) = 1.0668
STK EXIT VELOCITY (M/S)= 6.0960
STK GAS EXIT TEMP (K) = 866.4833
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = 0.0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = 0.0000
MIN HORIZ BLDG DIM (M) = 0.0000
MAX HORIZ BLDG DIM (M) = 0.0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 11.257 M**4/S**3; MOM. FLUX = 3.575 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1000.	0.4066E-04	4	5.0	5.1	1600.0	36.21	68.53	32.94	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

216.	0.7769E-04	3	10.0	10.1	3200.0	21.97	25.73	15.55	NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED

DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	0.7769E-04	216.	0.

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 incinerator 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 #5349-00, 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.

IX. Taking or Damaging Implication Analysis

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

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible,

YES	NO	
		waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

The proposed project would take place on private land. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ's approval of MAQP #5349-00 would not have private property-taking or damaging implications.

X. Environmental Assessment

An environmental assessment (EA), prepared pursuant to the applicable requirements of Title 75, Chapter 1, Parts 1-3, was completed for the proposed project. A copy of the EA is attached.

DRAFT ENVIRONMENTAL ASSESSMENT

March 10, 2026

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

A. PROJECT/SITE NAME: Montana Veterinary Diagnostic Lab

B. APPLICANT/COMPANY NAME: Montana Department of Livestock

C. Montana Air Quality Permit #5349-00

D. LOCATION: Section 14, Township 2 North, Range 5 East

E. COUNTY: Gallatin

F. PROPERTY OWNERSHIP: FEDERAL STATE X PRIVATE X

TABLE OF CONTENTS

OVERVIEW OF PROPOSED ACTION

Authorizing Action

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

Description of DEQ Regulatory Oversight

DEQ implements the Clean Air Act of Montana, overseeing the development of Montana Department of Livestock – Montana Veterinary Diagnostic Lab (MVDL) and associated facilities. DEQ has authority to analyze impacts to the environment as a result of installing and operating a animal remains incinerator/crematorium.

Proposed Action

MVDL has applied for a Montana Air Quality Permit (MAQP) under the Clean Air Act of Montana, § 75-2-101, et. *seq*, to construct 1.75 million British thermal unit (MMBtu) propane fired animal remains incinerator. The project subject to the proposed action would be located on private land, in Belt, 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.

G. Table 1. Summary of Proposed Action

General Overview	MVDL plans to install and operate one (1) 7.3 million British thermal unit per hour (MMBtu/hr) natural gas-fired incinerator with a maximum rated design capacity of 60 pounds per hour (lb/hr) in an already existing facility.
Duration & Hours of Operation	***Construction:*** *Installation of the unit is not expected to last more than 2 to 4 weeks.* ***Operation:*** *The unit is expected to operate 12 hours a day, 1 day a week, 52 weeks a year.*
Estimated Disturbance	There would be no new disturbances associated with the proposed project.
Construction Equipment	Construction equipment may include but is not limited to delivery vehicles and forklifts.
Personnel Onsite	***Construction:*** 2 to 10, depending on instillation scheduling with contractors. ***Operation:*** 23 full time, existing employees.
Location and Analysis Area	***Location****:* 1911 W. Lincoln Street, Bozeman, 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.

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

Air Quality	MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.
Water Quality	The proposed project would not affect water quality.
Erosion Control and Sediment Transport	The proposed project would be constructed inside an already existing facility with no disturbances outside of the facility.
Solid Waste	Solid waste may be generated as a result of the proposed project. Any solid waste would be transported to the local sanitary landfill for disposal.
Cultural Resources	The proposed project would not have an impact on any cultural resources.
Hazardous Substances	The proposed project is not expected to have any hazardous substances. If hazardous substances are present, proper handing would be required.
Reclamation	The proposed project would be constructed inside an already existing facility.

I. Table 3. Cumulative Impacts

Past Actions	This is a new source.
Present Actions	MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.
Related Future Actions	No future actions have been identified.

Purpose, Need, and Benefits

DEQ's purpose in conducting this environmental review is to act upon MVDL's application for a MAQP to install and operate an animal remains incinerator/crematorium. DEQ's action on the permit application is governed by § 75-2-201, et seq., Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM) 17.8.740, et seq.

The applicant's purpose and need, as expressed to DEQ in seeking this action, is to install and operate an animal remains incinerator/crematorium.

J. Figure 1. General Location of the Proposed Project

Other Governmental Agencies and Programs with Jurisdiction

The proposed action would be located on developed, residential land. All applicable local, state, and federal rules must be adhered to, which may include other local, state, federal, or tribal agency jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: Montana Department of Public Health and Human Services, Montana Board of Funeral Service – Dept. of Labor, Montana Department of Livestock, Gallatin County Sanitarian.

EVALUATION OF AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE

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

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

The duration of the proposed action is quantified as follows:

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

- **Operation Impacts (long-term)**: These are impacts to the environment during the operational period of the proposed action, including the anticipated range of operational time.

The intensity of the impacts is measured using the following:

- **No impact**: There would be no change from current conditions.

- **Negligible**: An adverse or beneficial effect would occur but would be at the lowest levels of detection.

- **Minor**: The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.

- **Moderate**: The effect would be easily identifiable and would change the function or integrity of the resource.

- **Major**: The effect would alter the resource.

1. Geology and Soil Quality, Stability and Moisture

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

The geology of Gallatin County, Montana, consists of conglomerates, sandstones, and clays deposited in waters of a lake that once occupied Gallatin Valley. Loosely cemented. Consist of variety of materials from adjacent mountain slopes, with marls and layers of volcanic dust. Thickness exposed in this quadrangle 1,200+/- feet, but much greater in other parts of Gallatin Valley. Rest unconformably on Archean schists and all sedimentary strata up to and including Livingston formation (of Cretaceous and Eocene age). The site has approximately 0.5 feet of vegetated topsoil. Beneath the topsoil is a layer of sandy lean clay to depths of 2.5 to 4.0 feet.

Direct Impacts

Proposed Action: No direct construction or operational impacts are expected as a result of the proposed action because there are no new land disturbances associated with the proposed action during construction or operation of the facility.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts are expected as a result of the proposed action because there are no new land disturbances associated with the proposed action during construction or operation of the facility.

Cumulative Impacts

Proposed Action: No cumulative impacts are expected as a result of the proposed action are anticipated since no direct impacts or secondary impacts were identified.

2. Water Quality, Quantity, And Distribution

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

There are no naturally existing bodies of water within the analysis area of the project.

Direct Impacts

Proposed Action: No direct construction or operational impacts to water quality, quantity, and distribution are expected with the proposed project. Because the project does not include the use of water as part of constructing or operating the incinerator.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to water quality, quantity, and distribution are expected with the proposed project. As described in Project

Action, Table 1. Summary of Proposed Action, the project does not include the use of water as part of constructing or regular operations of the incinerator.

Cumulative Impacts

Proposed Action: No cumulative impacts to water quality, quantity, and distribution are anticipated since no direct impacts or secondary impacts were identified.

3. Air Quality

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

This facility is located in Gallatin County which is classified as an attainment/unclassifiable airshed.

Direct Impacts

Proposed Action: Minor, short-term impacts would be expected during the installation of the incinerator unit. Possible impacts include fugitive emissions in the form of particulate matter as a result of delivery vehicles and contractor vehicles.

Minor, long-term operational impacts to air quality are expected as a result of the proposed action. The incinerator unit would be used to cremate animal remains. Emissions from the operation of the incinerator are listed in Section 3 – Emissions Inventory of the Permit Analysis Section.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts would be expected as a result of the proposed action.

Cumulative Impacts

Proposed Action: Minor, long-term impacts to air quality may be expected as a result of the proposed action. The operation of the incinerator would be a source of air pollution for as long as the facility is operating.

4. Vegetation Cover, Quantity, and Quality

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.
The facility is surrounded by commercial buildings on the north, west, and east sides. The lot directly south of the facility is undeveloped with vegetative cover that includes wild grasses, bushes, and intermittent farmlands.

Direct Impacts

Proposed Action: No direct construction or operational impacts are expected as a result of the proposed project. The incinerator would be installed in an already existing facility with no new disturbances.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts are expected as a result of the proposed project. The incinerator would be installed in an already existing facility with no new disturbances.

Cumulative Impacts

Proposed Action: No cumulative construction or operational impacts are anticipated since no direct impacts or secondary impacts were identified.

5. Terrestrial, Avian, and Aquatic Life and Habitats

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: No direct construction or operational impacts to terrestrial, avian, or aquatic life because the proposed action would be located inside an existing facility that would not impact any terrestrial, avian, or aquatic life and habitats.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to terrestrial, avian, or aquatic life because the proposed action would not have any new outside disturbances.

Cumulative Impacts

Proposed Action: No cumulative construction or operational impacts to terrestrial, avian, or aquatic life are anticipated since no direct impacts or secondary impacts were identified.

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

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

DEQ conducted research using the Montana Natural Heritage Program (MTNHP) website and ran a query titled “Environmental Summary Report” dated February 18,, 2025, which identified the following plant Potential Species of Concern (SOC) located in or near the affected facility:

Birds – Hooded Merganser, Yellow-Billed Cuckoo, Ovenbird, Black-necked Stilt, Lewis’s Woodpecker, Sharp-tailed Grouse, Sprague’s Pipit

Mammals – Canada Lynx, Dwarf Shrew, Merriam's Shrew, Uinta Ground Squirrel, Wyoming Ground Squirrel, Northern Hoary Bat, Long-legged Myotis, Western Spotted Skunk, Spotted Bat, Wolverine

Vascular Plants – Pale-yellow Jewel-weed, Crawe's Sedge, Beaked Spikerush, Platte Cinquefoil, Slender Indian Paintbrush, Panic Grass, High Northern Buttercup, Fleshy Stitchwort, Oregon Checker-mallow

Direct Impacts

Proposed Action: No direct construction or operational impacts to terrestrial, avian, or aquatic life because the proposed action would not have any new outside disturbances.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to terrestrial, avian, or aquatic life because the proposed action would not have any new outside disturbances.

Cumulative Impacts

Proposed Action: No cumulative impacts to terrestrial, avian, or aquatic life because the proposed action would not have any new outside disturbances.

7. Historical and Archaeological Sites

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

Archaeological Sites

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.
The property associated with the proposed project has 3 separate buildings located on it, the facility where the proposed project is being installed was constructed in 2024.

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.

Direct Impacts

Proposed Action: No direct construction or operational impacts to any historical or archaeological sites are not expected. The installation of the cremation unit would take place in an already established facility that is less than 50 years old. There is also no new ground disturbances associated with the proposed action.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to historical or archaeological sites are expected because there are no new disturbances associated with the proposed action. Also, there are no structures located on the proposed project site that are over 50 years old.

Cumulative Impacts

Proposed Action: No cumulative impacts to historical or archaeological sites are anticipated

since no direct impacts or secondary impacts were identified.

8. Aesthetics

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

The proposed action would include the installation of a "stack" to vent gasses to the atmosphere. The stack is approximately 35.5 feet above grade and would protrude from an existing structure located within the property boundary. Noise levels from the cremation unit are approximately 100 decibels. No new exterior lighting is expected with the proposed project. The area surrounding the facility consists of commercial buildings and undeveloped lots. The nearest residential building is located approximately 650 feet to the southeast of the facility.

Direct Impacts

Proposed Action: Minor, short-term impacts are expected during the installation phase of the proposed project due to delivery vehicles and contractors.

Negligible, long-term impacts are expected during normal operation of the cremation unit due to the above-mentioned stack and noise produced from the unit while in operation.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to aesthetics are expected as a result of the proposed action.

Cumulative Impacts

Proposed Action: Minor cumulative impacts are expected as a result of the proposed action. The installation of the cremation unit would result in a visible stack being added to the structure and ambient noise levels would slightly increase while the unit is in operation.

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

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: No impacts on environmental resources of land and water are expected. The proposed project would be located within an existing facility with no new land disturbances expected. The proposed project would not use water in any part of operations.

Minor, long-term impacts to air and energy are expected. The operation of the cremation would use propane as a fuel source while the cremation unit would produce emissions. The impacts would be limited to the operation hours described in Table 1 of this EA and

emissions produced are listed in Section IV – Emissions Inventory of the Permit Analysis.

Secondary Impacts

Proposed Action: Negligible secondary impacts to energy are expected. The crematorium is fueled by propane and would need to the delivered which could result in fugitive emissions in the form of particulate matter emanating from the county road. No other secondary impacts are expected.

Cumulative Impacts

Proposed Action: Minor long-term cumulative impacts on energy and air are expected as a result of the project.

10. Impacts on Other Environmental Resources

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: Fugitive dust emissions resulting from installation of the proposed facility may adversely impact air quality in the affected area.

However, MVDL must use reasonable precautions to limit fugitive dust generated from construction activities; therefore, the proposed project would not be expected to cause or contribute to a violation of the applicable NAAQS for particulate matter (fugitive dust). See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provides public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Therefore, any adverse direct impacts to other environmental resources would be short-term and minor. No beneficial direct impacts would be expected because of the proposed project.

Secondary Impacts

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

Cumulative Impacts

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

11. Human Health and Safety

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

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

Direct Impacts

Proposed Action: Negligible changes in impacts to human health and safety are anticipated as a result of this project action due to the commercial nature of the facility. A human health risk assessment was conducted for this crematorium, concluding that risks are below levels triggering health concerns. See Section VIII – Human Health Risk Assessment of the attached permit.

Secondary Impacts

Proposed Action: 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. The proposed action would be expected to comply with all applicable air quality standards. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly.

Cumulative Impacts

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

The proposed project would be considered a small commercial activity.

Direct Impacts

Proposed Action: Negligible, short-term impacts to commercial activity may be expected during the instillation phase and operation of the crematory due to delivery and installation of the crematory.

Negligible, long-term impacts to commercial activity may be expected as a result of the proposed project. MVDL is considered a small commercial activity and would not be

expected to have a major commercial impact on the local area.

Secondary Impacts

Proposed Action: No construction or operational impacts are expected as a result of the proposed activity.

Cumulative Impacts

Proposed Action: Negligible cumulative impacts are expected as a result of the proposed project due to installation and operation of the crematorium due to installation and operation of the crematorium.

13. Quantity and Distribution of Employment

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

MVDL identified 23 full-time employees expected to run the facility.

Direct Impacts

Proposed Action: Negligible, short-term and beneficial impacts to installation may be expected through the employment of contractors to install the crematorium.

Negligible, long-term and beneficial impacts to operation of the facility are expected by employing two full-time employees as a result of the proposed project.

Secondary Impacts

Proposed Action: No secondary impacts to construction or operation of the facility are expected as a result of the proposed action. No secondary employment is expected as a result of the proposed action.

Cumulative Impacts

Proposed Action: Negligible cumulative and beneficial impacts are expected as a result of the proposed project due to both temporary and permanent employment to install and operate the crematory, respectively.

14. Local and State Tax Base and Tax Revenue

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: No direct impacts would be expected because of the proposed project. Instillation of the crematory may increase local sales of goods and services. However, because the proposed project would be small by commercial standards any direct impacts to the local and state tax base and tax revenues would be long-term, negligible to minor, and beneficial.

Secondary Impacts

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

Cumulative Impacts

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

15. Demand for Government Services

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

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

Secondary Impacts

Proposed Action: No beneficial secondary impacts would be expected because of the proposed project. 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 adverse secondary impacts to demands for government services would be consistent with existing impacts and negligible.

Cumulative Impacts

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

16. Locally Adopted Environmental Plans and Goals

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

DEQ has reviewed the Cascade County website and found no locally adopted environmental plans and goals for the area.

Direct Impacts

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

Secondary Impacts

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

Cumulative Impacts

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

17. Access to and Quality of Recreational and Wilderness Activities

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: No direct construction or operational impacts to access to and quality of recreational and wilderness activities because the facility is located on private property with no public access to the immediately surrounding area.

Secondary Impacts

Proposed Action: No secondary construction or operational impacts to access to and quality of recreational and wilderness activities because the facility is located on private property with no public access to the immediately surrounding area.

Cumulative Impacts

Proposed Action: No cumulative impacts to access to and quality of recreation and wilderness activities are anticipated since no direct impacts or secondary impacts were identified.

18. Density and Distribution of Population and Housing

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

Proposed Action: Negligible impact on the overall distribution of employment would be expected as the facility would add two new employees, therefore increasing the long-term employment because of this permitting action.

Secondary Impacts

Proposed Action: No secondary impacts to density and distribution of population and housing are expected from the proposed action.

Cumulative Impacts

Proposed Action: Negligible cumulative impacts would be expected as a result of the proposed action. Two full-time employees would operate the crematorium on a permanent basis.

19. Social Structures and Mores

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Based on the required information provided by MVDL, 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

Proposed Action: The proposed action is located on an existing residential 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

Proposed Action: No secondary impacts to social structures and mores are anticipated as a result of the proposed actions due to the existing residential nature of the area.

Cumulative Impacts

Proposed Action: No cumulative impacts to social structures and mores are anticipated since no direct impacts or secondary impacts were identified.

20. Cultural Uniqueness and Diversity

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Based on the required information provided by SRC, 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

Proposed Action: No direct impacts to the existing cultural uniqueness and diversity of the affected population would be expected because of the proposed project. MVDL would employ new staff 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 residents who own the private property.

Secondary Impacts

Proposed Action: No secondary impacts to cultural uniqueness and diversity are expected as a result of the proposed project.

Cumulative Impacts

Proposed Action: No cumulative impacts to cultural uniqueness and diversity are anticipated since no direct impacts or secondary impacts were identified.

21. Private Property Impacts

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

22. Other Appropriate Social and Economic Circumstances

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

Affected Environment

MVDL plans to install and operate one (1) 7.3 MMBtu/hr natural gas-fired incinerator with a maximum rated design capacity of 60 lb/hr in an already existing facility.

Direct Impacts

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

Secondary Impacts

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

Cumulative Impacts

Proposed Action: No cumulative impacts to other appropriate social and economic circumstances are anticipated since no direct impacts or secondary impacts were identified.

23. Greenhouse Gas Assessment

When greenhouse gases are emitted by the Proposed Action, they become well-mixed globally due to their long lifetimes in the atmosphere (i.e., tens of years for methane to thousands of years for carbon dioxide) and atmospheric mixing, primarily driven by differential heating and synoptic-scale weather patterns, which distribute the gases throughout the planet, leading to a relatively uniform concentration of these gases across the globe. These factors could contribute to an overall negligible increase of greenhouse gas concentrations in the global atmosphere, not local airsheds. Localized industrial source greenhouse gas emissions do not have a direct impact on climate, public health and associated impacts to the affected human environment on a local scale.

DEQ determined the Proposed Action would not be expected to result in a substantive change to the existing greenhouse gas composition of the Montana environment. The Proposed Action, as permitted, would involve combustion of approximately 62.69 million standard cubic feet (mmSCF) of natural gas fuel. Due to the limited amount of greenhouse gas emissions potentially produced by the Proposed Action, DEQ has used its discretion pursuant to Section (1)(a) of Senate Bill 221, passed during the 2025 Legislative Session, to forego further analysis for this resource area.

Description of Alternatives

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

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

Other Reasonable Alternative(s): No other reasonable alternatives were discussed. The conditions and limitations identified in the MAQP are reasonable and protective of human health while allowing the facility to operate without any restrictions.

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 included queries to the following websites/databases/personnel: Montana Natural Resource Information System, Montana Cadastral Database.

Public Involvement

The public comment period for this permit action is March 10, 2026, through April 9, 2026. Any substantive public comments received during the public comment period would be summarized and included in Section I.C – Response to Public Comment, of the permit analysis.

Significance of Potential Impacts and Need for Further Analysis

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

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts – 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 negligible impacts to air quality in Gallatin County, Montana.

No significant adverse impacts would be expected because of the proposed project. As noted through the draft EA, the severity, duration, geographic extent and frequency of the occurrence of the impacts associated with the proposed air quality project would be limited. The proposed action would result in a new animal remains crematory/incinerator being installed in an already existing facility.

The applicant proposed to install and operate one (1) 7.3 million British thermal unit per hour (MMBtu/hr) propane fired incinerator with a maximum rated design capacity of 60 pounds per hour (lb/hr) in an already existing facility. The site would be permitted to operate the crematory/incinerator unit up to 8,760 hours per year using operational controls identified in section III – BACT Analysis, of the permit analysis.

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

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

There would be negligible impacts to view-shed aesthetics as the crematory would be installed in an area of limited visibility from the county road.

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

Impacts to human health and safety would be insignificant.

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

Issuance of a Montana Air Quality Permit #5349-00 to the Applicant does not set any precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the Applicant submits another modification or proposes to amend the permit, DEQ is not committed to issuing those revisions.

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

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

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

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

PREPARATION

Environmental Assessment and Significance Determination Prepared By:

John P. Proulx
Air Quality Engineer

Environmental Assessment Reviewed By:

Eric Merchant, Supervisor
Air Quality Permitting Services Section

Approved By:

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

March 10, 2026
Date

REFERENCES

- 5349-00_2025_12_23_APP – Application received from Montana Department of Livestock.

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

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

- 2021 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, https://www.blm.gov/content/ghg/?year=2022

- 5242-01_NRIS_MTNHP_ESR_Data.xls – Natural Resource Information System Endangered Species Investigation, https://mtnhp.org

- https://www.gallatinmt.gov/

- https://svc.mt.gov/msl/cadastral/

- https://ngmdb.usgs.gov/Geolex/UnitRefs/BozemanRefs_7306.html

COMMENT SUMMARY AND RESPONSES TO SUBSTANTIVE COMMENTS

Remove this section before publishing draft documents or final documents for which there was no public comment period. For final documents with comments, include responses to substantive comments.