DRAFT ENVIRONMENTAL ASSESSMENT

September 19, 2025

Montana Department of Environmental Quality
Waste Management Division

PROJECT/SITE NAME: Grizzly Disposal and Recycling

APPLICANT/COMPANY NAME: Grizzly Disposal and Recycling

PROPOSED PERMIT/LICENSE NUMBER: NA

LOCATION: SW 1/4, NW 1/4, Section 28, Township 14N, Range 20W

COUNTY: Missoula

PROPERTY OWNERSHIP: PRIVATE

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OVERVIEW OF PROPOSED ACTION

Authorizing Action

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the Montana environment. The Proposed Action is considered to be a state action that may have an impact on the Montana environment and, therefore, the Department of Environmental Quality (DEQ) must prepare an environmental review. This environmental assessment (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 Montana Solid Waste Management Act (SWMA or the Act), overseeing the development of solid waste management facilities. DEQ has authority to issue solid waste licenses under the SWMA and associated administrative rules. DEQ is also responsible for the regulation of air and water quality under the Clean Air Act of Montana (CAA) and the Montana Water Quality Act (WQA), respectively. DEQ continuously oversees solid waste management facility operation and management (e.g., annual inspections, groundwater monitoring reports, annual license renewal, etc.) for the life of the facility including post-closure monitoring and care.

Proposed Action

Grizzly Disposal and Recycling has applied for a solid waste management license under the SWMA of Montana to construct a transfer facility. The proposed action would be located on private land, in Missoula, Montana. All information included in this EA is derived from the license application, discussions with the applicant, analysis of aerial photography, topographic maps, and other research tools.

Table 1. Summary of Proposed Action

General Overview	Upon issuance of the new solid waste management license, Grizzly Disposal and Recycling would begin operation of a transfer station on a private lot in Missoula, MT using the facilities already constructed on site.
Duration & Hours of Operation	***Construction:*** *No construction would be required as this site has already been built and in operation.* ***Operation: Monday through Sunday, 7:00 AM to 5:00 PM***
Estimated Disturbance	No additional disturbance would be required because the site has already been built.
Construction Equipment	No construction equipment would be required because the site has already been built.
Personnel Onsite	***Construction:*** *No construction would be required as this site has already been built and in operation.* ***Operation:*** *25 total staff, someone on site at all times during operating hours*

Location and Analysis Area	***Location**:* 9730 Derby Drive, Missoula, MT 59808 ***Analysis Area**:* The area being analyzed as part of this environmental review includes the immediate project area (Figure 1), as well as neighboring lands surrounding the analysis area, as reasonably appropriate for the impacts being considered.

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

Air Quality	The applicant proposes to operate inside a building on site, thereby mitigating airborne dust issues.
Water Quality	The applicant proposes to operate on an on-site concrete pad and collecting tipping floor leachate/rinse water for disposal at a wastewater treatment plant.
Erosion Control and Sediment Transport	The applicant proposes to operate on a completely paved property preventing erosion and sediment transport.
Solid Waste	The applicant proposes to operate a transfer station at the site.
Cultural Resources	As part of the Grizzly Disposal Transfer Station Application, a Cultural Resource Inventory was completed by the Montana Historical Society, State Historic Preservation Office in January 2025. No cultural resources were discovered that would be impacted by the proposed project. The applicant would be required to adhere to all applicable local, county, state, and federal requirements pertaining to cultural resources.
Hazardous Substances	The applicant proposes to train staff to screen for hazardous waste at the gate and on the tipping floor. Any regulated hazardous waste identified would be turned away or kept in a separate location until proper disposal can be arranged.
Reclamation	The applicant has not proposed any reclamation actions for the site. The applicant would be required to adhere to all applicable local, county, state, and federal requirements pertaining to reclamation.

Table 3. Cumulative Impacts

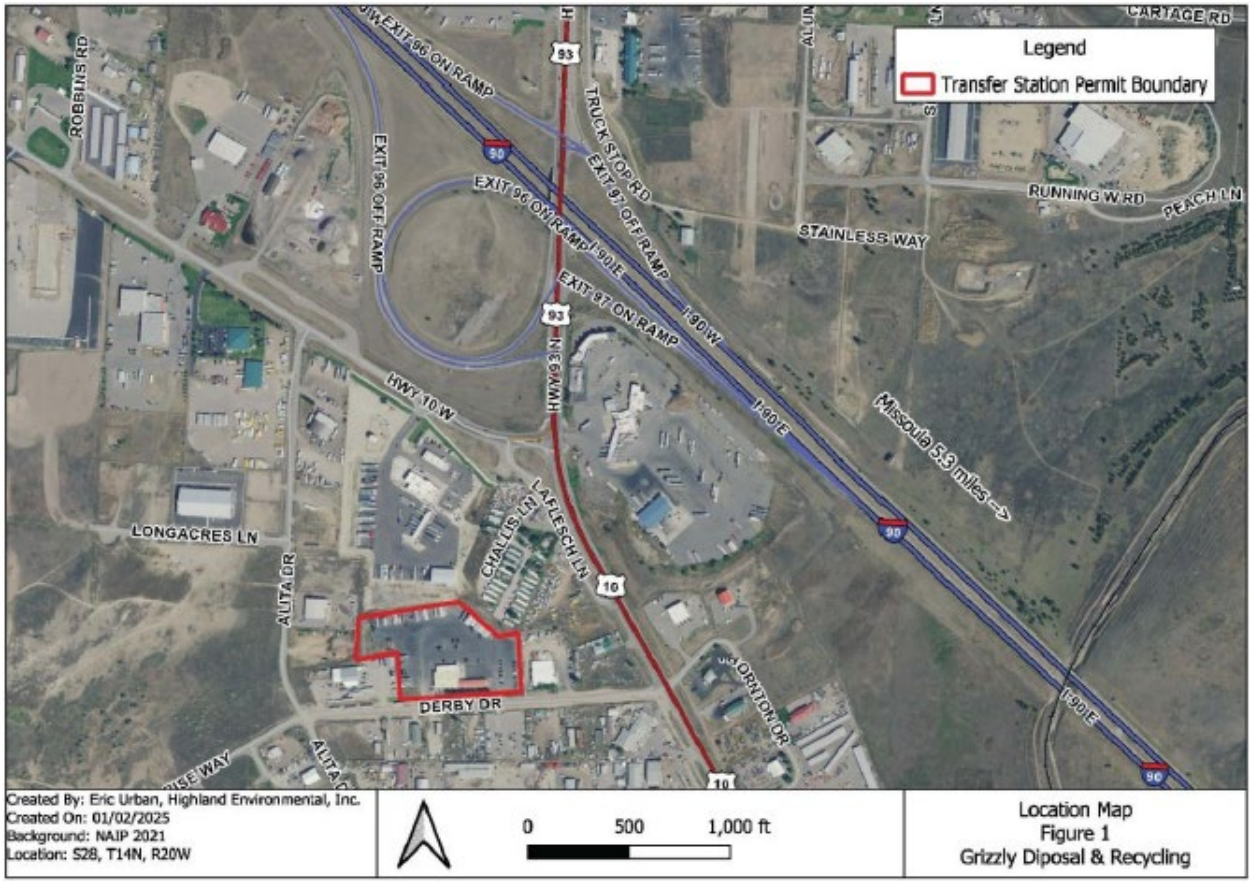
Past Actions	The property is paved with several buildings on site that have been used for industrial and commercial purposes in the past. The site is not associated with any previous solid waste licenses.
Present Actions	The property would be used as a solid waste transfer station upon license issuance.
Related Future Actions	The applicant could build additional facilities on-site in the future which would require an expansion application and additional environmental review.

Purpose, Need, and Benefits

DEQ's purpose in conducting this environmental review is to act upon Grizzly Disposal and Recycling's application for a license to operate a transfer station. DEQ's action on the license application is governed by § 75-10-201, et seq., Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM)Title 17, chapter 50.

The applicant's purpose and need, as expressed to DEQ in seeking this action, is to operate a transfer station in Missoula to facilitate Grizzly Disposal and Recycling waste hauling operations and to serve the public in the greater Missoula area.

Figure 1. General Location of the Proposed Project



Other Governmental Agencies and Programs with Jurisdiction

The proposed action would be located on private land. All applicable local, state, and federal rules must be adhered to, which may also 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: Missoula County.

EVALUATION OF AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE

The impact analysis will identify and evaluate the proximate direct and secondary impacts to the physical environment and population in the area to be affected by the proposed project. *Direct impacts* occur at the same time and place as the action that causes the impact. *Secondary impacts* are a further impact to Montana's environment that may be stimulated, induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts will be described in this analysis. When the analysis discloses environmental impacts, these are proximate impacts pursuant to 75-1-201(1)(b)(iv)(A), MCA.

Cumulative impacts are the collective impacts on Montana's environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures. The projects identified in Table 1 were analyzed as part of the cumulative impacts assessment for each resource.
The duration is quantified as follows:

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

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

The intensity of the impacts is measured using the following:

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

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

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

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

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

Geology and Soil Quality, Stability and Moisture

The project site would continue to be located in a developed industrial area. The proposed site has a concrete pad, and therefore, no earthwork or construction activities would be expected to occur.

Direct Impacts:

The proposed site is currently in industrial use, and therefore, no earthwork or construction activities would be expected. No impacts to geology and soil would be expected because of the proposed action.

Secondary Impacts:

No secondary impacts to geology and soil would be expected.

Cumulative Impacts:

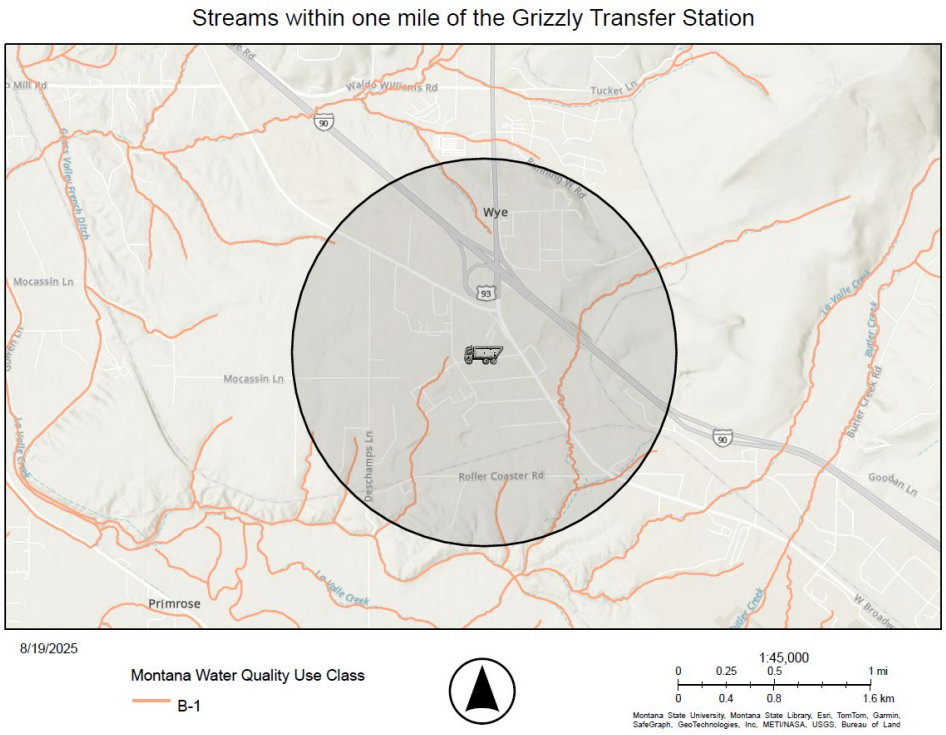
No cumulative impacts to geology and soil would be expected.

Water Quality, Quantity, And Distribution

Precipitation in the area has an annual accumulation of approximately 14 inches (Western Region Climate Center). The Federal Emergency Management Agency (FEMA) has characterized the area as having minimal to no flood potential (FEMA 2025). There are eight B-1 classified streams located within a one-mile radius of the proposed transfer station. B-1 classifies streams as supporting cold water aquatic life and having drinking water as the beneficial use. **Figure 2** below shows the eight streams within a one-mile radius of the property boundary.

The proposed transfer station does not contain any areas that are designated as wetland habitat by the United States Fish and Wildlife Service (USFWS, 2025) and the Montana National Heritage Program (MTNHP).

Figure 2. Surface Waters



(Source: Discover DEQ Throughout Montana Web Map – Water Quality Map)

Direct Impacts

The proposed waste transfer station would be licensed in an industrial area where buildings,

concrete, the scale, and other infrastructure is already in place. Rinsewater leachate control berms are present at the proposed site to mitigate contamination. The tipping floor was built with a slope to facilitate drainage of water that has encountered waste. Leachate would be collected in tanks. Wastewater, generated from washing trucks, would be properly disposed in the City of Missoula's Wastewater System. No direct impacts to surface water would be expected from the proposed action. No interaction with or direct impacts to groundwater would be expected.

Secondary Impacts

No secondary impacts to surface or groundwater would be expected to occur from the proposed action. Flood impacts are not anticipated to affect the proposed transfer station. If there is a great precipitation event, on-site drainage, stormwater controls, and leachate collection via floor-absorbing pads or a Tennant floor scrubber would control any potential pollution. Vertical migration of contaminants would be limited by the tipping floor given it is made of asphalt, and the leachate collection system would ensure proper disposal of water that meets waste. Regular sampling of GWIC Well #71090 would occur to ensure no degradation of water quality, and that drinking water supplied to the site is to MT DEQ standards.

Cumulative Impacts

No cumulative impacts to surface or groundwater would be expected to occur from the proposed action. Potential runoff discharge would be controlled by the sloped tipping floor, leachate collection system, and berms to control the vertical migration of contaminants and ensure groundwater quality.

Air Quality

The nearest Class I airshed to the proposed transfer station is the Flathead Indian Reservation which is approximately 5 miles north of the proposed site. Pollutants, such as landfill gas emissions, would not occur given the waste collected at the site would be transferred to other locations and would be deposited inside a building. Dust and airborne particulate matter would not be produced during the construction phase of the transfer station because the site is already built. A small amount of dust would be anticipated during operating hours from gravel road access through the proposed site. Paved surfaces, already present onsite, would reduce the amount of dust that is produced during operations.

Direct Impacts

Minor direct impacts on air quality could result from the proposed action. Impacts would be caused by traffic entering the site via the gravel Derby Road and creating dust. Dust control would occur through limiting vehicle speeds to 25 mph on Derby Road, and 15 mph within the site.

Secondary Impacts

No secondary impacts on air quality are expected because of the proposed action. The decay of waste containing degradable carbon under anaerobic conditions would not occur since the waste would not be present in an anaerobic environment long enough for substantial amounts of methane and carbon dioxide to be produced.

Cumulative Impacts

No cumulative impacts from the development of the proposed action are expected.

Vegetation Cover, Quantity, and Quality

The proposed site is largely paved apart from surrounding ditches and minor landscaping which would not be disturbed by the operation. Transfer station operations would occur on the paved portion of the site and inside existing buildings on site.

Direct Impacts

No direct impacts to vegetation are expected because of the proposed action.

Secondary Impacts

No secondary impacts to vegetation are expected because of the proposed action.

Cumulative Impacts

No cumulative impacts to vegetation are expected because of the proposed action.

Terrestrial, Avian, and Aquatic Life and Habitats

The proposed site would be located in an industrial area that is largely paved aside from landscaping and adjacent ditches/drainages. There are no unique, endangered, fragile, or limited habitats or wetlands in or adjacent to the proposed site. Operations would occur on/in the in-situ pavement and buildings. The proposed site is fenced to keep out terrestrial life, and waste would be properly managed and removed daily to prevent attracting other insect or avian life as listed in the Operation and Maintenance plan and as required by ARM 17.50.11.

Direct Impacts

No direct impacts to terrestrial, avian, and aquatic life and habitats are expected because of the proposed action.

Secondary Impacts

No secondary impacts to terrestrial, avian, and aquatic life and habitats are expected because of the proposed action.

Cumulative Impacts

No cumulative impacts to terrestrial, avian, and aquatic life and habitats are expected because of the proposed action.

History, Culture, and Archaeological Uniqueness

As part of the Grizzly Disposal Transfer Station Application, a Cultural Resource Inventory was completed by the Montana Historical Society, State Historic Preservation Office in January 2025. No cultural resources were discovered that would be impacted by the proposed project.

Direct Impacts

No impacts on historical and archeological sites are expected because of the proposed action.

Secondary Impacts

No impacts on historical and archeological sites are expected because of the proposed action.

Cumulative Impacts

No impacts on historical and archeological sites are expected because of the proposed action.

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

No unusual demands on land, water, air, or energy are anticipated from the proposed waste transfer station. Examples of unusual demands, which would not be anticipated from this project, would be rerouting creeks, rebuilding of roads, or relocated specific utilities.

Direct Impacts

Based on the analysis of available data, DEQ does not foresee any unusual demands on land, water, air or energy resulting from this project. Therefore, no direct impacts would be anticipated.

Secondary Impacts

No secondary impacts would be anticipated because of the proposed action.

Cumulative Impacts

No cumulative impacts would be anticipated because of the proposed action.

Human Health and Safety

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

Under the Proposed Action, mitigation for impacted environmental resources would alleviate any potential impact to human health and safety. The activities at the site would primarily take place in an enclosed area. Regular cleaning would be performed using a skid steer with a sweeper attachment and, for liquid spills, floor-absorbing pads or a Tennant floor scrubber. The entire property is surfaced with asphalt, eliminating any direct interaction between waste and the substrate below. The property is equipped with an oil water separator and is connected to the City of Missoula wastewater collection system. The applicant would use the Missoula wastewater system for wastewater treatment.

The applicant would implement a safety program for staff members to limit damage or injury to themselves or the public. This includes safety trainings, appropriate PPE, first aid supplies, and listing emergency phone numbers. Clear signage would be posted to ensure public safety. A fire safety plan would be implemented, and employees would be trained on fire response at the Site.

Direct Impacts

No direct impacts to human health and safety are expected because of the Proposed Action.

Secondary Impacts

No secondary impacts to human health and safety are expected because of the Proposed Action.

Cumulative Impacts

No cumulative impacts to human health and safety are expected because of the proposed

action.

Aesthetics

Class II solid wastes produce gases, primarily hydrogen sulfide and ammonia, from the bacterial breakdown of waste material, resulting in odors. The amount of gas produced depends on the type of waste present, the age of the waste, oxygen content, the amount of moisture, and temperature, and the amount of time and conditions under which the waste stockpiled or disposed. Gas formation increases as the temperature and moisture content increase.

The waste arriving at the proposed site would likely be young waste and in the early stages of biological breakdown. The waste would be planned to be trucked within two to three days of arrival to the Deer Lodge County, Lewis and Clark County, or Gallatin County landfills for final disposal. During its time at the proposed site, waste would be inside the enclosed building. Each of these considerations minimizes any odor impacts from the Proposed Action.

Unloading procedures for waste material would be restricted to the tipping deck or transfer trailers. All operations would be conducted inside of an enclosed building to prevent litter. Truckloads of waste, delivered to the landfill sites, must be covered by a secured tarp or some other means to control littering. Litter control would occur daily onsite, and one to two times per week or as needed along the access roads and perimeter of tipping deck to the site.

The following species may be attracted the site: flies, mosquitoes, rodents, and birds. The enclosed building prevents mammalian/bird intrusion, and standing water is eliminated to deter mosquitoes. Professional pest control services are employed as needed. This proactive approach minimizes health risks and environmental impacts associated with vectors.

Traffic would be similar in nature to previous uses of the site and consistent with industrial uses in the area.

Noise at the proposed site would be generated mainly by vehicles hauling waste from the transfer station to the landfill. Vehicle noise would be controlled by the proper maintenance of mufflers to factory specifications. Noise would only be generated during daytime hours of operation. The on-site structures have already been constructed, so no construction noise impacts would be anticipated.

Direct Impacts

Implementing the Proposed Action would have minor impacts to aesthetics. These impacts could be odors, litter, attracted species, and noise. Odors from the Proposed Action are expected to be minimal due to the tipping deck being an enclosed structure and the waste being located at the site for no more than three days. There could be a minor impact of litter potentially from the public bringing waste directly to the transfer station. Litter at the site would be expected to be controlled as the tipping deck is enclosed and due to the facility plan to pick litter around the facility and adjoining roadways as necessary. Implementation of the Proposed Action would likely have minor impacts due to the potential increase of attracted species in the area. Facility staff would mitigate attracted species regularly by implementing best management practices throughout the facility and by ensuring that the structure remains enclosed whenever possible. There would potentially be an increased amount of noise from waste transfer trucks. The area is primarily industrial, and the site was formerly a trucking company, so the overall impact would be expected to be minimal.

Secondary Impacts

No secondary impacts to aesthetics are expected because of the Proposed Action.

Cumulative Impacts

No cumulative impacts to aesthetics are expected because of the Proposed Action.

Socioeconomics

Under the Proposed Action, the transfer station would maintain jobs for the extent of its operation. The transfer station plans to employ 25 staff. The job security of the facility staff would have a minor beneficial impact on the quantity of employment in the region.

Local, state and federal governments would be responsible for appraising the property, setting tax rates, collecting taxes, etc., from the companies, employees, or landowners benefiting from this operation. Since the proposed site has been used as an industrial site in the past, it is unlikely that the tax base on the land would be expected to change.

The location of the proposed waste transfer station site would be in an industrial area where haul traffic is common. Traffic would generally be consistent with current traffic conditions in the area but may cause some increases in traffic with daily variation.

The proposed activity would not require additional services such as fire protection, police schools, etc. that are not already available in Missoula County.

The proposed operation would occur within Missoula County. The Applicant submitted zoning compliance forms completed by Missoula County for the proposed project that indicate that a waste transfer station can occur within the proposed site. The Missoula County Planner signed the application to indicate that the site would conform to the land uses allowed by the zoning.

The proposed activities would occur on Private land. The project would not limit access to wilderness or recreational areas nearby.

The proposed waste transfer station would impact population minimally as the transfer station plans to employ 25 staff. It is not anticipated that additional housing would be required.

DEQ is not aware of any native cultural concerns that would be affected by the proposed activity and also described in *Historical and Archaeological Sites* above. It is not anticipated that this project would disrupt native or traditional lifestyles or communities.

Direct Impacts

New employment opportunities would be limited. No lasting positive or negative impacts to employment would be expected from this project.

The proposed project may or may not add to the population or require additional housing. Therefore, it is unknown if impacts to density and distribution of population and housing would occur. It is unlikely this site would add to the population.

Occasional increases in operation-related traffic would likely to occur. Wear and tear to local

roads and bridges may occur. The daily traffic that would be leaving the site could vary greatly.

Secondary Impacts

No secondary impacts to socioeconomics are expected because of the Proposed Action.

Cumulative Impacts

Truck traffic associated with the project could contribute to the cumulative impacts of wear and tear from industrial trucks on local roads. No other cumulative impacts to socioeconomics are expected because of the Proposed Action.

Private Property Impacts

The proposed project would take place on private land owned by the applicant. DEQ's approval of a solid waste management license would affect the applicant's real property. DEQ has determined, however, that the license conditions are reasonably necessary to ensure compliance with applicable requirements under the Solid Waste Management Act. Therefore, DEQ's approval of a waste management license would not have private property-taking or damaging implications.

Greenhouse Gas Assessment

Issuance of this license would authorize use of various equipment and vehicles to assist in proper disposal and transfer of waste. The development of the new transfer station would require the use of roll off trucks, forklifts, and excavator, and a skid steer. In an email sent by the applicant on August 18th, 2025, annual consumption of diesel is estimated to be 18,500 gallons.

The analysis area for this resource is limited to the activities regulated by the issuance of the Transfer Station Solid Waste Management License which is construction and operation of a Transfer Station Solid Waste Management System, or the Proposed Action. The amount of diesel fuel and natural gas utilized at this site may be impacted by a number of factors including seasonal weather impediments and equipment malfunctions. To account for these factors DEQ has calculated the range of emissions using a factor of +/- 10% of the Applicant's estimate.

Direct Impacts

For the purpose of this analysis, DEQ has defined greenhouse gas emissions as the following gas species: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and many species of fluorinated compounds. The range of fluorinated compounds includes numerous chemicals which are used in many household and industrial products. Other pollutants can have some properties that also are similar to those mentioned above, but the EPA has clearly identified the species above as the primary GHGs. Water vapor is also technically a greenhouse gas, but its properties are controlled by the temperature and pressure within the atmosphere, and it is not considered an anthropogenic species.

The combustion of diesel fuel at the site would release GHGs primarily being carbon dioxide (CO_2), nitrous oxide (N_2O) and much smaller concentrations of uncombusted fuel components including methane (CH_4) and other volatile organic compounds (VOCs).

DEQ has calculated GHG emissions using the EPA Simplified GHG Calculator version May 2023, for the purpose of totaling GHG emissions. This tool totals carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) and reports the total as CO_2 equivalent (CO_2e) in metric tons CO_2e. The calculations in this tool are widely accepted to represent reliable calculation approaches for developing a GHG inventory. DEQ has determined EPA's Scope 1 GHG impacts as defined

in the Inventory Guidance for Greenhouse Gas Emissions are appropriate under MEPA for this Proposed Action. Scope 1 emissions are defined as direct GHG emissions that occur from sources that are controlled or owned by the organization (EPA Center for Corporate Climate Leadership). DEQ's review of Scope 1 emissions is consistent with the agency not evaluating downstream effects of other types of impacts.

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

Operation of gasoline-fueled vehicles throughout the life of the proposed project would produce exhaust fumes containing GHGs.

Direct Impacts

The applicant estimated the annual consumption of diesel would be 18,500 gallons in an email dated August 18th, 2025. To account for variability due to the factors described above, DEQ has calculated the range of emissions using a factor of +/- 10% (This number can be identified based on professional opinion of the actions complexity and duration) of the Applicant's estimate. Therefore, DEQ estimates that between approximately 16,650 and 20,350 gallons of fuel would be utilized per year. Using the Environmental Protection Agency's (EPA) simplified GHG Emissions Calculator for mobile sources from September 2024, between 170 and 208 metric tons of CO_2e would be produced per year.

Secondary Impacts

GHG emissions contribute to changes in atmospheric radiative forcing, resulting in climate change impacts. GHGs act to contain solar energy loss by trapping longer wave radiation emitted from the Earth's surface and act as a positive radiative forcing component (BLM 2023).

Per EPA's website "Climate Change Indicators", the lifetime of carbon dioxide cannot be represented with a single value because the gas is not destroyed over time. The gas instead moves between air, ocean, and land mediums with atmospheric carbon dioxide remaining in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments. Methane remains in the atmosphere for approximately 12 years. Nitrous oxide has the potential to remain in the atmosphere for about 109 years (EPA, Climate Change Indictors). The impacts of climate change throughout western Montana include changes in flooding and drought, rising temperatures, and the spread of invasive species (BLM 2023).

Cumulative Impacts

Montana recently used the EPA State Inventory Tool (SIT) to develop a greenhouse gas inventory in conjunction with preparation of a possible grant application for the Community Planning Reduction Grant (CPRG) program. This tool was developed by EPA to help states develop their own greenhouse gas inventories, and this relies upon data already collected by the federal government through various agencies. The inventory specifically deals with carbon dioxide, methane, and nitrous oxide and reports the total as CO_2e. The SIT consists of

eleven Excel based modules with pre-populated data that can be used with default settings or in some cases, allows states to input their own data when the state believes their own data provides a higher level of quality and accuracy. Once each of the eleven modules is filled out, the data from each module is exported into a final “synthesis” module which summarizes all of the data into a single file. Within the synthesis file, several worksheets display the output data in a number of formats such as GHG emissions by sector and GHG emissions by type of greenhouse gas.

DEQ has determined the use of the default data provides a reasonable representation of the greenhouse gas inventory for the various sectors of the state, and the estimated total annual greenhouse gas inventory by year. The SIT data from EPA is currently only updated through the year 2021, as it takes several years to validate and make new data available within revised modules. DEQ maintains a copy of the output results of the SIT.

DEQ has determined that the use of the default data provides a reasonable representation of the GHG inventory for all of the state sectors, and an estimated total annual GHG inventory by year. At present, Montana accounts for 47.77 million metric tons of CO_2e based on the EPA SIT for the year 2021. This project may contribute up to 208 metric tons per year of CO2e. The estimated emission of 208 metric tons of CO2e from this project would contribute 0.0004% of Montana’s annual CO2e emissions.

GHG emissions that would be emitted as a result of the proposed activities would add to GHG emissions from other sources. The current land use of the area is industrial/commercial and office space.

Description of Alternatives

No Action Alternative: In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval of a solid waste management license to operate a transfer station. 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.

Consultation

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries to the websites/databases/personnel listed below in **REFERENCES**.

Public Involvement

After publication of this document on September 19, 2025, there will be a 30-day public comment period that ends on October 20, 2025. Adjacent landowners and other parties of interest including state and county officials will be notified of the publication of the document and the opportunity to submit comments regarding the proposed action.

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

The Proposed Action would meet the minimum requirements of the Solid Waste Management Act and associated administrative rules regulating solid waste disposal. Adherence to the solid waste, water quality, and air quality regulations and the DEQ-approved facility Operation and Maintenance plan would mitigate the potential for harmful releases and impacts to human health and the environment by the Proposed Action.

DEQ has prepared this EA to examine and document the effects of the Proposed Action on Montana's environment and to determine the need to prepare an environmental impact statement through an initial evaluation and determination of the significance of impacts associated with the Proposed Action. As discussed in Section 2 of this EA, DEQ has evaluated the severity, duration, geographic extent, and frequency of potential impacts to Montana's environment from the Proposed Action. DEQ has also evaluated the probability that the impacts will occur if the Proposed Action occurs. DEQ has not identified any significant environmental impacts from the Proposed Action.

DEQ has not identified any growth-inducing or growth-inhibiting aspects of the Proposed Action. DEQ's approval of the proposed transfer station would not set any precedent and would not commit DEQ to any future action with significant impacts, nor is it a decision in principle about any future actions that DEQ may act on. Finally, the Proposed Action does not conflict with any local, state, or federal laws, requirements, or formal plans.

Based on consideration of all the criteria set forth in ARM 17.4.608, DEQ has determined that the

Proposed Action would not significantly affect Montana's environment. Therefore, an environmental assessment is the appropriate level of environmental review and preparation of an environmental impact statement is not required.

PREPARATION

Environmental Assessment and Significance Determination Prepared By:

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Approved By:

September 19, 2025

Fred Collins, Solid Waste Section Supervisor
Department of Environmental Quality

Date

REFERENCES

2023 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, 2023 BLM Specialist Report - GHG Emissions and Climate Trends

EPA Center for Corporate Climate Leadership, Scopes 1, 2 and 3 Emissions Inventorying and Guidance | US EPA.

EPA, "Climate Change Indictor: Greenhouse Gases". Climate Change Indicators: Greenhouse Gases | US EPA

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