

DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION

Air and Waste Management Bureau



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STATE OF MONTANA

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June 17, 1998

RECEIVED

JUN 18 1998

ENVIRONMENTAL  
QUALITY COUNCIL

Tom Sylvester  
Mountain West Colorado Aggregate  
4212 South Highway 191  
Rexburg, Idaho 83440

Dear Mr. Sylvester:

Air Quality Permit #2994-00 is deemed final as of June 17, 1998, by the Department of Environmental Quality. This permit is for a bark processing facility. All conditions of the department's decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the department,

Handwritten signature of Richard Knatterud in cursive.

Richard Knatterud  
Air Permitting Section Supervisor

RK:bjd

Enclosure

Department of Environmental Quality  
Permitting and Compliance Division  
Air and Waste Management Bureau  
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P.O. Box 200901  
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**FINAL ENVIRONMENTAL ASSESSMENT**

**ISSUED TO:** Mountain West Colorado Aggregates (MWCA)  
4212 S. Hwy 191  
Rexburg, ID 83440

**PERMIT NUMBER:** 2994-00

**PRELIMINARY DETERMINATION ON PERMIT ISSUED:** 5/13/98  
**DEPARTMENT DECISION ON PERMIT ISSUED:** 6/1/98  
**FINAL PERMIT ISSUED:** 6/17/98

**MONTANA ENVIRONMENTAL POLICY ACT (MEPA) COMPLIANCE:** An environmental assessment required by the Montana Environmental Policy Act, was completed for this project as follows:

**LEGAL DESCRIPTION OF SITE:** NW ¼ of Section 13, Township 16 North, Range 26 West, Mineral County.

**DESCRIPTION OF PROJECT:** This permit is for the existing bark processing facility located about 4.5 miles west of Superior.

**BENEFITS AND PURPOSE OF PROPOSAL:** This permit will allow MWCA to operate the facility in compliance with applicable requirements and will set enforceable limits to minimize emissions from the facility

**DESCRIPTION AND ANALYSIS OF REASONABLE ALTERNATIVES WHENEVER ALTERNATIVES ARE REASONABLY AVAILABLE AND PRUDENT TO CONSIDER:** No reasonable alternatives are available.

**A LISTING AND APPROPRIATE EVALUATION OF MITIGATION, STIPULATIONS AND OTHER CONTROLS ENFORCEABLE BY THE AGENCY OR ANOTHER GOVERNMENT AGENCY:** A list of enforceable permit conditions and an analysis containing a BACT analysis are contained in Air Quality Permit #2994-00.

**DESCRIPTION AND ANALYSIS OF REGULATORY IMPACTS ON PRIVATE PROPERTY RIGHTS:** The department has considered alternatives to the conditions imposed in this permit as part of the permit development. The department has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and do not unduly restrict private property rights.

## Potential Impact on Physical Environment

|    |  | Major | Moderate | Minor | None | Unknown |
|----|--|-------|----------|-------|------|---------|
| 1  | Terrestrial and Aquatic Life and Habitats                    |       |          | X     |      |         |
| 2  | Water Quality, Quantity and Distribution                     |       |          | X     |      |         |
| 3  | Geology and Soil Quality, Stability and Moisture             |       |          | X     |      |         |
| 4  | Vegetation Cover, Quantity and Quality                       |       |          | X     |      |         |
| 5  | Aesthetics   |       |          | X     |      |         |
| 6  | Air Quality  |       |          | X     |      |         |
| 7  | Unique Endangered, Fragile or Limited Environmental Resource |       |          | X     |      |         |
| 8  | Demands on Environmental Resource of Water, Air and Energy   |       |          | X     |      |         |
| 9  | Historical and Archaeological Sites                          |       |          | X     |      |         |
| 10 | Cumulative and Secondary Impacts                             |       |          | X     |      |         |

### Comments

1. Terrestrial and Aquatic Life and Habitats - Some small terrestrial mammals may have been displaced by the construction of this facility; however, the area is not unique and there are no threatened species expected to be displaced. The minor amounts of dust and wood particles which may settle into nearby waterways is not expected to have a significant impact on aquatic life.
2. Water Quality, Quantity and Distribution - There are no water discharges from this facility. The Department believes that the potential for ground or surface water degradation will be minimal.
3. Geology and Soil Quality, Stability and Moisture - The disturbances to the surrounding geology and soils from this facility will be minor, if any.
4. Vegetation Cover, Quantity and Quality - The vegetative cover on the facility grounds has been removed since the establishment of the original cedar pole yard in 1973. The bark processing facility is not expected to have a significant detrimental impact on the vegetation surrounding the facility.
5. Aesthetics - The bark processing facility will be visible and does cause some additional noise in the area. Permit # 2994-00 includes federally enforceable controls to limit the amount of dust produced from the operation of the facility.
6. Air Quality - Although the operation of this facility will produce some fugitive dust and wood particles, MWCA has shown through the use of EPA approved models that the facility will not cause or contribute to any violations of the ambient air quality standards.
7. Unique Endangered, Fragile or Limited Environmental Resources - Based on information from the Montana Natural Heritage Program, there are a few species of concern in the area surrounding the facility. These include the Coeur D'Alene Salamander, Harlequin Duck, Bald Eagle, Westslope Cutthroat Trout, Townsend's Big-Eared Bat, and the Shinyleaf Gooseberry. All are listed as sensitive except the Bald Eagle which is listed as threatened. The only species observed within a five mile radius of the facility is the Harlequin Duck which was last observed in 1989. It is believed that none of these ducks currently inhabit the area. It is the responsibility of the owner/operator of the facility to contact the US Fish & Wildlife Service to ensure that all requirements of the Endangered Species Act are being adhered to.

8. Demands on Environmental Resource of Water, Air and Energy - The affect on the environmental resources in the area from this facility is minor. Water will be used to control dust from motor vehicle traffic but the amounts used is not expected to affect the local resources.
9. Historical and Archaeological Sites - Based on information from the Montana Historical Society there are two historic and one Archaeological sites in the area. They include a historic railroad, a historic mining road and an aboriginal lithic scatter. Bark has been processed at this site since 1988 and the previous owner produced cedar fence and poles since 1973. This permit will not authorize additional expansion of the area of the facility. If MWCA plans to expand its operations they must assume the responsibility of ensuring the Historical and Archaeological sites are preserved to the maximum extent possible.
10. Cumulative and Secondary Impacts - This facility processes log yard waste and bark from various sawmills in Western Montana. This material would have to be disposed of by either landfilling it or incineration. The use of the material as a raw material to produce a value added product is a positive action. The cumulative and secondary impacts are believed to be minor and include dust and noise from truck traffic.

**Potential Impact on Human Environment**

|    |   | Major | Moderate | Minor | None | Unknown |
|----|---|-------|----------|-------|------|---------|
| 1  | Social Structures and Mores                                     |       |          |       | X    |         |
| 2  | Cultural Uniqueness and Diversity                               |       |          |       | X    |         |
| 3  | Local and State Tax Base and Tax Revenue                        |       |          | X     |      |         |
| 4  | Agricultural or Industrial Production                           |       |          | X     |      |         |
| 5  | Human Health  |       |          | X     |      |         |
| 6  | Access to and Quality of Recreational and Wilderness Activities |       |          | X     |      |         |
| 7  | Quantity and Distribution of Employment                         |       |          | X     |      |         |
| 8  | Distribution of Population                                      |       |          |       | X    |         |
| 9  | Demands for Government Services                                 |       |          | X     |      |         |
| 10 | Industrial and Commercial Activity                              |       |          | X     |      |         |
| 11 | Locally Adopted Environmental Plans and Goals                   |       |          |       | X    |         |
| 12 | Cumulative and Secondary Impacts                                |       |          | X     |      |         |

**Comments**

1. Social Structures and Mores
2. Cultural Uniqueness and Diversity
8. Distribution of Population

This facility has been in operation at this site since 1988. It currently employs 35 people. The continued operation of the facility is not expected to cause a significant change in the area's social structure, cultural uniqueness or distribution of population.

3. Local and State Tax Base and Tax Revenue
9. Demands of Government Services

As stated above, the facility currently employs 35 people and therefore has an impact on the local tax base. The facility will require increased administrative and inspection services from the Department of Environmental Quality. The impacts in both these areas are expected to be minor.

4. Agricultural or Industrial Production
10. Industrial and Commercial Activity

The operation of the facility is an obvious increase in the industrial production and activity in the area. The fines from the process lines are sold to composting facilities as a raw material. There is not expected to be any additional industrial growth in the area as a result of this facility. There is not expected to be any affect on agriculture production from this facility.

5. Human Health - The bark processing facility has the potential to cause a minor impact on human health. There may be impacts from the inhalation of dust and wood particles; however, MWCA has shown through modeling that the emissions will not cause or contribute to any violation of the ambient air quality standards which are set at a level protecting public health.
6. Access to and Quality of Recreational and Wilderness Activities - This operation is not expected to cause any reduction in the access to recreational or wilderness areas. The air quality impacts on these areas are expected to be minimal as demonstrated by ambient air impact modeling.
7. Quantity and Distribution of Employment - This facility has a minor impact on the area's employment as it has a work force of about 35 people.
8. Locally Adopted Environmental Plans and Goals - This operation should have no impacts on locally adopted environmental plans.

RECOMMENDATION: An EIS is not required.

IF AN EIS IS NOT REQUIRED, EXPLAIN WHY THE EA IS AN APPROPRIATE LEVEL OF ANALYSIS: The Department's analysis of this facility has shown that the impacts from it's operation will be minor.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: None.

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: Department of Environmental Quality, Permitting and Compliance Division.

EA PREPARED BY: Jeff Briggs

DATE: 5/12/98