DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION
Air and Waste Management Bureau

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July 27, 1998

RECEIVED
JUL 28 1998
ENVIRONMENTAL QUALITY COUNCIL

Richard Parril
Holly Sugar Corporation
P.O. Box 1168
Sidney, MT 59270

Dear Mr. Parril:

Air Quality Permit #1826-06 is deemed final as of July 27, 1998, by the Department of Environmental Quality. This permit is for existing sugar beet processing equipment. 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,

Richard Knatterud, P.E.
Air Permitting Section Manager

RK:kd

Enclosure

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued for: Holly Sugar Corporation
Box 1168
Sidney, MT 59270

Air Quality Permit Number: 1826-06

Preliminary Determination on Permit Issued: 6/25/98
Department Decision Issued: 7/11/98
Final Permit Issued: 7/27/98

Montana Environmental Policy Act (MEPA) Compliance: An environmental assessment required by MEPA, was completed for this project as follows.

Legal Description of Site: NW¼, NW¼, Section 34, Township 23 North, Range 59 East, in Richland County, Montana.

Description of Project: This permit is for the addition of a pebble lime hopper and pneumatic loading equipment to be installed at the facility.

Benefits and Purpose of Proposal: This proposal will provide Holly Sugar with a more efficient means of adding lime to the kiln and will make it more cost effective.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: No reasonable alternatives available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A list of enforceable conditions, including a BACT analysis, are contained in permit #1826-06.

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 demonstrate compliance with those requirements and do not unduly restrict private property rights.

Potential Impact on Physical Environment

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

Potential Impact on Human Environment

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

Potential Impacts on Physical Environment

1. Terrestrial and Aquatic Life and Habitats

   Common terrestrial species occupy the same areas as the sugar beet plant. However, the proposed expansion will be located on the facility's existing property. There will be no new habitat destruction as a result of this project. In addition there is no evidence of any unique, threatened, rare, or endangered species in the area, or any wetlands or riparian areas. The department feels that the proposed expansion at this site will only represent a minor affect on terrestrial life. Aquatic life will not be affected by this permitting action.

2. Water Quality, Quantity and Distribution

   Water may be used as a means of pollution control at this facility, and will cause only minor disturbances to the area. Any spills, or leaks, from this operation will be properly handled by the operator.

3. Geology and Soil Quality, Stability and Moisture

   This site is located just outside of the Town of Sidney, Montana. The soils in the immediate area will likely be impacted by the proposed construction at this facility. However, the impacts will be minimal because the proposed expansion is minor, and will only affect existing plant property.

4. Vegetation Cover, Quantity and Quality

   Currently, the surrounding area is residential and commercial. There is no evidence that any rare plants, or vegetative communities exist in the area.

5. Aesthetics

   The site is an established sugar beet processing facility near the Town of Sidney. The proposed expansion at this facility will generate excess light and noise, but the impacts on local residence will be minimal.

6. Air Quality

   Air quality impacts from this facility will be minor. Permit #1826-06 includes conditions that will require the emissions from this expansion be vented through an existing baghouse with a control efficiency of 99%. The actual emissions increase will be less than 1.5 tons of particulate and PM-10 per year. In addition, the emission control requirements contained in the permit will further limit the emissions, thus minimizing any affects it might have on air quality in the area.

7. Unique Endangered, Fragile, or Limited Environmental Resources

   The affects on Unique, endangered, fragile, or limited environmental resources will be minor since the facility is existing and only a small portion of the surrounding plant property will be disrupted during construction and operation of the proposed expansion.

8. Demands on Environmental Resources of Water, Air, and Energy

   No significant demands will be placed on environmental resources. In order for the facility to operate, minor demands will be placed on local air, water, and energy resources.

9. Historical and Archaeological Sites

Since this facility is existing, and only a small portion of the plant property will be disrupted as a result of the proposed expansion, the affects on historical and archeological findings are expected to be minimal.

10. Cumulative and Secondary Impacts

The facility will have minor impacts on the area due to the conditions and limitations contained in permit #1826-06. If the facility wants to expand more in the future, they will be required to apply for, and receive another air quality permit prior to construction of any new sources. If there are cumulative and secondary impacts, they will be addressed at that point. Other environmental regulations would apply if there are discharges into state waters, or if there are spills of regulated substances.

Potential Impacts on Human Environment

1. Social Structures

There will be no significant impact on social structures as a result of this permitting action.

2. Cultural Uniqueness and Diversity

The proposed facility will not cause a change in the cultural uniqueness and/or diversity of the area.

3. Local and State Tax Base and Tax Revenue

The facility is expected to have a minimal affect on the local and state tax base and tax revenue because other similar sources in the state have had little impact. In addition, the facility will serve a need and will generate local revenue in the process.

4. Agricultural of Industrial Production

This facility will not increase agricultural production, but will make Holly Sugar's operation operate more efficiently. In addition, the proposed expansion will be very minor, in terms of industrial production. Therefore, any impacts this facility has on industrial production will be minimal.

5. Human Health

Permit #1826-06 contains conditions that ensure the facility operates in compliance with all applicable standards.

6. Access to and Quality of Recreational and Wilderness Activities

The proposed facility may cause minor impacts to the quality of recreational and wilderness areas nearby as a result of air emissions and noise.

7. Quantity and Distribution of Employment

The proposed facility will not greatly affect the quantity and distribution of employment in the area. The facility is not proposing to hire any new employees as a result of this expansion.

8. Distribution of Population

The proposed facility will not require any additional, or less, housing in the area. Since this is an existing operation, there will be no need to increase the number of workers at the facility.

9. Demands of Government Services

The only government services required by this project are the agencies involved in issuing permits to the facility.

10. Industrial and Commercial Activity

This facility will represent a minor increase in the industrial activity in the area.

11. Locally Adopted Environmental Plans and Goals

The local zoning authority has been notified, and granted clearance for this project. There are no other local authorities that require approval/notification.

12. Cumulative and Secondary Impacts

Overall, the facility will have only minor impacts on the human environment. The limitations and conditions contained in permit #1826-06 will limit the impacts the facility has on the surrounding area. Any future plans to expand this facility will require appropriate analysis by the department. This analysis will address any potential impacts associated with additional sources operating at this location. Other environmental regulations may apply if there are discharges into state waters, or spills of regulated substances.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The emissions from this proposed expansion are minimal. In addition, the controls contained in permit #1826-06 will further limit the emissions.

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 Bellino
Date: June 15, 1998