DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
1520 East Sixth Avenue
P.O. Box 200901, Helena, Montana 59620-0901
(406) 444-3490

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ENVIRONMENTAL QUALITY COUNCIL

DRAFT ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Luzenac America, Inc.
2150 Bench Road
Three Forks, MT 59752

Permit Number: 2282-04

Preliminary Determination on Permit Issued: 8/04/98

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

Legal Description of Site: The facility is located in Section 36, Township 2 North, Range 1 East, Gallatin County, Montana.

Description of Project: The permit application is for the a Product Classifier Circuit that consists of the installation of a 30-inch air classifier, dust collection system, and two pneumatic conveying systems to transport coarse and fine cut powder from the classifier to existing packaging or processing systems. The facility's allowable emissions will increase by 3.82 tons per year of PM-10. The proposed change should not result in an increase of the land disturbed near the site.

Benefits and Purpose of Proposal: The proposed system will allow Luzenac America to classify talc.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: None available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A listing of the enforceable permit conditions and a permit analysis, including a Best Available Control Technology analysis, is contained in permit #2282-04.

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 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 Included
1	Terrestrial and Aquatic Life and Habitats			X			yes
2	Water Quality, Quantity and Distribution				X		yes
3	Geology and Soil Quality, Stability and Moisture				X		yes
4	Vegetation Cover, Quantity and Quality			X			yes
5	Aesthetics				X		yes
6	Air Quality			X			yes
7	Unique Endangered, Fragile or Limited Environmental Resource			X			yes
8	Demands on Environmental Resource of Water, Air and Energy			X			yes
9	Historical and Archaeological Sites				X		yes
10	Cumulative and Secondary Impacts			X			yes

Potential Impact on Human Environment

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

The following summary describes the impacts that may result from the Product Classifier Circuit as proposed with the conditions and limitations outlined in permit #2282-04.

Potential Impact on Physical Environment

1. Terrestrial and Aquatic Life and Habitats

   This permitting action will result in an increase in emissions at the facility of 3.82 tons per year of PM-10. Minor impacts to the habitats of fish and wildlife do to the increased emissions may occur but are not anticipated. Habitat impacts could result in a change in the diversity or abundance of terrestrial or aquatic life.

2. Water Quality, Quantity and Distribution

   The actions addressed in this permit will not result in a change in the amount or characteristics of surface water discharged or the alteration of the course or magnitude of any drainage system. This action does not result in a change in the quality or quantity of ground water. Therefore, no impact to water quality, quantity and distribution is anticipated.

3. Geology and Soil Quality, Stability and Moisture

   The Product Classifier Circuit will not result in an increase in the land disturbed at the site. Therefore, no impact to geology and soil quality, stability and moisture are anticipated.

4. Vegetation Cover, Quantity and Quality

   The increase in regulated pollutants may result in minor impacts to the diversity, productivity or abundance of plant species.

5. Aesthetics

   The permit application proposes new equipment but the overall appearance of the facility should not change. Furthermore, the additional equipment will not alter any scenic vista or create an aesthetically offensive site or effect.

6. Air Quality

   The allowable PM-10 emissions from the facility are permitted to increase; therefore, minor impacts from greater regulated pollutants, as a result of this permit, are likely.

7. Unique Endangered, Fragile or Limited Environmental Resources

   Two species of birds and one species of plants in the Three Fork's area are listed a threatened or endangered. The birds include the Bald Eagle (*Haliaeetus leucocephalus*) and Peregrine Falcon (*Falco Peregrinus*) and the plant is the UTE Ladies' Tresses (*Spiranthes diluvialis*). This permitting action allows for an increase in emissions; therefore minor impacts to terrestrial and aquatic life and/or their habitat are possible. The threatened or endangered species identified may experience minor impacts.

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

The department does not anticipate the actions permitted to result in increased demands on water or energy resources. The permit allows for an increase of 3.82 tons per year of PM-10; therefore, minor demand on air resources is anticipated.

9. Historical and Archaeological Sites

The actions permitted will not result in an increase of land disturbed at the site. The Product Classifier Circuit will not result in any impacts to historical or archaeological sites.

10. Cumulative and Secondary Impacts

Minor cumulative and secondary impacts to terrestrial and aquatic habitats and air quality as a result of the allowable emissions increases in addition to the facility's current emissions are possible.

Potential Impact on Human Environment

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

The location, distribution, density, or growth rate of the human population nor the cultural uniqueness or diversity of the community surrounding the facility will be altered as a result of the actions permitted. The fundamental moral views of a social group are not anticipated to be altered as a result of this permitting action.

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

The changes to Luzenac America air quality permit will not result in a need for new or altered governmental services nor are they anticipated to effect local or state tax bases or revenues.

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

The changes permitted in #2282-04 will not result in a reduction of available acreage or productivity of any agricultural land; therefore, agricultural production should not be affected. Industrial production at the facility will be increasing so minor impacts are anticipated. The industrial and commercial activity in the neighboring area is not anticipated to be altered substantially by this permit.

5. Human Health

The two primary vehicles for impact upon human health are water and air. Since there will be no change in the amount or characteristics of surface water discharged or the quality or quantity of ground water, human health impacts from water are not likely. The allowable increase in PM-10 emissions will result in an increase in airborne particulate matter in the area. Therefore, minor human health impacts from air quality are possible.

6. Access to and Quality of Recreational and Wilderness Activities

The actions permitted will not alter any existing access to and quality of any recreational or wilderness area.

7. Quantity and Distribution of Employment

The actions permitted in permit #2282-04 will not result in an increase in the number of employees at the facility.

11. Locally Adopted Environmental Plans and Goals

Permit #2282-04 should not affect any locally adopted environmental plans or goals.

12. Cumulative and Secondary Impacts

The two primary vehicles for impact upon human health are water and air. Since there are possibly minor air quality impacts from Luzenac America cumulative human health impacts are possible.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The source is applying the Best Available Control Technology; the analyses indicates compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: None

Individuals or groups contributing to this EA: Department of Environmental Quality - Air and Waste Management Bureau.

EA prepared by: Denise A. Kirkpatrick

Date: July 30, 1998