DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION
Air and Waste Management Bureau

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STATE OF MONTANA

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August 18, 1998

RECEIVED
AUG 21 1998
ENVIRONMENTAL QUALITY COUNCIL

Bob Carroll
American Chemet Corporation
P.O. Box 1160
East Helena, Montana 59634

Dear Mr. Carroll:

Air Quality Permit #1993-07 is deemed final as of August 14, 1998 by the Department of Environmental Quality. This permit is for a copper oxide and zinc oxide production 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,

Richard Knatterud
Air Permitting Section Supervisor

RK:bjd

Enclosure

Department of Environmental Quality
Permitting and Compliance Division
1520 E. Sixth Ave., P.O. Box 200901
Helena, Montana 59620

FINAL ENVIRONMENTAL ASSESSMENT

ISSUED TO: American Chemet Corporation
P.O. Box 1160
#1 Smelter Road
East Helena, MT 59634

PERMIT NUMBER: 1993-07

PRELIMINARY DETERMINATION ON PERMIT ISSUED: 7/13/98
DEPARTMENT DECISION ISSUED: 7/219/98
FINAL PERMIT ISSUED: 8/14/98

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: NE 1/4 of Section 36, Township 10 N, Range 3W, Lewis and Clark County

DESCRIPTION OF PROJECT: American Chemet is proposing four minor changes within their facility which will not increase their allowable emissions. American Chemet will replace the #32 Crusher with a new crusher denoted as the #45 Crusher. The new crusher, will be controlled by the baghouse that vents to the #5 stack. The retiring of #32 Crusher vented to the #19 baghouse/stack. Therefore, after construction, the baghouse/stack #5 will control the #6 Copper Mill, and the new #45 Crusher.

American Chemet intends to remove the #25 Copper Shredder. This unit will come out of service and an alternate piece of equipment is not planned to replace it. The #25 Copper Shredder is controlled by the baghouse that vents to stack #19. American Chemet will also move the #31 Sieve and control it with the baghouse that vents to stack #19. Prior to this proposed action, the #31 Sieve is being controlled by the baghouse that vents to stack #18.

Prior to project initiation, the baghouse that vents to stack #19 controls the #32 Crusher, #25 Shredder, and the #30 Copper Mill. After completion of the project, the baghouse that vents to stack #19 will only control the #30 Copper Mill, and the #31 Sieve.

The remaining proposed action is to relocate an existing process unit, the #44 Copper Mill, and control it with the baghouse that vents to stack #25. Therefore, after completion of this project, the baghouse that vents to stack #25 will control the #33 Copper Blender, the #34 Copper Mill, the #35 Copper Sieve, #36 Copper Blender, the #37 Copper Packer, and the relocated #44 Copper Mill.

The project described does not allow an increase in allowable emissions. Therefore, with the negligible net change in actual emissions (minor increases and decreases) occurring at existing stacks, modeling was not performed or required.

BENEFITS AND PURPOSE OF PROPOSAL: The permit will allow American Chemet to operate their facility more efficiently, and minimize the impacts of their manufacturing process on air quality. Furthermore, the permit will allow American Chemet to operate their facility in compliance with applicable requirements.

DESCRIPTION AND ANALYSIS OF REASONABLE ALTERNATIVES WHENEVER ALTERNATIVES ARE REASONABLY AVAILABLE AND PRUDENT TO CONSIDER: No other alternatives were identified which would reasonably reduce emissions, therefore, 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 a complete permit analysis which includes a "best available control technology" or BACT analysis, are contained in Air Quality Permit 1993-07.

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	Comments Attached
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	X		
8	Demands on Environmental Resource of Water, Air and Energy			X			
9	Historical and Archaeological Sites			X	X		
10	Cumulative and Secondary Impacts			X			

Comments on Potential Impacts

1. Terrestrial and Aquatic Life and Habitat - The negligible change in particulate emissions from these alterations should have little to no affect on nearby terrestrial and aquatic life.

2. Water Quality, Quantity, and Distribution - The most predominant air pollution control device found at this facility are baghouses. The single wet scrubber present controls the emissions from the #2 copper furnace. The alterations proposed by this project do not impact the existing wet scrubber or its operation; therefore, the potential for ground or surface water degradation from this project is minimal.

3. Geology and Soil Quality, Stability, and Moisture - The disturbances to the surrounding geology and soils from this facility will be minimal. The entire American Chemet Plant resides within approximately 4 acres.

4. Vegetative Cover, Quantity, and Quality - American Chemet's facility is located between ASARCO and Highway 12 in East Helena. Nearby vegetation is not anticipated to suffer from this facility, or the proposed project, to any major extent. Impacts expected are minor.

5. Aesthetics - American Chemet is visible from the nearby road and highway. The facility has surrounded its numerous processes by enclosing them in structures. This provides many practical advantages to the facility, but also reduces noise, maintains a clean exterior appearance, and reduces dust. Minor or negligible aesthetic impacts are anticipated from this project..

6. Air Quality - The proposed project does not allow American Chemet to increase its emissions. Only very negligible changes are anticipated in the facility's actual emissions. Permit 1993-07 maintains emission limits, and provides a regulatory framework to protect the local ambient air quality. Therefore, the facility will not cause or contribute to any violations of the ambient air quality standards.

7. Unique Endangered, Fragile, or Limited Environmental Resources - No impacts to habitat are anticipated as a result of this project.

8. Demands on Environmental Resource of Water, Air, and Energy - The effect on the environmental resources in the area from the proposed actions is minor. Water necessary to operate the scrubber is not significant enough to stress local sources. Similarly, no additional energy is anticipated to implement the permit alterations.

9. Historical and Archaeological Sites - The permit alterations proposed do not allow expansion of the facility, nor does it allow American Chemet to move the facility. The proposed alterations do not pose a threat to historical or archaeological sites.

10 Cumulative and Secondary Impacts - Cumulative and secondary impacts from all pollutants emitted are expected to be minor. Particulate emissions from this facility are not significant and cumulative impacts are not anticipated. However, American Chemet is located next to a lead smelter, and both are in an nonattainment area for lead and sulfur dioxide. American Chemet emits very little lead and sulfur dioxide from its furnaces, none of which are affected by the proposed alterations. Subsequently, cumulative or secondary impacts due to lead from American Chemet are expected to be minor.

Potential Impact on Human Environment

		Major	Moderate	Minor	None	Unknown	Comments Attached
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 on Potential Impacts:

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

American Chemet has been in continuous operation for decades. It employs 85 people, and manufactures copper powders, copper oxides, and zinc oxides. The continued operation of this facility, and the proposed alterations at the facility, are not expected to cause any significant change in the local community social structure, cultural uniqueness, or distribution of population.

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

This facility employs 85 people; therefore, it does have an impact on the local and state tax base. American Chemet also requires administrative and inspection services from the Montana Department of Environmental Quality. Impacts in both these areas is anticipated to be minor.

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

American Chemet does increase the industrial production and activity for the area. However, industrial growth due to this facility is not anticipated.

5. Human Health

American Chemet does emit into the atmosphere a very small quantity of particulate matter; a portion of those emissions is lead. Therefore, this facility does have the potential to cause a minor impact on human health. The plant is located immediately next to a large lead smelter and a heavily-traveled highway, both of which have a much greater impact on human health than American Chemet. Because no increase in the facility's allowable emissions is necessary to complete the proposed project, the ambient air quality standards are not impacted.

6. Access to and Quality of Recreational and Wilderness Activities

This facility or its operation is not expected to cause any reduction in the access to recreational or wilderness areas.

11. Locally Adopted Environmental Plans and Goals

American Chemet is located within Lewis and Clark County, which has a local air quality control program. The plant is also in a nonattainment area for lead and sulfur dioxide, and is situated immediately adjacent to ASARCO, a primary lead smelter. American Chemet has a minor impact to these local control plans, but permit #1993-07 maintains emission limits established in the local plans for particulate, lead, and sulfur dioxide. Therefore, the proposed project should not increase the impacts to human health and the environment.

12. Cumulative and Secondary Impacts.

Cumulative and secondary impacts from all pollutants emitted are expected to be minor. Particulate emissions from this facility are not significant; therefore, cumulative impacts are not anticipated. American Chemet is, however, located next to a lead smelter and both facilities are in an nonattainment area for lead and sulfur dioxide. American Chemet emits very little lead from its furnaces, none of which are affected by the proposed alterations. Subsequently, additional cumulative or secondary impacts due to lead from American Chemet are not anticipated.

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 its continued operation, and its proposed alterations in permit 1993-07, 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: Jack Dartman

DATE: July 9, 1998