

DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION

Air and Waste Management Bureau



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August 24, 1998

RECEIVED
AUG 26 1998
ENVIRONMENTAL
QUALITY COUNCIL

Ward E. Wickham III
Allwaste Container Services
3415 Edgewood Drive
Miles City, Montana 59301

Dear Mr. Wickham:

Air Quality Permit #2832-04 is deemed final as of August 23, 1998, by the Department of Environmental Quality. This permit is for a rail car cleaning 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,

A handwritten signature in cursive script, appearing to read "Richard Knatterud".

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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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Allwaste Container Services
Two Concourse Parkway, Suite 750
Atlanta, Georgia 30328-5347

Permit Number: 2832-04

Preliminary Determination on Permit Issued: July 21, 1998
Department Decision Issued: August 7, 1998
Final Permit Issued: August 23, 1998

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

Legal Description of Site: Section 26, Township 8 North, Range 47 East, Custer County, Montana

Description of Project: Allwaste proposes to exempt those general purpose railcars with no serviceable vents or connections from the requirement to route the gases from these cars to the flaring system.

Benefits and Purpose of Proposal: This project will allow Allwaste to continue their operation in a safe manner and decrease their liability for these cars.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: The department has reviewed a best available control technology analysis for this proposal. These are contained in the permit analysis and demonstrate that there are no reasonable alternatives available for controlling those general purpose railcars with no serviceable vent or connection.

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 are contained in permit #2832-04.

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
1	Terrestrial and Aquatic Life and Habitats			X			Terrestrials will use the same areas as the Allwaste facility. However, Allwaste is an existing site and any impacts from this proposal will be minor.
2	Water Quality, Quantity and Distribution				X		Water will not be affected in any manner from this proposal.
3	Geology & Soil Quality, Stability and Moisture				X		The soils will not be impacted by this proposal because this is existing equipment.
4	Vegetation Cover, Quantity and Quality				X		The vegetation cover will not be affected by this proposal because this is existing equipment.
5	Aesthetics				X		There will not be any impact to the aesthetics of the area because this is an existing operation and this proposal will not require any new equipment at the site. In addition, the flare is currently limited to no visible emissions.
6	Air Quality			X			The air quality impacts from the proposal will be minor. Permit #2832-04 includes conditions limiting the emissions of VOC to 14.5 tons/yr. This is below the departments deminimis threshold.
7	Unique Endangered, Fragile or Limited Environmental Resource			X			The affects to unique, endangered, fragile or limited environmental resources are minor because this proposal results in a small increase in emissions.
8	Demands on Environmental Resource of Water, Air & Energy			X			This proposal will only demand small quantities of air and energy for proper operation.
9	Historical and Archaeological Sites				X		Historical and archaeological sites are not present at the pre-existing location where the flare is operating.
10	Cumulative and Secondary Impacts			X			This proposal will result in a small emissions increase beyond what is currently emitted from the facility. Therefore, any Cumulative and Secondary Impacts will be minor because the total emissions from this facility are still minor.

Potential Impact on Human Environment

		Major	Moderate	Minor	None	Unknown	Comments
1	Social Structures and Mores				X		There will be no disruption of native or traditional lifestyles or communities from this proposal.
2	Cultural Uniqueness and Diversity				X		This proposal will not cause a change in the cultural uniqueness and diversity of the area.
3	Local and State Tax Base and Tax Revenue			X			This proposal will have a minor impact on the local and state tax base and tax revenue because Allwaste may generate more revenue.
4	Agricultural or Industrial Production			X			This proposal will result in a minor increase in industrial production.
5	Human Health			X			The proposed emissions increase is considered to be insignificant because the potential increase in emissions is below the de minimis threshold. Therefore, any impacts to human health will be minor.
6	Access to and Quality of Recreational and Wilderness Activities				X		This proposal will not have any affect on the Access to and Quality of Recreational and Wilderness Activities.
7	Quantity and Distribution of Employment				X		This proposal will not affect the quantity and distribution of employment in the area because this is an existing operation.
8	Distribution of Population				X		This proposal will not require additional or less housing in the area or require additional employees because this is an existing operation.
9	Demands for Government Services			X			The only government services demanded for this project will be acquiring the appropriate permits. Therefore, this impact is considered to be minor.
10	Industrial and Commercial Activity			X			This proposal will result in a minor increase in the industrial and Commercial activity in the area.
11	Locally Adopted Environmental Plans and Goals				X		This proposal will not affect any Locally Adopted Environmental Plans and Goals.
12	Cumulative and Secondary Impacts			X			This proposal will result in a small emissions increase beyond what is currently emitted from the facility. Therefore, there will be minor Cumulative and Secondary Impacts because the total emissions from this facility are still minor.

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; and there will not be a significant impact as a result of this proposal.

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: David Klemp
Date: July 21, 1998