

**RECEIVED**

**AUG 31 1998**

**ENVIRONMENTAL  
QUALITY COUNCIL**

Department of Environmental Quality  
Permitting and Compliance Division  
Air and Waste Management Bureau  
1520 E. Sixth Avenue  
P.O. Box 200901  
Helena, Montana 59620-0901  
(406) 444-3490 FAX (406) 444-1499

**DRAFT ENVIRONMENTAL ASSESSMENT**

ISSUED TO: Montana Power Company  
Colstrip Project Division  
P.O. Box 38  
Colstrip, MT 59323

PERMIT NUMBER: 1187-04

PRELIMINARY DETERMINATION ON PERMIT ISSUED: August 28, 1998

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: Section 34, Township 2 North, Range 41 East, Rosebud County

DESCRIPTION OF PROJECT: MPC submitted an application to alter permit #1187-03 for the Colstrip 3&4 facility. The alteration includes incorporation of a 3-hr rolling average SO<sub>2</sub> limit, the 1% inlet sulfur standard that was inadvertently removed during the previous modification, and the removal of the inlet monitor requirement. The 3-hr SO<sub>2</sub> limit is being incorporated in the permit to ensure protection of the 3-hr SO<sub>2</sub> standard. The 1% inlet sulfur limit existed in the original permit but was inadvertently removed during the last permit modification. MPC has continued to maintain compliance with the 1% inlet sulfur limit even though it was not stated in the permit. The requirement for the inlet sulfur monitor as a compliance demonstration for the inlet sulfur content is being replaced with an on-going fuel sampling analysis.

BENEFITS AND PURPOSE OF PROPOSAL: The proposed limit will protect the 3-hr SO<sub>2</sub> ambient standard as well as ensure that the 1% sulfur content limit is in the permit. The change in the compliance demonstration for the sulfur limit will benefit both the MPC and the department. The sampling will provide on-going accurate information regarding the sulfur content of the fuel. The advantage to MPC is the monitors are expensive and difficult to assure data quality.

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 are contained in Air Quality Permit 1187-04.

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

**POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT**

1. Terrestrial and Aquatic Life and Habitats  
 Water Quality, Quantity and Distribution  
 Geology and Soil Quality, Stability and Moisture  
 Vegetation Cover, Quantity and Quality  
 Vegetation Cover, Quantity and Quality  
 Aesthetics  
 Unique Endangered, Fragile or Limited Environmental Resource  
 Demands on Environmental Resource of Water, Air and Energy  
 Historical and Archaeological Sites

The incorporation of the 3-hr SO<sub>2</sub> limit, 1% sulfur content limit, and compliance demonstration through fuel sampling at the MPC Colstrip 3&4 facility will not change the allowable emissions from the facility. No other changes will be seen at the facility and the facility is currently complying with the limits and conducting the fuel sampling.

2. Air Quality  
 Cumulative and Secondary Impacts

MPC Colstrip 3&4 will be required to comply with all applicable requirements and permit #1187-04. Compliance with the 3-hr SO<sub>2</sub> limit will be confirmed with the SO<sub>2</sub> CEM and compliance with the 1% sulfur limit will be demonstrated with the on-going fuel sampling. There will be no change in allowable emissions as a result of this permit alteration.

### 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		

#### POTENTIAL IMPACT ON HUMAN ENVIRONMENT

1. Social Structures and Mores  
 Cultural Uniqueness and Diversity  
 Local and State Tax Base and Tax Revenue  
 Agricultural or Industrial Production  
 Access to and Quality of Recreational and Wilderness Activities  
 Quantity and Distribution of Employment  
 Distribution of Population  
 Demands for Government Services  
 Industrial and Commercial Activity  
 Locally Adopted Environmental Plans and Goals

MPC operates Unit 3&4 in Colstrip, Montana. The facility's operates two tangential coal-fired boilers and will not change this operation through the current permit action. The current permit action will incorporate a 3-hr SO<sub>2</sub> limit which will demonstrate protection of the ambient standard, and re-states the 1% sulfur content limit. Compliance with sulfur content limit will be demonstrated with the on-going fuel sampling.

2. Human Health  
 Cumulative and Secondary Impacts

MPC Colstrip 3&4 will be required to comply with all applicable requirements and permit #1187-04. Compliance with the 3-hr SO<sub>2</sub> limit will be confirmed with the SO<sub>2</sub> CEM and compliance with the 1% sulfur limit will be demonstrated with the on-going fuel sampling. There will be no change in allowable emissions as a result of this permit alteration.

**RECOMMENDATION:** An EIS is not required.

**IF AN EIS IS NOT REQUIRED, EXPLAIN WHY THE EA IS AN APPROPRIATE LEVEL OF ANALYSIS:**  
The current permitting action results in no increase in the current allowable emissions for the facility and will require the facility to demonstrate compliance with the ambient standards. In addition, there are requirements in permit #1187-04 that further limit the facility.

**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:** Vickie Walsh  
**DATE:** August 18, 1998