DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
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ENVIRONMENTAL
QUALITY COUNCIL

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Donaldson Brothers Ready Mix.
477 HWY 93 North
Hamilton MT 59840

Air Quality Permit Number: 3017-00

Preliminary Determination on Permit Issued: 07/27/98
Department Decision on Permit Issued: 09/04/98

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

Legal Description of Site: (portable source, original location) NE¼ of SW¼, Section 30, Township 7 North, Range 20 West, in Ravalli County, Montana.

Description of Project: This permit is for a 1989 Fabtec screen (maximum production 100 TPH) and associated equipment to operate in Donaldson's north pit. This pit is contracted under the mined land reclamation contract #00441, Amendments 1 and 3.

Benefits and Purpose of Proposal: This plant sorts sand and gravel for use in industry.

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 #3017-00.

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

		Significant	Non-Significant	None	Unknown	Comments Attached
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

		Significant	Non-Significant	None	Unknown	Comments Attached
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

SUMMARY OF COMMENTS ON POTENTIAL IMPACTS: The following comments have been prepared by the Department.

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

1. Terrestrial and Aquatic Life and Habitats

   Impacts to terrestrial and aquatic life and habitats will be insignificant. This facility operates on small portions of land.

2. Water Quality, Quantity and Distribution

   As a result of mining and crushing activities, the existing operations at the original site include ponds used to capture pit water and water from dredge mining. Sediment largely settles out in the ponds. The pond water has the potential to discharge into local surface and ground water. This discharged water may increase sediment or other pollutant concentrations over background levels in local, undisturbed surface and ground water. Donaldson must acquire MPDES process and storm water discharge permits to operate the site and discharge to state surface waters. A Montana ground water pollution control system permit may be required for certain discharges to ground water. These permits establish limits on discharge which protect quality of waters at a particular site. When permits are issued, there are likely to be insignificant effects on quality or use of adjacent waters. Continued use of these ponds must also be addressed in Donaldson's mined land reclamation contract.

3. Geology and Soil Quality, Stability and Moisture

   Mining activities occurring at the original location of this facility are addressed in the mined land reclamation conract issued by the Industrial and Energy Minerals Bureau of the department. Expansion beyond the contracted boundary has occurred. This issue will be addressed through the amendment of the mined land reclamation contract and possibly through enforcement by the department.

4. Vegetation Cover, Quantity and Quality

   Issuance of this air quality permit will not have a direct impact on the vegetation at any site where operations will occur. Insignificant, indirect impacts would occur from associated mining activities. These are mitigated for the current site through the revegetation and reclamation requirements of Donaldson's mined land reclamation contract #00441, Amendments 1 and 3. This contract will address any further issues arising from the expansion when future amendments to this contract have been completed.

5. Aesthetics

   At the existing location, the equipment listed in this permit will be visible and will create additional noise in the area. Due to the small size of equipment to be used, noise will be minimally disruptive in the context of background noise and distance to adjacent homeowners. Current operations do not occur during the night hours, which further reduces the disruptive nature of noises associated with this type of equipment. Therefore the department believes any impacts will be insignificant.

6. Air Quality

This permit includes conditions limiting the opacity from the operation as well as requiring water spray bars to control air pollution. In addition to water spray bars, Donaldson is required to use water or chemical dust suppressants on all haul roads. Therefore, air quality impacts from the operation are nonsignificant.

7. Unique Endangered, Fragile or Limited Environmental Resources

The department is unaware of any unique, endangered, fragile or limited environmental resources associated with the original location at which this equipment currently operates. It has been determined that the closest sensitive species in the area is the Fringed Myotis. This species has been located in Section 36 of Township 7N, Range 21W which is southwest of the section in which Donaldson's north pit is located. The gravel pits have been in operation for many years at this site. Birds, wildlife, and plant species that live in the area surrounding the pit and near the Bitterroot River should not be impacted by air emissions.

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

Wetlands may have been intersected by Donaldson's pit expansion onto the flood plain. Disturbance to wetlands is regulated by the U. S. Army Corp of Engineers (USACOE). Mr. Donaldson has been informed (Rod Samdahl letter August 10, 1998) that a permit from the USACOE may be required. If a permit is required, Donaldson will be required to have appropriate mitigating plans for the disturbed wetlands. The department would incorporate these requirements into the mined land reclamation contract if the USACOE determines wetland disturbance would occur as a result of future plans.

Demands on air are addressed in permit #3017-00. Energy demands are expected to be nonsignificant because this facility is small by industry standards.

9. Historical and Archaeological Sites

Historical and archaeological sites may be present at the locations where operations will be performed. If artifacts are found during the course of mining, operations should be routed around the site of discovery for a reasonable time until salvage can be made. The State Historic Preservation Office should be promptly notified.

10. Cumulative and Secondary Impacts

Donaldson has expanded the pit beyond the boundary permitted in their mined land reclamation contract #00441, Amendments 1 and 3. The expansion issue will be addressed through the mined land reclamation contract amendment required by the Industrial and Energy Minerals Bureau of the department. This contract amendment will include an environmental assessment which will address issues from a mining perspective. The potential of existing wetland intersection by the expansion onto the flood plain will be addressed through determinations made by the USACOE. The department may also address issues of concern through enforcement actions.

As a result of mining and crushing activities, the existing operations at the original site include ponds used to capture pit water and water from dredge mining. Sediment largely settles out in the ponds. The pond water has the potential to discharge into local surface and ground water. This discharged water may increase sediment or other pollutant concentrations over background levels in local, undisturbed surface and ground water. Donaldson must acquire MPDES process and storm water discharge permits to operate the site and discharge to state surface waters. A Montana ground water pollution control system permit may be required for certain discharges to ground water. These permits establish limits on discharge which protect quality of waters at a particular site. When permits are issued, there is likely to be an insignificant effect on quality or use of adjacent waters. Continued use of these ponds must also be addressed in Donaldson's amended mined land reclamation contract.

The potential exists for noise and aesthetic impacts by future activities associated with this operation. These issues are usually addressed through the mined land reclamation contract and may be addressed through the upcoming amendment of this contract and the accompanying environmental assessment. Therefore, future noise and aesthetic impacts should not be significant.

There is potential for other portable operations to locate at any of the sites where nonmetallic mineral processing may occur. However, any such operation would have to apply for and hold the appropriate permits/contracts from the department prior to operation. These permits/contracts will address the environmental impacts associated with such operations at this or any other site. All sites are limited to a total particulate emissions of 250 tons/year or less from the plant and associated equipment.

There may be dust created by traffic on haul roads; however, the authorizing agent of the road is required to take reasonable precautions to reduce fugitive emissions. Therefore, the dust should not result in a significant impact.

POTENTIAL IMPACT ON HUMAN ENVIRONMENT

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

There will be no disruption of native or traditional lifestyles or communities from this operation. The cultural uniqueness and diversity of the area will not be impacted by this operation. No change in housing will be required due to this operation. This operation is small by industrial standards and operates on small portions of land.

3. Local and State Tax Base and Tax Revenue
7. Quantity and Distribution of Employment
9. Demands of Government Services

This permitting action will not have significant effects to the local and state tax base and tax revenue. This permitting action does not represent an increase in the operations or activities at this site. Activities associated with this type of operation usually do not greatly effect the quality and distribution of employment in the area. The demands for government services are not significantly affected by this permitting action.

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

Operations will not displace any agricultural production. This operation is small by industrial standards and will therefore not have a significant impact on local industrial production. More than likely, the activities will only employ people from the company. It is possible that company employees may travel with the equipment, if moved to other locations, and stay in that area during a short-term project. No additional industrial or commercial activity is expected as a result of the operations.

5. Human Health

This permit incorporates conditions to ensure that the operations will be operated in compliance with all applicable rules and standards. These conditions are designed to be protective of human health; therefore, any impacts will be nonsignificant.

6. Access to and Quality of Recreational and Wilderness Activities

The operation will not affect any access to recreational and wilderness activities, as any existing access will remain in place. Individuals may use the Bitterroot River for recreation purposes. However, there is a buffer of trees and vegetation between the river and the pit which further minimize the impact. Therefore, effects to the quality of recreation will not be significant.

11. Locally Adopted Environmental Plans and Goals

There will be no affect to the locally adopted environmental plans and goals because this plant will operate at sites where mining activity is contracted.

12. Cumulative and Secondary Impacts

Donaldson has expanded the pit beyond the boundary permitted in their current mined land reclamation contract (#00441, Amendments 1 and 3). This issue will be addressed through future amendments to this contract which will include an environmental assessment and through possible enforcement by the department.

The potential exists for noise and aesthetic impacts by future activities associated with this operation. These issues are usually addressed through the mined land reclamation contract and may be addressed through the upcoming amendment of Donaldson's contract and the accompanying environmental assessment. Therefore, future aesthetic impacts should not be significant.

There is potential for other portable operations to locate at any of the sites where nonmetallic mineral processing may occur. However, any such operation would have to apply for and hold the appropriate permits/contracts from the department prior to operation. These permits/contracts will address the human health impacts associated with such operations at this or any other site. All sites are limited to total particulate emissions of 250 tons/year or less from the plant and associated equipment.

There may be dust created by traffic on haul roads; however, the authorizing agent of the road is required to take reasonable precautions to reduce fugitive emissions. Therefore, the dust should not result in a significant impact.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: This plant is a portable source and there will be no significant impacts. In addition, the controls contained in permit #3017-00 will further limit the emissions.

Other groups or agencies contacted or which may have overlapping jurisdiction:
Department of Environmental Quality, Industrial and Energy Minerals Bureau.
Department of Environmental Quality, Water Protection Bureau.
Montana Natural Heritage Program.

Individuals or groups contributing to this EA:
Department of Environmental Quality, Permitting and Compliance Division.
Department of Environmental Quality, Industrial and Energy Minerals Bureau.
Department of Environmental Quality, Water Protection Bureau.

EA prepared by: Lana Hedlund
Date: September 3, 1998