



Montana Department of
ENVIRONMENTAL QUALITY

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June 18, 2008

Mr. Joe Aline
Shumaker Trucking and Excavating Contractors, Inc.
PO Box 1279
Great Falls, MT 59403

Dear Mr. Aline:

Air Quality Permit #2605-02 is deemed final as of June 18, 2008, by the Department of Environmental Quality (Department). This permit is for a portable crushing/screening 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,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
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VW:cw: vs
Enclosure

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Shumaker Trucking and Excavating Contractors, Inc.
P.O. 1279
Great Falls, Montana 59403

Permit Number: #2605-02

Preliminary Determination Issued: 04/30/08

Department Decision Issued: 06/02/08

Permit Final: 6/18/08

- Legal Description of Site:* Shumaker submitted an application for the addition of equipment to the facility's portable crushing/screening plant in the SW ¼ of Section 30, Township 21 North, Range 4 East, in Cascade County, Montana. Permit #2605-02 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program, those areas considered tribal lands, or those areas in or within 10 km of certain PM₁₀ nonattainment areas. An addendum to this air quality permit will be required if Shumaker intends to locate in or within 10 km of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*
- Description of Project:* The permit application proposes to allow for additional equipment as necessary for future portable crushing operations. Specifically, Shumaker requested that the permit be modified to include up to four crushers with a combined capacity of 1,500 TPH, up to six 3-deck screening plants with a combined capacity of 2,500 TPH, and up to six diesel-fired engines/engine-powered generators with a combined engine capacity of up to 2,200 horsepower (hp). The permit was written in a de minimis friendly manner.
- Objectives of Project:* The object of the project would be to produce business and revenue for the company through the increased sale and use of aggregate. The issuance of Permit #2605-02 would allow Shumaker to operate the permitted equipment at various locations throughout Montana, including the proposed initial site location.
- Additional Project Site Information:* In many cases, this crushing/screening operation may move to a general site location or open cut pit, which has been previously permitted through the Industrial and Energy Minerals Bureau (IEMB). If this were the case, additional information for the site would be found in the Mined Land Reclamation Permit for that specific site.
- Alternatives Considered:* In addition to the proposed action, the Department considered the "no-action" alternative. The "no-action" alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Shumaker demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

6. *A Listing of Mitigation, Stipulations, and Other Controls:* A listing of the enforceable permit conditions and a permit analysis, including a BACT analysis, would be contained in Permit #2605-02.
7. *Regulatory Effects on Private Property Rights:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and would not unduly restrict private property rights.
8. *The following table summarizes the potential physical and biological effects of the proposed project on the human environment.* The “no action alternative” was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			X			yes
B.	Water Quality, Quantity, and Distribution			X			yes
C.	Geology and Soil Quality, Stability, and Moisture			X			yes
D.	Vegetation Cover, Quantity, and Quality			X			yes
E.	Aesthetics			X			yes
F.	Air Quality			X			yes
G.	Unique Endangered, Fragile, or Limited Environmental Resource			X			yes
H.	Demands on Environmental Resource of Water, Air, and Energy			X			yes
I.	Historical and Archaeological Sites			X			yes
J.	Cumulative and Secondary Impacts			X			yes

Summary of Comments on Potential Physical and Biological Effects: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Terrestrials would use the same area as the crushing/screening operations. The crushing/screening operations would be considered a minor source of emissions, by industrial standards, with intermittent and seasonal operations. Therefore, only minor effects on terrestrial life would be expected as a result of equipment operations or from pollutant deposition because the emissions from the facility would be minor.

Impacts on aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor as the facility would be a minor source of emissions (with seasonal and intermittent operations) and only minor amounts of water would be required to be used for pollution control. Since only a minor amount of air emissions would be generated, only minor deposition (see Section 8.F of this EA) would occur. Therefore, at most, only minor and temporary effects to aquatic life and habitat would be expected from the proposed crushing/screening operation.

B. Water Quality, Quantity, and Distribution

Water would be used for dust suppression on the surrounding roadways and areas of operation and for pollution control for equipment operations. However, water use would only cause a minor disturbance to these areas, since only relatively small amounts of water would be needed. At most, only minor surface and groundwater quality impacts would be expected as a result of using water for dust suppression because only small amounts of water would be required and deposition of air pollutants would be minor (as described in Section 8.F of this EA).

C. Geology and Soil Quality, Stability, and Moisture

The crushing/screening operations would have only minor impacts on soils at this proposed site location (due to the construction and use of the crushing/screening facility) because the facility would be relatively small in size, would be required to use only small amounts of water for pollution control, would only have minor deposition on the surrounding soils, and would only have seasonal and intermittent operations. Further, because the topography and vegetative cover at the site would allow for good pollutant dispersion (as described in Section 8.F of this permit), the associated impacts from pollutant deposition upon the surrounding soils would be minimal. Therefore, any effects upon geology and soil quality, stability, and moisture at any proposed operational site would be minor.

D. Vegetation Cover, Quantity, and Quality

Because the facility would operate at an existing open-cut pit (at a site where good pollutant dispersion would occur and vegetation has been previously removed/disturbed) and because the facility would be a relatively minor source of emissions, impacts from the emissions leaving the site and depositing on vegetation (surrounding agricultural land) would be minor. As described in Section 8.F of this EA, the amount of air emissions from this facility would be minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor. Also, because the water usage is minimal (as described in Section 8.B) and the associated soil disturbance is minimal (as described in Section 8.C) corresponding vegetative impacts would be minor.

E. Aesthetics

The crushing/screening operation would be visible and would create additional noise while operating in this area. However, Permit #2605-02 would include conditions to control emissions, including visible emissions, from the plant. Also, because the crushing/screening operation would be portable, would operate on an intermittent and seasonal basis, and would locate within an open-cut pit, any visual and noise impacts would be minor and short-lived.

F. Air Quality

The air quality impacts from the crushing/screening operations would be minor because Permit #2605-02 would include conditions limiting the opacity from the plant, as well as requiring water spray bars and other means to control air pollution. Additionally, the facility's production capacity would be limited and the facility would be considered a minor source of air pollution by industrial standards. Because the facility would be a minor source of air pollution, and Permit #2605-02 would limit total emissions from the crushing/screening operation and include other permit limitations (such as limiting additional equipment operated by Shumaker at the site to 250 TPY or less, excluding fugitive emissions), the facilities effects upon air quality would be minor.

This facility would have temporary and intermittent use, thereby further reducing potential air quality impacts from the facility emissions. Further, pollutant deposition from the facility would

be minimal because the pollutants would be widely dispersed and would have only minor effects upon the surrounding soils, vegetation, water resources, human population, and terrestrial and aquatic life as a result of the deposition and accumulation of these pollutants. Additionally, the small and intermittent amounts of deposition generated from the crushing/screening operation would only have minor impacts upon the surrounding environment and would comply with ambient air quality standards. Further, because the site has little vegetative cover and would locate in an area where good ventilation would occur as a result of the open terrain (due to pollutant dispersion from the corresponding ventilation conditions of wind speed and wind direction), air quality impacts would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to unique endangered, fragile, or limited environmental resources in the initial proposed area of operation, had previously contacted the Montana Natural Heritage Program (MNHP). MNHP search results concluded there are two such environmental resources found within the defined area. The defined area, in this case, is defined by the township and range of the proposed site, with an additional 1 -mile buffer.

The two species of concern are the plant species *Funaria Americana* and the *Entosthodon Rubiginosus*. While these species have been identified within the defined area, they have been generalized from many miles of potential habitat. The proposed crushing/screening plant operations would initially locate at a previously disturbed site that is separated from the general population and the facility would operate in an area that would effectively ventilate and dissipate air emissions. As described from past meteorological information and modeling done for another source in the same general area (Permit #3238-00), wind direction would primarily carry the pollutants to the north and east and good ventilation would exist in the area. Also, because the crushing/screening operations would be small and temporary in nature and emissions would be controlled (as outlined in Permit #2605-02), applicable ambient air quality impacts would not be exceeded. Thus, deposition generated from the crushing/screening operations would be minor and associated impacts upon the surrounding environment would also be minor. Further, these plant species were recorded as last being observed over a century ago and the proposed operations would be conducted at a previously disturbed area, thus, no impacts upon these species from air quality are expected to occur.

H. Demands on Environmental Resources of Water, Air, and Energy

Due to the size of the facility, the crushing/screening operation would only require small quantities of water, air, and energy for proper operation. Small quantities of water would be required to be used for dust suppression and would control emissions being generated at the site. Energy requirements would also be relatively small, as the facility would have operational limits on the six diesel-fired engines/engine-powered generators totaling up to 2,200 hp. The facility would have limited production, and would have seasonal and intermittent use. In addition, impacts to air resources would be minor because the source is a small industrial emissions source, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed (see Section 8.F of this EA). Therefore, any impacts to water, air, and energy resources would be minor.

I. Historical and Archaeological Sites

The Department previously contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the proposed area of construction/operation. Search results concluded that

there is one previously recorded historical or archaeological resource of concern within the area proposed for initial operations. The cultural resource of concern has been identified as the Rainbow to Ryan Road. While this resource may be used by Shumaker, it is not anticipated that existing usage would be greatly impacted by the proposed facility operations and, in fact, the existing facility could be used to improve and preserve the roadway.

Further, according to past correspondence from the Montana State Historic Preservation Office, there would be a low likelihood of adverse disturbance to any known archaeological or historic site given previous industrial disturbance to an area. Therefore, no impacts upon historical or archaeological sites would be expected as a result of operating the proposed crushing/screening equipment because the operational site has already been disturbed and because no previously recorded historical/archaeological resources have been identified at the equipment operational site location.

J. Cumulative and Secondary Impacts

The crushing/screening operation would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would generate emissions of PM, PM₁₀, NO_x, VOC, CO, and SO_x. Noise would also be generated from equipment operations. Emissions and noise would cause minimal disturbance to the surrounding environment because the equipment is a small industrial source of production and emissions. Also, the facility would initially operate in a previously disturbed area. Additionally, this facility may operate in combination with other facilities owned and operated by Shumaker. However, total emissions from Shumaker’s operations at the operational site would not be permitted to exceed 250 TPY of non-fugitive emissions. Overall, any cumulative or secondary impacts to the physical and biological aspects of the human environment would be minor.

9. *The following table summarizes the potential economic and social effects of the proposed project on the human environment. The “no action alternative” was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Social Structures and Mores				X		yes
B.	Cultural Uniqueness and Diversity				X		yes
C.	Local and State Tax Base and Tax Revenue			X			yes
D.	Agricultural or Industrial Production			X			yes
E.	Human Health			X			yes
F.	Access to and Quality of Recreational and Wilderness Activities			X			yes
G.	Quantity and Distribution of Employment			X			yes
H.	Distribution of Population				X		yes
I.	Demands for Government Services			X			yes
J.	Industrial and Commercial Activity			X			yes
K.	Locally Adopted Environmental Plans and Goals			X			yes
L.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The crushing/screening operation would cause no disruption to the social structures and mores in the area because the source would be a minor industrial source of emissions, would be operating at an area previously used for the mining of aggregate and would be separated from the general population, and would only have temporary and intermittent operations. Additionally, the equipment would be expected to operate according to the conditions placed in Permit #2605-02. Thus, no impacts upon social structures or mores would result.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of this area would not be impacted by the proposed crushing/screening operation because this site is currently used for the crushing/screening of aggregate and is separated from the general population. Additionally, the facility would be considered a portable/temporary source with seasonal and intermittent operations. Therefore, the predominant use of the surrounding areas would not change as a result of this project and the cultural uniqueness and diversity of the area would not be affected.

C. Local and State Tax Base and Tax Revenue

The crushing/screening operation would have little, if any, impact on the local and state tax base and tax revenue because the facility would be a relatively small industrial source (minor source) and would have seasonal and intermittent operations. The facility would require the use of only a few existing employees. Thus, only minor impacts to the local and state tax base and revenue could be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue would be minor because the source would also be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The crushing/screening operations would have only a minor impact on local industrial production since the facility would be a relatively small industrial source of aggregate production and air emissions. Also, the facility would locate in a previously disturbed site, adjacent to an area that could be used for animal grazing and agricultural production. However, the facility operations would be small and temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts on surrounding vegetation (as described in Section 8.D of this EA). Pollution control would be utilized for equipment operations and production limits would be established to minimize emissions.

E. Human Health

Permit #2605-02 would incorporate conditions to ensure that the crushing/screening facility would be operated in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 8.F. of this EA, the air emissions from this facility would be minimized by the use of water spray and other process limits. Furthermore, dispersion of pollutants would result in minimal impacts upon the surrounding area of operations and pollutants would be dispersed (see Section 8.F of this EA). Therefore, only minor impacts would be expected on human health from the proposed crushing/screening facility.

F. Access to and Quality of Recreational and Wilderness Activities

The crushing/screening plant would operate at a previously disturbed industrial site and on private land. Therefore, no additional impacts upon the access to and quality of recreational and wilderness activities would be created by operating the equipment. The facility would be located adjacent to Rainbow Road, so any changes to the existing noise levels would be minimal. Also, the facility would operate on a seasonal and intermittent basis and would be a relatively minor industrial emissions source. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at this site would be expected to be minor and intermittent.

G. Quantity and Distribution of Employment

The crushing/screening operation is a small, portable source, with seasonal and intermittent operations and would have only minor effects upon the quantity and distribution of employment in this area of operation since Shumaker would be expected to utilize a few new employees for the project. Therefore, only minor effects upon the quantity and distribution of employment in this area would be expected.

H. Distribution of Population

The portable crushing/screening operation is small and would only require a few employees to operate. No individuals would be expected to permanently relocate to this area of operation as a result of operating the crushing/screening facility, which would have only intermittent and seasonal operations, and is a portable source. Therefore, the crushing/screening facility would not disrupt the normal population distribution.

I. Demands of Government Services

Minor increases would be seen in traffic on existing roadways in a given area while the crushing/screening operation is in progress. In addition, government services would be required for acquiring the appropriate permit from government agencies and determining compliance with the permit. Demands for government services would be minor.

J. Industrial and Commercial Activity

The crushing/screening operation would represent only a minor increase in the industrial activity in this or any other area of operation because the source would be a relatively small industrial source that would be portable and temporary in nature. No additional industrial or commercial activity would be expected as a result of the proposed operation.

K. Locally Adopted Environmental Plans and Goals

Shumaker would be allowed, by permit, to operate in areas designated by EPA as attainment or unclassified. Permit #2605-02 would contain limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards, as a locally adopted environmental plan or goal for operating at this proposed site. Because the facility would be a small and portable source, and would have intermittent and seasonal operations, any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The crushing/screening operations would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate areas of operation because the source is a portable and temporary source. Minor increases in traffic would have minor effects on local traffic in the immediate area. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Further, this facility may be operated in conjunction with other equipment owned and operated by Shumaker, but any cumulative impacts upon the social and economic aspects of the human environment would be minor and short-lived. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: An Environmental Impact Statement (EIS) is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from construction and operation of the proposed facility are minor; therefore, an EIS is not required.

Other groups or agencies contacted or which may have overlapping jurisdiction: Previous permit (#2605-01) Department of Environmental Quality - Permitting and Compliance Division (Industrial and Energy Minerals Bureau); Montana Natural Heritage Program; and the State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality (Air Resources Management Bureau), Montana State Historic Preservation Office (Montana Historical Society).

EA prepared by: Moriah Peck, P.E. and Christine Weaver

Date: April 4 & 16, 2008