

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
Permitting and Compliance Division  
Waste and Underground Tank Management Bureau  
Solid Waste Section  
Metcalf Building  
PO Box 200901  
Helena, MT 59620-0901

**CHECK LIST ENVIRONMENTAL ASSESSMENT**

1. Name of facility: West Yellowstone Transfer Station / Compost Facility

Address of facility: PO Box 226  
West Yellowstone, MT 59758

Facility telephone: 406-646-9298

2. This application is for a:

- solid waste landfill     transfer station     resource recovery or processing facility  
 other: Amendment to current operations to include a Road Kill Carcass Composting Operation

3. a) Legal description of location: Section 3, T13S, R5E, M.P.M

b) General description of facility location: The facility is located approximately four (4) miles north of the town of West Yellowstone just east of Highway 191/287 and just west of the Yellowstone National Park boundary.

4. If the applicant does not own the property, give name and address of lessor who holds title to the property:  
U.S. Forest Service.

5. Total acreage of system: 12.64 acres

6. Population and service area: The applicant plans continued service of the immediate and extended area around the facility. This market includes the West Yellowstone/Hebgen Lake area and Yellowstone National Park.

Tonnage to be accepted per year: On average, 30 tons of road kill carcasses have been generated annually. At the present time, these carcasses are transported to the Logan Landfill via the transfer station for disposal. Based on previous years' transportation and disposal of road kill, it is estimated that a total of 30 to 40 tons of carcasses will be accepted.

7. Description of the benefits and purpose of the proposed action:

a) The West Yellowstone Transfer Station/Compost Facility has been operating a licensed municipal solid waste compost site for 5 years. This compost operation currently includes bio-solids and other organic waste collected from the West Yellowstone/Hebgen Lake Waste Management District and adjacent forest and Yellowstone National Park lands. The site is remote and secure.

b) The West Yellowstone transfer station currently accepts approximately 40 road-killed animals per year. The majority of the road-killed animals received are bison. However, elk and moose are also accepted at the facility. At this time, the proposed modification to the existing facility operation and maintenance plan provides for the acceptance of only the road-killed bison for incorporation into a road kill carcass compost operation. Historically, road-killed animals have been transported to the Logan Landfill for disposal at a cost of approximately \$3,000 per year. The incorporation of the road-kill compost operation to the facility's current operation and maintenance plan would save the facility the rising cost of transportation and disposal, provide the facility with the means to properly compost the road-killed animals, and create a material that may be used for land reclamation.

8. Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider:

Following the Department's finding that the West Yellowstone Transfer Station / Compost Facility's updated Operation and Maintenance Plan was complete, the Department considered two alternatives in the preparation of this checklist EA:

Alternative A. Deny the license modification as proposed by the applicant— the "no action alternative". If this alternative were chosen, the applicant could:

1. Continue to transport and dispose all of the road kill carcasses at the Logan Landfill. This is not the preferred alternative because it would continue to burden the facility with the rising cost of transportation and disposal and use up valuable landfill air space.

Alternative B. Approve the license modification as proposed by the applicant. Several factors support the viability of this option:

1. The facility has been licensed by the Department since 2003 and has a 5-year history of operation in compliance with the Montana solid waste laws and rules.
2. The site is remote and secure.
3. The facility would provide a sound alternative for the disposition of road kill carcasses.
4. The selection of this alternative would save the facility the rising cost of fuel for continued transportation and disposal off-site.

9. A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency.

The road-kill compost operation will be operated in accordance with the approved modification to the facility Operation and Maintenance Plan. The proposed composting operation will meet the minimum requirements of the Montana Solid Waste Management Act and the rules promulgated under that Act as well as State and County subdivision and County zoning regulations. Negotiations between the Montana Department of Fish, Wildlife, and Parks and the Montana Department of Transportation will be used as the basis for the proposed final use of the compost. Final use of finished road-kill derived compost will be determined after concerns about its use from all relevant agencies have been addressed. Until such negotiations are complete, and a decision has been made regarding the approved final uses, finished compost derived from the road-killed bison at this site will remain stockpiled on site.

10. Recommendation:

The recommended action is to approve the modification of the facility Operation and Maintenance Plan by incorporating the road-kill carcass compost operation.

11. If an EIS is needed, and if appropriate, explain the reasons for preparing the EA:

Due to the absence of significant potential environmental impacts as indicated by this checklist environmental assessment, the Department finds that an Environmental Impact Statement is not necessary.

12. If an EIS is not required, explain why the checklist EA is an appropriate level of analysis:

The Department finds that modification of the solid waste management system license would not significantly affect the quality of the human environment. The facility has been licensed by the Department since 2003 and has a 5-year history of composting municipal solid waste in compliance with the Montana solid waste laws and rules.

There are expected to be no potential impacts to the human environment, nor to the surface water resources, terrestrial and aquatic life, vegetation and other aspects of the physical environment. Therefore, a checklist Environmental Assessment is an adequate document to address potential impacts of the proposed solid waste management system license modification.

13. Other groups or agencies contacted or which may have overlapping jurisdiction:

Montana Department of Fish, Wildlife, and Parks  
Montana Department of Transportation  
Montana Department of Livestock  
National Park Service  
U.S. Forest Service  
U.S. Fish & Wildlife Service

14. Individuals or groups contributing to this checklist EA:

West Yellowstone Transfer Station and Compost Facility  
Crowley Consultants, LLC

Checklist EA prepared by:

Joe Blaine and Mary Louise Hendrickson - *Montana DEQ, Permitting and Compliance Division, Waste and Underground Tank Management Bureau, Solid Waste Program*

Date: August 27, 2008

## IMPACTS

<u>PHYSICAL ENVIRONMENT</u>	Major	Moderate	Minor	No	Unknown	Attached
1. TOPOGRAPHY: Are there unusual geologic features?				<b>X</b>		
Will the surface features be changed?				<b>X</b>		
2. GEOLOGY & SOIL QUALITY, STABILITY & MOISTURE: Are fragile, compactible or unstable soils present?				<b>X</b>		
Are there special reclamation considerations?				<b>X</b>		
3. WATER QUALITY, QUANTITY & DISTRIBUTION: Are important surface or ground water resources present?				<b>X</b>		
Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?				<b>X</b>		
4. AIR QUALITY: Will pollutants or particulate be produced?				<b>X</b>		
Is the project influenced by air quality regulations or zones (Class I airshed)?				<b>X</b>		
5. DEMANDS ON ENVIRONMENTAL RESOURCES OR LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area?				<b>X</b>		
Are there other activities nearby that will affect the project?				<b>X</b>		
6. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other studies, plans or projects on this tract?				<b>X</b>		
7. TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?				<b>X</b>		<b>X</b>
8. VEGETATION COVER, QUANTITY & QUALITY: Will vegetative communities be permanently altered?				<b>X</b>		
Are any rare plants or cover types present?				<b>X</b>		
9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present?				<b>X</b>		
Any wetlands?				<b>X</b>		
Any species of special concern?				<b>X</b>		
10. HISTORICAL AND ARCHAEOLOGICAL SITE: Are any historical, archaeological or paleontological resources present?				<b>X</b>		
11. AESTHETICS: Is the project on a prominent topographical feature?				<b>X</b>		
Will it be visible from populated or scenic areas?				<b>X</b>		
Will there be excessive noise, light or odors?				<b>X</b>		
12. AGRICULTURE: Will grazing lands, irrigation waters or crop production be affected?				<b>X</b>		

<sup>1</sup> CUMULATIVE IMPACTS: None for Proposed Project. The activity will take place within the licensed boundary of the West Yellowstone Composting Facility. Additional minor ground disturbance will occur if the proposed activity is approved. There are no recognized secondary impacts.

## IMPACTS

<u>HUMAN ENVIRONMENT</u>	Major	Moderate	Minor	No	Unknown	Attached
1. SOCIAL STRUCTURES & MORES: Is some disruption of native or traditional lifestyles or communities possible?				<b>X</b>		
2. CULTURAL UNIQUENESS & DIVERSITY: Will the action cause a shift in some unique quality of the area?				<b>X</b>		
3. DENSITY & DISTRIBUTION OR POPULATION & HOUSING: Will the project add to the population and require additional housing?				<b>X</b>		
4. HUMAN HEALTH & SAFETY: Will this project add to health and safety risks in the area?				<b>X</b>		
5. COMMUNITY & PERSONAL INCOME: Will the facility generate or degrade income?				<b>X</b>		
6. QUANTITY & DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs?				<b>X</b>		
If so, estimate number.						
7. LOCAL & STATE TAX BASE REVENUES: Will the project create or eliminate tax revenue?				<b>X</b>		
8. DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads?				<b>X</b>		
Will other services (fire protection, police, schools, etc.) be needed?				<b>X</b>		
9. INDUSTRIAL, COMMERCIAL & AGRICULTURAL ACTIVITIES & PRODUCTION: Will the project add to or alter these activities?				<b>X</b>		
10. ACCESS TO & QUALITY OF RECREATIONAL & WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract?				<b>X</b>		
Is there recreational potential within the tract?				<b>X</b>		
11. LOCALLY ADOPTED ENVIRONMENTAL PLANS & GOALS: Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?				<b>X</b>		
12. TRANSPORTATION: Will the project affect local transportation networks and traffic flows?				<b>X</b>		

<sup>1</sup> CUMULATIVE IMPACTS: None for Proposed Project. The activity will take place within the licensed boundary of the West Yellowstone Composting Facility. No other projects affect the area. There are no recognized secondary impacts.



**APPENDIX**  
**COMMENTS REGARDING THE POTENTIAL IMPACTS OF THE  
PROPOSED O&M PLAN AMENDMENT  
(ALTERNATIVE B)**

**I. POTENTIAL IMPACTS ON THE PHYSICAL ENVIRONMENT**

7. Terrestrial and Aquatic Life and Habitats

The proposed road-killed bison composting area will be located on the northern portion of the current site of the West Yellowstone Municipal Solid Waste Compost Facility. The facility sits on 13-acres of land leased from the U.S. Forest Service and is surrounded by the adjacent forest and park lands. The entire 13-acre parcel is enclosed by an 8-foot chain-link fence that is topped with barbed wire. The gate is closed and locked after hours and at any other time employees are not present on site.

The Montana Department of Transportation (MDT), with cooperation from the DEQ, developed a process to compost road-killed animals. The process involves the construction of a 2-foot thick bed of wood chips on which the road-killed carcass is placed. The carcass is then covered entirely with 2-feet of wood chips. The size of the carcasses typically determines the height of the windrow of compost and thus the number of layers within the compost pile. Because the road-killed bison are so large, the carcasses will be placed in one layer. In addition to providing the insulation necessary to facilitate decomposition, the top layer of wood chips also acts as a biofilter that will capture and convert the odorous gases to carbon dioxide and water.

Prior to implementation state-wide, the road-kill composting process was tested at two facilities in grizzly bear country to determine the attractiveness of the process to bears. Neither facility was compromised by bears during the testing period. Further, based on the observations from active carcass composting facilities to date, bears do not seem to be particularly attracted to the active carcass compost sites.

The Montana Department of Fish, Wildlife, and Parks (FWP) conducted an experiment with the finished compost at the Wolf and Grizzly Bear Recovery Center in West Yellowstone. In that experiment, compost from the MDT compost site in Victor was placed in the bear containment area. The results indicated that although the bears appeared to be interested in the new material in their containment facility, they did not eat it nor did they seem unduly attracted to it.

Finally, it seems now that bears, although once common visitors to the old West Yellowstone landfill site, are now only infrequently seen near the facility. To further reduce the attractiveness of the carcass composting operation to bears and other unwanted vectors and vermin, the facility will implement the following measures:

1. The chain-link fence surrounding the facility will be inspected on at least a weekly basis to ensure the fence is tight and that there have been no breaches to the fence.
2. The facility will maintain at least 24-inches of wood chips over the active compost pile at all times to ensure adequate odor elimination and to reduce the attractiveness to bears, rodents, birds, and other vermin.