Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

September 23, 2008

Lt. Kenneth Fechter
Montana Air National Guard, 120 FW
2800 Airport Ave B
Great Falls, MT 59404

Dear Lt. Fechter:

Air Quality Permit #2930-03 is deemed final as of September 23, 2008, by the Department of Environmental Quality (Department). This permit is for a modification at a military operations and support 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
(406) 444-3490

Julie Merkel
Air Quality Specialist
Air Resources Management Bureau
(406) 444-3626

VW: JM
Enclosures

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

Issued For: Great Falls Air National Guard Base
2800 Airport Avenue B
Great Falls, Montana 59404-5570

Permit Number: 2930-03

Preliminary Determination on Permit Issued: August 4, 2008
Department Decision Issued: September 5, 2008
Final Permit Issued: September 23, 2008

1. *Legal Description of Site:* Southeast ¼ of Section 8, Township 20 North, Range 3 East, Cascade County, Montana.

2. *Description of Project:* Under the current permit action, the Great Falls MANG Base proposed a transition from operating the F-16 fighter aircraft with the F110-GE-100 engine to the F-15 fighter aircraft with two 100-PW-200 engines. The change in aircraft operation will affect the emissions from the Engine Test Cell operations at the MANG facility.

3. *Objectives of Project:* Transition from the operation of the F-16 fighter aircraft to the F-15 fighter aircraft due to the recent BRAC Commission's final and approved recommendations.

4. *Alternatives Considered:* The "no action alternative" consists of not issuing the permit and was considered but dismissed, given that the current permit action, as proposed, will maintain compliance with all applicable rules and standards. MANG has demonstrated compliance with all applicable rules and standards as required for permit issuance.

5. *A Listing of Mitigation, Stipulations, and Other Controls:* A listing of the enforceable permit conditions and a permit analysis, including a best available control technology analysis, are contained in Permit #2930-03.

6. *Regulatory Effects on Private Property:* 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.

7. 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
B. Water Quality, Quantity, and Distribution
C. Geology and Soil Quality, Stability, and Moisture
D. Vegetation Cover, Quantity, and Quality

Operations at the facility would occur at a site previously used for the same purpose. Although, there may be increased activities during the initial testing of the engines, the activity would taper off after a period of time. No surface water or ground water quality problems are expected as a result of the current permit action. Any accidental spills or leaks from equipment would be handled according to the appropriate environmental regulations in an effort to minimize any potential impact on the immediate and surrounding area. The actions addressed in this permit would not change the soil stability or geologic substructure. The proposed changes would not result in impacts to productivity or fertility at or near the site. No unique geologic or physical features would be disturbed. Therefore, no impact to geology and soil quality, stability, and moisture would occur. Overall, the proposed project would only slightly increase potential NO_x emissions. Therefore, there would be no impacts on terrestrial and aquatic life and habitats, water quality, quantity and distribution, geology and soil quality, stability, and moisture, or vegetation cover, quantity, and quality.

E. Aesthetics

The proposed permit action would include an increase in activities during the initial testing of the engines, which would taper off over time. However, the additional testing would not alter any scenic vista or create an aesthetically offensive site or effect.

F. Air Quality

Allowable emissions of pollutants would increase slightly as result of the current permit action. However, the allowable emissions would still be within the National Ambient Air Quality Standards and Montana Ambient Air Quality Standards.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The current permit action would occur at a site that is currently used for the same purpose. There are no known unique endangered, fragile, or limited environmental resources surrounding the proposed project. However, the slight increase in NO_x emissions could result in minor impacts to any existing unique endangered, fragile, or limited environmental resource in the area.

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

The changes to the facility would not impact water. Additional energy may be required at the facility; therefore, minor impacts to energy would occur. Minor demands on air resources would occur because the facility's emissions would be increasing.

I. Historical and Archaeological Sites

The proposed project would take place within the base property, a previously disturbed industrial site. According to the Montana State Historic Preservation Office, there is low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within a given area. Therefore, it is unlikely the current permit action would have an effect on any known historic or archaeological site.

J. Cumulative and Secondary Impacts

Overall, cumulative and secondary impacts from this project would result in minor physical and biological impacts to the human environment in the immediate area. Air pollution from the facility would be controlled by Department-determined conditions in Permit #2930-03. The Department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in Permit #2930-03.

8. 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
B. Cultural Uniqueness and Diversity
C. Local and State Tax Base and Tax Revenue
D. Agricultural or Industrial Production

The proposed project would take place within the base property, a previously disturbed industrial site. The project would not require additional staff or resources for testing the engines. The proposed changes would not displace or otherwise affect any agricultural land or practices. In addition, the proposed operations would not impact local industrial production.

E. Human Health

There may be minor effects on human health due to the slight increase in emissions of pollutants. However, Permit #2930-03 incorporates conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed project would take place within the base property, a previously disturbed industrial site. Therefore, the project would not affect any access to or aesthetic attribute of recreational or wilderness activities in the area.

G. Quantity and Distribution of Employment
H. Distribution of Population

Activities from the proposed operations would not affect the quantity and distribution of employment in the area. The project would occur at a site previously used for the same purpose, and would not require additional employees.

I. Demands of Government Services

Government services would be required for acquiring the appropriate permits from government agencies. Demands for government services would be minimal.

J. Industrial and Commercial Activity

No additional industrial or commercial activity is expected as a result of the proposed changes.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans or goals that would be affected by the current permit action. The state standards would protect the proposed site and the environment surrounding the site.

L. Cumulative and Secondary Impacts

Overall, cumulative and secondary impacts from this project would result in minor economic and social impacts to the human environment in the immediate area. Air pollution from the facility would be controlled by Department-determined conditions in Permit #2930-03. The Department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in Permit #2930-03.

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: The source would be applying the Best Available Control Technology; the analyses indicate compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society, Montana Natural Heritage Program.

Individuals or groups contributing to this EA: Department of Environmental Quality - Air Resources Management Bureau; Montana Historical Society; and the Montana Natural Heritage Program.

EA prepared by: Julie Merkel
Date: July 29, 2008