Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
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September 26, 2008

Ms. Tracy Hodik
Century Companies, Inc
P.O. Box 579
Lewistown, MT 59457

Dear Ms. Hodik:

Air Quality Permit #2641-02 is deemed final as of September 26, 2008, by the Department of Environmental Quality (Department). This permit is for operation of a portable asphalt plant. 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

Jenny O'Mara
Environmental Engineer
Air Resources Management Bureau
(406) 444-1452

VW:JO
Enclosure

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, MT 59620
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Century Company, Inc.

Air Quality Permit number: 2641-02

Preliminary Determination Issued: August 25, 2008
Department Decision Issued: September 10, 2008
Permit Final: September 26, 2008

1. *Legal Description of Site*: Permit #2641-02 is currently located in the NW 1/4 Section 21, Township 16 North, Range 17 East, in Fergus County, Montana**.**

2. *Description of Project*: Century owns and operates an existing portable asphalt drum mixer with a maximum production capacity of 300 TPH at various locations across Montana. The current permit action is to add two diesel engines to an existing asphalt plant. The size of the diesel engines associated with this permitting action are 600 hp and a 55 hp.

3. *Objectives of Project*: The objective of this permitting action would be for Century to update the equipment inventory of their existing plant. The issuance of Permit #2641-02 would allow Century to operate the permitted engines at various locations throughout Montana, including the current location.

4. *Alternatives Considered*: In addition to the proposed action, the Department also 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 Century has demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

5. *A Listing of Mitigation, Stipulations, and Other Controls*: A list of enforceable conditions, including a BACT analysis, would be included in Permit #2641-02.

6. *Regulatory Effects on Private Property*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department 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.

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 Resources			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

There is a possibility that terrestrials would use the same area as the project. Impacts on terrestrial and aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor because the two diesel engines would be considered a minor source of emissions, and would have intermittent and seasonal operations. Furthermore, the air emissions would have only minor effects on terrestrial and aquatic life because facility emissions would be well dispersed in the area of operation (see Section 8.F of this EA). Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected from the engines operation.

B. Water Quality, Quantity and Distribution

Adding the engines to this existing asphalt plant would not cause an increase in water consumption. Any pollutant deposition in the area would be seasonal and intermittent given the portable nature of the engines. There would be no additional impacts to water resources and therefore, no surface and groundwater quality impacts would be expected.

C. Geology and Soil Quality, Stability and Moisture

The proposed project would have minor impacts on geology and soil quality, stability and moisture because deposition of air pollutants on soils would be minor (see Section 8.F of this EA). Only minor amounts of pollution would be generated. Pollutants would be widely dispersed before settling upon vegetation and surrounding soils (see Section 8.D of this EA). According to the applicant, Century will not disturb any new soils because the engines would be located at an existing site. Therefore, any effects upon geology and soil quality, stability, and moisture at this proposed operational site would be minor and short-term.

D. Vegetation Cover, Quantity, and Quality

The facility would be considered a minor source of emissions by industrial standards and would typically operate in areas previously designated and used for this type of operation. Minor impacts would occur on vegetative cover, quality, and quantity because this facility would be operating on an intermittent and temporary basis. Pollutants would be greatly dispersed and corresponding deposition on vegetation from the proposed project would be minor. MNHP noted that there are no known vegetative species of concern at the proposed location. Therefore, given the temporary and portable nature of the engines located at the existing asphalt plant, and the fact that there are no known vegetative species of concern, and that pollutants would be widely dispersed; minor impacts to vegetative cover, quantity and quality would occur as a result of this project.

E. Aesthetics

The engines at the asphalt plant operation would be visible, and would create additional noise. However, according to the applicant, the nearest neighbor is located approximately ½ mile from the proposed location. Permit #2641-02 would include conditions to control emissions, including visible emissions from the engines. Since the engines associated with the asphalt plant would be portable, and would operate on an intermittent and seasonal basis, any visual aesthetic impacts would be minor and short-lived.

F. Air Quality

Air quality impacts from the proposed diesel engines would be minor because they would operate on an intermittent and temporary basis. In addition, Permit #2641-02 would include conditions limiting the facility's opacity and the facility's operation. The permit would also limit the hours of operation for each engine to 3500 hours per year.

Further, the Department determined that the engines associated with the asphalt plant would remain a minor source of emissions as defined under the Title V Operating Permit Program because the source's PTE would continue to be below the major source threshold level of 100 tons per year for any regulated pollutant. Pollutant deposition from the engines would be minimal because pollutants emitted would be widely dispersed (from factors such as wind speed and wind direction) and would have minimal deposition on the surrounding area (due to site topography of the area and minimal vegetative cover in the area). Therefore, air quality impacts from operating the engines at the existing asphalt plant would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to any unique endangered, fragile, or limited environmental resources contacted MNHP. Search results concluded that a vertebrae animal known as the Sauger, a species of concern, is located one mile or more from the proposed engines. Because the Sauger was the only species of concern in the area and it is located outside of the project site, the impacts to unique endangered, fragile of limited environmental resources would be minor.

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

The operation of the diesel engines at the portable asphalt plant would not require any water. Impacts to air resources would be minimal because the source would be considered a minor industrial source of emissions, with intermittent and seasonal operations. Because air pollutants

generated by the engines would be widely dispersed (see Section 8.F of this EA) and energy requirements would be provided by a diesel engine, and water use would be minimal, 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 archaeological sites that may be present in the proposed area of operation. Search results concluded that there are no previously recorded historical or archaeological resources of concern within the area proposed for initial operation. According to correspondence from the SHPO, there would be a low likelihood of adverse disturbance to any known archaeological or historic site given previous industrial disturbance to the area. Therefore, no impacts upon historical or archaeological sites would be expected as a result of operating the engines at the existing asphalt plant. However, if cultural materials are discovered during this project the Montana Historical Society should be contacted.

J. Cumulative and Secondary Impacts

The engines' operation would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because they are located at an existing asphalt plant and would be limited in the amount of PM, $PM_{10,}$ NO_x, VOC, CO, and SO_x emissions generated. Emissions and noise generated from the equipment would, at most, result in only minor impacts to the area of operation because it would be seasonal and temporary in nature. Additionally, this facility, in combination with other emissions from equipment operations would not be permitted to exceed 250 tons per year of non-fugitive emissions. Overall, cumulative and secondary impacts to the physical and biological aspects of the human environment would be minor.

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

The addition of the engines at the asphalt plant would cause no disruption to the social structures and mores in the area because the source would be considered a minor industrial source of emissions, and would have temporary and intermittent operations. Further, the facility would be required to operate according to the conditions placed in Permit #2641-02, which would limit the effects to social structures and mores.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of this area would not be impacted by the engines operation at the asphalt plant because the facility would be a portable source, with seasonal and intermittent operations. The predominant use of this area has historically been crushing and screening operations and this operation would not change as a result of adding engines to the current permit. Therefore, the cultural uniqueness and diversity of the area could experience minor impacts.

C. Local and State Tax Base and Tax Revenue

Operation of the engines would have little, if any, impact on the local and state tax base and tax revenue because the source would be a minor industrial source of emissions, and would have seasonal and intermittent operations. Only minor impacts to the local and state tax base and revenue could be expected from the employees and facility production. According to the applicant approximately 3 people would be employed at the asphalt plant, however the addition of the engines would not require additional employees. Because the facility would be portable and temporary it is unlikely that people would move to the area as a result of this project. Impacts to local tax base and revenue would be minor and short-term because the source would be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The operation would be located on approximately 2.1 acres that was previously used for crushing and screening operations. The diesel engines would not have an impact on local industrial production since the engines operation would be minimal and emissions from the engines would be minor. Also, the portable facility would generally locate in a rural area. Minimal deposition of air pollutants would occur on the surrounding land (see Section 8.F of this EA) and only minor and temporary effects on the surrounding vegetation (i.e. agricultural production) would occur. In addition, the engines' operation would be temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation (see Section 8.D of this EA). Overall, the impacts to agricultural or industrial production would be minor.

E. Human Health

Permit #2641-02 would incorporate conditions to ensure that the engines' operation would be in compliance with all applicable air quality rules and standards. These rules and standards are designed to protect human health. Air emissions from this facility would be limited by the hours of operation. Because the engines would operate on a temporary basis, and pollutants would be widely dispersed, only minor impacts would be expected on human health from this operation.

F. Access to and Quality of Recreational and Wilderness Activities

Access to recreational opportunities would not be limited by the operation of two diesel engines. All recreational opportunities, if available in the area, would still be accessible. Noise from the facility would be minimal to surroundings because of the limited hours of operation, and rural location. The facility would operate on a seasonal and intermittent basis on private land and would be a minor industrial source of emissions. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at this site would be minor.

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G. Quantity and Distribution of Employment

According to the applicant, the plant operation would require approximately 3 employees. However, the additional engines would not require any additional employees. Other employees that would be associated with the asphalt plant would be a transient (i.e. truck drivers for aggregate, mineral filler, asphalt cement, load out, etc.). Because the operation would be seasonal (approximately six months/year), no individuals would be expected to permanently relocate as a result of operating the two diesel engines. Therefore, no effects upon the quantity and distribution of employment in this area would be expected.

H. Distribution of Population

The operation of the diesel engines at the associated asphalt plant would be considered a portable industrial facility and would require few employees to operate. No individuals would be expected to permanently relocate to this area. Therefore, the operation would not impact the normal population distribution in the initial area of operation or any future operating site.

I. Demands for Government Services

The addition of two engines to the existing asphalt plant would cause minimal demand for government services. This project would not result in an increase in traffic on existing roadways. Government services would be required for acquiring the appropriate permits for the proposed project, and to verify compliance with the permits that would be issued. However, any increase or demand for government services would be minor given the temporary and portable nature of the project.

J. Industrial and Commercial Activity

The engines would be considered 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

Century would be allowed by Permit #2641-02 to operate these diesel engines in areas designated by EPA as attainment or unclassified for ambient air quality. Permit #2641-02 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 have intermittent and seasonal operations any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

Operation of the diesel engines would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area of operation because the source would be portable and temporary. Further, no other industrial operations are expected to result from the permitting of this facility. Any minor increase in traffic would have little effect 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 engines. Further, these engines may be operated in conjunction with other equipment owned and operated by Century, 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 and secondary effects would result.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the addition of two diesel engines to an existing portable asphalt plant. Permit #2641-02 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

EA prepared by: Jenny O'Mara
Date: August 11, 2008