Montana Department of
ENVIRONMENTAL QUALITY
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February 5, 2010

Silver City Sand & Gravel
H. Howard Anderson
8920 Birdseye Road
Helena, MT 59602

Dear Mr. Anderson:

Montana Air Quality Permit #3380-01 is deemed final as of February 5, 2010, 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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Air Quality Specialist
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VW:JM
Enclosures

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
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DRAFT ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Silver City Sand and Gravel
6920 Birdseye Rd
Helena, MT 59602

Permit Number: 3380-01

Preliminary Determination Issued: January 4, 2010
Department Decision Issued: January 20, 2010
Permit Final: February 5, 2010

1. *Legal Description of Site*: Silver City submitted an application to add equipment to the portable aggregate crushing/screening plant located in the SE¼ of Section 36, Township 12 North, Range 5 West, in Lewis and Clark County, Montana. Permit #3380-01 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program, those areas considered to be tribal lands, or those areas in or within 10 km of certain PM_{10} nonattainment areas. An addendum to this air quality permit would be required if Silver City intends to locate in or within 10 km of certain PM_{10} nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*

2. *Description of Project*: The permit applicant proposes the addition of equipment to a portable crushing/screening plant that would consist of up to two portable crushers (up to 350 TPH total), up to four screens (up to 650 TPH total), up to four diesel generators/engines (up to 850 hp combined), and associated equipment.

3. *Objectives of Project*: The object of the project would be to produce business and revenue for the company through the sale and use of aggregate. The issuance of MAQP #3380-01 would allow Silver City to operate the permitted equipment at various locations throughout Montana.

4. *Additional Project Site Information*: In many cases, this crushing 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.

5. *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 Silver City 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 MAQP #3380-01.

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 additional equipment at the crushing/screening operation 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.

Impacts on aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor as the addition of equipment at the facility would only slightly increase emissions (with seasonal and intermittent operations) and only minor amounts of water would be used for pollution control. Since only a minor amount of air emissions would be generated, only minor deposition would occur. Therefore, 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 to control air pollutant emissions and deposition of air pollutant emissions would be minor (as described in Section 8.F of this EA).

C. Geology and Soil Quality, Stability, and Moisture

The addition of equipment at the crushing/screening facility would have only minor impacts on soils in any proposed site location because the facility is relatively small in size, would use only relatively small amounts of water for pollution control, and would only have seasonal and intermittent operations. Therefore, any affects upon geology and soil quality, stability, and moisture at any proposed operational site would be minor.

D. Vegetation Cover, Quantity, and Quality

Because the addition of equipment at the facility would be a minor source of emissions by industrial standards and would typically operate in areas previously designated and used for aggregate crushing and screening, impacts from the emissions from the additional equipment at the crushing/screening facility would be minor.

As described in Section 8.F of this EA, the amount of air emissions from the additional equipment 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 additional equipment at the crushing/screening operation would be visible and would create additional noise while operating in these areas. However, MAQP #3380-01 would include conditions to control emissions, including visible emissions, from the equipment. Also, because the crushing/screening operation is portable and would operate on an intermittent and seasonal basis, would typically 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 addition of equipment at the crushing/screening facility would be minor because MAQP #3380-01 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 emit relatively small amounts of air pollutants. Further, MAQP #3380-01 would limit total emissions from the crushing/screening operation and any additional Silver City equipment operated at the site to 250 tons/year or less, excluding fugitive emissions.

This facility would be used on a temporary and intermittent basis, thereby further reducing potential air quality impacts from the facility. Additionally, the small and intermittent amounts of deposition generated from the additional equipment would only have minor impacts upon the surrounding environment. Therefore, air quality impacts would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The operation of this additional equipment at the crushing/screening operation would result in the emissions of air pollutants that could result in impacts to existing unique endangered, fragile, or limited environmental resources in the areas of operation. However, given the temporary and portable nature of the operations, any impacts would be minor and short-lived. Additionally, operational conditions and limitations within MAQP #3380-01 would aid in the protection of these resources by protecting the surrounding environment.

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

Due to the size of the facility, the additional equipment at the facility would require only small quantities of water, air, and energy for proper operation. Small quantities of water would be used for dust suppression and would control particulate emissions being generated at the site. Energy requirements would also be small because the energy demands of the crushing/screening operation would be relatively small and the facility would not be used continuously. The facility would have limited hours of operation, limited production, and would have seasonal and intermittent use. In addition, impacts to air resources would be minor because the source is small by industrial standards, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed. Therefore, any impacts to water, air, and energy resources in any given area would be minor.

I. Historical and Archaeological Sites

The crushing/screening operations, including the additional equipment, would typically take place within a previously disturbed open-cut pit. According to past correspondence from the Montana Historical Preservation Office, there would be a low likelihood of disturbance to any known archaeological or historical site given any previous industrial disturbance in a given area of operation. Therefore, the additional equipment would have only a minor impact on any historical or archaeological sites in a given area of operation.

J. Cumulative and Secondary Impacts

The additional equipment at the crushing/screening operation would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the equipment would generate emissions of PM and PM_{10}. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance because the equipment is small and the facility would be expected to operate in areas designated and used for such operations. Additionally, this facility, in combination with the other emissions from equipment operations at the operational site, would not be permitted to exceed 250 tons per year 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 Department has prepared the following comments.

A. Social Structures and Mores

The additional equipment at the crushing/screening facility would cause no disruption to the social structures and mores in the area because the source is a minor source of emissions (by industrial standards) and would only have intermittent operations. Additionally, the equipment would be expected to operate in an area previously designated and used for aggregate crushing/screening and in an area removed from the general population. Further, the facility would be a minor source of air pollution and would be required to operate according to the conditions that would be placed in MAQP #3380-01. Thus, no native or traditional communities would be affected by the proposed project operations and no impacts upon social structures or mores would result.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of these areas would not be impacted by the proposed project because these sites are expected to be previously designated and used for aggregate crushing/screening and because these sites are separated from the general population. Additionally, the additional equipment at the facility would be considered a portable/temporary source with seasonal and intermittent operations. Therefore, predominant use of the surrounding areas would not change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The additional equipment at the crushing/screening operation would have little, if any, impact on the local and state tax base and tax revenue because the facility would remain a relatively small industrial source (minor source) and would be used on a seasonal and intermittent basis. The facility would not require additional employees. Thus, only minor, if any, 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 additional equipment at the crushing/screening operations would have minor or no impact on local industrial production since the equipment would be a minor source of emissions (by industrial standards) and would typically locate in an existing open-cut pit. The additional equipment would be small and temporary in nature, and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation (as described in Section 8.D of this EA). Additionally, pollution control would be utilized for equipment operations and production limits would be established.

E. Human Health

MAQP #3380-01 would incorporate conditions to ensure that the additional equipment at the crushing/screening facility would operate 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 conditions that would be established in MAQP #3380-01, though the facilities air emissions would be quite small without the use of pollution controls. Therefore, only minor impacts would be expected upon human health from the proposed project.

F. Access to and Quality of Recreational and Wilderness Activities

The additional equipment at the crushing/screening plant would typically operate within the confines of an existing open-cut pit. Therefore, only minor impacts upon the access to and quality of recreational and wilderness activities would result. Additionally, noise from the facility would be minor because the facility would typically operate within the confines of an existing open-cut pit. Also, the facility would continue to operate on a seasonal and intermittent basis and would be relatively small by industrial standards. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at a given 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 the additional equipment would not be expected to have any long-term affects upon the quantity and distribution of employment in any given area of operation. Therefore, no effects upon the quantity and distribution of employment in these areas would be expected.

H. Distribution of Population

The portable crushing/screening operation would remain small and would not require additional employees to operate. Also, no individuals would be expected to permanently relocate to a given area of operation as a result of operating the crushing/screening facility, which would have only intermittent and seasonal operations. Therefore, the project would not disrupt the normal population distribution in a given area of operation.

I. Demands of Government Services

No increases would be seen in traffic on existing roadways in a given area while the additional equipment at the crushing/screening operation is in progress. In addition, government services would be required for acquiring the appropriate permits from government agencies and determining compliance with the permits. 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 any given area because the source would be a minor source (relatively small in size by industrial standards) and 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

The Department is not aware of any locally adopted environmental plans and goals that would affect Silver City. Silver City would be allowed, by permit, to operate the equipment in areas designated by EPA as attainment or unclassified. MAQP #3380-01 would contain limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards. Because the equipment would be located at an existing facility, would be a small and portable source, and would have intermittent and seasonal operations, any effects from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The additional equipment at 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 existing source is a portable and temporary source. Minor increases in traffic would have minor effects on local traffic in the immediate areas, thus, having a direct effect on the social environment. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: An 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: 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: Julie Merkel
Date: December 8, 2009