



Montana Department of  
**ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor

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September 7, 2010

Mr. Brian L. Wood  
Wood's Crushing & Hauling, Inc.  
933 Woodside Road  
Sandpoint, ID 83864

Dear Mr. Wood:

The Department of Environmental Quality (Department) has made its decision on the Montana Air Quality Permit application for a portable crushing/screening facility. The application was given permit number 4564-00. The Department's decision may be appealed to the Board of Environmental Review (Board). A request for hearing must be filed by September 22, 2010. This permit shall become final on September 23, 2010, unless the Board orders a stay on the permit.

Procedures for Appeal: Any person jointly or severally adversely affected by the final action may request a hearing before the Board. Any appeal must be filed before the final date stated above. The request for a hearing shall contain an affidavit setting forth the grounds for the request. Any hearing will be held under the provisions of the Montana Administrative Procedures Act. Submit requests for a hearing in triplicate to: Chairman, Board of Environmental Review, P.O. Box 200901, Helena, Montana 59620.

Conditions: See attached.

For the Department,

Vickie Walsh  
Air Permitting Program Supervisor  
Air Resources Management Bureau  
(406) 444-9741

Karen Gillespie  
Environmental Engineer Specialist  
Air Resources Management Bureau  
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VW:KG  
Enclosure

**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Permitting and Compliance Division**  
**Air Resources Management Bureau**  
**P.O. Box 200901, Helena, MT 59620**  
**(406) 444-3490**

**FINAL ENVIRONMENTAL ASSESSMENT (EA)**

*Issued To:* Wood's Crushing & Hauling, Inc.

*Montana Air Quality Permit number:* 4564-00

*Preliminary Determination Issued:* 8/3/2010

*Department Decision Issued:* 9/7/2010

*Permit Final:*

1. *Legal Description of Site:* Wood's proposes to operate a crushing and screening facility initially located in Section 25, Township 30 North, Range 19 West in Flathead County, Montana. MAQP #4564-00 would apply while operating at any location in Montana, except those areas having a Department-approved permitting program and areas considered tribal lands. MAQP #4564-00 and Addendum 1 would allow the portable crushing/screening plant to operate in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas (Libby, Kalispell, Columbia Falls, Whitefish, Thompson Falls, and Butte) during the summer season (April 1 through September 30) and within the locations listed in Section II.A or Addendum 1 during the winter season (October 1 through March 31).
2. *Description of Project:* Wood's proposes to operate a portable crushing and screening plant at various locations throughout Montana. The plant would consist of four crushers (a maximum combined capacity of 1,700 TPH), three screens (a maximum combined capacity of 1,400 TPH), a 1,072 hp engine driving a generator, and associated material handling and processing equipment. The proposed action is to issue MAQP #4564-00 allowing the construction and operation of the plant in Flathead County, Montana and other locations across the state.
3. *Objectives of Project:* The objective of the operation of the crushing and screening facility is to produce business and revenue by selling aggregate to support various projects. The issuance of MAQP #4564-00 would allow Wood's to operate the permitted equipment at various locations throughout Montana, including the home pit 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 Wood's 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 MAQP #4564-00.
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

Terrestrials would use the same area as the crushing and screening operation. The proposed crushing/screening operations would be considered a minor source of emissions, by industrial standards, with intermittent and seasonal operations. Limitations and conditions would be placed in MAQP #4564-00 to minimize these emissions. Therefore, only minor effects on terrestrial life and habitats would be expected as a result of equipment operations or from pollutant deposition.

Impacts on aquatic life and habitats 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). Since only a minor amount of air emissions would be generated, only minor deposition would occur. Furthermore, this project would typically operate in an area designated for such activities. Therefore, only minor and temporary impacts 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 7.F of this EA).

Overall, any impacts to the water quality, quantity, and distribution of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall characteristics of the area would not change as a result of the proposed project and any associated impacts would be minor.

C. Geology and Soil Quality, Stability and Moisture

The crushing/screening operations would have only minor impacts on soils in any proposed site location (due to the construction and use of the crushing/screening facility) 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 impacts to geology and soil quality, stability, and moisture at any proposed operational site would be minor.

Overall, any impacts to the geology and soil quality, stability, and moisture of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall characteristics of the area would not change as a result of the proposed project and any associated impacts would be minor.

D. Vegetation Cover, Quantity, and Quality

Because 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 crushing/screening facility would be minor. As described in Section 7.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 7.B of this EA, and the associated soil disturbance is minimal as described in Section 7.C of this EA, corresponding vegetative impacts would be minor.

Overall, any impacts to the vegetation cover, quantity, and quality of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall characteristics of the area would not change as a result of the proposed project and any associated impacts would be minor.

E. Aesthetics

The crushing/screening operation would be visible and would create additional noise while in operation. However, MAQP #4564-00 and Addendum 1 would include conditions to control emissions, including visible emissions, from the plant. Also, because the crushing/screening operation is portable, would operate on an intermittent and seasonal basis, and would typically locate within a previously permitted open-cut pit, any visual and noise impacts would be minor and short-lived.

Overall, any impacts to the aesthetics of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall characteristics of the area would not change as a result of the proposed project and any associated impacts would be minor.

F. Air Quality

The air quality impacts from the crushing/screening operations would be minor because MAQP #4564-00 and Addendum 1 would include conditions limiting the opacity from the plant, as well as requiring water spray bars and other means to control air pollution. Further, MAQP

#4564-00 would limit total emissions from the crushing/screening operation and any additional equipment owned and operated by Wood's to 250 TPY or less at any given operating site, excluding fugitive emissions, and Addendum 1 would be more stringent than the MAQP to address specific NAAQS of PM<sub>10</sub> nonattainment areas.

The crushing/screening plant would be used on a temporary and intermittent basis and typically operate within an area designated for such operations, thereby further reducing potential air quality impacts from the facility. Additionally, the small and intermittent amounts of deposition generated from the crushing/screening operation would be minimal because the pollutants emitted would be well controlled, widely dispersed (from such factors as wind speed and wind direction), and would result in only minor impacts to the surrounding environment. Overall, any air quality impacts resulting from the proposed crushing/screening operation would be minor.

#### G. Unique Endangered, Fragile, or Limited Environmental Resources

Emissions from the proposed project may impact unique, endangered, fragile, or limited environmental resources located in a given proposed project area. However, allowable emissions and resulting impacts from the project would be minor due to the low concentration of those pollutants emitted.

MAQP #4564-00 and Addendum 1 would cover the proposed crushing/screening operation while located at various locations throughout the state. Most operations would be expected to take place within existing and previously disturbed industrial gravel pits thereby resulting in only minor impacts to the industrial area. Further, given the temporary and portable nature of the operations, any impacts would be expected to be minor and short-lived. In addition, operational conditions and limitations in MAQP #4564-00 and Addendum 1 would be protective of these resources by limiting overall impacts to the surrounding environment.

The Department has previously contacted the Montana Natural Heritage Program (MNHP) to identify species of special concern that may be found in the area where the proposed plant would initially locate. Search results concluded that there were 6 species of concern in the area. The area, in this case, was defined by the section, township, and range of the proposed site, with an additional 1-mile buffer. The species of special concern were the bull trout, grizzly bear, fisher, wolverine, Canada lynx, and English sundew.

Given the fact that most of the species of concern (i.e., the bull trout, grizzly bear, fisher, wolverine, and Canada lynx) would not likely be located within the operational area of the project and the nature of similar permitted crushing and screening operations, any effects on the local populations are expected to be minimal. Lastly, the English sundew, a vascular plant, covers a small area about one mile from the proposed plant area. As allowable emissions are limited, and deposition is expected to be minimal, if any, effects to the English sundew would be expected to be minimal.

In addition, initial and typical operations would take place within a previously disturbed industrial site, further limiting the potential for impact to any unique endangered, fragile, or limited environmental resource. Therefore, the overall industrial nature of the area would not change as a result of the proposed project and any associated impacts would be minor.

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

Due to the relatively small size of the facility, the crushing/screening operation would result in only minor demands on the environmental resources of water, air, and energy for normal operations. Small quantities of water would be used for dust suppression and would control

particulate emissions generated through equipment operations and vehicle traffic at the site. Energy requirements would be accommodated through the operation of the permitted diesel-fired electric generator and would be minor due to the relatively small amount of diesel fuel required to operate the generator. In addition, the crushing/screening plant would operate on an intermittent and seasonal basis thereby minimizing energy demands. Further, impacts to air resources would be minor because the source would be small by industrial standards, would operate on an intermittent and seasonal basis, and would generate relatively minor amounts of regulated pollutants through normal operations.

Overall, any impacts to the demands on the environmental resources of water, air, and energy of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall industrial nature of the area would not change as a result of the proposed project and any associated impacts would be minor.

#### I. Historical and Archaeological Sites

Typically, the crushing/screening plant would operate within a previously disturbed open-cut pit used for such purposes. The Department 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 crushing and screening plant. However, if cultural materials are discovered during this project, or any future project location, the Montana Historical Society should be contacted.

#### 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 of a given proposed area of operation because the facility would generate emissions of regulated air pollutants and noise would be generated from equipment operations. Emissions and noise would cause minor disturbances to a given area because the equipment is relatively small by industrial standards and the facility would be expected to operate in areas designated and typically 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 TPY of non-fugitive emissions.

Overall, any cumulative or secondary impacts to the physical and biological aspects of the human environment of the project area would be minor because the proposed crushing/screening operation would typically operate within areas designated for such operations. Therefore, the overall industrial nature of the area would not change as a result of the proposed project and any associated impacts 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 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 typically operate in an existing industrial gravel pit used for such purposes, and would operate on a temporary and intermittent basis. Further, the facility would be required to operate according to the limits and conditions that would be included in MAQP #4564-00 and Addendum 1, 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 proposed crushing/screening facility operation because the proposed facility would be a portable source, the facility would conduct seasonal and intermittent operations, and the facility would utilize a relatively small number of employees for normal operations. The predominant use of the surrounding area would not change as a result of this crushing/screening operation. Therefore, the cultural uniqueness and diversity of the area would not be impacted.

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 minor industrial source and would conduct only seasonal and intermittent operations. The proposed project would not be expected to require any more than a few employees. Furthermore, the impacts to local tax base and revenue would be minor because the source would continue to be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The crushing/screening operations would result in only minor impacts to local industrial production since the facility would be a minor source of aggregate production and air emissions. Because minimal deposition of air pollutants would occur on the surrounding land, only minor effects on the vegetation or agricultural production would occur. In addition, the facility operations would be small and temporary in nature. Pollutant deposition from the project would be minimal because the emissions would be well controlled, widely dispersed (from factors such as wind speed and wind direction), and would have minimal deposition on the surrounding area. In addition, the facility operations would be temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts to local agricultural areas.

E. Human Health

MAQP #4564-00 and Addendum 1 would include limits and 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 7.F of this EA, the air emissions from the proposed facility would be minimized by the use of water spray and other process limits that would be required by MAQP #4564-00 and Addendum 1. Also, the facility would operate on a temporary and intermittent basis and pollutants would be widely dispersed (see Section 7.F of this EA). Therefore, only minor impacts would be expected on human health from the proposed crushing/screening operations.

F. Access to and Quality of Recreational and Wilderness Activities

Access to recreational opportunities would not be limited by this facility. The equipment would be initially and typically located within preexisting industrial sites. All recreational opportunities, in available in the area, would still be accessible. Noise from the facility would be minor because the crushing/screening operation would be small by industrial standards and would operate in areas typically used for such operations (i.e., existing gravel pit). As a result, the amount of noise generated from the crushing/screening operation would be minimal for the area. Also, the facility would operate on a seasonal and intermittent basis. Therefore, any impacts to the quality of recreational and wilderness activities created by the proposed project would be expected to be minor and short-lived.

G. Quantity and Distribution of Employment

This facility would be a small, portable operation. Therefore, this project would not be expected to have any more than a minor effect to the quantity and distribution of employment in any given area of operation.

H. Distribution of Population

The portable crushing/screening operation would be small and temporary in nature with few employees. Therefore, the facility would be expected to have little, if any, impact on the normal population distribution in the area of operation or any future operating site.

I. Demands for Government Services

There would be a very small increase in traffic on existing roadways and highways in the area from the proposed project. 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, demands for government services would be minor.

J. Industrial and Commercial Activity

The proposed project would represent only a minor increase in the industrial activity in the proposed area of operation because the facility would continue to be a small industrial source and be portable and temporary in nature. Very little additional industrial or commercial activity would be expected as a result of the proposed operation. Therefore, any impacts to the industrial and commercial activity would be minor.

K. Locally Adopted Environmental Plans and Goals

MAQP #4564-00 and Addendum 1 would allow Wood's to operate in areas designated by the Environmental Protection Agency (EPA) as attainment or unclassified for the National and Montana Ambient Air Quality Standards (NAAQS/MAAQS). MAQP #4564-00 and Addendum 1 would include limits and conditions that would protect air quality and keep facility emissions in compliance with any applicable ambient air quality standards. In addition to the air quality protection provided by MAQP #4564-00 and Addendum 1, the facility would be a portable source and would have intermittent and season operations, thus, 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 area of operation because the source would be a portable and temporary source. No other industrial operations would be expected to result from the permitting and operation of this facility. Minor increases in traffic would have minor effects on local traffic in the immediate area. Because the source is an existing permitted crushing/screening operation and would remain relatively small and temporary, only minor economic impacts to the local economy would be expected from the proposed project.

Further, this facility may be operated in conjunction with other equipment owned and operated by Wood's; however, any cumulative impacts to the social and economic aspects of the human environment would be minor and short-lived. In conclusion, the source is relatively small, the facility emissions would be minimal, and the project would have only minor cumulative and secondary impacts.

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 construction and operation of a portable crushing/screening facility. MAQP #4564-00 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: Karen Gillespie

Date: July 30, 2010