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August 16, 2012

Joni Johnson
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212 Broadway Street
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Dear Ms. Johnson:

Montana Air Quality Permit #4666-03 is deemed final as of August 16, 2012, by the Department of Environmental Quality (Department). This permit is for a non-metallic processing operation. 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,

Charles Homer
Manager, Air Permitting, Compliance and Registration
Air Resources Management Bureau
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Tashia Love
Environmental Science Specialist
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CH:TL
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: Concord Field Services, LLC
P.O. Box 1077
Shelby, MT 59474

Montana Air Quality Permit Number (MAQP): 4666-03

Preliminary Determination Issued: June 29, 2012

Department Decision Issued: July 31, 2012

Permit Final: August 16, 2012

1. *Legal Description of Site:* Concord operates a portable non-metallic mineral crushing and screening operation, with a designated home-pit located in Section 8, Township 27 North, Range 57 East within Roosevelt County, Montana. However, MAQP #4666-03 applies while operating at any location in Montana, except those areas having a Department-approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum would be required for locations in or within 10 km of certain PM₁₀ nonattainment areas.
2. *Description of Project:* The current action is a modification for an addition of an impact crusher with an integral diesel-fired engine/generator and one diesel-fired engine/generator to Concord's existing crushing/screening facility.
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 #4666-03 would allow Concord to operate the permitted equipment at various locations throughout Montana (as described above).
4. *Alternatives Considered:* In addition to the proposed action, the Department considered the "no-action" alternative. The "no-action" alternative would deny issuance of the MAQP to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Concord 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 listing of the enforceable permit conditions and a permit analysis, including a BACT analysis, would be contained in MAQP #4666-03.
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 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.

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.

| | | <i>Major</i> | <i>Moderate</i> | <i>Minor</i> | <i>None</i> | <i>Unknown</i> | <i>Comments Included</i> |
|----------|-----------------------------------------------------------------------|--------------|-----------------|--------------|-------------|----------------|--------------------------|
| <i>A</i> | <i>Terrestrial and Aquatic Life and Habitats</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>B</i> | <i>Water Quality, Quantity, and Distribution</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>C</i> | <i>Geology and Soil Quality, Stability and Moisture</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>D</i> | <i>Vegetation Cover, Quantity, and Quality</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>E</i> | <i>Aesthetics</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>F</i> | <i>Air Quality</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>G</i> | <i>Unique Endangered, Fragile, or Limited Environmental Resources</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>H</i> | <i>Demands on Environmental Resource of Water, Air and Energy</i> | | | <i>X</i> | | | <i>Yes</i> |
| <i>I</i> | <i>Historical and Archaeological Sites</i> | | | | <i>X</i> | | <i>Yes</i> |
| <i>J</i> | <i>Cumulative and Secondary Impacts</i> | | | <i>X</i> | | | <i>Yes</i> |

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

This permitting action would be expected to have a minor effect on terrestrial and aquatic life and habitats, as the proposed project would affect an existing mining site. Current permit acreage is 134 acres, with currently 35 acres under disturbance, 15 acres under reclamation, and 84 acres undisturbed. Maximum disturbed acreage at one time would be 50 acres. Furthermore, the air emissions would likely have only minor effects on terrestrial and aquatic life because facility emissions would be well dispersed in the area of the operations (see Section 7.F of this EA) and would have intermittent and seasonal operations. Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected.

B. Water Quality, Quantity, and Distribution

Water would be required for dust suppression on the surrounding roadways and general facility area. This water use would be expected to only cause minor, if any, impacts to water resources because the proposed project is small and only a small, additional volume of water would be required to be used. The site is in an existing mining site and there are no wetlands within 800 feet of the mining site. Disturbed ground would drain to areas contained by earth and/or scoria berms to allow for percolation into sub-soils prior to surface flow. At final reclamation, original drainage patterns would be maintained and no discharges are proposed to occur from the existing site. Therefore, the Department determined that, due to dispersion characteristics of pollutants and conditions that would be placed in MAQP #4666-03, any impacts from deposition of pollutants on water quality, quantity, and distribution expected would be minor from the current permit action.

C. Geology and Soil Quality, Stability, and Moisture

Scoria bedrock outcrops 2-4 acres in the area with overlying sandy sediments such as sandstone and siltstone. Overburden may include thick sequences of sandy substrate with moderate clay content. The top soils are rich in organic material, although poorly developed

and deeply incised on steep slopes. The site is used as open graze land by the landowner, Anderson Diamond Ranch Inc. Minor impacts from deposition of air pollutants on soils would likely result (as described in Section 7.F of this EA) and only minor amounts of water would be used for pollution control, and only as necessary, in controlling particulate emissions. Thus, only minimal water runoff would likely occur. Since only minor amounts of pollution would be expected from the current permitting action and corresponding emissions would be widely dispersed before settling upon surrounding soils and vegetation (as described in Section 7.D of this EA), impacts would be minor. Therefore, any effects upon geology and soil quality, stability, and moisture from air pollutant emissions from equipment operations would likely be minor and short-lived.

D. Vegetation Cover, Quantity, and Quality

This site might be characterized as open grassy hills and valleys. Vegetation is primarily grassland habitat with mostly Agropyron species including Western and Slender wheatgrass, Thick-spike wheatgrass, Green needlegrass, Sideoats grama, and Prairie sandreed. Tree species include Cedar, Juniper, Ash, and Oak stands in the drainage bottom draining south. During operations, the proposed project would likely be a relatively minor source of emissions and the pollutants widely dispersed (as described in Section 7.F of this EA); therefore, deposition on vegetation from the project would expect to be minor. Also, due to a limited increase in water usage from this permitting action (as described in Section 7.B of this EA) and minimal associated soil disturbance from the application of water and water runoff (as described in Section 7.C of this EA), corresponding vegetative impacts would likely be minor.

E. Aesthetics

The nearest residence is two miles north from the proposed project site. Noise levels immediate to crushing equipment may approach 95 decibals, while noise levels of rock processing equipment and front end loaders may approach 90 decibals. The additional crusher would be visible and would create noise while operating at the proposed site. However, MAQP #4666-03 would include conditions to control emissions, including visible emissions, from the plant. The facility is portable and operates on an intermittent and seasonal basis, and would be a small industrial source. Therefore, any visual aesthetic impacts would be short-lived and are expected to be minor.

F. Air Quality

Air quality impacts from the proposed project would likely be minor because an increase in air pollutants would be relatively small and the proposed project would operate on an intermittent and temporary basis. MAQP #4666-03 includes conditions limiting the facility's opacity; requires water and water spray bars be available on site and used to ensure compliance with opacity standards.

Further, the Department determined that this proposed project would be a minor source of emissions as defined under the Title V Operating Permit Program because the source's potential to emit is limited to below the major source threshold level of 100 TPY for any regulated pollutant. Pollutant deposition from the facility would expect to be minimal because the pollutants emitted are widely dispersed (from factors such as wind speed and wind direction) and exhibit minimal deposition on the surrounding area. Therefore, air quality impacts from operating the proposed project in this area would be expected to 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 in the proposed area of operation (Section 8, Township 27 North, Range 57 East within Roosevelt County, Montana) contacted the Natural Resource Information System – Montana Natural Heritage Program. Search results concluded there is one species of concern within the area. The search area, in this case, is defined by the section, township, and range of the proposed site, with an additional one (1) mile buffer. The known species of concern includes a single vertebrate animal: the Whooping Crane (Endangered).

While this species may be found within the search area, the Whooping Crane is a migratory animal and will likely have access to many miles of potential habitat. Furthermore, the Whooping Crane is known to inhabit wetland areas, which are not impacted by the operation of this facility. The site is also grazed by mule eared and white tailed deer. Shrub and tree habitat in the bottom drainages support a number of other bird species as well. These areas would not be disturbed. Specific effects of operating the proposed project in this area would be minor since the project is relatively small in size and located within an existing construction area. In addition the source will have only seasonal and intermittent operations in the area. Therefore, the Department determined that any effects upon these species would likely be minor and short-lived.

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

Due to the relatively small size of the proposed project, only small demands on environmental resources would likely be required for proper operation. Only small quantities of water are required for dust suppression of particulate emissions being generated at the site. In addition, impacts to air resources would be expected to be minor because the proposed project would be considered a minor industrial source of emissions, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed as described in Section 7.F of this EA. Overall, any impacts to water, air, and energy resources would likely be minor.

I. Historical and Archaeological Sites

The Department contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be disturbed due to the current permitting action. Search results concluded that as long as there will be no new ground disturbance or any alteration to structures over fifty years of age, there is a low likelihood cultural properties will be impacted.

Therefore, a recommendation for a cultural resource inventory is unwarranted at this time.

J. Cumulative and Secondary Impacts

The current permitting action would likely cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the action cause a minor increase in the amount of emissions being released into the environment. Emissions and noise generated from the equipment would likely result in only minor impacts to the area of operations because the operation of the crushing facility would be seasonal and temporary. The proposed project would be short-term in nature, and likely have minor cumulative effects upon resources within the area. These resources include water, terrestrial and aquatic life, soils, and vegetation. Overall, cumulative and secondary impacts to the physical and biological aspects of the human environment would likely 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.*

| | | <i>Major</i> | <i>Moderate</i> | <i>Minor</i> | <i>None</i> | <i>Unknown</i> | <i>Comments Included</i> |
|----------|------------------------------------------------------------------------|--------------|-----------------|--------------|-------------|----------------|--------------------------|
| <i>A</i> | <i>Social Structures and Mores</i> | | | | X | | <i>Yes</i> |
| <i>B</i> | <i>Cultural Uniqueness and Diversity</i> | | | | X | | <i>Yes</i> |
| <i>C</i> | <i>Local and State Tax Base and Tax Revenue</i> | | | X | | | <i>Yes</i> |
| <i>D</i> | <i>Agricultural or Industrial Production</i> | | | X | | | <i>Yes</i> |
| <i>E</i> | <i>Human Health</i> | | | X | | | <i>Yes</i> |
| <i>F</i> | <i>Access to and Quality of Recreational and Wilderness Activities</i> | | | | X | | <i>Yes</i> |
| <i>G</i> | <i>Quantity and Distribution of Employment</i> | | | | X | | <i>Yes</i> |
| <i>H</i> | <i>Distribution of Population</i> | | | | X | | <i>Yes</i> |
| <i>I</i> | <i>Demands for Government Services</i> | | | X | | | <i>Yes</i> |
| <i>J</i> | <i>Industrial and Commercial Activity</i> | | | X | | | <i>Yes</i> |
| <i>K</i> | <i>Locally Adopted Environmental Plans and Goals</i> | | | X | | | <i>Yes</i> |
| <i>L</i> | <i>Cumulative and Secondary Impacts</i> | | | X | | | <i>Yes</i> |

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The current permitting action would expect to cause no disruption to the social structures and mores in the area because the proposed project would be a minor increase of emissions and would only have temporary and intermittent operations. Further, the facility would be required to operate according to the conditions that would be placed in MAQP #4666-03, 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 likely be impacted by the operation of the proposed project because the facility is a portable source, with seasonal and intermittent operations. Therefore, there would not be any impacts expected to the cultural uniqueness and diversity of this.

C. Local and State Tax Base and Tax Revenue

The operation of the proposed project would likely have little, if any, impact on the local and state tax base and tax revenue because the facility would be a minor industrial source of emissions and would have seasonal and intermittent operations. Five miners and up to 20 truck drivers would be employed at the mine site. Thus, only minor impacts to the local and state tax base and revenue would be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue would be minor because the source would be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The operation of the proposed project would have only a minor impact on local industrial production since the facility would be a minor source of air emissions. Because minimal deposition of air pollutants would occur on the surrounding land (as described in Section 7.F

of this EA), only minor and temporary effects on the surrounding vegetation (i.e. agricultural production) would occur. In addition, the proposed project operations 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 7.D of this EA.

E. Human Health

MAQP #4666-03 would incorporate conditions to ensure that the proposed project 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 7.F. of this EA, the air emissions from the proposed project would be minimized by the use of water spray and other operational limits that would be required by MAQP #4666-03. Also, the proposed project would be operating on a temporary basis and pollutants would disperse from the ventilation of emissions at this site (see Section 7.F of this EA). Therefore, only minor impacts would be expected on human health from the proposed project.

F. Access to and Quality of Recreational and Wilderness Activities

Based on information received from Concord, no recreational activities or wilderness areas are near the proposed project site. Therefore, no impacts to the access to and quality of recreational and wilderness activities are anticipated.

G. Quantity and Distribution of Employment

The proposed project would not require a significant increase in employees and would have seasonal and intermittent operations. No individuals would be expected to permanently relocate to this area of operation as a result of operating the crushing/screening facility. Therefore, no effects upon the quantity and distribution of employment in this area would be expected.

H. Distribution of Population

No individuals would be expected to permanently relocate to this area of operation as a result of the proposed project. Therefore, the proposed project would not likely impact the normal population distribution in the initial area of operation or any future operating site.

I. Demands of Government Services

Minor or no increases would be expected in traffic on existing roadways in the area while the proposed project is being operated. In addition, 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 expect to be minor.

J. Industrial and Commercial Activity

The proposed project would represent only a minor increase in the industrial activity in the area of operation because the source would be a relatively small industrial source that would be portable and temporary in nature. No additional industrial or commercial activity would be expected.

K. Locally Adopted Environmental Plans and Goals

Concord would be allowed, by MAQP #4666-03, to operate in areas designated by Environmental Protection Agency as attainment or unclassified for ambient air quality. MAQP #4666-03 contains operational restrictions 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 proposed project would be a portable source and would likely have intermittent and seasonal operations, any impacts from the project would be expected to be minor and short-lived.

L. Cumulative and Secondary Impacts

The proposed project would cause only 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. Minor increases in traffic would have minor effects on local traffic in the immediate area. Because the proposed project is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Further, this proposed project may be operated in conjunction with other equipment owned and operated by Concord, but any cumulative impacts upon the social and economic aspects of the human environment would likely be minor and short-lived. Thus, only minor and temporary cumulative effects would be expected to the local economy.

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; MAQP #4666-03 provides conditions and limitations to ensure the facility would 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: T. Love

Date: June 5, 2012