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

PRELIMINARY DETERMINATION
ON PERMIT APPLICATION

Date of Mailing: November 14, 2012

Name of Applicant: Montana Fiberglass, Inc.

Source: Manufacture of fiberglass tanks and other products

Proposed Action: The Department of Environmental Quality (Department) proposes to issue a permit, with conditions, to the above-named applicant. The application was assigned Permit Application Number 4069-01.

Proposed Conditions: See attached.

Public Comment: Any member of the public desiring to comment must submit such comments in writing to the Air Resources Management Bureau (Bureau) of the Department at the above address. Comments may address the Department's analysis and determination, or the information submitted in the application. In order to be considered, comments on this Preliminary Determination are due by December 17, 2012. Copies of the application and the Department's analysis may be inspected at the Bureau's office in Helena. For more information, you may contact the Department.

Departmental Action: The Department intends to make a decision on the application after expiration of the Public Comment period described above. A copy of the decision may be obtained at the above address. The permit shall become final on the date stated in the Department's Decision on this permit, unless an appeal is filed with the Board of Environmental Review (Board).

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 by the date stated in the Department's Decision on this permit. 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, MT 59620.

For the Department,

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Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-3490

Shawn Juers
Environmental Engineer
Air Resources Management Bureau
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JM:SJ
Enclosures

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

DRAFT ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Montana Fiberglass, Inc

Montana Air Quality Permit Number: 4069-01

Preliminary Determination Issued: 11/14/2012
Department Decision Issued:
Permit Final:

1. *Legal Description of Site*: Section 22, Township 15 North, Range 18 East, in Fergus County

2. *Description of Project*: Montana Fiberglass, Inc (MFI) operates a manufacturing facility that produces fiberglass reinforced products. The current permit action removes one impregnator unit and one chopper gun, and adds one pressure feed roller, one putty dispenser, and one gel coat spray gun.

3. *Objectives of Project*: To continue meeting expected demands for fiberglass reinforced products.

4. *Alternatives Considered*: In addition to the proposed action, the Department of Environmental Quality – Air Resources Management Bureau (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 MFI 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 Montana Air Quality Permit (MAQP) #4069-01.

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			XX			Yes
B	Water Quality, Quantity, and Distribution			XX			Yes
C	Geology and Soil Quality, Stability and Moisture			XX			Yes
D	Vegetation Cover, Quantity, and Quality			XX			Yes
E	Aesthetics		XX				Yes
F	Air Quality			XX			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources			XX			Yes
H	Demands on Environmental Resource of Water, Air and Energy			XX			Yes
I	Historical and Archaeological Sites			XX			Yes
J	Cumulative and Secondary Impacts			XX			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

Emissions from the operation could affect terrestrial and aquatic life and habitats in the project area. The operation would continue to occur within buildings. Overall, any impact to the terrestrial and aquatic life and habitats of the project area would be expected to be minor.

B. Water Quality, Quantity and Distribution

The operation would continue to take place indoors and would not be expected to create additional demand for or discharge of process water as part of the project. Any impacts to water quality, quantity, and distribution, would be expected to be minor.

C. Geology and Soil Quality, Stability and Moisture

The operation would continue to take place indoors. No destruction or modification of any unique geological features would be expected. The site is currently graveled in traffic areas around buildings. Minor, if any, impacts to geology and soil quality, stability, or moisture, would be expected.

D. Vegetation Cover, Quantity, and Quality

The operation would continue to take place indoors. Any impacts from the emissions for this project would be expected to be minor.

E. Aesthetics

The operation would take place within a building. MFI is located approximately 1,000 feet from Lewistown, Montana. Any visible emissions from the source would be limited to 20% opacity, and noise generated by the operation would be minor due to the nature of the business.

Styrene is the main pollutant of concern from the facility. Styrene has a very low odor threshold (0.32 parts per millions (ppm) according to the EPA). According to the Occupational Health and Safety Administration (OSHA), facilities must limit their workers' exposure to styrene at an average of 100 ppm for an 8-hour workday, 40-hour workweek. Since styrene has a low odor threshold, which would be expected to be exceeded, nearby residents could be impacted by odor nuisance.

As an existing and operating facility, the operation would be expected to have moderate impacts to aesthetics in the immediate area, due to additional styrene odors.

F. Air Quality

MFI has the potential to emit over 10 tons per year of styrene, and as such, the source will be classified as a major Title V source. The facility is subject to federal Maximum Achievable Control Technology standards, codified in 40 Code of Federal Regulations (CFR) 63, Subpart WWWW. MAQP #4069-01 would require that the facility meet all requirements of this rule. Further, the MAQP would contain a plantwide Volatile Organic Compounds (VOC) limitation of 75.8 tons per year.

No ambient air quality standard exists for odor or styrene. Overall VOC emissions are below the threshold which would trigger necessity of more detailed modeling analyses. As such, the Department determined that ambient air impacts from this permitting action would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department has previously contacted the Montana Natural Heritage Program, requesting a search for information regarding identification and known presence of any unique endangered, fragile, or limited environmental resources in the area. No species of special concern were identified. As an existing and operating source, the Department would expect minor, if any, impacts to endangered, fragile, or limited environmental resources.

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

As described in Section 7.B and 7.F, demands on water and air would be expected to be minor. As the source would be expected to have minor energy demands on an industrial scale, impacts to energy demands would be expected to be no more than minor.

I. Historical and Archaeological Sites

The Department has previously contacted the Montana Historical Society, State Historic Preservation Office (SHPO), requesting a file search for the presence of any historic or archaeological sites within the project area. The file search concluded that no recorded historic or archaeological sites are within the project area. Further, the operation is current existing and operating. The Department determined that any impacts to cultural or historic sites in the area

J. Cumulative and Secondary Impacts

The Department found no more than moderate impacts expected to the individual physical and biological considerations above. From a cumulative and secondary impacts standpoint, the Department would consider impacts from this project at an existing and operating facility to 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			XX			Yes
B	Cultural Uniqueness and Diversity			XX			Yes
C	Local and State Tax Base and Tax Revenue			XX			Yes
D	Agricultural or Industrial Production			XX			Yes
E	Human Health			XX			Yes
F	Access to and Quality of Recreational and Wilderness Activities			XX			Yes
G	Quantity and Distribution of Employment				XX		Yes
H	Distribution of Population				XX		Yes
I	Demands for Government Services			XX			Yes
J	Industrial and Commercial Activity			XX			Yes
K	Locally Adopted Environmental Plans and Goals			XX			Yes
L	Cumulative and Secondary Impacts			XX			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

The predominant use of the surrounding area is industrial/commercial and would not change as a result of the project. No additional employment is expected as a result of this project. Further, the project takes place at an existing and operating facility. The Department believes the project would have minor effects on any native or traditional lifestyles or communities (social structures or mores) or cultural uniqueness and diversity.

C. Local and State Tax Base and Tax Revenue

No additional employment is expected as a result of this project. The project would be considered small by industrial standards, and any impacts to local and state tax base and revenue would be expected to be minor.

D. Agricultural or Industrial Production

As an existing and operating facility, any impacts to agricultural or industrial production as a result of issuance of MAQP #4069-01 would be expected to be minor.

E. Human Health

There may be minor effects on human health due to the emission of pollutants (primarily styrene). According to the Agency for Toxic Substances and Disease Registry (ATSDR), breathing high levels of styrene for a short-time could result in impacts to the nervous system, as well as eye, nose, and throat irritation. There is little known regarding the human health effects of breathing low levels of styrene for a long period of time. Styrene is also a reasonably anticipated human carcinogen. High level exposure to styrene would occur from breathing indoor air that is contaminated with styrene vapors. Levels of styrene in ambient air would be much lower than the levels occurring within the facility itself.

MAQP #4069-01 incorporates conditions to ensure that the facility would be required to operate in compliance with all applicable rules and standards, including the Maximum Achievable Control Technology Standards of 40 CFR 63, Subpart WWWW. Therefore, the Department believes that there would be a minor risk to human health in the surrounding area.

F. Access to and Quality of Recreational and Wilderness Activities

The facility would continue to operate in its current location. Minor, if any, effects to quality of recreational and wilderness activities would be expected.

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

This project is not expected to result in any change in employment. No change to the quantity and distribution of employment or distribution of population would be expected.

I. Demands for Government Services

Government services would be required for acquiring the appropriate permits from government agencies, and analyses of those permits. In addition, the permitted source of emissions would be subject to periodic inspections by government personnel. Demands for government services would be minor.

J. Industrial and Commercial Activity

The facility would continue to operate in the same location. Increases in production, if achieved, may slightly increase the overall industrial activity. No additional employment is expected. Any impacts to industrial activity would be expected to be minor.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans or goals in the immediate area affected by the project. Because the facility is existing, the Department believes this project would not impact or change any other environmental plans and goals.

L. Cumulative and Secondary Impacts

MFI 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 considered small by industrial standards. Minor health effects could occur from styrene (HAP); however, the concentration of styrene near residential areas would be low due to dispersion and would mainly be an odor irritant. Further, few industrial operations, if any, would be expected to result from permitting this facility. Any minor increase in traffic would have little effect on local traffic in the immediate area. Because the source would be relatively small, only minor economic impacts to the local economy would be expected from operating the facility. Further, any cumulative impacts upon the social and economic aspects of the human environment would be minor. 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 construction, removal, and operation of additional equipment at the Montana Fiberglass Inc. facility. MAQP #4069-01 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: Shawn Juers
Date: 10/18/2012