Montana Department of
ENVIRONMENTAL QUALITY

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September 17, 2013

Richard Slotness
Malteurop North America, Inc
415 North US Highway 87
Great Falls, MT 59404

Dear Mr. Slotness:

Montana Air Quality Permit #3238-07 is deemed final as of September 17, 2013, by the Department of Environmental Quality (Department). This permit is for the Malteurop North America Inc. plant in Great Falls, Montana. 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,

Julie A. Merkel
Air Permitting Supervisor
Air Resources Management Bureau
(406) 444-3626

Shawn Juers
Environmental Engineer
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JM:SJ
Enclosure

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Malteurop North America Incorporated
415 US Highway 87
Great Falls, MT 59404

Montana Air Quality Permit (MAQP) Number: #3238-07

Preliminary Determination on Permit Issued: 8/14/2013
Department Decision Issued: 8/30/2013
Permit Final: 9/17/2013

1. *Legal Description of Site*: Malteurop North America (Malteurop) submitted an MAQP application to replace an existing baghouse with one of higher capacity, which is located approximately 2 miles north of the City of Great Falls, Montana, and approximately ½ mile west of Black Eagle Road. The legal description of the facility site is the NE ¼ of the SE ¼ of Section 30, Township 21 North, Range 4 East, in Cascade County, Montana.

2. *Description of Project*: The permit application is for the removal of a baghouse and addition of a new baghouse with higher dust handling capabilities. The process description for the facility is discussed in the permit analysis Section of the permit.

3. *Objectives of Project*: To increase control equipment capacity.

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 Malteurop 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 #3238-07.

6. *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 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	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 Resource			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

Minor impacts to terrestrial and aquatic life and habitats may result as the current permit action is allowing for an increase in particulate matter emissions. However, the allowed increase is very small and any impacts would be expected to be minor.

B. Water Quality, Quantity, and Distribution

There would be a minor increase in potential to emit of particulate associated with this permit action. As described in Section 7.F of this EA, the Department determined that any impacts from deposition of pollutants would be minor.

C. Geology and Soil Quality, Stability, and Moisture

No known impacts to the geology, soil quality, or stability and moisture would be expected as a result of the new baghouse installation as the project would take place within an existing footprint, and the emissions increase would be small. Impacts to geology, soil quality, stability, and moisture would be minor, if any at all.

D. Vegetation Cover, Quantity, and Quality

Because there is a minor increase in emissions associated with the permit action, small amounts of pollutant deposition would occur on the surrounding areas. Therefore, there could be impacts on local vegetative cover, quantity and quality; however, any impacts would be expected to be minor.

E. Aesthetics

The new baghouse would be replacing an existing baghouse at an existing operation. Impacts to aesthetics would be expected to be minor.

F. Air Quality

The air quality emission impacts from the project would be expected to be minor because MAQP #3238-07 would include conditions limiting the particulate and the visible emissions (opacity) from the new baghouse. With the controlled amount of emissions, any impacts from the deposition of pollutants would be expected to be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The proposed project could have a minor impact on any unique endangered, fragile, or limited environmental resources. The Department, in an effort to identify any species of special concern associated with the site location, has recently contacted the Montana Natural Heritage Program (MNHP). Search results have concluded there are four species of concern in the area. Area, in this case, is defined by the township, range and section of the proposed site, with an additional one-mile buffer. The species of concern identified in the search include the following three vertebrate animals and one plant.

1. Bald Eagle (Sensitive)
2. Burrowing Owl (Sensitive)
3. Grasshopper Sparrow (Sensitive)
4. Little Indian Breadroot (Sensitive)

As the impacts to all other physical and biological considerations mentioned in Section 7 of this environmental assessment is considered minor, and as the project would take place at an existing and operating facility and would result in a very small increase in potential emissions, the impacts to these species of special concern would be expected to be minor.

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

The operation of the new baghouse at the facility would require additional energy for proper operation. No utilities upgrading is expected to be required for the project. As described in Section 7.F of this EA, pollutant emissions generated from the facility would have minimal impacts on air quality in the immediate and surrounding area. Demands and impacts to the environmental resource of water, air and energy would be expected to be minor.

I. Historical and Archaeological Sites

The project would be located within the existing building footprint. According to previous consultation with the Montana State Historic Preservation Office regarding this location, there is low likelihood of adverse disturbance to any known archaeological or historic site, given previous industrial disturbance within the area. Therefore, the operation would not have an effect on any known historic or archaeological site.

J. Cumulative and Secondary Impacts

The project may cause minor cumulative and secondary impacts to the physical and biological environment in the immediate area because of an associated increase in potential emissions of particulate matter. Little or minor impacts could occur on local vegetation, and some minor impact may be expected on air quality. Sensitive animals and plants are in the vicinity but again minor impacts are expected. Small amounts of additional energy could be consumed at the facility. The Department expects this facility to operate in compliance with all applicable rules and regulations as would be outlined in MAQP #3238-07.

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	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 Department has prepared the following comments.

A. Social Structures and Mores

The project would not be expected to alter or disrupt any local lifestyles or communities (social structures or mores) in the area of operation as the permit action would apply to an existing source making minor modifications. Impacts to social structures and mores would be minor, if any at all.

B. Cultural Uniqueness and Diversity

The project would not be expected to impact the cultural uniqueness and diversity of the area because the source would be within the existing facility footprint. Impacts to cultural uniqueness and diversity would be expected to be minor, if any at all.

C. Local and State Tax Base and Tax Revenue

The project would be expected to have little, if any, effect on the local and state tax base and tax revenue because the facility overall production capacity remains unchanged. The project does add air quality control equipment. Any impacts to local and state tax base and revenue would be expected to be minor.

D. Agricultural or Industrial Production

The project would be located within an existing footprint. No increase in production capacity would be allowed as part of the permit action. A slight increase in allowable emissions would be permitted. Impacts to agricultural or industrial production would be expected to be minor, if any at all.

E. Human Health

MAQP #3238-07 would incorporate conditions with a goal that the project would be in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. Since these conditions would be incorporated, only minor impacts would be expected from the permitting of this project.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed project would not be expected to affect any access to wilderness activities because of the lack of wilderness areas in the proximity. MAQP #3238-07 would contain limits on opacity (visible emissions) and would limit allowable particulate matter emissions. Any impacts to recreational and wilderness activities would be expected to be minor.

G. Quantity and Distribution of Employment

The proposed project would not be expected to impact the quantity and distribution of employment in the area as the number of employees is not expected to change as a result of this project. Construction activity will be required to install the new baghouse. Any impacts to quantity and distribution of employment would be expected to be minor.

H. Distribution of Population

The proposed project would not be expected disrupt the normal population distribution in the area because the project will be located within the existing building footprint. Construction activity will be required to install the new baghouse. Any impacts to distribution of populations would be expected to be minor.

I. Demands of Government Services

The potential for a minor increase on traffic on existing roadways in the area while the project is being installed exists. In addition, government services may be required for acquiring the appropriate permits from government agencies. Demands for government services would be expected to be minor.

J. Industrial and Commercial Activity

The project would potentially create a minor increase in the industrial activity associated with installation work. Additionally, an increase in the amount of particulates captured by the dust control system would occur. The Department would expect any impacts to industrial and commercial activity to be minor.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans or goals that would be affected by the proposed project. The state and national ambient air quality standards would protect the proposed site and the environment surrounding the site.

L. Cumulative and Secondary Impacts

The proposed project is expected to have little or very minor cumulative and secondary impacts to the social and economic environment in the immediate area because the facility is already existing. During the construction phase of the upgrade, some increase in industrial activity and demand for government services may occur but once the project is complete, demand should return to normal.

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 project are minor; therefore, an EIS is not required. In addition, the source would be applying the Best Available Control Technology and the analysis indicates compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality - Permitting and Compliance Division (Air Resources Management Bureau), Montana Natural Heritage Program; and State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality (Air Resources Management Bureau), Montana Natural Heritage Program, and State Historic Preservation Office (Montana Historical Society).

EA Prepared By: Shawn Juers
July 23, 2013