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Permitting and Compliance Division
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LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE

DRAFT ENVIRONMENTAL ASSESSMENT (EA)

Issued For: Portable Incorporated

Permit Number: #3202-01

Preliminary Determination Issued: 06/15/06

Department Decision Issued:

Permit Final:

1. *Legal Description of Site:* Portable Inc. would operate the portable diesel generator at various locations throughout Montana. The diesel generator was originally located in the SW ¼ of Section 23, Township 1 South, Range 4 East, in Gallatin County, Montana. Permit #3202-00 applied to the source while operating at any location in Montana, except within those areas having a Department-approved permitting program, those areas considered tribal lands, or those areas in or within 10 km of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit is required for locations within Missoula County, Montana.* Portable Inc. is required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of certain PM₁₀ nonattainment areas.
2. *Description of Project:* On May 19, 2006, the Department received a request from Portable Inc. for a modification to Permit #3202-00. The modification requested the operation of a diesel generator up to 750 kW. The 750-kW diesel generator replaces the existing 350-kW diesel generator.
3. *Objectives of Project:* The diesel generator would be used to provide power to other Portable Inc. equipment (i.e. screens, crushers, etc.) which is permitted separately from the diesel generator. Having separate air quality permits for the equipment would allow Portable Inc. the operational flexibility to operate the equipment in different locations at the same time.
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 air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because Portable Inc. 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 Permit #3202-01.
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 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.

		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

Additional emissions from the proposed 750-kW diesel generator would have only minor impacts upon the terrestrial and aquatic life and habitats in areas where the generator may operate. Although air pollutant deposition would occur in the areas where the generator operates, the size and temporary nature of the operation, dispersion characteristics of pollutants, and conditions included in Permit #3202-01 would result in minor impacts. Also, the additional emissions as a result of this project would be relatively small and the generator would likely be located at previously disturbed sites. Therefore, the operation of the generator would present only minor impacts to the terrestrial and aquatic life and habitats in areas of potential operation.

B. Water Quality, Quantity, and Distribution

Although there would be an increase in air emissions from the proposed diesel generator, there would only be minor impacts on water quality, quantity, and distribution because of the temporary nature, size, operational requirements, and conditions included in Permit #3202-01 for the facility. Further, as described in Section 7.F of this EA, the Department determined that any impacts from deposition of pollutants would be minor. In addition, any accidental spills or leaks from equipment would be required to be handled according to the appropriate environmental regulations in an effort to minimize any potential adverse impacts on the immediate and surrounding area. Overall, the proposed project would have minor impacts to water quality, quantity, and distribution in the area of operations.

C. Geology and Soil Quality, Stability, and Moisture

As a result of the proposed project, there would be minor impacts to the geology and soil quality, stability, and moisture near the equipment’s operational area because of the deposition of pollutants from portable generator operations. As explained in Section 7.F of this EA, the facility’s size, operational requirements, temporary nature of the operation, and conditions

contained in Permit #3202-01, would minimize the impacts from deposition. Also, the additional emissions from the proposed generator would be relatively small and the generator would likely be located at previously disturbed sites, which would also reduce the potential impact to the local geology and soil quality, stability, and moisture. Therefore, any effects upon geology and soil quality, stability, and moisture at this proposed operational site would be minor.

D. Vegetation Cover, Quantity, and Quality

The operation of the facility would result in minor impacts to the vegetative cover, quantity, and quality, because small amounts of vegetation would likely be disturbed as a result of operating the diesel generator. In addition, pollutant deposition would occur on the surrounding vegetation. However, as explained in Section 7.F of this EA, the Department determined that, due to the relatively small size and temporary nature of the operation, conditions contained in Permit #3202-01, and dispersion characteristics of the emissions, any impacts from deposition would be minor. Lastly, because the water usage would be minor and the associated soil disturbance would be minor, corresponding vegetative impacts from water and soil disturbances would also be minor.

E. Aesthetics

The proposed generator would be visible and would create additional noise in the areas where it would operate. Permit #3202-01 would include conditions to control emissions (including visible emissions) from the generator and the surrounding work area. The additional emissions from the proposed generator would be relatively small and the generator would be used to power permitted portable equipment owned by Portable Inc. at previously disturbed sites. Therefore, any aesthetic impact to a given area would be minor and temporary.

F. Air Quality

Air quality impacts from the proposed project would be minor because this is an existing facility that would operate on an intermittent and temporary basis and would be located at previously disturbed sites. Further, there would only be a small increase in emissions associated with the 750 kW generator as opposed to the 350 kW generator currently permitted. Permit #3202-01 would include conditions limiting the opacity from the diesel generator and would require that reasonable precautions be taken to control emissions from haul roads, access roads, parking lots, or the general work area. Pollutant deposition from the facility would be minimal because the pollutants emitted would be widely dispersed (from factors such as wind speed and wind direction) and would have minimal deposition on the surrounding area (due to site topography of the area and minimal vegetative cover in the area). In addition, Permit #3202-01 would also limit total emissions from the facility and any additional Portable Inc. equipment operated at the site to 250 tons/year or less, excluding fugitive emissions. Further, the Department determined that this existing facility would be a minor source of emissions as defined under the Title V Operating Permit Program because the source's PTE was limited below the major source threshold level of 100 tons per year for any regulated pollutant.

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 previously contacted the Montana Natural Heritage Program (MNHP). Search results concluded there were no known environmental resources of special concern within the area. Issuance of this permit would increase emissions to the atmosphere near the location proposed for the operation of the diesel generator. However, as explained in Section 7.F of this EA, because of the relatively small increase in emissions and temporary nature of the diesel generator, operating in previously disturbed areas, and conditions contained in Permit #3202-01, any impacts to unique endangered, fragile, or limited environmental resources from the deposition of pollutants would be minor.

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

The diesel generator would be used to provide power to other Portable Inc. equipment (i.e. screens, crushers, etc.) that is permitted separately from the diesel generator. Water would be used on haul roads, access roads, parking lots, or the general plant property to control dust resulting from indirect use of the diesel generator. Also, minor amounts of air would be used in diesel generator operations and air quality would be impacted by pollutant emissions. The generator would consume energy from diesel fuel, a non-renewable resource. Generally, the operations are seasonal and would result in smaller demands on environmental resources. Therefore, any impacts on the demands of the environmental resources of water, air, and energy would be minor.

I. Historical and Archaeological Sites

The Department previously contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the proposed area of construction/operation. Search results concluded that there are no previously recorded historical or archaeological resources of concern within the area proposed for initial operations. According to past correspondence from the Montana State Historic Preservation Office, there would be a low likelihood of adverse disturbance to any known archaeological or historic site given previous industrial disturbance to an area. Therefore, at most, minor impacts upon historical or archaeological sites would be expected as a result of the proposed facility.

J. Cumulative and Secondary Impacts

The proposed increase in generator size would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment, but the facility would be limited in the amount of PM, PM₁₀, NO_x, VOC, CO, and SO_x emissions generated. Emissions and noise generated from the diesel generator would, at most, result in only minor impacts to the area of operations because the proposed project would be seasonal and temporary in nature. The proposed project would be short-term in nature, and have minor cumulative effects upon resource within the area. These resources include water, terrestrial and aquatic life, soils, and vegetation. However, while the short-term effects may decrease the presence or quality to these resources, effecting terrestrial and aquatic (life and habitats), water (quality, quantity, and distribution), soil (quality, stability, and moisture), vegetation (cover, quantity, and quality), long-term increases in the overall presence or quality to these resources would occur. Overall, cumulative and 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 following comments have been prepared by the Department.

A. Social Structures and Mores

The operation of the diesel generator would cause no disruption to the social structures and mores in the area because the source is an existing minor industrial source 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 Permit #3202-01, which would limit the effects to social structures and mores. Therefore, the existing social structures and mores would not be affected as a result of this permitting action.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of this area would not be impacted by the proposed operation because the facility is an existing portable source, with seasonal and intermittent operations, and would likely operate with additional permitted equipment at a previously disturbed site. Therefore, the cultural uniqueness and diversity of the area would not be affected.

C. Local and State Tax Base and Tax Revenue

The proposed operation of the diesel generator 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 of emissions and would have seasonal and intermittent operations. The facility would require the use of only a few existing employees. Thus, only minor 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 be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

Under normal circumstances, the operation of the diesel generator would take place in a previously disturbed industrial area. Therefore, the Department does not expect that the operation of the diesel generator would affect or displace any agricultural land. Further, the diesel generator operation is small by industrial standards and would have only a minor impact on any local industrial production.

E. Human Health

Permit #3202-01 would incorporate conditions to ensure that the diesel generator 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 Department determined that any impacts from deposition would be minor due to dispersion characteristics and conditions contained in Permit #3202-01. The air emissions from this facility would be minimized by opacity limitations on the diesel generator and the surrounding area of operation. Therefore, only minor impacts would be expected on human health from the proposed facility.

F. Access to and Quality of Recreational and Wilderness Activities

Noise from the facility would be minor because the facility would be small and would operate on a seasonal and intermittent basis. As a result, the amount of noise generated from the diesel generator would be minimal. Also, the facility would be a relatively minor industrial source of emissions. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment would be expected to be minor and intermittent.

G. Quantity and Distribution of Employment

The operation of the diesel generator would only require a few existing employees to operate 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 facility. Therefore, no effects upon the quantity and distribution of employment in this area would be expected.

H. Distribution of Population

The diesel generator operation is a portable industrial facility that would require only a few existing employees to operate. No individuals would be expected to permanently relocate to this area of operation as a result of operating the facility. Therefore, the current permitting action would not impact the normal population distribution in the area of operation or any future operating site.

I. Demands of Government Services

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, the government services required would be minor.

J. Industrial and Commercial Activity

The operation of the diesel generator would represent only a minor increase in the industrial activity in any given area. No additional industrial or commercial activity would result from the operation of the diesel generator because no secondary activities are expected to move to any area as a result of the current project.

K. Locally Adopted Environmental Plans and Goals

Portable Inc. would be allowed, by Permit #3202-01 to operate in areas designated by EPA as attainment or unclassified for ambient air quality. Permit #3342-01 would contain limits 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 this is an existing portable facility and would have intermittent and seasonal operations, any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The portable generator 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. Further, no other industrial operations are expected to result from the permitting of this facility. Minor increases in traffic would have minor effects on local traffic in the immediate area. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Further, this facility may be operated in conjunction with other equipment owned and operated by Portable Inc., but any cumulative impacts upon the social and economic aspects of the human environment would be minor and short-lived. 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: Montana 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: Montana Department of Environmental Quality (Air Resources Management Bureau and Industrial and Energy Minerals Bureau), Montana State Historic Preservation Office (Montana Historical Society).

EA prepared by: Eric Thunstrom

Date: May 4, 2006