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

Issued For: Fiberglass Structures, Inc.
P.O. Box 206
Laurel, MT 59044

Permit Number: 3821-00

Preliminary Determination Issued: August 25, 2006
Department Decision Issued:
Permit Final:

1. *Legal Description of Site*: The facility is located in Section 16, Township 2 South, Range 24 East, in Yellowstone County, Montana.

2. *Description of Project*: The current permit action would allow the operation of a manufacturing facility that produces tanks and other fiberglass products. The process description is discussed in Section I.B. of the permit analysis of Permit #3821-00.

3. *Objectives of Project*: The objective of the project would be to generate business and revenue for the company and to continue to supply fiberglass products.

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 permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because FSI 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 #3821-00.

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 would be reasonably necessary to ensure compliance with applicable requirements and 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 project on the human environment. The "no-action" alternative was discussed previously.

Potential Physical and Biological Effects							
		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 Department has prepared the following comments.

A. Terrestrial and Aquatic life and Habitats

Emissions from the operation could affect terrestrial and aquatic life and habitats in the project area. However, any emissions and resulting impacts from the operation would be minor due to the location of the facility within an industrialized/commercial area, and the relatively low concentration of the pollutants emitted.

The operation will occur within an existing building and no new construction or ground disturbance to the area would be required. Overall, any impact to the terrestrial and aquatic life and habitats of the project area would be minor.

B. Water Quality, Quantity and Distribution

The operation would not affect water quantity or distribution in the project area. The operation would continue to take place within existing facilities and would not discharge process water as part of the project. There will be sanitary water use and discharge at the facility.

Emissions from the project could affect water quality in the project area. However, as described in Section 7.F of this EA, any emissions and resulting deposition impacts from the project would be minor due to the low concentration of the pollutants emitted and dispersion characteristics of pollutants and the atmosphere.

C. Geology and Soil Quality, Stability, and Moisture

The operation could affect the geology, soil quality, stability, and moisture of the project area. The operation would take place within existing facilities and no new construction or ground disturbance to the area would be required. However, the operation would result in minor air pollution emissions to the ambient environment. Any impact from deposition of these pollutants would be minor due to dispersion characteristics of pollutants and the atmosphere and the low concentration of the pollutants emitted.

D. Vegetation Cover, Quantity, and Quality

The operation would take place within an existing building and no new construction or ground disturbance to the area would be required. Emissions from the operation may affect vegetation cover, quantity, and quality in the project area. However, any resulting impacts from the emissions from this project would be minor.

E. Aesthetics

The operation may have moderate impacts on the aesthetic nature of the project area. Styrene has a very low odor threshold (0.32 ppm according to the EPA) and the odor does not tend to dissipate very readily. The facility is designed to provide building ventilation for the workers; however, when the exhaust fans remove the styrene from the building, it can impact nearby residents.

The operation will take place within an existing building and no new construction would be required. Visible emissions from the source would be limited to 20% opacity. Further, noise generated by the operation would be minor due to the nature of the business. Overall, the operation would have moderate impacts to the aesthetics of the immediate area.

F. Air Quality

The air quality impacts from FSI would be minor, with most of the impact on the proximate neighbors. The proposed project would result in the emission of various air pollutants, the vast majority of which is styrene, which is regulated as both a VOC and a HAP. Because FSI has the potential to emit over 10 tons per year of styrene, a HAP, the source will be classified as a major Title V source.

Permit #3821-00 would include conditions limiting the opacity, VOC and HAP emissions. Montana does not have ambient air quality standards for styrene. In addition, Montana does not have an odor regulation. Although VOC is a contributor to ozone, the low amount of emissions are not expected to cause an exceedence of any ozone air quality standard. The Department determined that the facility, operating under the limits and conditions included in this permit, will not cause or contribute to a violation of any applicable ambient air quality standard.

Based on the relatively low levels of pollutants emitted from FSI, the Department determined that ambient air impacts from this permitting action would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

In an effort to identify any unique endangered, fragile, or limited environmental resources in the area, the Department contacted the Montana Natural Heritage Program, Natural Resource Information System (NRIS). The NRIS search identified several species of special concern in the vicinity of the project area. These species include Great Blue Heron and Double-Crested Cormorant bird rookery (200 and 40 nests, respectively), Bald Eagle, and Long-Billed Curlew. The search area was defined by the section, township, and range of the proposed location with an additional 1-mile buffer zone.

FSI's tank division will be located approximately 0.75 miles northeast of the perimeter of the rookery boundary and 1.0 miles northeast of the bald eagle habitat boundary. The facility is located within the Long-billed Curlew habitat area; however, the operations will be conducted in an existing building located in an industrial/commercial area and would not be expected to disrupt any natural habitat. Due to the fact that no construction would be required, the low levels of pollutants that would be emitted by the project, and conditions that would be placed in Permit #3821-00, the Department determined that the chance of the project impacting any species of special concern would be minor.

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

The operation would result in minor demands on the environmental resource of water and air, as discussed in Sections 7.B and 7.F of this EA. Because the operation is small by industrial standards, a relatively small amount of energy would be required for operation, and the resulting impact on energy resources would be minor. Overall, the demands on the environmental resources of water, air, and energy would be minor.

I. Historical and Archaeological Sites

In an effort to identify any historical and archaeological sites near the proposed project area, the Department contacted the Montana Historical Society, State Historic Preservation Office (SHPO). According to SHPO records, there have been several previously recorded historic or archaeological sites within the proposed area. In addition, there have been previously conducted cultural resource inventories done in the area.

SHPO recommends that any structures over 50 years of age be recorded and a determination of their eligibility for the National Register of Historic Places be made. However, neither the Department nor SHPO has the authority to require FSI to conduct a cultural resource inventory. Furthermore, although FSI will conduct its operations in an existing industrial building, the building is of relatively recent construction. Since no potentially historic structure will be altered, there is a low likelihood that cultural property will be impacted.

The Department determined that due to the age of the existing building and the lack of any land disturbance, the chance of the project impacting any cultural or historic sites would be minor.

J. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts on the physical and biological aspects of the human environment in the immediate area would be minor due to the relatively small size of the operation. The Department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as outlined in Permit #3821-00.

8. The following table summarizes the potential economic and social effects of the project on the human environment. The "no-action" alternative was discussed previously.

Potential Economic and Social Effects							
		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 Department has prepared the following comments.

A. Social Structures and Mores

The operation would not have any effect on any native or traditional lifestyles or communities (social structures or mores) of the proposed area of operation because the project is small by industrial standards. The predominant use of the surrounding area is industrial/commercial and would not change as a result of the project. However, there is a residential area several hundred feet away that is potentially impacted by styrene odor from the facility. FSI can be considered to have a minor impact on social structure and mores.

B. Cultural Uniqueness and Diversity

The operation would not have any effect on cultural uniqueness and diversity of the proposed area of operation because the project is small by industrial standards. The predominant use of the surrounding area would not change as a result of the project.

C. Local and State Tax Base and Tax Revenue

The project would have a minor impact on the local and state tax base and tax revenue. The project is small by industrial standards; thus, any economic impact to the area would be minor. There would be 10 employees required for this facility.

D. Agricultural or Industrial Production

FSI would have a minor impact on local industrial production. FSI would operate in an existing industrial building, located in an area that is predominantly industrial/commercial, although there is a nearby residential area. There will not be any change in agricultural production, other than indirectly due to sales of stock tanks. There will be a minor change in local industrial production, due to FSI production directly, as well as indirectly due to sales of tanks to oil & gas well facilities.

E. Human Health

There may be minor effects on human health due to the emission of pollutants. However, Permit #3821-00 incorporates conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

F. Access to and Quality of Recreational and Wilderness Activities

Because the facility would operate in an existing building located in a mixed area that is predominantly industrial/commercial, the project would not affect any access to or quality of any recreation or wilderness activities in the area.

G. Quantity and Distribution of Employment

FSI will employ 10 people in the Tank Division. Therefore, the project would have a minor impact on the quantity and distribution of employment in the area.

H. Distribution of Population

FSI is located near Billings, which is the largest city in Montana. Therefore, the employment of 10 people would not have an impact on the distribution of population in the project area.

I. Demands for Government Services

Government services would be required for acquiring the appropriate permits from government agencies. 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 operation would result in a minor impact on local industrial and commercial activity. Although FSI would operate in an existing building and would require no new construction, the operations will require 10 permanent employees.

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. The state standards would be protective of the project area.

L. Cumulative and Secondary Impacts

Overall, cumulative and secondary impacts from this project would result in minor impacts to the economic and social aspects of the human environment in the immediate area due to the relatively small size of the operation. Due to the relatively small size of the project, the industrial production, employment, and tax revenue (etc.) would be slightly impacted by the project. In addition, the Department believes that this facility could be expected to operate in compliance with all applicable rules and regulations as would be outlined in Permit #3821-00.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the continued operation of a manufacturing facility. Permit #3821-00 includes conditions and limitations to ensure that the facility would operate in compliance with all applicable rules and regulations. In addition, as detailed in the above EA, there are no significant impacts associated with the project.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Natural Heritage Program, National Resource Information System (NRIS) and Montana Historical Society, State Historic Preservation Office (SHPO).

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

EA prepared by: Christine Weaver
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