

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

Issued To: Helena Sand & Gravel, Inc.
d.b.a. Blahnik Construction
759 US Hwy 93 N
P.O. Box 1129
Hamilton, MT 59840

RECEIVED

APR 07 2008

Air Quality Permit Number: 2735-03

LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE

Preliminary Determination Issued: 04/04/08

Department Decision Issued:

Permit Final:

1. *Legal Description of Site:* This permit is for the operation of a portable asphalt plant originally located in the southwest ¼ of the northeast ¼ of Section 12, Township 6 North, Range 21 West, in Ravalli County, Montana. Permit #2735-03 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program or those areas considered tribal lands. Addendum #3 is included in this air quality permit, to allow Blahnik to operate in or within 10 km of certain PM₁₀ nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.*
2. *Description of Project:* This permit modification adds a 676-hp diesel backup power genset unit, and updates Addendum 2 (which expired in 1999) to Addendum 3, to allow for operation in or within 10 km of certain PM₁₀ nonattainment areas. Further, the Department updated the emission inventory for the permitted facility to reflect up-to-date published emission factors for hot-mix asphalt plants and updated Addendum 3 to reflect current Department modeling guidance for portable or temporary sources operating in or within 10 km of certain PM₁₀ nonattainment areas during the winter season.
3. *Objectives of Project:* The object of the project would be to operate the business in a cost-effective manner to provide revenue for the company by the sale and use of asphalt. The issuance of Permit #2735-03 and Addendum 3 would allow Blahnik to operate the permitted equipment at various locations throughout Montana, including the proposed initial site location.
4. *Additional Project Site Information:* In many cases, the drum mix asphalt plant operation may move to a general site location, or open cut pit, which has been previously permitted through the Industrial and Energy Minerals Bureau (IEMB). If this were the case, a more extensive EA for the site would have been conducted and would be found in the Mined Land Reclamation Permit for that specific site.
5. *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 Blahnik demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the “no-action” alternative was eliminated from further consideration.

6. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions and a permit analysis, including a BACT analysis, would be contained in Permit #2735-03.
7. *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.
8. *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

Terrestrials would use the same area as the asphalt plant operation. The asphalt plant operation would be considered a minor source of emissions (by industrial standards) with intermittent and seasonal operations. Furthermore, the plant is part of an 11-acre site that has been an active gravel pit for many years. Therefore, only minor effects on terrestrial life and aquatic life would be expected as a result of the proposed changes of equipment operations or from pollutant deposition.

B. Water Quality, Quantity, and Distribution

Water would be used for dust suppression on the surrounding roadways and areas of operation and for pollution control for equipment operations. However, water use would only cause minor impacts upon water quality, quantity, and distribution at the site because

the equipment would only have seasonal and intermittent operations, only relatively small amounts of water would be needed for pollution control, and water would be readily available at the site. There are no proposed changes that would have an impact on surface water, groundwater, or drainage patterns on or off site. Overall, any associated impacts would be minor.

C. Geology and Soil Quality, Stability, and Moisture

The proposed addition of a backup diesel generator would have only minor impacts on soils in any proposed site location because the facility would remain a relatively small industrial operation, would continue to use only relatively small amounts of water for pollution control, and would only have seasonal and intermittent operations.

D. Vegetation Cover, Quantity, and Quality

Because the modified facility would remain a minor source of emissions, by industrial standards, and would typically operate in areas previously designated and used for non-metallic mineral processing operations, impacts from the emissions from the modified asphalt plant would be minor. As described in Section 8.F of this EA, the amount of air emissions generated from the modified facility would be minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor. Also, because water use for pollution control would be minimal, as described in Section 8.B, and the associated soil disturbance from modified operations would be minimal, as described in Section 8.C, corresponding vegetative impacts would be minor.

E. Aesthetics

The 676-hp Genset would be visible and would create additional noise in the area. The nearest residence is 200 feet to the south; however, Permit #2735-03 and Addendum #3 would include conditions to control emissions from the Genset as well as the rest of the plant. The Genset and the asphalt plant operations would have a minor amount of emissions, would be portable, would have seasonal and intermittent operations, and the primary location would be within a rather large open cut pit near an existing highway. Therefore, any visual and noise impacts would be minor.

F. Air Quality

The air quality impacts from the Genset, as well as the asphalt operations, would be minor because Permit #2735-03 and Addendum #3 would include conditions limiting the opacity from the plant, as well as requiring a baghouse and other means to control air pollution. Additionally, the facility is considered a minor source of air pollution by industrial standards and would be located in an area where good air pollutant dispersion would occur. Therefore, the air impacts would be minor.

The operations would be limited, by Permit #2735-03, to total emissions of 250 TPY or less of any regulated pollutant from non-fugitive sources at the plant, including any additional equipment operated at the site. Furthermore, the facility emissions would be subject to BACT. For example, the plant would be required to use water to reduce emissions from equipment operations, storage piles, and haul roads. Also, the operation would have temporary and intermittent use, thereby further reducing potential air quality impacts from the facility. Therefore, air quality impacts would 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 initial proposed area of operation (Southwest ¼, Northeast ¼ of Section 12, Township 6 North, Range 21 West, in Ravalli County, Montana), contacted the Natural Resource Information System – Montana Natural Heritage Program. Search results concluded there are seven 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-mile buffer. The known species of concern include four vertebrates: the Gray Wolf (Endangered), Bald Eagle, Bull Trout (Threatened), Fringed Myotis, Townsend's Big-eared Bat, Westslope Cutthroat Trout (Sensitive), and Western Skink.

While these species may be found within the search area, these animals may have many miles of potential habitat. Specific effects of operating the asphalt plant and diesel engine in this area would be minor since the facility is relatively small in size, typically operates within an existing and previously disturbed industrial site, would have only seasonal and intermittent operations in the area, and is primarily located adjacent to highway 93. Therefore, the Department determined that any effects upon these species would be minor and short-lived.

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

Due to the size of the facility, the modified asphalt plant operation would only require small quantities of water, air, and energy for proper operation. Small quantities of water would be used for dust suppression and would control fugitive emissions being generated at the site. Energy requirements would also be small because the facility is small by industrial standards and would be powered by electricity and one backup industrial diesel generator. In addition, impacts to air resources would be minor because the source is small by industrial standards, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed. Furthermore, the particulate emissions would be controlled. Therefore, any impacts to water, air, and energy resources would be minor.

I. Historical and Archaeological Sites

According to correspondence from the Montana Historical Society, State Historic Preservation Office (SHPO), there have been no previously recorded sites in the area. Also, according to previous correspondence with SHPO, there would be a low likelihood of disturbance to any known archaeological or historical site given previous industrial disturbance in any given area of operation. Therefore, it is unlikely that the project would impact any historical or archaeological sites in a given area of operation.

J. Cumulative and Secondary Impacts

The addition of the generator to the asphalt plant operation would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would have seasonal and intermittent use and because the facility is considered a minor source of air pollutants by industrial standards. The modified facility would also have additional restrictions while operating in or within 10 km of certain PM₁₀ nonattainment areas, which would further control pollutant emissions. The facility would generate emissions of PM, PM₁₀, NO_x, VOC, CO, and SO_x. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance and noise at the initial site location. Additionally, this facility, in combination with the other emissions from the site would not be permitted to exceed 250 TPY of non-fugitive emissions.

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 Department has prepared the following comments.

A. Social Structures and Mores

The addition of a backup diesel generator to the portable asphalt plant would cause no disruption to the social structures and mores in the area because the facility is a minor source of emissions, would initially and typically operate in an existing industrial site, and would operate on a temporary and intermittent basis. Further, the plant would be required to operate according to the limits and conditions that would be included in Permit 2735-03, which would limit any impacts to social structures and mores.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of the area would not be impacted by the proposed backup diesel generator because it is part of an existing asphalt plant located within an existing gravel pit. Additionally, the facility would be considered a portable/temporary source with seasonal and intermittent operations. Also, the predominant use of the surrounding area would not change as a result of this project.

C. Local and State Tax Base and Tax Revenue

The addition of the backup diesel generator would have little, if any, impact on the local and state tax base and tax revenue. The facility requires the use of approximately 25 employees. There will be no additional employment to accommodate the proposed changes in operations. The backup diesel generator will allow the facility to operate during times of electrical interruption or at locations without land lines. 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 are expected to be minor because the source would be portable and the money generated for taxes would be widespread.

D. Agricultural or Industrial Production

The addition of a backup diesel generator would have only a minor impact on local industrial production since the facility is existing and is located in an existing gravel pit. Because of the seasonal and intermittent use of the equipment and the staged use of the proposed project site, only minor and temporary effects to the existing agricultural land are expected to occur. As described in Section 8.D, impacts to vegetation would be minimal. Also, operational limits would be established (including those in Addendum #3) to protect the environment. Therefore, any effects upon agricultural or industrial production would be minor and short-lived.

E. Human Health

Permit #2735-03 and Addendum #3 would incorporate conditions to ensure that the asphalt plant 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 8.F., the air emissions from this facility are minimized by the use of a baghouse on the asphalt plant as well as emission limits established in Permit #2735-03 and Addendum #3. Therefore, only minor impacts would be expected upon human health from the asphalt plant.

F. Access to and Quality of Recreational and Wilderness Activities

Noise from the proposed modified facility would be minor because the asphalt plant operation would remain small by industrial standards and would operate in areas typically used for such operations. As a result, the amount of noise generated from the proposed change in operations would be minimal and typical for the area. Also, the facility would operate on a seasonal and intermittent basis. Therefore, any impacts to the quality of recreational and wilderness activities created by the proposed new equipment operating with the existing asphalt plant would be minor and short-lived.

G. Quantity and Distribution of Employment

H. Distribution of Population

The asphalt plant operation employs approximately 25 people, which is not expected to change as a result of this permit modification. Therefore the proposed addition of a backup diesel generator would not impact the above-cited economic and social resources of the human environment of any given project area.

I. Demands of Government Services

Minor increases would be seen in traffic on existing roadways in the area while the asphalt plant operations are in progress. In addition, government services would be required for acquiring the appropriate permits from government agencies. Demands for government services would be minor.

J. Industrial and Commercial Activity

The addition of a backup diesel generator would represent only a minor increase in the industrial activity in the given area because of the size of the operations (relatively small by industrial standards) and the portable and temporary nature of the facility. No additional industrial or commercial activity would be expected as a result of the proposed operations.

K. Locally Adopted Environmental Plans and Goals

Blahnik would be allowed, by permit, to operate the diesel generator in areas designated by EPA as attainment, unclassified, or in or within 10 kilometers of certain PM₁₀ nonattainment areas in the summer months. Permit #2735-03 and Addendum #3 would contain limits, which would be protective of air quality and the ambient air quality standards while the facility is operating in these designated areas. Additionally, because the facility is a portable source that will operate at multiple sites on an intermittent and temporary basis, the Department determined that any impacts to existing air quality in these areas of operation would be minor and short-lived.

L. Cumulative and Secondary Impacts

The asphalt plant would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area because the source is a portable, temporary source. Minor increases in traffic would have minor effects on local traffic in the immediate area, thus, having a direct effect on the social environment. Because the source is relatively small (by industrial standards) and temporary, only minor economic impacts to the local economy could be expected from the operation of the facility. Thus, minor and temporary cumulative effects would result to the local economy.

Recommendation: An Environmental Impact Statement (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 Natural Heritage Program; and the 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: Christine Weaver

Date: March 21, 2008