



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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November 22, 2010

Todd Moore
N.A. Degerstrom, Inc.
P.O. Box 425
Spokane, WA 99210-0425

Dear Mr. Moore:

Montana Air Quality Permit #4582-00 is deemed final as of November 20, 2010, by the Department of Environmental Quality (Department). This permit is for a portable crushing/screening operation. 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,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Julie Merkel
Air Quality Specialist
Air Resources Management Bureau
(406) 444-3626

VW:JM
Enclosure

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

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: N.A. Degerstrom Const Co
P.O. Box 425
Spokane, WA 99210-0425

Montana Air Quality Permit number: 4582-00

Preliminary Determination Issued: October 1, 2010

Department Decision Issued: November 4, 2010

Permit Final: November 20, 2010

1. *Legal Description of Site:* N.A. Degerstrom proposes to operate a portable crushing and screening operation, which will initially be located in the Southwest ¼ of Section 15, Township 1 South, Range 25 East, in Yellowstone County, Montana. However, MAQP #4582-00 would apply while operating at any location in Montana, except those areas having a Department-approved permitting program, areas considered tribal lands, or areas in or within 10 km of certain PM₁₀ nonattainment areas. A Missoula County air quality permit will be required for locations within Missoula County, Montana. An addendum will be required for locations in or within 10 km of certain PM₁₀ nonattainment areas.
2. *Description of Project:* The project involves installation and operation of a portable crushing and screening facility. The equipment included is listed in Section I.A of MAQP #4582-00.
3. *Objectives of Project:* The objectives of the project are to crush and sort sand and gravel like material.
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 N.A. Degerstrom has 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 MAQP #4582-00.
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 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

Terrestrials may use the same area as the crushing and screening operation. The proposed project would be considered a minor source of emissions by industrial standards. Limitations and conditions would be placed in MAQP #4582-00 to minimize these emissions. Minor effects on terrestrial life would be expected.

Impacts on aquatic life may result from storm water runoff and pollutant deposition, but such impacts would be minor as the facility would be a minor source of emissions. Since only a minor amount of air emissions would be generated, only minor deposition would occur. Furthermore, this project would typically operate in an area designated for such activities. Minor effects to aquatic life and habitat would be expected from the proposed crushing and screening operation.

B. Water Quality, Quantity and Distribution

Water would be required for pollution control for equipment operation. However, pollutant deposition and water use would cause minor impacts as only a small volume of water would be expected to be used and only a small amount of pollution deposition would be expected. Overall, the equipment would be expected to have minor impacts to water quality, quantity, and distribution in the area of operation.

C. Geology and Soil Quality, Stability and Moisture

The facility would be a minor source of emissions by industrial standards and would typically operate in areas designated for open-cut and crushing/screening operations. Therefore, impacts from the emissions from this project would be expected to be minor.

The crushing and screening operation would have only minor impacts on soils in any proposed site location because the facility is relatively small in size, would use relatively small amounts of water for pollution control, and would be expected to have seasonal and intermittent operations. Therefore, any affects upon geology and soil quality, stability, and moisture at any proposed operational site would be expected to be minor.

D. Vegetation Cover, Quantity, and Quality

Because the equipment at the facility would be a minor source of emissions by industrial standards due to the controls that would be required as a part of MAQP #4582-00, and because the project would typically operate in areas designated for such uses, impacts would be expected to be minor. The deposition of the air pollutants on the surrounding vegetation would be present and is expected to be minor.

E. Aesthetics

The project would be visible and would create additional noise while operating. However, MAQP #4582-00 would include conditions to control emissions, including visible emissions, from the plant. Visual and noise impacts would be expected at minor levels.

F. Air Quality

The air quality impacts from the crushing and screening operation would be expected to be minor because the facility would be relatively small and be required to operate using appropriate air pollution controls. MAQP #4582-00 would include conditions limiting the opacity from the plant, as well as requiring water spray bars as necessary to control particulate matter. Based on modeling done for recently permitted similar sources the Department believes the project is expected to remain within ambient air quality standards. Furthermore, this project will likely operate on an intermittent basis. Therefore, air quality impacts would be expected to be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department contacted the Montana Natural Heritage Program (MNHP) to identify species of special concern that may be found in the area where the proposed portable plant would initially locate. Search results concluded that there was 1 species of concern in the area. The area was defined by the section, township, and range of the proposed site, with an additional 1-mile buffer. The species of concern was the Greater Sage-Grouse.

The mapping delineation explanation for the Greater Sage-Grouse explained that the confirmed breeding area is based on the presence of a nest, chicks, juveniles, or adults.. Point observation location is buffered by a minimum distance of 6,400 meters in order to encompass the latest research on the area used for breeding, nesting, and brood rearing and otherwise is buffered by the locational uncertainty associated with the observation up to a maximum distance of 10,000 meters. The Southwest ¼ of Section 15, Township 1 South, Range 25 East, is located on the edge of one such defined area.

Emissions from the proposed project may impact unique, endangered, fragile, or limited environmental resources located in any given area. However, allowable emissions and resulting impacts from the project would be expected to be minor due to the low concentration of those pollutants emitted, as a result of conditions that would be placed in MAQP #4582-00.

As described by Section 7.F above, air quality impacts would be expected to be minor. As described in Section 7.D above, deposition of the air pollutants on the surrounding vegetation would be present and is expected to be minor. Therefore, in consideration of location, the

emissions controls that would be required by MAQP #4582-00, and resulting impacts expected to the surrounding environment, only minor impacts would be expected to the Greater Sage-Grouse.

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

The project would require only small quantities of water, air, and energy for proper operation. Water would be used for dust suppression and would control particulate emissions being generated at the site. However, the total usage would be expected to be relatively small. Energy requirements would be required, and consist mostly of on-site diesel fired generators. Any impacts to water, air, and energy resources in any given area would be expected to be minor.

I. Historical and Archaeological Sites

The Department contacted the State Historic Preservation Office (SHPO) to request a cultural resource file search for the project location to aid the Department in the assessment of impacts to historical and archeological sites. According to SHPO’s records, there have been no previously recorded sites within the designated search locale. The absence of cultural properties in the area does not mean that they do not exist but rather reflects the absence of any previous cultural resource inventory in the area. Therefore, the Department would expect minor, if any, impacts to historical and archaeological sites in issuing MAQP #4582-00.

J. Cumulative and Secondary Impacts

The proposed project would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment. Noise would also be generated from the site. Emissions and noise would cause minimal disturbance because the equipment is small and the facility would be expected to operate in areas designated and used for such operations. The potential impacts to the individual physical and biological considerations above were minor. Collectively, any cumulative or secondary impacts to the physical and biological aspects of the human environment would be expected 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

The proposed project would result in minor, if any, impacts to social structures and mores. The project would typically operate in an area designated for crushing and screening activities.

B. Cultural Uniqueness and Diversity

The proposed project would result in minor, if any, impacts to cultural uniqueness and diversity. The project would typically operate in an area designated for such activities. Furthermore, operations are expected to be intermittent. Only minor changes in employment would be expected.

C. Local and State Tax Base and Tax Revenue

The proposed project would result in minor impacts to the local and state tax base and tax revenue. The project would take place in an area designated for such activities. Furthermore, the operations are expected to be intermittent and therefore, employees would only live in the area temporarily.

D. Agricultural or Industrial Production

The equipment would typically operate in areas previously designated and used for crushing/screening operations. The proposed project would have a minor impact on local industrial production since the project would increase air emissions slightly.

Conditions and limitations placed in MAQP #4582-00 would ensure a minor increase in allowable air emissions, with minimal deposition of air pollutants. Therefore, deposition on the surrounding land and vegetation would be expected to be minor. Any affects to agricultural production would be expected to be minor.

E. Human Health

Conditions would be incorporated into MAQP #4582-00 to ensure that the facility would operate in compliance with all applicable air quality rules and standards. These rules and standards are designed to protect human health. The air emissions from this project would be required to be minimized by the use of water spray.

F. Access to and Quality of Recreational and Wilderness Activities

This facility would typically be located on previously disturbed property or areas designated for such uses. This permitting action would not be expected to impact access to recreational and wilderness activities. Minor impact on the quality of recreational activities might be created by noise. Visible air emissions would be minimized as a result of limitations placed in the MAQP and the expected temporary and portable nature of the operation.

G. Quantity and Distribution of Employment

This facility would be a small, portable operation. Therefore, this project would not be expected to have any more than a minor effect to the quantity and distribution of employment in any given area of operation.

H. Distribution of Population

The facility would be small and temporary in nature with few employees expected. Therefore, the facility would be expected to have little, if any, impact on the normal population distribution in the area of operation or any future operating site.

I. Demands for 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, demands for government services would be minor.

J. Industrial and Commercial Activity

The proposed project would represent only a minor increase in the industrial activity in the proposed area of operation because the facility would be a small industrial source, and be portable and temporary in nature.

K. Locally Adopted Environmental Plans and Goals

The Department is not aware of any locally adopted environmental plans or goals in which this permitting action would interfere. The proposed project would be allowed by its Montana Air Quality Permit to operate in areas designated by EPA as attainment or unclassified for ambient air quality. An addendum would be required to operate in or within 10 km of a PM₁₀ nonattainment area. The permit would contain maximum capacity and opacity limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards.

L. Cumulative and Secondary Impacts

Overall, the proposed project would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area of operation.

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 and operation of a portable crushing and screening operation. MAQP #4582-00 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: Julie Merkel
Date: 9/24/10