

Holcim Air Quality Permit Chronology

September 2003

Subject

Holcim Inc.'s proposal to burn waste tires as supplemental fuel at its cement manufacturing facility in Trident, Mt.

Background

The Holcim plant manufactures cement, in part, by heating the mineral components in a horizontal rotary kiln. Holcim is authorized by the state to burn up to 100% natural gas, 100% coal, 100% petroleum coke or any combination of these fuels. Holcim has proposed to supplement up to 15% of its fuel needs by incinerating whole waste tires in the kiln.

Legal requirements

- ! Holcim must modify its current air quality permit to allow it to burn waste tires. Also, it will need to obtain a solid waste management license for a resource recovery facility to address tire storage and management. The air quality permit is the more problematic of the two. Both approvals are issued by the Department of Environmental Quality (DEQ).

- ! The Montana Environmental Policy Act (MEPA) requires the DEQ to conduct an environmental review of its proposed decision to issue a revised air quality permit and solid waste management license to Holcim to identify the significance of any impacts on the human environment.

- ! DEQ must issue the air quality permit within 60 days of its receipt of a complete application if an environmental impact statement (EIS) is not required although it may extend this time by 30 days (75-2-211(9)(b)).

- ! DEQ must issue the air quality permit within 180 days of its receipt of a complete application if an EIS is required. (75-2-211(9)(a)).

- ! Since a solid waste management system license is also required by this project, an air quality permit may not be issued until the solid waste license is issued (MCA 75-10-221), and the additional provisions of MCA 75-2-215 for solid and hazardous waste incinerators, or boilers or industrial furnaces are met. One of these provisions is that the department must determine that the projected emissions will constitute a negligible risk to the public and the environment. There are no statutory deadlines for the issuance of a solid waste management system license. MEPA requires that an environmental assessment (EA) be completed within 90 days or an EIS be completed within 180 days of the receipt of a complete application. There are provisions for some extensions of time.

OVER

Chronological Timeline

- 10/03/01 Holcim filed an air quality permit application with DEQ.
- 12/18/01 DEQ participated in a public meeting in Manhattan on Holcim proposal.
- 2002 DEQ requested and Holcim provided additional information necessary to process the permit application and produce the MEPA environmental review. Details are available in the EQC office.
- 02/12/03 Holcim filed a complete air quality permit application with DEQ. The application was deemed complete upon submittal of responses by Holcim to incompleteness issues raised by the Department on the initial permit application and subsequent submittals.
- 3-24-03 DEQ made a preliminary determination to issue an air quality permit. Also issued with the preliminary permit determination was a draft EA regarding the Holcim proposal. DEQ announced intentions of holding a public hearing on the proposal before the end of the public comment period.
- 4-29-03 DEQ held a public hearing in Manhattan on the Holcim EA and DEQ's preliminary determination to issue the air quality permit.
- 5-1-03 DEQ extended the public comment period on the EA from 5-2-03 until 5-30-03
- 8-15-03 DEQ announced that it will prepare an EIS on the Holcim air quality/solid waste management facility permit application. The decision was announced following the issuance of a final EA. The EA determined that potential environmental impacts from the proposal to burn tires in conjunction with current impacts from the plant may cumulatively result in significant impacts that will require a more detailed analysis. An EIS is that more detailed analysis.