

Chapter 15

STATE OF MONTANA  
AIR QUALITY CONTROL  
IMPLEMENTATION PLAN

Subject: Flathead County  
Air Quality Control  
Program

1 BEFORE THE BOARD OF HEALTH AND ENVIRONMENTAL SCIENCES  
2 OF THE STATE OF MONTANA

3 In the Matter of Compliance of )  
4 Klingler Lumber Company, Inc., )  
5 Kalispell, Montana, with 40 CFR ) STIPULATION  
6 50.6, National Ambient Air )  
7 Quality Standard for Particulate )  
8 Matter and ARM 16.8.821, Montana )  
9 Ambient Air Quality Standard for )  
10 PM-10 )

11 The Department of Health and Environmental Sciences  
12 ("Department"), and Klingler Lumber Company Inc. ("Kling-  
13 ler"), hereby stipulate and agree to all the following Para-  
14 graphs 1-18 inclusive, including the exhibits as referenced  
15 below, in regard to the above-captioned matter and present  
16 the same for consideration and adoption by the Board of  
17 Health and Environmental Sciences ("Board"):

18 A. BACKGROUND:

19 1. On July 1, 1987, the United States Environmental  
20 Protection Agency ("EPA") promulgated national ambient air  
21 quality standards for particulate matter (measured in the  
22 ambient air as PM-10, or particles with an aerodynamic diame-  
23 ter less than or equal to a nominal 10 micrometers) ("partic-  
24 ulate matter NAAQS"). The annual standard of 50 micrograms  
25 per cubic meter (annual arithmetic mean), and the 24-hour  
26 standard of 150 micrograms per cubic meter (24-hour average  
27 concentration), were promulgated by EPA pursuant to Section  
109 of the Federal Clean Air Act, 42 U.S.C. 7401, et seq., as

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1 amended by the Clean Air Act Amendments of 1990 ("Act").

2 2. Section 110 of the Act requires each state to sub-  
3 mit an implementation plan for the control of each air pol-  
4 lutant for which a national ambient air quality standard has  
5 been promulgated. Since a standard has been promulgated for  
6 particulate matter, the State of Montana is required to sub-  
7 mit an implementation plan for particulate matter to EPA.

8 3. Section 75-2-202, MCA, requires the Board to estab-  
9 lish ambient air quality standards for the state. Sections  
10 75-2-111(3) and 75-2-401, MCA, empower the Board to issue  
11 orders upon a hearing before the Board concerning compliance  
12 with national and state ambient air quality standards.

13 4. On April 29, 1988, the Board adopted state ambient  
14 air quality standards for PM-10, including an annual standard  
15 of 50 micrograms per cubic meter (annual arithmetic mean),  
16 and a 24-hour standard of 150 micrograms per cubic meter (24-  
17 hour average concentration). ARM 16.8.821 ("PM-10 MAAQS").

18 5. On August 7, 1987, the Kalispell area was designat-  
19 ed as a Group I area by EPA. 52 Fed. Reg. 29383. Pursuant  
20 to the Federal Clean Air Act of all Group I areas, including  
21 Kalispell, are designated by operation of law to be in non-  
22 attainment for the particulate matter NAAQS. 42 U.S.C.  
23 7407(d)(4)(B), as amended. Further, the Act designated the  
24 Kalispell area as a "moderate" PM-10 nonattainment area. 42  
25 U.S.C. 7513(a), as amended. For areas designated as "moder-  
26 ate", the state was required to submit to EPA an implementa-

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1 tion plan no later than one year from enactment of November  
2 15, 1990 amendments to the Act. 42 U.S.C. 7513a(a)(2). The  
3 area encompassed in the moderate nonattainment designation  
4 (hereafter "Kalispell nonattainment area") generally includes  
5 the City of Kalispell and that portion of Flathead County  
6 within the vicinity of the boundaries of the City of Kali-  
7 spell. A map of the Kalispell nonattainment area is attached  
8 to the Stipulation as Exhibit A and by this reference is  
9 incorporated herein in its entirety as part of this document.

10 6. Results of air quality sampling and monitoring from  
11 1986 through 1991 have demonstrated violations within the  
12 Kalispell nonattainment area of the 24-hour standard con-  
13 tained in both the particulate matter NAAQS and the PM-10  
14 MAAQS.

15 7. On November 25, 1991, Governor Stephens submitted  
16 to EPA an implementation plan for Kalispell, Montana, demon-  
17 strating attainment of the particulate matter NAAQS. The  
18 implementation plan relied upon the receptor modeling tech-  
19 nique known as chemical mass balance (CMB) to identify the  
20 major emission sources contributing to noncompliance. The  
21 implementation plan consisted of an emission control plan  
22 that controlled fugitive dusts emissions from roads, parking  
23 lots, construction and demolition project, and barren ground.

24 8. On April 29, 1992, EPA notified Governor Stephens  
25 that the Kalispell implementation plan could be conditionally  
26 approved if certain deficiencies were corrected. A major  
27

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1 deficiency identified by EPA was that the emission limita-  
2 tions set for industrial sources (or in some cases for indus-  
3 trial sources where there was no emission limitation set at  
4 all) could result in significant emission increases above the  
5 emission levels occurring during the source apportionment  
6 modeling study (CMB). Furthermore, such potential emissions  
7 increases were not accounted for in the particulate matter  
8 NAAQS demonstration of attainment.

9       9. On June 15, 1992, Governor Stephens submitted a  
10 letter to EPA committing to additional analysis utilizing  
11 dispersion modeling technique on the Kalispell area industri-  
12 al sources. If the dispersion modeling indicated that a  
13 source significantly impacted the nonattainment area, the  
14 Governor further committed to developing new emission limita-  
15 tions on the Kalispell area industrial sources which would  
16 demonstrate attainment of the particulate matter NAAQS.

17       10. The department has determined that emission limita-  
18 tions applicable to Klingler were in some cases nonexistent  
19 (no permit requirements) or significantly higher than actual  
20 emissions during the CMB modeling study.

21       11. Dispersion modeling analysis has been conducted by  
22 the department for the Kalispell nonattainment area. The  
23 dispersion modeling incorporates the allowable emission rates  
24 from the sources of PM-10 emissions in the Kalispell non-  
25 attainment area to determine the extent of their respective  
26 contributions to the ambient levels of PM-10. Based upon the  
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1 results of this modeling, the PM-10 emissions from Klingler  
2 were identified as a significant contributor to ambient lev-  
3 els of PM-10 in the Kalispell nonattainment area. Further-  
4 more, both parties agree that based upon these modeling re-  
5 sults, revised emission limitation for Klingler are necessary  
6 to demonstrate compliance with the particulate matter NAAQS.  
7 The department has performed additional modeling using re-  
8 vised emission rates for Klingler and other sources in the  
9 Kalispell area to determine the level of emissions which  
10 achieves the particulate matter NAAQS. Based upon these  
11 modeling results, both parties agree that revised emission  
12 limitation must be imposed upon Klingler.

13

14 B. BINDING EFFECT

15 12. The parties to this Stipulation agree that any such  
16 emission limitations placed on Klingler must be enforceable  
17 by both the department and EPA. To this end, the parties  
18 have negotiated specific limitations and conditions that are  
19 to be applicable to Klingler. The specific conditions which  
20 comprise these limitations are contained in Exhibit B to this  
21 Stipulation (entitled "Emission Limitations and Conditions,  
22 Klingler Lumber Company Inc.") which is attached hereto and  
23 by this reference is incorporated herein in its entirety as  
24 part of this document.

25 13. Both parties understand and agree that if EPA finds  
26 the Kalispell implementation plan incomplete or disapproves  
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1 it or if future violations of the particulate matter NAAQS or  
2 PM-10 standard MAAQS occur, this Stipulation may be renegoti-  
3 ated and made enforceable through an associated Board Order  
4 or simply superseded by a subsequent order of the Board upon  
5 notice of hearing.

6 14. The Board is the state agency that is primarily  
7 responsible for the development and implementation of the  
8 State Implementation Plan under the Federal Clean Air Act.  
9 Under Sections 75-2-101, et seq., the Board is required to  
10 protect public health and welfare by limiting the levels and  
11 concentrations of air pollutants within the state and such  
12 responsibility includes the adoption of emission standards  
13 (Section 75-2-203, MCA) and the issuance of orders (Sections  
14 75-2-111(3), 75-2-401, MCA) to effectuate compliance with  
15 national and state ambient air quality standards.

16 15. The parties to this Stipulation agree that upon  
17 finding the limitations and conditions contained in Exhibit B  
18 to this Stipulation to be necessary for the Kalispell non-  
19 attainment area to meet the particulate matter NAAQS and the  
20 PM-10 MAAQS, the Board has jurisdiction to require the im-  
21 position of such limitations and conditions, and may adopt the  
22 same as enforceable measures applicable to Klingler.

23 16. The conditions and limitations contained in Exhibit  
24 B to this Stipulation are consistent with the provisions of  
25 the Montana Clean Air Act, Title 75, Chapter 2, MCA, and  
26 rules promulgated pursuant to statute.

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1 17. Any obligations in this Stipulation and attached  
2 Exhibit B that are more stringent than conditions set forth  
3 in the permit issued to the air source/party to this agree-  
4 ment (if issued), supersede the less stringent permit condi-  
5 tions.

6 18. Accordingly, the parties to this Stipulation agree  
7 that it would be consistent with the terms and intent of this  
8 Stipulation for the Board to issue an Order which requires  
9 the imposition of the terms in this Stipulation and the limi-  
10 tations and conditions contained in Exhibit B of this Stipu-  
11 lation, and adopts the same as enforceable measures applica-  
12 ble to Klingler.

14 KLINGLER LUMBER COMPANY INC.

MONTANA DEPARTMENT OF  
HEALTH AND ENVIRONMENTAL  
SCIENCES

16 BY *John Hammond*

BY *Robert J. Robinson*  
Robert J. Robinson  
Director

18 BY \_\_\_\_\_  
19 Attorney

BY *Timothy R. Baker*  
Timothy R. Baker  
Attorney

21 DATE 9/7/93

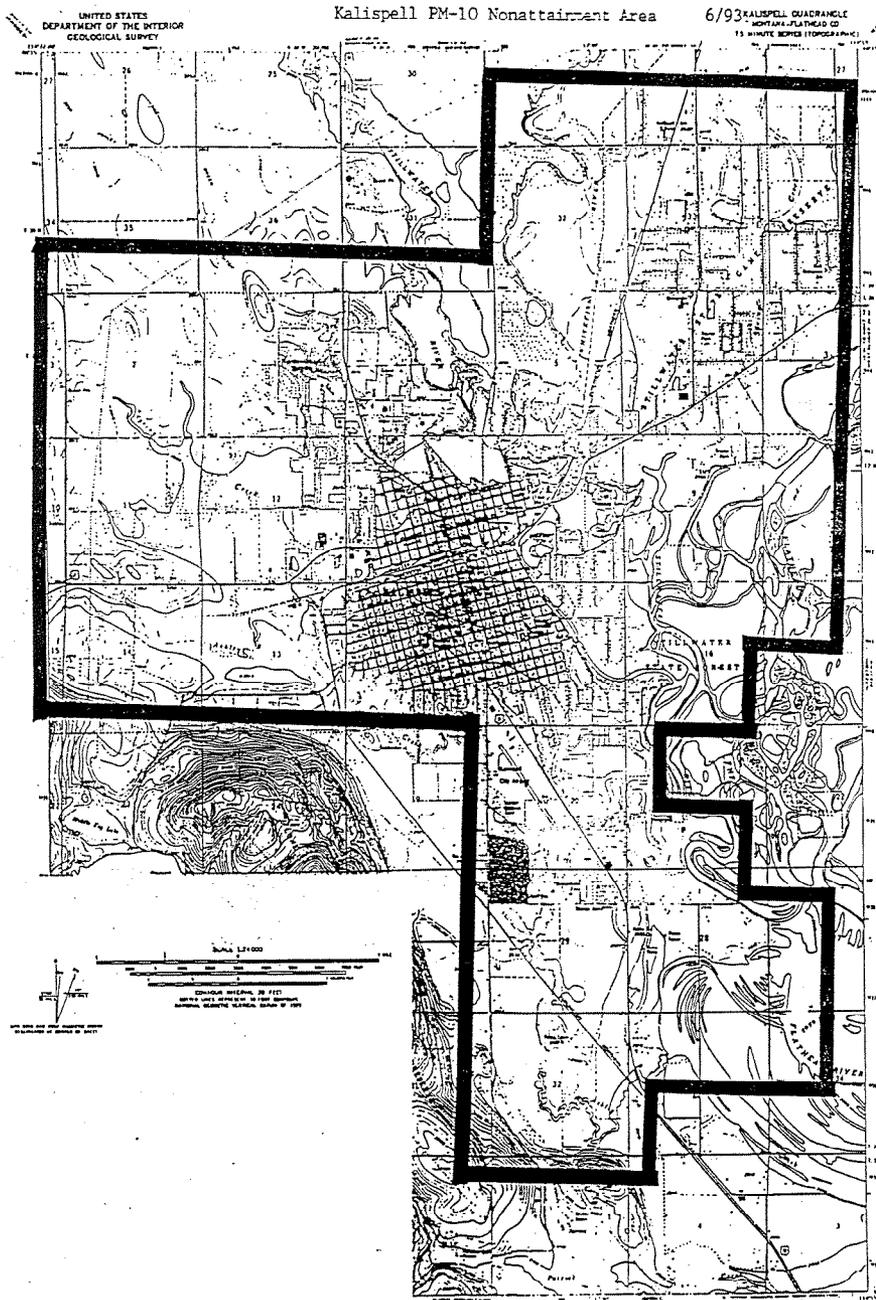
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EXHIBIT B  
EMISSION LIMITATIONS AND CONDITIONS

Klingler Lumber Company, Inc.  
P.O. Box 1097  
Kalispell, MT 59903

The above-named company is hereinafter referred to as "Klingler."

SECTION I: Affected Facilities

A. Plant Location:

A 14 MMBF/yr planer mill located  $\frac{1}{4}$  mile northeast of Kalispell, Montana on Whitefish Stage Road (Section 22, Township 29 North, Range 21 West, Flathead County).

B. Affected Equipment and Facilities:

1. Lumber planer with cyclone<sup>1</sup>;
2. Trim saw with cyclone<sup>1</sup>;
3. Trim block chipper with cyclone<sup>1</sup>;
4. Two (2) wood-waste bins with two (2) cyclones;
5. Wood-waste bins truck loadout;
6. Fugitive emissions from lumber handling.

C. Existing Equipment not allowed to operate:

1. Teepee burner. (See Section II.A.7)

SECTION II: Limitations and Conditions

A. Emission Limitations and Conditions:

1. Klingler shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968 that exhibit an opacity<sup>2</sup> of twenty percent (20%) or greater averaged over six (6) consecutive minutes. This applies to stack emissions from the two (2) wood-waste bin cyclones.
2. Klingler shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed prior to November 23, 1968 that exhibit an opacity<sup>2</sup> of forty percent (40%) or greater averaged over six (6) consecutive minutes. This applies to stack emissions from

<sup>1</sup> The planer, trim saw, and block chipper are all controlled by a common cyclone.

<sup>2</sup> Opacity shall be determined according to 40 CFR, Part 60, Appendix A, Method 9 Visual Determination of Opacity of Emissions from Stationary Sources.

the cyclone used to collect the shavings and sawdust from the lumber planer, trim saw, and chipper.

3. Klingler shall operate the planer mill facility so as not to cause or authorize emissions to be discharged into the outdoor atmosphere from access roads, parking lots, or the general plant property any visible fugitive emissions that exhibit opacity<sup>3</sup> of 5% or greater averaged over six (6) consecutive minutes. This applies to fugitive emissions from any hauling, handling, loading, and unloading operation. (RACT)
4. Klingler shall treat all unpaved portions of the haul roads, access roads, parking lots, lumber yard, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the 5% opacity<sup>3</sup> limitation. (RACT) ✓
5. Klingler shall submit final engineering plans for the complete wood waste collection system, including the two (2) wood waste storage bins, the two (2) wood waste bin cyclones and the piping system, to the department within 180 days of completion of construction. ✓
6. Klingler shall dismantle, demolish or otherwise render the tepee burner incapable of being operated by November 15, 1993. ✓

B. Operational Reporting Requirement:

Klingler shall supply the Department of Health and Environmental Sciences Air Quality Bureau with an annual emission inventory for the listed emission points. The annual emission inventory report must be submitted in writing to the department by March 1 of the following calendar year. The emission inventories shall include the following production and emission inventory information:

1. Mill Production:
  - total hours of operation.
  - total mill cut for the year.
2. Hours of operation and flow rate for each of the following cyclones:
  - a. Planer, trim saw, and chipper cyclone.\*
  - b. Wood-waste bin cyclone #1;
  - c. Wood-waste bin cyclone #2.
3. Fugitive dust information consisting of a listing of all plant vehicles including:
  - a. Vehicle type;
  - b. Vehicle weight loaded;
  - c. Vehicle weight unloaded;

<sup>3</sup> Opacity shall be determined according to 40 CFR, Part 60, Appendix A, Method 9 Visual Determination of Opacity of Emissions from Stationary Sources.

- d. Number of tires on vehicles;
  - e. Average trip length;
  - f. Number of trips per day;
  - g. Average vehicle speed;
  - h. Area of activity; and
  - i. Vehicle fuel usage (gasoline or diesel in gallons) - annual total.
4. Fugitive dust control for haul roads and general plant area:
- a. Hours of operation of water trucks.
  - b. Application schedule for chemical dust suppressant if applicable.
- C. The department may require additional emissions testing on sources in the plant per ARM 16.8.704 Testing Requirements.
- D. Klingler must maintain a copy of the air quality stipulation at the Kalispell planer mill and make that copy available for inspection by department personnel upon request.
- E. Klingler shall comply with all other applicable state, federal and local laws and regulations.

Section III: General Conditions

- A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this stipulation.
- B. Compliance with Statutes and Regulations - Specific listing of requirements, limitations, and conditions contained herein does not relieve the applicant from compliance with all applicable statutes and administrative regulations including amendments thereto, nor waive the right of the department to require compliance with all applicable statutes and administrative regulations, including amendments thereto.
- C. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for penalties.

Analysis of Conditions

Klingler Lumber Company, Inc.

I. Introduction/Process Description

Klingler operates an existing planer mill located ¼ mile north east of Kalispell, Montana on Whitefish Stage Road. The mill receives rough cut lumber from area forest product companies and stockpiles them in their lumber yard prior to processing them in the planer mill.

The rough lumber is air dried to reduce shrinkage in the final dimension cut lumber. Once the lumber is dry it is run through a thickness planer where the rough cut lumber is planed to the proper dimensions. The planed lumber is then cut to the proper length using a trim saw. The final dimension lumber is then inspected and shipped.

At present, the planer shavings, saw dust, and chipped trim blocks from this process are collected and transferred pneumatically to the tepee burner. Klingler has operated a tepee burner, which is used for the disposal of the wood wastes generated from the planer mill processes, since 1962. By June 1993, an alternate means of disposing of the unmarketable wood wastes must be used.

Klingler has purchased and installed two used wood-waste bins with two cyclones, for the collection, storing, and shipping of marketable wood wastes. The new collection system became operational on approximately July 1, 1993. Since this date, the planer shavings, saw dust, and chipped trim blocks from this process are to be collected and transferred pneumatically to the wood waste bins and loaded into trucks.

II. Applicable Rules and Regulations

A. ARM 16.8.821, Ambient Air Quality Standards for PM-10:

This section requires that the 24-hour and annual average concentrations of PM-10 in the ambient air not exceed the set standards. (See Existing Air Quality and Impacts, Section V)

B. ARM 16.8, Subchapter 9, Prevention of Significant Deterioration of Air Quality (PSD):

ARM 16.8.921 Definitions. Klingler's planer mill is not a "major stationary source" because it is not a listed source and does not have the potential to emit more than 250 tons of any pollutant. Once the tepee burner is removed this source will no longer have the potential to emit more than 250 tons per year of any pollutant.

C. ARM 16.8, Subchapter 14, Emission Standards, including but not limited to:

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1. ARM 16.8.1401 Particulate Matter, Airborne. This section requires reasonable precautions for fugitive emissions sources and Reasonably Available Control Technology (RACT) for existing fugitive sources located in a nonattainment area. The department, in consultation with EPA, has determined that the use of chemical stabilization or paving on major haul roads will satisfy these requirements.
2. ARM 16.8.1404 Visible Air Contaminants. This section requires an opacity limitation of 20% for all stacks or vents installed after November 23, 1968.

III. RACM/RACT Determination

Under section 189(a)(1)(C) of the amended Clean Air Act of 1990, moderate area State Implementation Plans (SIP's) must contain "reasonably available control measures" (RACM) for the control of PM-10 emissions. RACM for stationary sources is the application of reasonably available control technology (RACT). Since the Kalispell area has been designated as a nonattainment for PM-10 by EPA, RACT must be applied to those stationary sources which cause or contribute to the nonattainment area.

A RACT determination is required for:

A. Wood Waste Collection Cyclones

A cyclone would provide the best level of particulate control (85%). Klingier currently uses a cyclone for particulate control from the planer, trim saw, chipper, and two wood waste bins. The department has determined that the cyclones will constitute RACT for these sources.

B. Fugitive Road Dust Emissions

RACT for fugitive road dust emissions for sources of this type has been determined by the department to be use of water or chemical stabilization so as to maintain compliance with a 5% opacity limitation.

IV. Emissions Inventory

Planer Mill

Annual Emission Rates (Potential) \*

Source	tons/year					
	TSP	PM-10	SOX	NOX	VOC	CO
Wood Waste Bin Cyclone #1	5.09	2.04				
Wood Waste Bin Cyclone #2	5.09	2.04				
Shavings Bin Loadout	5.75	3.45				
Chip Bin Loadout	1.56	0.56				
Trim Saw Cyclone	2.65	1.06				
Lumber Yard - Fugitives	1.42	0.51				
Total Emissions	21.56	9.65	0.00	0.00	0.00	0.00

\* Based on operating 8760 hours/year.

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Daily Emission Rates (Potential) \*\*

Source	lbs/day					
	TSP	PM-10	NOX	VOC	CO	SOX
Wood Waste Bin Cyclone #1	27.88	11.15				
Wood Waste Bin Cyclone #2	27.88	11.15				
Shavings Bin Loadout	31.53	12.92				
Chip Bin Loadout	8.57	3.05				
Trim Saw Cyclone	14.52	5.81				
Lumber Yard - Fugitives (Daily)	12.07	4.35				
<b>Total Emissions</b>	<b>122.46</b>	<b>54.43</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*\* Based on operating 24 hours/day.

✓ Wood Waste Bin Cyclone #1

Production Flowrate: 4523 scfm (Designed flow rate)  
Hours of operation: 8760 hrs (Maximum Potential)  
Fraction of year operating: 1.00 %/yr

TSP Emissions:

Emission Factor: 2.25 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 4523 scfm \* 2.25 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 5.09 tons/yr

PM-10 Emissions:

Emission Factor: 0.90 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 4523 scfm \* 0.90 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 2.04 tons/yr

✓ Wood Waste Bin Cyclone #2

Production Flowrate: 4523 scfm (Designed flow rate)  
Hours of operation: 8760 hrs (Maximum Potential)  
Fraction of year operating: 1.00 %/yr

TSP Emissions

Emission Factor: 2.25 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 4523 scfm \* 2.25 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 5.09 tons/yr

PM-10 Emissions:

Emission Factor: 0.90 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 4523 scfm \* 0.90 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 2.04 tons/yr

Shavings Bin Loadout

Lumber Production: 14.00 MMBF/yr (Based on two shifts)  
Shavings Production: 411 tons/MMBF

TSP Emissions:

Emission Factor: 2.00 lbs/ton (3-07-030-02, AFSSCC page 144)  
Calculations: 14.00 MMBF/yr \* 411 tons/MMBF \* 2.00 lbs/ton \* 0.0005 tons/lb = 5.75 tons/yr

PM-10 Emissions:

Emission Factor: 1.20 lbs/ton (3-07-030-02, AFSSCC page 144)  
Calculations: 14.00 MMBF/yr \* 411 tons/MMBF \* 1.20 lbs/ton \* 0.0005 tons/lb = 3.45 tons/yr

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Chip Bin Loadout

Lumber Production: 14.00 MMBF/yr (Based on two shifts)  
Chip Production: 621 tons/MMBF

TSP Emissions:

Emission Factor: 0.36 lbs/ton (Estimate based on knowledge of process & size of material)  
Calculations: 14.00 MMBF/yr \* 621 tons/MMBF \* 0.36 lbs/ton \* 0.0005 tons/lb = 1.56 tons/yr

PM-10 Emissions:

Emission Factor: 0.128 lbs/ton (Estimate based on knowledge of process & size of material)  
Calculations: 14.00 MMBF/yr \* 621 tons/MMBF \* 0.13 lbs/ton \* 0.0005 tons/lb = 0.56 tons/yr

Trim Saw Cyclone

Production Flowrate: 2356 scfm (Designed flow rate)  
Hours of operation: 8760 hrs (Maximum Potential)  
Fraction of year operating: 1.00 %/yr

TSP Emissions

Emission Factor: 2.25 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 2356 scfm \* 2.25 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 2.65 tons/yr

PM-10 Emissions:

Emission Factor: 0.90 lbs/scfm (3-07-008-05, AFSSCC page 143)  
Calculations: 2356 scfm \* 0.90 lbs/scfm \* 1.00 %/yr \* 0.0005 tons/lb = 1.06 tons/yr

Lumber Yard - Fugitives

Operating Hours 8760 Hours/Yr  
Vehicle Miles Traveled 9300 VMT/Yr  
Control Efficiency is 50% for watering.

TSP Emission Factor is determined by the following equation:

$$E = 5.9 * k * (s/12) * (s/30) * (W/3) * 0.7 * (w/4) * 0.5 * PR$$

Where:

E= TSP Emission Factor in Lbs/Vehicle Mile Traveled (VMT) 1.0  
k= Particle sizing constant for TSP 8.7 %  
s= Silt Content in percent 5.0 mph  
S= Average Speed of vehicles in mph 3.67 Tons  
W= Average weight of vehicles in Tons 5.33 wheels  
w= Average number of wheels on vehicles  
PR= Precipitation Ratio based on the following:

130 Days with more than .01" of Precipitation  
PR= (365 days - 130 days)/365 Days = 0.6438

TSP Emissions:

TSP Emission Factor 0.61 Lbs/VMT

E(TSP)= (9300 VMT/Yr)(0.61 Lbs/VMT)(0.5)  
E(TSP)= 2837 Lbs/Yr  
or 1.42 Tons/Yr

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V. Existing Air Quality and Impacts

On July 1, 1987 the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter of 10 microns or less (PM-10). Due to exceedances of the national standards for PM-10, the city of Kalispell and the nearby Evergreen area have been designated by EPA as nonattainment for PM-10. As a result of this designation, EPA required the Department of Health and Environmental Sciences and the Flathead City-County Health Department to submit the Kalispell PM-10 State Implementation Plan (SIP) to EPA in November, 1991. The SIP consisted of an emission control plan that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors of PM-10 emissions.

Receptor modeling (a model which identifies contributors based on actual area and industrial emissions and ambient data) was originally used to demonstrate attainment of the federal PM-10 standards in the SIP. The EPA required the department to use a dispersion model (a model which incorporates allowable emission rates from facilities) to assure that attainment can still be demonstrated if individual sources are operating at their maximum allowable emission rates.

After an analysis, the department determined that emission limitations applicable to the Klingler facility were in some cases nonexistent (no permit required) or several times higher than actual emissions (ARM 16.8.1403). Dispersion modelling conducted using emissions from the Klingler facility at its potential to emit (emissions associated with maximum design capacity or as limited by ARM 16.8.1403) indicated that the facility contributed significantly to the PM-10 concentrations in the Kalispell nonattainment area.

In order to demonstrate compliance (through dispersion modeling) with the PM-10 NAAQS in the Kalispell nonattainment area, it is necessary to reduce or establish new emission limitations for the Klingler facility. The new emission limitations in this document, in conjunction with similar limitations on other Kalispell area facilities, demonstrates through dispersion modeling that compliance with the NAAQS for PM-10 will be attained. These reductions in allowable emissions will be enforced through a signed stipulation.

With the proper utilization of existing control equipment and reasonable control techniques (watering or application of dust suppressant) for haul road dust, the Klingler facility should be able to operate at maximum design rates and remain in compliance with the stipulated emission limitations.

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Kalispell and Evergreen Nonattainment Boundaries

The area is bounded by lines from UTM Coordinate 700000mE, 5347000mN, east to 704000mE, 5346000mN, south to 704000mE, 5341000mN, west to 703000mE, 5341000mN, south to 703000mE, 5340000mN, west to 702000mE, 5340000mN, south to 702000mE, 5339000mN, east to 703000mE, 5339000N, south to 703000mE, 5338000mN, east to 704000mE, 5338000mN, south to 704000mE, 5336000mN, west to 702000mE, 5336000mN, west to 702000mE, 5336000mN, south to 702000mE, 5335000mN, west to 700000mE, 5335000mN, north to 700000mE, 5340000mN, west to 695000mE, 5340000mN, north to 695000mE, 5345000mN, east to 700000mE, 5345000mN, north to 700000mE, 5347000mN.

VI. Environmental Assessment

An environmental assessment, required by the Montana Environmental Protection Act, was completed for this project. A copy is attached.

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES  
Air Quality Bureau  
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FINAL ENVIRONMENTAL ASSESSMENT (EA)

Project or Application: Klingler Lumber Company, Inc., Air Quality Stipulation for Kalispell SIP.

Description of Project: Klingler Lumber Company, Inc. operates an existing planer mill located ¼ mile northeast of Kalispell, Montana on Whitefish Stage Road. This facility manufactures dimension lumber for use in the construction industry. The mill receives rough cut lumber from area forest product companies. The rough cut lumber is air dried to reduce shrinkage and planed into dimension cut lumber. The wood wastes that this facility generates is sold as a by-product which is used in the manufacture of other wood products.

Benefits and Purpose of Proposal: On July 1, 1987 the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter of 10 microns or less (PM-10). Due to exceedances of the national standards for PM-10, the city of Kalispell and the nearby Evergreen area have been designated by EPA as nonattainment for PM-10. As a result of this designation, EPA required the Department of Health and Environmental Sciences and the Flathead City-County Health Department to submit the Kalispell PM-10 State Implementation Plan (SIP) to EPA in November, 1991. The stipulation identifies the emission sources and makes enforceable emission limitations and the operation of control equipment and techniques which when considered with similar limitations on other Kalispell area sources will achieve the PM-10 NAAQS.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: No reasonable alternatives exist.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A list of enforceable conditions are contained in a signed stipulation.

Recommendation: An EIS is not required.

If an EIS is needed, and if appropriate, explain the reasons for preparing the EA:

If an EIS is not required, explain why the EA is an appropriate level of analysis: The emissions from this plant will not change. This action makes the control equipment and control techniques at the plant enforceable and assures that the emissions from this facility when considered with similar emission limitations at other sources will attain the PM-10 NAAQS.

Other groups or agencies contacted or which may have overlapping jurisdiction: None.

Individuals or groups contributing to this EA: Department of Health and Environmental Sciences, Air Quality Bureau.

EA prepared by: Michael Glavin

Date: July 22, 1993

Potential Impact on Physical Environment

		Major	Moderate	Minor	None	Unknown	Comments Attached
1	Terrestrial and Aquatic Life and Habitats				X		
2	Water Quality, Quantity and Distribution				X		
3	Geology and Soil Quality, Stability and Moisture				X		
4	Vegetation Cover, Quantity and Quality				X		
5	Aesthetics				X		
6	Air Quality			X			
7	Unique Endangered, Fragile or Limited Environmental Resource					X	
8	Demands on Environmental Resource of Water, Air and Energy				X		
9	Historical and Archeological Sites					X	
10	Cumulative and Secondary Impacts			X			

Potential Impact on Human Environment

		Major	Moderate	Minor	None	Unknown	Comments Attached
1	Social Structures and Mores				X		
2	Cultural Uniqueness and Diversity				X		
3	Local and State Tax Base and Tax Revenue				X		
4	Agricultural or Industrial Production				X		
5	Human Health				X		
6	Access to and Quality of Recreational and Wilderness Activities				X		
7	Quantity and Distribution of Employment				X		
8	Distribution of Population				X		
9	Demands for Government Services				X		
10	Industrial and Commercial Activity				X		
11	Locally Adopted Environmental Plans and Goals			X			
12	Cumulative and Secondary Impacts				X		