Prepared for:

Crawford Grading & Pipeline, Inc. 1505 Dunlap Rd Luthersville, GA 30251

SITE ASSESSMENT REPORT Crawford Grading & Pipeline, Inc. Luthersville, Georgia

Prepared by:



a Montrose Environmental Group company

400 Northridge Road, Suite 400 Sandy Springs, GA 30350 Tel: 404-315-9113

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1505 Dunlap Rd Luthersville, GA 30251

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Katrina Bagwell, PE Principal

No. PE043965 PROFESSIONAL

> Farhana Momin, PE Project Engineer



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ATTACHMENTS

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Attachment A – Figures
Attachment B – County Tax Parcel Map and Details

Attachment C – Zoning Verification Letter

Attachment D – Solid Waste Management Plan Consistency Letter



1 Introduction

On behalf of Crawford Grading & Pipeline, Inc.'s (referred to herein as Crawford Grading), EPS has prepared the following site acceptability study for the proposed facility located at 212 South Main Street in Luthersville, Meriwether County, Georgia 30251. Crawford Grading is proposing to install and operate an Air Curtain Destructor (ACD) at the 212 South Main location. A solid waste handling permit may be required for this type of activity, and as part of the permit determination, a site acceptability study is required, as outlined in Circular 14 – Criteria for Performing Site Acceptability Studies for Solid Waste (Version 1.1, 1997). The Site Location Map which depicts the physical location of the property is included in Attachment A as Figure 1.

1.1 Application Contacts

The contact persons for additional information about this permit application submittal are Mr. Scott Bowden of Crawford Grading (jscott@crawfordgrading.com; 678-877-9832), and Mrs. Katrina Bagwell, P.E. of EPS, Inc. (kbagwell@montrose-env.com; 678-336-8561).

1.2 Project Description

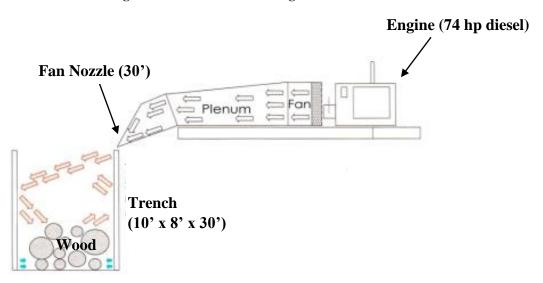
Crawford Grading operates a grading and pipeline company specializing in the installation of water, sanitary sewer and storm drain projects for city, county, government, and private entities.

The facility is proposing to install an ACD which will be permitted to burn clean wood generated by the grading and land clearing process conducted at off-site property locations. Crawford Grading would also like to accept clean wood for treatment from outside companies at a future time. The collected wood (tree stumps, trees, and tree limbs) is considered untreated wood waste. The proposed McPherson M30G trench ACD has a 30-foot nozzle length and a maximum rated capacity of 8 tons of wood per hour. A USEPA Tier 4 certified, Deere 74 horsepower (hp), four-cylinder turbo diesel motor will be used to drive the fan for the air curtain along with an accompanying 105-gallon fuel oil tank. A schematic diagram for the ACD process is shown below in Diagram 1.

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Diagram 1 - ACD Schematic Diagram



The ACD creates and maintains a uniform curtain of air across the top of a trench which inhibits smoke and ash from leaving. It also increases the burn efficiency in the trench by increasing the available oxygen which allows for faster and more complete burning of trees, stumps and limbs.

An outline of the property boundary and waste disposal boundary is included as Figure 2 of Attachment A. As shown in Figure 2, the property consists of 50.71 acres with a proposed waste disposal boundary consisting of 2.36 acres. Figure 2 also provides a depiction of the 200-foot buffer between the proposed waste disposal boundary and the property line. Figure 3 of Attachment A presents the topography of the proposed project site. A copy of the Meriwether County tax parcel map confirming the property boundary is included as Attachment B.



2 GENERAL SITE CHARACTERISTICS

Following the guidance outlined in Appendix B of the Criteria for Performing Site Acceptability Studies for Solid Waste document, the site acceptability criteria should include an analysis of the zoning; floodplains; wetlands; and proximity to national historic sites, county boundaries, nearest residence, and property line buffer. The results of the analysis are presented in the following sections.

2.1 Zoning

Per the guidance outlined in Appendix B of the Circular 14 document, the site must conform to all local zoning/land use ordinances. Written verification must be submitted to the Division by the facility demonstrating that the proposed site complies with local zoning and land use ordinances, if any. This verification should include a letter from the local governmental authority stating that the proposed site complies with local zoning or land use ordinances, if any. This verification has to be provided at the time of submission of the permit application and reaffirmed by the governmental authority prior to permit issuance.

The required zoning verification letter form the local zoning authority, the City of Luthersville is included as Attachment C to this report. The proposed property where the ACB will be located, 212 S Main Street in Luthersville, Georgia is currently zoned as General Industrial. Based on the verification determination provided by the City of Luthersville, the proposed project site complies with local zoning or land use ordinances.

2.2 Floodplains

According to Appendix B of the Circular 14, a solid waste handling facility located in the 100-year floodplain should not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in a washout of solid waste so as to pose a hazard to human health and the environment. The owner or operator must place a demonstration of compliance in the operating record and notify the Director that it has been placed in the operating record.

According to the Federal Emergency Management Agency (FEMA) Flood Map, the proposed project location has a minimal flood risk and is not located within a 100-year floodplain. A map depicting the FEMA 100-year floodplain in relation to the project site is shown as Figure 4 of Attachment A.

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2.3 Wetlands

Under the guidance outlined in Appendix B of the Circular 14, a solid waste handling facility is not allowed to be located in wetlands, as defined by the U.S. Corps of Engineers, unless evidence is provided to the Director, by the applicant, that use of such wetlands has been permitted or otherwise authorized under all other applicable state and federal laws and rules.

According to the National Wetlands Inventory, a portion of the 212 South Main Street property owned by Crawford Grading is considered a Palistrine freshwater forested/shrub wetland. However, the proposed project location within the property is situated 1,190 feet away from the wetland to the East. There is no potential impact to the nearest wetland area expected from the proposed project. Please refer to Figure 5 of Attachment A for details.

2.4 Proximity to National Historic Sites

Guidance outlined in Appendix B of the Circular 14 document indicates that the site should not be located within 5,708 yards (or 3.24 miles) of a National Historic Site.

Based on a review of the National Park Service (NPS) Register of National Historic Sites listing posted March 13, 2020, the proposed project site is not within 5,708 yards of the Andersonville, Jimmy Carter, or Martin Luther King, Jr. National Historic Sites.

2.5 Proximity to County Boundaries

According to Appendix B of the criteria document, the proposed project should not be located within one-half (½) mile of a county boundary except when the governing authority of the adjoining county gives written approval.

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The approximate distances of the proposed ACB from various bordering counties are:

- Coweta- 1.6 miles
- Spalding- 13.5 miles
- Pike- 13.0 miles
- Upson- 19.6 miles
- Talbot- 24.4 miles
- Harris- 22.6 miles
- Troup- 7.1 miles



Since the proposed project is located outside of ½ mile proximity to any neighboring county boundary, the facility is not required to obtain written approval from any adjoining counties.

2.6 Proximity to Homes, Roads, Airports, Railroads, and Property Boundary

The nearest residence to the proposed project site, 178 South Main Street is owned by Michael and Tammy Worley and is located 0.40 miles to the West. There is also a residence owned by Doris Ellen and Robert Dodds, 1896 Luthersville Road located 0.62 miles to the East from the project site. The proposed waste disposal boundary is bordered by South Main Street (Highway 27) approximately 2,000 feet to the West. The Newman Coweta County Airport is the closest airport to the project site, located approximately 8 miles to the North. The nearest rail lines are operated by CSX with one line located approximately 4.5 miles Northwest and the other located over 9 miles to the East of the proposed project location. Additionally, as shown in Figure 2, the proposed waste disposal boundary is located at least 200 feet from the property line.



3 ASSESSMENT SUMMARY

The information presented in this assessment addresses EPD's Solid Waste Management Criteria for Site Acceptability for the proposed ACD. The following bullets summarize the information presented in the above sections:

- 1) **Zoning** the proposed ACD project meets the local zoning and land use ordinance (see verification letter included as Attachment C);
- **2) Floodplain** the proposed project location has a minimal flood risk and is not within a 100-year floodplain (see Figure 4 of Attachment A);
- 3) **Wetlands** there is no potential impact to the nearest wetland area which is situated 1,190 feet to the East of the proposed project (see Figure 5 of Attachment A);
- **4) Proximity to National Historic Sites** the proposed project site is not located within 5,708 yards (or 3.24 miles) of a National Historic Site;
- 5) **Proximity to County Boundaries** the project site is not located within one-half (½) mile of a county boundary;
- 6) Proximity to Homes, Roads, Airports, Railroads, and Property Boundary the proposed waste disposal boundary is located at lest 500 feet from the nearest residence or occupied dwelling, 2,000 feet from the nearest roadway, 8 miles from the nearest airport, 4.5 miles from the nearest railway, and over 200 feet away from the property boundary; and
- 7) Solid Waste Management Plan Conformance the proposed facility is consistent with the local, multijurisdictional, or regional solid waste management plan developed in accordance with standards promulgated pursuant to the Solid Waste Management Act subject to the provisions of Code Section 12-8-31 with active involvement and a strategy for meeting the state-wide goal of reducing waste by 25 percent (see Appendix D for verification letter).

Based on the information presented in this assessment, Crawford Grading has demonstrated that the proposed project site is an acceptable solid waste handling facility under GAEPD guidelines.

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ATTACHMENT A Figures

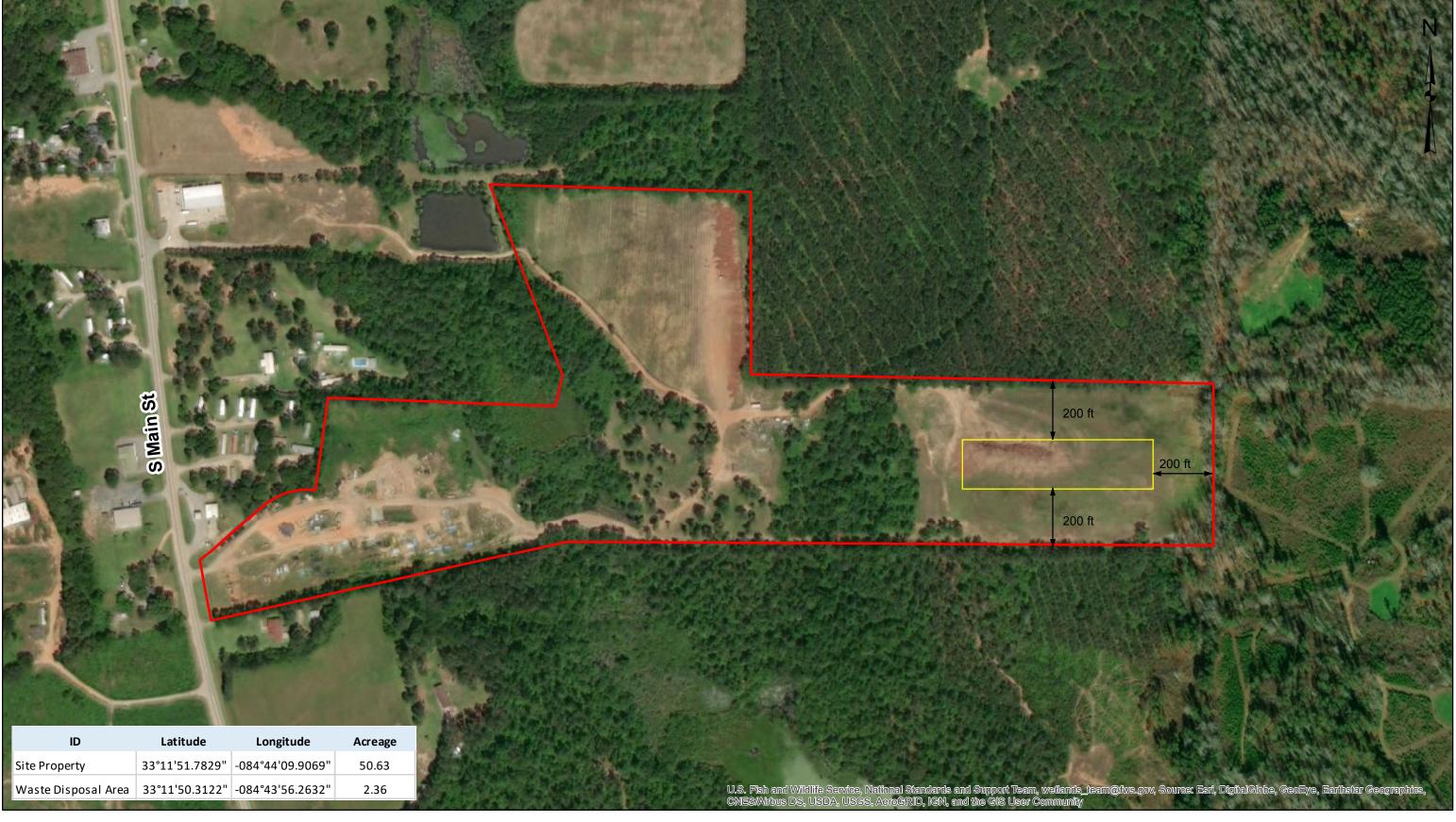


EPS

Marrow Environment Group (Property Circles Very Constitution of Constitut

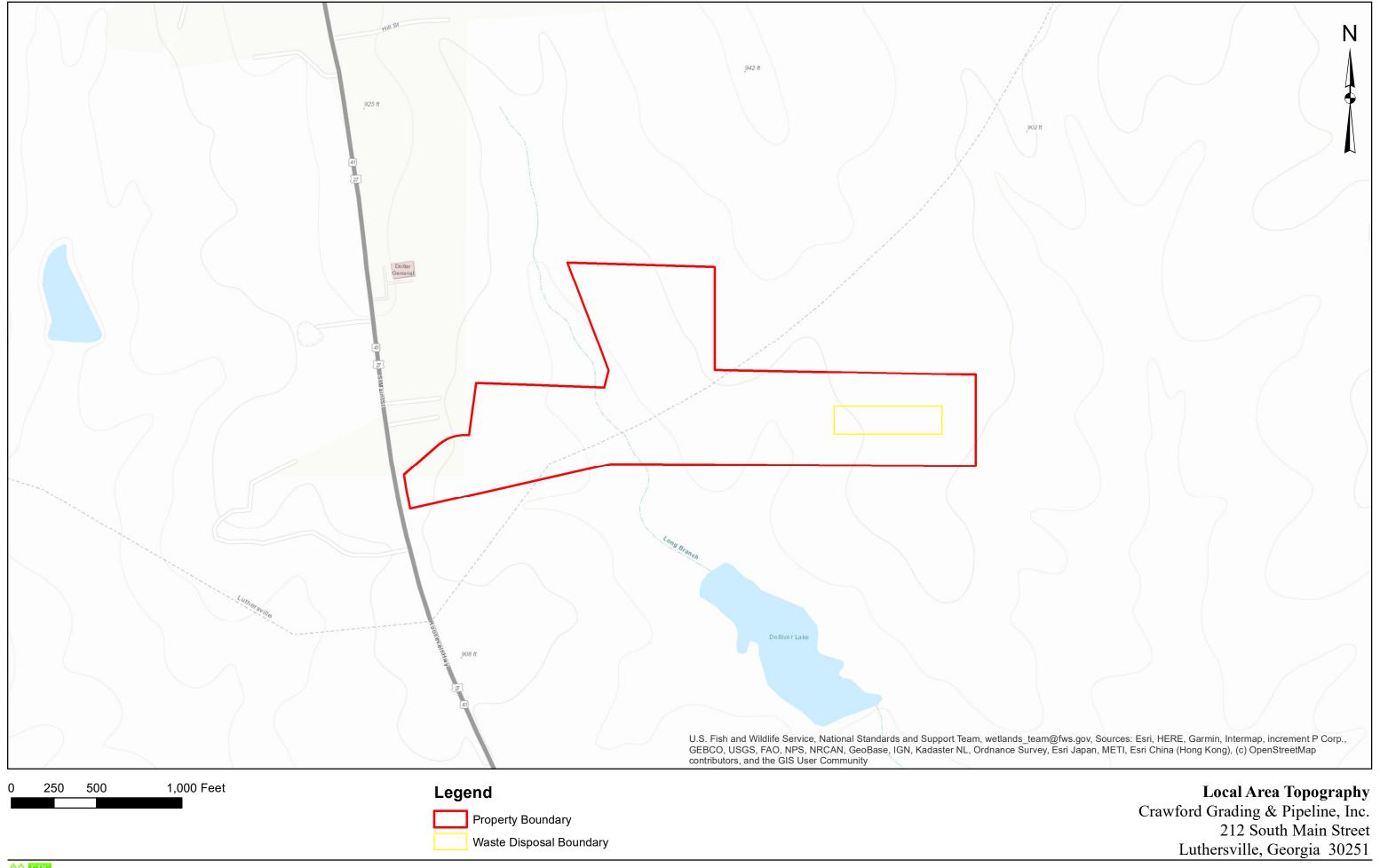
Luthersville, Georgia 30251

Figure 1



600 Feet 300 Legend 150 Property Boundary Waste Disposal Boundary

Waste Disposal Boundary Crawford Grading & Pipeline, Inc. 212 South Main Street





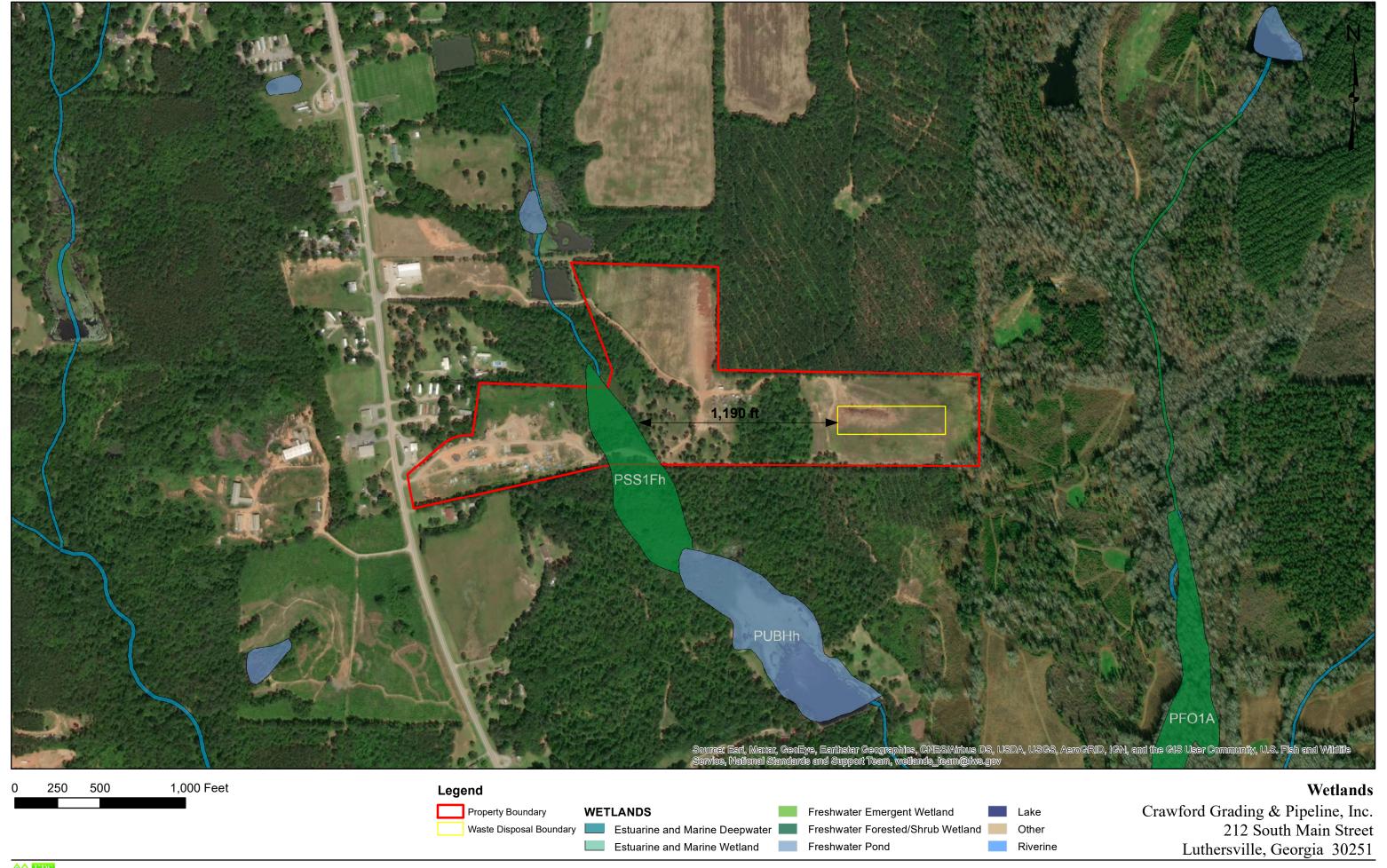
100-yr Floodplain

Property Boundary

Waste Disposal Boundary

G:\Crawford Grading\Air Permit Application - ACB\GIS\mxd\Figure 4 FEMA Flood Map.mxd

Crawford Grading & Pipeline, Inc.
212 South Main Street
Luthersville, Georgia 30251





ATTACHMENT B County Tax Parcel Map and Details

QPublic.net Meriwether County, GA



Parcel ID 068 025 Class Code Industrial Taxing District LUTHERSVILLE LUTHERSVILLE

40.71 Acres

(Note: Not to be used on legal documents)

Owner

CRAWFORD HERBERT 1505 DUNLAP ROAD LUTHERSVILLE GA 30251

Physical Address ROOSEVELTHWY Assessed Value \$189800

Last 2 Sales

Reason Qual Date Price 2/3/2011 \$70000 BK U 1/5/2010 0

Date created: 6/10/2020 Last Data Uploaded: 6/10/2020 6:54:55 AM





Summary

Parcel Number 068 025 001 Location Address ROOSEVELT HWY Legal Description 10 ACS/LL 63 10TH LD

(Note: Not to be used on legal documents)

Class I4-Industrial

(Note: This is for tax purposes only. Not to be used for zoning.) Zoning

Tax District LUTHERSVILLE (District 09)

Millage Rate 40.416 Acres 10

Neighborhood NORTH OF GREENVILLE (NORTH)

Homestead Exemption No (S0) Landlot/District

View Map

Owner

CRAWFORD HERBERT 1505 DUNLAP ROAD

LUTHERSVILLE, GA 30251

Rural Land

Туре	Description	Calculation Method	Soil Productivity	Acres
RUR	Small Tract	Rural	3	10

Valuation

	2019	2018	2017	2016
Previous Value	\$60,000	\$60,000	\$60,000	\$60,000
Land Value	\$60,000	\$60,000	\$60,000	\$60,000
+ Improvement Value	\$0	\$0	\$0	\$0
+ Accessory Value	\$0	\$0	\$0	\$0
= Current Value	\$60,000	\$60,000	\$60,000	\$60,000

No data available for the following modules: Land, Conservation Use Rural Land, Residential Improvement Information, Commercial Improvement Information, Mobile Homes, Accessory Information, $Prebill\ Mobile\ Homes,\ Permits,\ Sales,\ Photos,\ Sketches.$

The Meriwether County Assessor makes every effort to produce the most accurate information possible. No warranties, expressed or implied are provided for the data herein, its use or interpretation. The assessment information is from the last certified tax roll. All other data is subject to change. User Privacy Policy GDPR Privacy Notice

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Summary

Parcel Number 068 025 Location Address ROOSEVELT HWY Legal Description 40.71 AC/LL 63 10TH LD

(Note: Not to be used on legal documents)

Class I4-Industrial

(Note: This is for tax purposes only. Not to be used for zoning.)

Zoning
Tax District LUTHERSVILLE (District 09)

Millage Rate 40.416 Acres 40.71

Acres 40.71 Neighborhood LUTHERSVILLE (LU001)

Homestead Exemption No (SO)
Landlot/District N/A

View Map

Owner

CRAWFORD HERBERT 1505 DUNLAP ROAD

LUTHERSVILLE, GA 30251

Rural Land

Type	Description	Calculation Method	Soil Productivity	Acres
RUR	Small Tract	Rural	1	40.71

Accessory Information

Description	Year Built	Dimensions/Units	Identical Units	Value
*Site Improvement C Grade	2007	1x1/1	1	\$3,500
MHP1 MOBILE HME PARK PER SPACE	1980	1x1/1	2	\$4.800

Sales

Sale Date	Sale Price	Grantor	Grantee
2/3/2011	\$70,000	BRANCH BANKING & TRUST COMPANY	CRAWFORD HERBERT
1/5/2010	\$0	COOPER PATRICIA D WILLOUGHBY &	BRANCH BANKING & TRUST COMPANY
6/18/2007	\$400,000	DEVORE ELDRED JR	COOPER PATRICIA D WILLOUGHBY & JOHN
1/26/1993	\$125,000	J W ASKEW	DEVORE ELDRED JR
1/1/1973	\$0	ASKEW WJ	J W ASKEW
1/1/1957	\$0	ASKEW WELBORN PB11 P	ASKEW WJ

Valuation

	2019	2018	2017	2016
Previous Value	\$87,200	\$87,200	\$87,200	\$87,200
Land Value	\$181,500	\$78,900	\$78,900	\$78,900
+ Improvement Value	\$0	\$0	\$0	\$0
+ Accessory Value	\$8,300	\$8,300	\$8,300	\$8,300
= Current Value	\$189,800	\$87,200	\$87,200	\$87,200
10 Year Land Covenant (Agreement Year / Value)			2012/\$14,581	2012/\$14,157

No data available for the following modules: Land, Conservation Use Rural Land, Residential Improvement Information, Commercial Improvement Information, Mobile Homes, Prebill Mobile Homes, Permits. Photos. Sketches.

The Meriwether County Assessor makes every effort to produce the most accurate information possible. No warranties, expressed or implied are provided for the data herein, its use or interpretation. The assessment information is from the last certified tax roll. All other data is subject to change.

<u>User Privacy Policy</u>

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ATTACHMENT C Zoning Verification Letter

City of Luthersville

104 Wortham Road P.O. Box 10 Luthersville, Georgia 30251

Telephone 770-927-6885

Fax 770-927-9309

March 3, 2020

Environmental Planning Specialists, Inc. ATTN: Farhana Momin, P.E.; Katrina Bagwell 400 Northridge Road Suite 400 Sandy Springs, GA 30350

Subject: Request for Zoning Verification Letter

You have asked for verification of the zoning for the property located at 212 S Main St, Luthersville, GA 30251. That property, which belongs to Crawford Grading and Pipeline is properly and correctly zoned as General Industrial. With respect to Crawford's desire to install an air curtain incinerator, The City of Luthersville will abide by and support the Georgia EPD's decision in that regard.

Regards,

Donald T Cuttie

Mayor, City of Luthersville



ATTACHMENT D Solid Waste Management Plan Consistency Letter



Chairman Bryan Threadgill, District 4
Vice-Chairman Alfred McCoy, District 3
Commissioner Shirley Hines, District 1
Commissioner Mary Bray, District 2
Commissioner Beth Neely-Hadley, District 5
Theron Gay, County Manager
Beverly A. Thomas, County Clerk
Nathan T. Lee, Attorney

April 10, 2020

EPS
Montrose Environmental Group Company
400 Northridge Road, Suite 400
Sandy Springs, GA 30350

Dear Katrina Bagwell,

Meriwether County has been advised that Crawford Grading and Pipeline, Inc. has planned construction and operation of an air curtain burner at 212 South Main Street, Luthersville, GA 30251.

This facility will be located within the incorporated limits of the City of Luthersville and is covered under the Meriwether County Joint Solid Waste Management Plan.

After reviewing, it has been determined that this proposed facility is in conformance with the Meriwether County Joint Solid Waste Management Plan, developed in accordance with standards promulgated pursuant to Solid Waste Management Act [O.C.G.A. 12-8-24(f) with active involvement and a strategy for meeting the state-wide goal of reducing waste by 25 percent.

Should you have questions or need additional information, please let me know.

Sincerely,

Theron Gay

County Administrator

CC Mr. Scott Bowden Mayor Donald Cuttie Director Cathy Johnson