Writer's note: The page contains a document titled "SITE ASSESSMENT REPORT" for Crawford Grading & Pipeline, Inc. in Luthersville, Georgia. The document is prepared by EPS, a Montrose Environmental Group company.
SITE ASSESSMENT REPORT

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

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

Prepared by:

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

Katrina Bagwell, PE
Principal

Farhana Momin, PE
Project Engineer

June 2020
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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.
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.
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 Palustrine 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.

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 least 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.
ATTACHMENT A
Figures
Figure 1: Site Location Map
Crawford Grading & Pipeline, Inc.
212 South Main Street
Luthersville, Georgia 30251

Legend
- Property Boundary
Figure 2

<table>
<thead>
<tr>
<th>ID</th>
<th>Latitude</th>
<th>Longitude</th>
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<td>33°11'50.3122&quot;</td>
<td>-084°43'56.2632&quot;</td>
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Legend
- Property Boundary
- Waste Disposal Boundary
Local Area Topography
Crawford Grading & Pipeline, Inc.
212 South Main Street
Luthersville, Georgia 30251

Figure 3
Legend

- Property Boundary
- 100-yr Floodplain
- Waste Disposal Boundary

FEMA Floodplain Map
Crawford Grading & Pipeline, Inc.
212 South Main Street
Luthersville, Georgia 30251
1,190 ft

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands_team@fws.gov

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

Figure 5
G:\Crawford Grading\Air Permit Application - ACB\Final\Figure 5 Wetlands_rev.mxd

Legend
- Property Boundary
- Waste Disposal Boundary
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Estuarine and Marine Deepwater
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine
ATTACHMENT B
County Tax Parcel Map and Details
Meriwether County, GA

Parcels Information:
- Parcel ID: 068 025
- Class Code: Industrial
- Taxing District: LUTHERSVILLE
- Acres: 40.71
- Owner: CRAWFORD HERBERT
  - Physical Address: 1505 DUNLAP ROAD, LUTHERSVILLE GA 30251
  - Assessed Value: Value $189800

Last 2 Sales:
- Date: 2/3/2011
  - Price: $70000
  - Reason: BK
  - Qual: U
- Date: 1/5/2010
  - Price: 0
  - Reason: L
  - Qual: U

(Note: Not to be used on legal documents)

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

Developed by Schneider Geospatial
Summary

Parcel Number: 048 025 001
Location Address: ROOSEVELT HWY
Legal Description: 10 ACS/L, L 63 10TH LD
(Note: Not to be used on legal documents)
Class: I-1-Industrial
(Note: This is for tax purposes only. Not to be used for zoning.)
Zoning: LUTHERSVILLE (District 09)
Tax District: LUTHERSVILLE (District 09)
Millage Rate: 40.416
Acres: 10
Neighborhood: NORTH OF GREENVILLE (NORTH)
Homestead Exemption: No (50)
Landlot/District: N/A

View Map

Owner

CRAWFORD HERBERT
1505 DUNLAP ROAD
LUTHERSVILLE, GA 30251

Rural Land

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No data available for the following modules: Land, Conservation Use Rural Land, Residential Improvement Information, Commercial Improvement Information, Mobile Homes, Accessory Information, Prebuilt 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. Developed by Schr

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Last Data Upload: 6/10/2020, 6:54:55 AM
Version 2.3.62
Meriwether County, GA

Summary

Parcel Number: GA 025
Location Address: ROOSEVELT HWY
Legal Description: 40.71 AC/LL 63 107H:1D
(Note: Not to be used on legal documents)
Class: I-Industrial
(Note: This is for tax purposes only. Not to be used for zoning.)
Zoning: LUTHERSVILLE (District 09)
Millage Rate: 40.416
Acres: 40.71
Neighborhood: LUTHERSVILLE (LU001)
Homestead Exemption: No (50)
Landlot/District: N/A

Owner

CRAWFORD HERBERT
1505 DUNLAP ROAD
LUTHERSVILLE, GA 30251

Rural Land

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Valuation

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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, Permits, Photos, Sketches.

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Version 2.3.62
ATTACHMENT C
Zoning Verification Letter
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,

[Signature]
Donald T Cuttie
Mayor, City of Luthersville
ATTACHMENT D
Solid Waste Management Plan Consistency Letter
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