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May 8, 2024

Via Electronic Mail
Mr. Sean Hayes
Program Manager
Georgia DNR, Environmental Protection Division
East Central District
3525 Walton Way Ext.
Augusta, GA 30909
sean.hayes@dnr.ga.gov

Re: Corrective Action Plan
Complaint I.D. No. 107816
B-H Transfer Company
Waco Mill Road, Parcel 095 025
Sandersville, Washington County

Dear Mr. Hayes:

Please accept this letter as an update regarding the corrective actions undertaken by my client, Charles Tarbutton and B-H Transfer Company (B-H Transfer), related to the clean-up of plastic pellets and soda ash at the above-noted transload site (the Site) and responses to the alleged violations or deficiencies noted in your letter of March 7, 2024. We appreciated the opportunity to meet with you and Augusta District personnel on March 25th in your offices to discuss these actions further.

In addition to an update regarding the clean-up efforts, the following information below constitutes the Corrective Action Plan (CAP) as requested by your letter of March 7, 2024. Dan Wallace of Triple Point Engineering provided consultative services related to the various solid waste and stormwater compliance issues raised by your inspection and addressed in the CAP, and Louie Gao with TetraTech handled the Air Permitting Evaluation, attached hereto and incorporated by reference in the CAP.

Plastic Pellet Cleanup

Clean-up of the plastic pellets which had migrated off the Site began in early February 2024. Since then, B-H Transfer has had at least one employee assigned to the continuous clean-up work at the Site and on the property of the neighboring landowner, Ms. Lyle Lansdell. As of

our March 15, 2024 response letter to you, approximately 200 gallons of pellets had been recovered and disposed of properly from the Site and neighboring property. As of the date of this letter, it is estimated that approximately 300 gallons of pellets in total have been recovered. On May 3, 2024, after a recent inspection of Ms. Landsell's property, Mr. Tarbutton estimates that greater than 98% of the pellets have been removed. There were no pellets visible in the standing water in the creek bed, which at the time of the inspection was not flowing due to recent lack of rainfall. There were no pellets visible in the exposed creek bed, much of which was visible due to the dry conditions. A few isolated places were observed where prior high-water levels deposited natural debris on the creek bank – natural debris which in turn contained small amounts of pellets. Future rain events may flush some of these remaining pellets downstream to the natural "debris dam" area for future recovery and disposal. The nature of this clean-up work in and along this creek bottom is slow and involves targeted hand labor, with diminishing results over time. That said, my client is committed to periodic monitoring of the Lansdell property after significant rainfall events where pellets may become exposed. Any exposed pellets will be collected and disposed of properly.

With respect to the source of the pellets exiting the Site, efforts to control further releases have been effective since February 2024, resulting in no new pellets leaving the Site. This effort involves three key elements: (1) added training and oversight of transload operators to minimize pellet loss, (2) dedication of a full-time employee to routine site clean-up using a vacuum and (3) installation of screens on storm drain inlets to prevent any loose pellets through storm water discharge off-site.

Soda Ash Cleanup

Soda Ash transfer from rail car to tank trailer via a conveyor belt results in a small amount of product loss at the point of transfer from the rail car outlet gate to the belt conveyor despite the best efforts of the operator. As previously noted related to routine site clean-up, B-H Transfer employs a full-time person whose responsibility is to collect soda ash on the ground following the transloading process. This work is primarily accomplished with a tractor equipped with a front bucket and box blade, in addition to significant hand labor. The soda ash is then loaded into a dump trailer for disposal once the trailer is full. So far, one load of approximately 21 tons has been disposed of at the Wolf Creek Landfill. Documentation of that disposal is attached hereto as Exhibit A. A second load of approximately the same amount should be delivered to Wolf Creek for disposal later this week.

Storm Water

As noted in my client's initial March 15 response, we have completed the Facility ID form and submitted it to EPD as requested. In addition, the Responsible Official for the B-H Transfer, Keith Johnson, has designated Dan Wallace of Triple Point Engineering as Preparer in GEOS. Mr. Wallace has contacted Veronica Craw on behalf of B-H Transfer to confirm with her the appropriate sector for the Site for coverage under the Industrial General Stormwater Permit GAR050000 (GISP). Once we are able to speak with Ms. Craw or appropriate staff to determine the best method to accurately reflect the Site, we will move forward with the preparation of the

Storm Water Pollution Prevention Plan (SWPPP) and a Notice of Intent (NOI) for coverage under the GISP. We expect to complete the SWPP and file the NOI within four weeks of our confirmation of appropriate sector designation by the stormwater staff at EPD.

Stream Buffer Restoration

Charles Tarbutton and Dan Wallace met with the local issuing authority (LIA) staff onsite to review and discuss plans to revegetate the impacted stream bank area identified by EPD. B-H Transfer will complete its plan to replant the stream buffer area and will submit the plan to LIA staff and the EPD District Office prior to June 1. Upon concurrence of the plan by EPD and the LIA, B-H Transfer will begin the process of hiring a contractor to restore the vegetative buffer pursuant to those plans with the intent to have the contractor retained by July 1, 2024.

Air Permitting Evaluation

On May 7, 2024, Louie Gao with TetraTech provided a thorough analysis of whether an air permit was required for the site. This analysis was provided by letter to Ms. Wendy Troemel, Chemical Permitting Unit, Stationary Source Permitting Program, on May 7, 2024 and is attached hereto as Exhibit B. As thoroughly documented in the analysis provided by Mr. Gao, my client expects that Ms. Troemel will concur that the facility equipment and operation do not require an air permit.

Let me know if you have any follow-up questions related to the CAP or related activities and thank you for your attention to this matter.

Sincerely,

/s/ Judson H. Turner

Judson H. Turner

cc: Jeffery Williams, District Manager, EPD (via email)
Glenn Treadwell, Environmental Specialist, EPD (via email)
Charles Tarbutton, President, B-H Transfer (via email)
Dan Wallace, P.E., Triple Point Engineering (via email)
Louie Gao, P.E., TetraTech (via email)

Exhibit A

STANDARD TRUCKLOAD BILL OF LADING

Page _____

SHIP FROM

Name: BH Transfer Transload Site Location#:_____

Address: 2037 Waco Mill Rd

City/State/Zip: Sandersville, GA 31082

SID# FOB:

SHIP TO

Name: Wolf Creek Landfill

Address: 911 Landfill Rd

City/State/Zip: Dry Branch, GA 31020

CID# FOB:

THIRD PARTY FREIGHT CHARGES BILL TO:

Bill of Lading Number: _____

CARRIER NAME: B-H Transfer Co

Trailer number: 656 PO Number:

Seal number(s): Delivery Note:

SCAC: BHTF

Pro number:

Freight Charge Terms: (freight charges are prepaid unless marked otherwise)

Prepaid _____ Collect_____ 3rd Party_____

SPECIAL INSTRUCTIONS: DELIVER:

Master Bill of Lading with attached underlying Bills of Lading (check)

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER #	# PKGS	WEIGHT	PALLET/SHIP		ADDITIONAL SHIPPER INFO		
	1	41,160	Y	N	**RAILCAR#**		
			Y	N			
			Y	N	**RAILCAR#**		
			Y	N			
GRAND TOTAL							

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION			
						GROSS:	**70,900**		**SODA ASH WASTE**
						TARE:	**29,740**		
						NET:	**41,160**		
									RECEIVING
									STAMP SPACE
						TOTAL			

Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care.

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____"

COD Amount: $ _____

Fee Terms: Collect: _____ Prepaid: _____

Customer check acceptable: _____

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. §14706(c)(1)(A) and (B)

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper. If applicable, otherwise to the rates classifications and rules that have been established by the carrier and are available to the shipper, on request, and to the terms and conditions set forth on the reverse side here on as well as to all applicable state and fedral regulations.

The carrier shall not make deliver of this shipment without payment of freight and all other lawful charges.

Shipper Signature:

SHIPPER SIGNATURE/DATE

5/6/24

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper conditon for transportation according to the applicable regulations of the DOT.

Trailer Loaded:

_____ By Shipper

_____ By Driver

Freight Conted:

_____ By Shipper

_____ By Driven pallets said to contain

_____ By Driver/Pieces

CARRIER SIGNATURE/PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response quidebook or equivalent: documentation in the vehicle. Property described above is received in apparent good order, except as noted.

03:49 pm 05-03-2024

Truck Scale 1
B-H Transfer Co
750 Sparta Road
Sandersville, GA 31082
478-552-5119

Loop ID 393654

70900	lbGROSS
29740	lbTARE
41160	lbNET

Wolf Creek Landfill
911 Landfill Road
Dry Branch, GA 31020
Telephone: (478) 945-6713

Profile No.
(# AWC13044)

WASTE SHIPMENT TRACKING DOCUMENT

Generator Name: *B-H Transfer* Contact: *Keith Johnson*

Generator Address: *750 Sparta Road*
Sandersville, GA 31082

Telephone: *(478)552-5119* **Fax:**

Description of Waste: *Tank Wash Sediment* / SODA ASH WASTE

Location of Waste: *750 Sparta Road*
Sandersville, GA 31082

Date Shipped: 5/6/24

Quantity Shipped: 41,160 lbs.

Certification: I certify the waste described above is the waste represented by the Solid Waste Characterization Application (SWCA) of the same Profile Number (AWC13044) and no regulated hazardous waste has been introduced into the waste.

Generator's Signature: DJ Date: 5/6/24

Transporter: ***B-H Transfer*** Contact: ***Keith Johnson***
Address: ***750 Sparta Road, Sandersville, GA 31082***
Telephone: ***(478)552-5119***

Certification: I certify no regulated hazardous waste was introduced into the waste while in my custody:
Hauler's Signature: DJ Date: 5/6/24

Landfill facility: Wolf Creek Landfill- 911 Landfill Rd Dry Branch, GA 31020

Virginia Villatoro- General Manager _____

Exhibit B

May 7, 2024

Ms. Wendy Troemel
Chemicals Permitting Unit
Stationary Source Permitting Program
Georgia EPD - Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Re: **B-H Transfer Company**
Air Permitting Evaluation

Dear Ms. Troemel,

On behalf of B-H Transfer Company (B-H Transfer), Tetra Tech is submitting this air permit evaluation to EPD in response to an industrial stormwater complaint investigation performed by EPD on February 16, 2024. This investigation required B-H Transfer to complete an air permitting assessment to determine if an air permit is needed for the facility.

1) Facility Description and Equipment List

B-H Transfer is a truckload motor carrier primarily focused on importing and exporting shipments of various industrial products and rail-to-truck transloading operations. The facility is located at 750 Sparta Road, Sandersville, GA 31082 in Washington County. The following is a list of all sources at the facility that could potentially be subject to air permitting requirements:

a) Three (3) mobile transloading conveyors that operate within the facility transloading primarily soda ash between railcars and trucks. A brief description of each conveyor is provided below. See Attachment B for the detailed manufacturer specifications.

   i. One (1) mobile Rail Barge Truck (RBT) 2450 Conveyor is equipped with a 49 horsepower (hp) Hatz 3L41C engine that supplies power to the conveyor belt, a conveyor cover and telescoping chute to minimize fugitive dust emissions, a dust collector with a control efficiency of 99% and an exit gas flow rate of 600 cubic feet per minute (cfm).

   ii. One (1) mobile RBT 2450 Conveyor is equipped with a 42 hp Kohler KD11903TCR engine that supplies power to the conveyor belt, a conveyor cover and telescoping chute to minimize fugitive dust emissions, and a dust collector with a control efficiency of 99% and an exit gas flow rate of 600 cfm.

   iii. One (1) mobile Wilson Manufacturing 24-in Conveyor is equipped with a 50 hp Yanmar engine that supplies power to the conveyor belt, a conveyor cover and telescoping chute to minimize fugitive dust emissions, and a dust collector with a control efficiency of 99% and an exit gas flow rate of 600 cfm.

b) Two (2) mobile vacuum trucks that operate within the facility transloading plastic pellets between railcars and trucks. The transfer process is operated in a closed pneumatic system equipped with a cyclone resulting in little to no fugitive emissions.

c) Two (2) mobile transloading trucks that operate within the facility transloading bulk dry products that include fine particle size materials (e.g., kaolin and calcium carbonate). The transfer process is completed in a closed pneumatic system resulting in little to no fugitive emissions.

d) Approximately 15 to 20 loading trucks used to transport products to and from B-H Transfer and offsite client facilities via public roads.

e) Approximately 50 railcars used to transport shipments of product to and from B-H Transfer and offsite client facilities via rail.

f) One (1) 500-gallon diesel storage tank used to fuel the mobile transload conveyors.

2) Assessment of State Permitting Regulation Exemptions

In this section of our assessment, the above-referenced equipment are compared to select potentially applicable exemptions excerpted from Georgia Rule Chapter 391-3-1(6). These exemptions are not used to avoid any emissions limitations or standards of the Rules for Air Quality Control Chapter 391-3-1.02, lower the potential to emit below "major source" thresholds or to avoid any "applicable requirements" (i.e., NSPS, NESHAP, etc.) as defined in 40 CFR 70.2.

a) **500-gallon Diesel Storage Tank**

The following exemption was considered for the 500-gallon diesel storage tank:

Georgia Rule Chapter 391-3-1(6)(c)3, Storage Tanks: *All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.*

The volume of the 500-gallon diesel storage tank used to fuel the equipment engines is less than the threshold capacity of 10,000 gallons and is exempt from permitting.

b) **Loading Trucks and Railcars**

The following exemption was considered for the loading trucks and railcars used to transport product to offsite client facilities:

Georgia Rule Chapter 391-3-1(6)(a) defines *"Mobile Sources such as automobiles, trucks, buses, locomotives, airplanes, boats and ships, whether or not designated as subject to mandatory inspection, maintenance, or emission requirements pursuant O.C.G.A. Section 12-9-40, et seq., as amended, the Georgia Motor Vehicle Emissions Inspection and Maintenance Act." Further, m*obile sources are also defined in **40 CFR Part 51.491** as any *"on-road vehicles (e.g., automobiles, trucks, and motorcycles) and nonroad vehicles (e.g., trains, airplanes, agricultural equipment, industrial equipment, construction vehicles, off-road motorcycles, and marine vessels)."*

Loading trucks meet the definition of mobile sources and are classified as on-road vehicles. Therefore, the loading trucks are exempt from permitting.

Railcars also meet the definition of mobile sources and are classified as nonroad vehicles. Therefore, the rail cars are exempt from permitting.

c) **Transloading Equipment**

The following exemptions were considered for the mobile transloading conveyors, mobile vacuum trucks, and mobile transloading trucks located onsite:

i. **Georgia Rule Chapter 391-3-1(6)(a)** defines *"Mobile Sources such as automobiles, trucks, buses, locomotives, airplanes, boats and ships, whether or not designated as subject to mandatory inspection, maintenance, or emission requirements pursuant O.C.G.A. Section 12-9-40, et seq., as amended, the Georgia Motor Vehicle Emissions Inspection and Maintenance Act." Further, m*obile sources are also defined in **40 CFR Part 51.491** as any *"on-road vehicles (e.g., automobiles, trucks, and motorcycles) and nonroad vehicles (e.g., trains, airplanes, agricultural equipment, industrial equipment, construction vehicles, off-road motorcycles, and marine vessels)."*

ii. ***Georgia Rule Chapter 391-3-1(6)(i)6 Sources of minor significance as specified by the Director:*** *EPD issued a memorandum dated June 11, 2018 addressing an* ***Air Quality Permitting Exemption for Nonroad Engines*** *that states that nonroad engines, as defined in 40 CFR 89.2, are engines that are portable but not used for transportation purposes themselves.* See Attachment C for the signed memorandum.

iii. ***Georgia Rule Chapter 391-3-1(6)(i)1 -*** *Facilities where the combined emissions from all non-exempt source activities [i.e., not listed in 391-3-1-.03(6)(a)-(h)] are below the following for all pollutants:*

(i) 50 tons per year of carbon monoxide;

(ii) 300 pounds per year of lead total: with a 3.0 pound per day maximum emission;

(iii) 20 tons per year of particulate matter, PM_{10}, or sulfur dioxide;

(iv) 20 tons per year of nitrogen oxides or VOC's except in the counties of Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, or Rockdale, where less than 5 tons per year of nitrogen oxides or VOCs is exempted; and

(v) 2 tons per year total with a 15 pound per day maximum emission of any single hazardous air pollutant and less than 5 tons per year of any combination of hazardous of air pollutants.

The mobile transloading equipment are wheeled and therefore portable. The equipment is moved about the site as needed to handle product. Therefore, the engines associated with moving this equipment about the site are regarded as mobile sources and are therefore exempt from permitting. Since B-H Transfer is located in Washington County, the mobile equipment are not required under Georgia Rule 391-3-20 to perform periodic inspections pursuant to O.C.G.A. Section 12-9-40.

Fugitive dust emissions are generated by the handling of the materials. For all of the transloading equipment, these emissions are minimal due to the equipment design. For the purposes of this assessment, these emissions sources were assumed to be stationary and the emissions from these sources were conservatively calculated and compared to the exemption thresholds.

Each of the three transloading conveyors is equipped with a diesel engine as described above that supplies power to the conveyor belt. These engines are small, ranging from 42 to 50 hp, and are used only for short periods of time. These engines are portable but not used for transportation purposes themselves and are therefore classified as nonroad engines exempt from permitting per the EPD memorandum. Further, these engines are exempt from the requirements of the New Source Performance

Standards (NSPS) 40 CFR Part 60 IIII, 40 CFR Part 60 JJJJ, and National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 ZZZZ, which is aligned with the EPD memorandum. Despite these engines meeting the exemption, emissions from them were calculated and compared to the exemption thresholds.

As seen in Table 1 below, the total emissions for all sources not defined as otherwise exempt are less than the permitting thresholds for all pollutants. Therefore, all of the transloading equipment is exempt from permitting. See Attachment A for detailed potential emissions calculations, which assumes all equipment operates 8,760 hours per year, and emission factor sources.

Table 1: Non-Exempt Source Emissions Calculations

Equipment	CO	NO_x	PM*	SO_2	VOC	Pb	Single HAP	Total HAPs
RBT 2450 Conveyor No. 1			0.49					
Hatz 3L41C Engine	*1.18*	*5.15*	*0.15*	*0.003*	*0.15*	*0.00*	*0.0056*	*0.02*
RBT 2450 Conveyor No. 2			0.31					
Kohler KD11903TCR Engine	*1.01*	*4.42*	*0.13*	*0.002*	*0.13*	*0.00*	*0.0048*	*0.01*
Wilson Manufacturing 24-in Conveyor			0.31					
Yanmar Engine	*1.20*	*5.26*	*0.15*	*0.003*	*0.15*	*0.00*	*0.0057*	*0.02*
Total Emissions:	**3.40**	**14.82**	**1.55**	**0.01**	**0.44**	**0.00**	**0.02**	**0.05**
GA Rule 391-3-1(6)(i)1 Thresholds:	**50**	**20**	**20**	**20**	**20**	**0.15**	**2.00**	**5.00**

3) Federal Regulation Applicability

NSPS require new, modified, or reconstructed emissions sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. NESHAP are emission standards for HAPs and only apply to major sources of HAP or specifically designated area sources. Below is a list of federal regulations that potentially apply to emissions sources at B-H Transfer with assessment of the applicability of the rule provided:

a) ***NSPS Subpart OOO – Nonmetallic Mineral Processing Plants*** *regulates PM emissions from affected units in a fixed or portable nonmetallic mineral processing plant: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, and enclosed truck or railcar loading station.*

B-H Transfer is exempt from the requirements of NSPS Subpart OOO §60.670(a)(2) because the facility does not operate crushers or grinding mills.

b) ***NSPS Subpart IIII – Stationary Compression Ignition Internal Combustion Engines and NSPS Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines*** *applies to stationary internal combustion engines based on the date each engine was constructed, reconstructed, or modified.*

As stated in Georgia Rule Chapter 391-3-1(6)(i)6 Sources of minor significance as specified by the Director – Air Quality Permitting Exemption for Nonroad Engines (Attachment C), the portable diesel engines are nonroad engines which are specifically exempt from the requirements of 40 CFR 60 IIII and 40 CFR 60 JJJJ.

c) ***NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines*** *applies to new stationary internal combustion engines regardless of the major or minor HAP source status of the facility.*

As stated in Georgia Rule Chapter 391-3-1(6)(i)6 Sources of minor significance as specified by the Director – Air Quality Permitting Exemption for Nonroad Engines (Attachment C), the portable diesel engines are nonroad engines which are specifically exempt from the requirements of 40 CFR 63 ZZZZ.

4) Conclusion

Our assessment of the facility equipment and operation concludes that the facility would not require an air permit. Furthermore, the sources at the facility are not subject to any federal or state regulations that would require the facility to meet applicable compliance requirements. Nevertheless, B-H Transfer still utilizies best management practices (e.g, employing enclosed conveyer systems with dust collectors and telescoping chutes, utilizing watering trucks, limiting engine idling time, shutting down equipment when not in use, etc.) to limit and reduce the amount of fugitive emissions released during material transfer operations.

If you have any questions regarding this air permit assessment, please reach out to me at (412) 944 – 5387.

Sincerely,

Louie Gao
Senior Environmental Engineer
Tetra Tech Inc.

Attachments
A. Emissions Calculations
B. Manufacturer Specifications
C. Memorandum - Air Quality Permitting Exemption for Nonroad Engines

Cc: Charles Tarbutton, B-H Transfer, President
Judson Turner, GHSM, Attorney
Sean Hayes, GA EPD, East District Program Manager
Wendy Troemel, GA EPD, Stationary Source Chemical Permitting Manager
Steve Allison, GA EPD, Stationary Source Program Manager

ATTACHMENT A: EMISSIONS CALCULATIONS

Facility-Wide Emissions
B-H Transfer Company

Pollutant	Diesel Engines	Conveyors	Total Emissions	Georgia Rule 391-3-1(6)(i)1 Exemption Limit	Exceeds Limit?
	(tpy)	(tpy)	(tpy)	(tpy)	
CO	3.40		3.40	50.0	NO
NOx	14.82		14.82	20.0	NO
PM	0.43	1.12	1.55	20.0	NO
PM_{10}	0.43	1.12	1.55	20.0	NO
$PM_{2.5}$	0.43	1.12	1.55	20.0	NO
SO_2	0.01		0.01	20.0	NO
VOC	0.44		0.44	20.0	NO
Pb	0.00		0.00	0.15	NO
Single HAP	1.60E-02		0.02	2.00	NO
Total HAPs	0.05		0.05	5.00	NO

Conveyor Emissions
B-H Transfer Company

Equipment Description	Manufacturer Year	Control Device	Hours of Operation	Stack Emission Limit [1]	Moisture Content	Ambient Temp	Exit Gas Flowrate [2]		PM/ PM_{10}/ $PM_{2.5}$ [3]
			(hrs)	(gr/dscf)	(%)	(F)	(acfm)	(dscfm)	(tpy)
Rail Barge Truck 2450 Conveyor No. 1	2003	Bin Vent	8,760	0.022	1%	70	600	594	0.491
Rail Barge Truck 2450 Conveyor No. 2	2009	Bin Vent	8,760	0.014	1%	70	600	594	0.312
Wilson Manufacturing 24-inch Conveyor	2023	Bin Vent	8,760	0.014	1%	70	600	594	0.312

Notes:

[1] Table 2 to Subpart OOO of Part 60 - Stack Emission Limits for Affected Facilities with Capture Systems.
PM Limit for units that commenced constructure, modification or reconstruction after **August 31, 1983** but before **April 22, 2008**.
PM Limit for units that commenced constructure, modification or reconstruction on or after **April 22, 2008**.

*Please note that these conveyors are **not** subject to the PM limits in Subpart OOO. The stack emission limits are being used as conservative references to help estimate potential emissions. In addition, the conveyor belts are covered and equipped with a dust collector and telescoping chute. Therefore, the calculations are considered representative.

[2] Exit Gas Flow Rate (dscfm) = Exhaust Gas Flow Rate (acfm) * (1 - Moisture) * ((450 + 70)/(450 + Temperature)))

[3] PM Emissions = Emission Limit (gr/dscf) * Exhaust Gas Flowrate (dscfm) * 60 min/hr / 7,000 gr/lb * Hours of Operation (hr/yr) / 2,000 lb/ton

Diesel Generators Emissions
B-H Transfer Company

Equipment Parameters				
Equipment Description		**RBT 2450 Conveyor No. 1**	**RBT 2450 Conveyor No. 2**	**Wilson Manufacturing 24-inch Conveyor**
Engine Type		**Hatz 3L41C**	**Kohler KD11903TCR**	**Yanmar**
Engine Size		**49 hp**	**42 hp**	**50 hp**
Hours of Operation		**8760 hrs**		
Emissions Calculations				
Pollutant		**Emission Factor**	**Emissions**	
		(lb/hp-hr)	**(tpy)**	**(tpy)**	**(tpy)**
Criteria Pollutants [1]	CO	5.50E-03	1.18	1.01	1.20
	NOx	2.40E-02	5.15	4.42	5.26
	PM	7.00E-04	0.15	0.13	0.15
	PM_{10}	7.00E-04	0.15	0.13	0.15
	$PM_{2.5}$	7.00E-04	0.15	0.13	0.15
	SO_2	1.21E-05	0.003	0.002	0.003
	VOC	7.05E-04	0.15	0.13	0.15
	Pb	0.00E+00	0.00	0.00	0.00
		(lb/MMBtu)	**(tpy)**	**(tpy)**	**(tpy)**
HAPs [2,3]	Acetaldehyde	2.52E-05	1.81E-04	1.55E-04	1.85E-04
	Acrolein	7.88E-06	5.66E-05	4.85E-05	5.78E-05
	Benzene	7.76E-04	5.57E-03	4.78E-03	5.69E-03
	Formaldehyde	7.89E-05	5.67E-04	4.86E-04	5.78E-04
	Naphthalene	1.30E-04	9.34E-04	8.00E-04	9.53E-04
	PAH (Total)		4.92E-03	4.22E-03	5.02E-03
	Acenaphthene	4.68E-06	3.36E-05	2.88E-05	3.43E-05
	Acenaphthylene	9.23E-06	6.63E-05	5.68E-05	6.77E-05
	Anthracene	1.23E-06	8.84E-06	7.57E-06	9.02E-06
	Benz(a)anthracene	6.22E-07	4.47E-06	3.83E-06	4.56E-06
	Benzo(a)pyrene	2.57E-07	1.85E-06	1.58E-06	1.88E-06
	Benzo(b)fluoranthene	1.11E-06	7.97E-06	6.83E-06	8.14E-06
	Benzo(g,h,l)perylene	5.56E-07	3.99E-06	3.42E-06	4.08E-06
	Benzo(k)fluoranthene	2.18E-07	1.57E-06	1.34E-06	1.60E-06
	Chrysene	1.53E-06	1.10E-05	9.42E-06	1.12E-05
	Dibenz(a,h)anthracene	3.46E-07	2.49E-06	2.13E-06	2.54E-06
	Fluoranthene	4.03E-06	2.89E-05	2.48E-05	2.95E-05
	Fluorene	1.28E-05	9.19E-05	7.88E-05	9.38E-05
	Indeno(1,2,3,-d)pyrene	4.14E-07	2.97E-06	2.55E-06	3.03E-06
	Naphthalene	1.30E-04	9.34E-04	8.00E-04	9.53E-04
	Phenanthrene	4.08E-05	2.93E-04	2.51E-04	2.99E-04
	Pyrene	3.71E-06	2.67E-05	2.28E-05	2.72E-05
	Toluene	2.81E-04	2.02E-03	1.73E-03	2.06E-03
	Xylenes	1.93E-04	1.39E-03	1.19E-03	1.41E-03
		Total HAPs:	**0.02**	**0.01**	**0.02**

References:

[1] AP 42 Section 3.4 Table 3.4-1 for criteria pollutants.

[2] AP 42 Section 3.4 Table 3.4-3 for hazardous air pollutants (HAP).

[3] AP 42 Section 3.4 Table 3.4-4 for polycyclic aromatic hydrocarbons (PAH).

Conversions:

1 hp = 0.0335 MMBtu/hr

Sulfur content is 0.15%.

ATTACHMENT B: MANUFACTURER SPECIFICATIONS

MOBILE BELT CONVEYOR

MODELS 1850 & 2450

FEATURES:

- ONE MAN OPERATION
- TWO WHEEL DRIVE w/ FOUR WHEEL STEERING
- HEAD DRIVE w/ 12" TAKEUP
- 4" OR 5" THICK LOW PROFILE TAIL
- FULLY ENCLOSED TROUGH
- 440/220V 3 PH POWER 27 AMPS / 54 AMPS
- 600 cfm DUST COLLECTOR w/ AUTOMATIC SHAKER
- FLEXIBLE LOADOUT SPOUT w/ HAND WINCH
- LOCALIZED LIGHTING FOR NIGHT OPERATION
- WHITE FOOD GRADE BELT
- HEAVY DUTY BEARINGS
- STAINLESS STEEL SEALED BEARING IDLERS
- SHIPS LEGAL ON GOOSENECK TRAILER
- MODEL 1850 RATED @ 45 - 65 TONS PER HOUR @ 100 LBS. PER CUBIC FT.
- MODEL 2450 RATED @ 75 - 100 TONS PER HOUR @ 100 LBS. PER CUBIC FT.

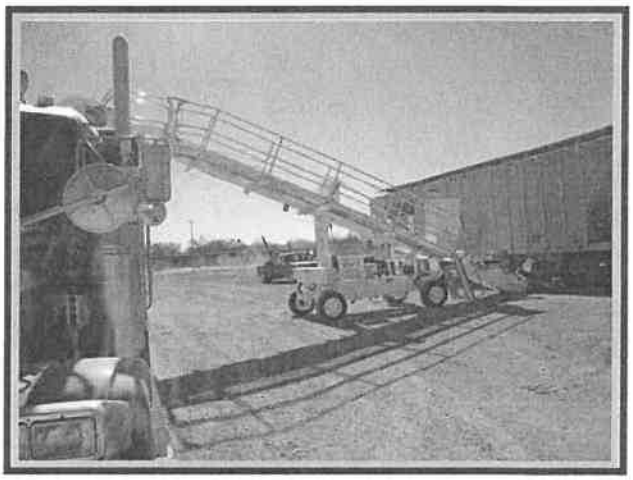
OPTIONS:

- FOUR WHEEL DRIVE
- LARGER DUST COLLECTORS (2000 CFM)
- STAINLESS STEEL CONVEYOR
- DIESEL POWER
- HYDRAULIC VIBRATORS
- BELT SCALE w/ +/- 1 TO 2% ACCURACY DEPENDING ON COMMODITY, FLOW CHARACTERISTICS, MOISTURE, AND DENSITY
- 6 FT. EXTENSION TO REACH TOP OF RAILCARS FOR RAILCAR LOADING

USES:

LOADING / UNLOADING OF SMALL PARTICLES SUCH AS:

- SAND, SODA ASH, PEBBLE LIME, ROOFING GRANULES, AND SALT

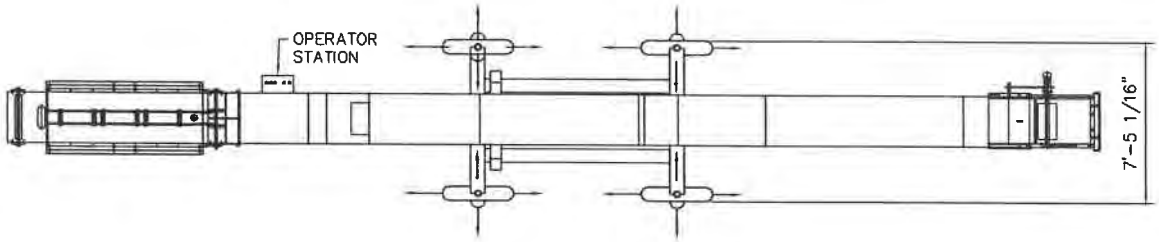


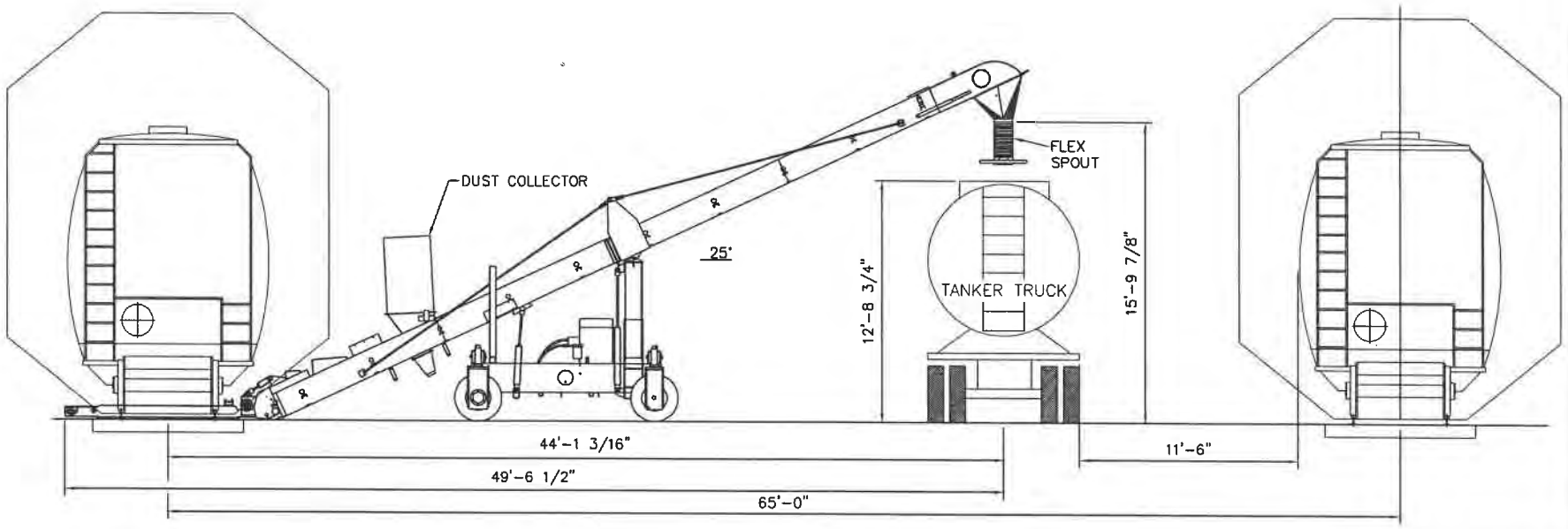
CONTACT RBT FOR ALL YOUR TRANSFER PROJECTS

RAIL BARGE TRUCK SERVICES, INC.

218 CORPORATE DR.
ELIZABETHTOWN,KY 42701
PHONE: (270) 763-6649
FAX: (270) 763-6653
web site: www.rbtsi.com
e-mail: sales@rbtsi.com

CVI15
REV. DATE: 04/15





MODEL #1850, MODEL #2450

REV. #	DATE:	DESCRIPTION:	BY:

RAIL BARGE TRUCK SERVICES, INC.
218 CORPORATE DRIVE
ELIZABETHTOWN, KY 42701
PHONE: (270) 763-6649
FAX: (270) 763-6653
e-mail: sales@rbtsi.com

DESCRIPTION:

STANDARD RBT CONVEYOR ELEVATION FOR MODELS 1850 & 2450 BELT CONVEYOR

DRAWN BY: SWD	DRAWN DATE: 01/22/01	APPROVED BY:	APPROVED DATE:
CHECKED BY: RDB	CHECKED DATE: 01/22/01	SHEET NUMBER:	OF
CUSTOMER:		JOB NO: SALES DRAWING	SCALE: NONE
LOCATION:		DWG NO: 1850-2450-GA	

Wilson Conveyor Manufacturer Specification

- **Conveyor**
  - ¼” Mild steel plate x 25” wide
  - Flexible adjustable load-out spout
  - Hydraulic head drive
  - Vulcanized lagged drive pulley
  - Electronic proximity overfill sensor
  - Intermediate section cleanout door
  - Full aluminum covers
  - Lights for night operation
  - Bend section clean-out doors
  - Dual tail section clean-out doors
- **Articulated Tail**
  - Low profile overtrack tail
  - Adjustable feed opening by hand gate
  - Internal rubber skirting
  - 24” U.H.M.W. Wear liner
- **Dust collector**
  - Rating: 600 CFM 99% @ 1 micron
  - Automatic power shaker
- **Finish**
  - Sandblasted to SP6 finish
  - Primed with a rust inhibitive primer
  - Low VOC, high performance, two component paint
- **Transportable**
  - Detachable goose-neck trailer in one complete unit, with proper head and tail support.

Yanmar Engine Manufacturer Specifications

4TNV88C

SPECIFICATION

Engine model	4TNV88C
Version	VM
Type	Vertical in-line diesel engine (Common rail system)
Combustion system	Direct injection (DI)
Aspiration	Naturally aspiration
No. of cylinders	4
Bore × stroke	ø88 × 90 mm
Displacement	2.189 L
Max. rated output (Gross)	3000 min^{-1}
	35.5 kW
	48.3 PS
High idling	3150 ± 25 min^{-1}
Engine weight (Dry) *1	220 kg
PTO position	Flywheel end
Direction of rotation	Counterclockwise viewed from flywheel end
Cooling system	Liquid-cooled with radiator
Lubricating system	Forced lubrication with trochoid pump
Normal oil pressure at rated engine speed	0.31 - 0.46 MPa
Normal oil pressure at low idle speed	0.06 MPa or greater
Starting system	Electric starting (Starter motor: DC 12 V - 1.7 kW) *3
	Alternator (12 V - 55 A) *3
	Recommended battery capacity: 12 V 622CCA *3
Dimensions (L × W × H)	Depend on DPF layout
Engine oil pan capacity *2	7.4/4.0 L (Dipstick upper limit/lower limit)
Engine coolant capacity *4	2.7 L (Engine only)
Standard cooling fan	ø370 pusher *3
Crank V-pulley dia./fan V-pulley dia.	ø110/ø110 mm *3
Top clearance	0.73 ± 0.06 mm

*1: Engine specifications without radiator.
*2: Engine oil capacity for a "Deep Standard" oil pan. Refer to the operation manual provided by the driven machine manufacturer for the engine lubricating oil capacity for replacement.
*3: May vary depending on application.
*4: Engine coolant capacity does not include the capacity for the radiator and reserve tank. Refer to the operation manual provided by the driven machine manufacturer for the engine coolant capacity for replacement.

ATTACHMENT C: NONROAD EXEMPTION MEMO

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch
4244 International Parkway
Suite 120
Atlanta, Georgia 30354
404-363-7000

DATE: June 11, 2018

TO: Karen Hays, Air Protection Branch Chief

FROM: Richard E. Dunn, Director

SUBJECT: Air Quality Permitting Exemption for Nonroad Engines under Subparagraph 391-3-1-.03(6)(i)6. of the Georgia Rules for Air Quality Control

Nonroad engines, as defined in 40 CFR 89.2, are engines that are portable but not used for transportation purposes themselves. Nonroad engines are specifically exempt from federal NSPS 40 CFR 60 IIII, 40 CFR CFR JJJJ, and NESHAP 40 CFR 63 ZZZZ. Furthermore, the Federal Clean Air Act, Section 302(z), specifically exempts nonroad engines from the definition of Stationary Source.

Portable diesel or gasoline-fired electrical generators typically meet this definition. Such engines are used for short periods of time in situations where connecting to the grid is not feasible. Issuing air quality permits for these short-term sources of limited use is not practical and provides no air quality benefit.

Given the temporary nature of nonroad engines, in both location and operation, and that there are no federal requirements to issue permits for these sources, nonroad engines are hereby specified as sources of minor significance and exempt from permitting as allowed in subparagraph 391-3-1-.03(6)(i)6. of the Georgia Rules for Air Quality Control.