



ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Hamid Yavari
FROM: Mohamed Abdalla
DATE: October 3, 2018

Facility Name: **Ballard Contractors**
AIRS No.: 30100020
Location: Warrenton, Georgia (Warren County)
Application #: 26734
Date of Application: September 20, 2017

Background Information & Purpose of Application

Ballard Contractors submitted Application No. 26734 for permission to operate a ready mix concrete batch plant in Warrenton, Georgia (Warren County). The company is based in Alabama and intends to operate at this site for about six months. Upon completion of its project, the company may apply for a state-wide permit to move the batch plant to a new project location in Georgia. Also, the company submitted a Permit by Rule (PBR) Application and requested a production limit of 600,000 cubic yards of concrete per year.

Emissions Summary

Emissions from the plant will include particulate matter (PM) from materials handling, mixing, storage and on-site traffic. Particulate matter (PM), consisting primarily of cement, aggregate and sand dust emissions from concrete batch mixing process, is the primary pollutant of concern. The facility will use baghouses CDC & HDC to control PM emissions from the entire process. Compliance with Rules 391-3-1-.02(2)(e) and (b) is inherent with respect to the expected exhaust PM emissions.

Regulatory Applicability

The PM emissions from this concrete batch mixing plant will be subject to Georgia Rule 391-3-1-.02(2)(e) – “Particulate Emissions from Manufacturing Processes”. Visible emissions from this plant will be subject to the opacity limit in Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions”. Georgia Rule 391-3-1-.02(2)(n) – “Fugitive Dust” will regulate fugitive emissions from this plant. Also, the Permittee asked for a PBR per GA Rule 391-3-1-.03(11)(b)4.

Permit Conditions

Various conditions in this proposed permit incorporate applicable emission and operating limitations as well as monitoring, maintenance, reporting and record keeping requirements to ensure that facility is in compliance with GA Air Quality Rules (b), (e), and (n) .

Conditions No. 1.1 through 1.5 are template conditions establishing general requirements for the operation of the source.

Condition No. 2.1 establishes PM emission limit.

Condition No. 2.2 incorporates the opacity limit for PM emissions under Rule 391-3-1-.02(2)(b).

Both the above conditions also ensure the compliance with the applicable PM emission limits in Rule 391-3-1-.02(2)(e) established by Condition No. 2.3.

Condition No. 2.4 requires the Permittee to operate the plant by electricity only.

Condition No. 2.5 limits the facility production to no more than 600,000 cubic yards of concrete during any twelve consecutive months.

Condition No. 3.1 is one of the Vault Conditions developed by the Division for implementing the fugitive emission requirements under Rule (n).

Conditions No. 4.1, 4.2 and 4.3 ensure proper function of the control devices and the compliance of the pertinent emission limits. These are standard conditions in permits issued recently to similar facilities.

Condition No. 5.1 also ensures proper function of the control devices and the compliance of the pertinent emission limits.

Condition No. 6.1 is a template condition for performance testing.

Condition No. 8.1 requires the Permittee to allow additional controls if the Division requires them.

Condition No. 8.2 requires the Permittee to keep the original or complete copies of permits at the facility.

Summary & Recommendations

A public advisory was issued for this source. It expires on November 2, 2018.

I recommend issuing Air Quality Permit **No. 3273-301-0020-R-01-0** to Ballard Contractors.