

# Walton County Department Agenda Request

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Department Name: **Walton County Planning & Development**

Department Head/Representative: **Kristi Parr**

Meeting Date Request: **April 14, 2026**

Has this topic been discussed at past meetings? **No**

If so, When?

TOPIC: **Solid Waste Handling Permit for proposed Air Curtain Destructor Facility at existing Preston Inert Landfill (Public Hearing)**

Wording For Agenda: **Solid Waste Handling Permit for proposed Air Curtain Destructor Facility at existing Inert Landfill located at 2351 Preston Road, Good Hope, Georgia (Public Hearing)**

This Request: **Informational Purposes Only**

**Needs Action by Commissioners\* Yes**

\*What action are you seeking from the Commissioners? **Approval of proposed air curtain destructor facility at Preston Inert Landfill so it can be sent to Solid Waste Management Program (Georgia Environmental Protection Division)**

Department Comments/Recommendation: **Approval**

Additional Documentation Attached?

Is review of this request or accompanying documentation by the County Attorney required? **No**

If so, has a copy of the documentation been forwarded to County Attorney? **N/A**

Date forwarded to County Attorney: **N/A**

Has the County Attorney review been completed? **N/A**

If this request involves the expenditure of county funds, please answer the following:

Approved in current budget? **N/A**

Budget information attached? **N/A**

Comments: **N/A**

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Purchasing Department Comments:

County Attorney Comments:

Chairman's Comments:



Walton County Board of Commissioners  
111 South Broad Street  
Monroe, Georgia 30655  
770/267-1301  
[www.waltoncountyga.gov](http://www.waltoncountyga.gov)

April 14, 2026

Mr. William Cook, Program Manager  
Solid Waste Management Program  
Georgia Environmental Protection Division  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354

**RE: EPD-approved D&O Plan  
Proposed Air Curtain Destructor Facility  
Preston Inert Landfill, LLC  
Walton County, Georgia  
Permit By Rule No. PBR-147-35IL**

Dear Mr. Cook:

In my official capacity as Chairman of the Walton County Board of Commissioners, I have reviewed the approved Regional Solid Waste Management Plan adopted by the Northeast Georgia Regional Solid Waste Management Authority in October 2021 and determined that the Design & Operation (D&O) Plan, as approved by the Georgia Environmental Protection Division (EPD) on January 30, 2026 (GEOS Submittal ID 964992) for the proposed air curtain destructor facility at the Preston Inert Landfill, located at 2351 Preston Road, Good Hope, Georgia, is consistent with that plan originally certified at the time of the application on February 6, 2025 (GEOS Submittal ID 831390).

Sincerely,

Mr. David G. Thompson, Chairman  
Walton County Board of Commissioners



**Walton County Board of Commissioners**  
**111 South Broad Street**  
**Monroe, Georgia 30655**  
**770/267-1301**  
**[www.waltoncountyga.gov](http://www.waltoncountyga.gov)**

April 14, 2026

Mr. William Cook, Program Manager  
Solid Waste Management Program  
Georgia Environmental Protection Division  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354

**RE: EPD-approved D&O Plan**  
**Proposed Air Curtain Destructor Facility**  
**Preston Inert Landfill, LLC**  
**Walton County, Georgia**  
**Permit By Rule No. PBR-147-35IL**

Dear Mr. Cook:

The Design & Operation (D&O) Plan, as approved by the Georgia Environmental Protection Division (EPD) on January 30, 2026 (GEOS Submittal ID 964992) for the proposed air curtain destructor facility at the Preston Inert Landfill, located at 2351 Preston Road, Good Hope, Georgia, complies with local zoning and land use ordinances originally certified at the time of the application on February 6, 2025 (GEOS Submittal ID 831390).

Sincerely,

Mr. David G. Thompson, Chairman  
Walton County Board of Commissioners



**Jeffrey W. Cown, Director**

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**Land Protection Branch**

4244 International Parkway  
Suite 104  
Atlanta, Georgia 30354  
404-362-2537

January 30, 2026

Mr. Josh Lee Evans, Managing Member  
Preston Inert Landfill, LLC  
932 N 2nd Avenue  
Rome, Georgia 30165

**SUBJECT: Walton County, Preston Inert Landfill  
Permit Number PBR147-035IL  
Proposed Air Curtain Destructor Facility  
Major Modification Request – D&O Plan  
Notification of Design and Operational Plan Review Completion  
SW03 Application Submittal ID 831390  
GEOS Submission ID: 964992**

Dear Mr. Evans:

The Environmental Protection Division (EPD) has completed a review of the Design and Operational (D&O) Plan for the proposed Air Curtain Destructor in Walton County submitted by the County's consultant, Michael Biers, P.E. on January 22, 2026. This letter serves to notify you that it is now appropriate to request letters from the applicable local governments reaffirming that the D&O Plan, as approved by EPD, is in compliance with the:

1. Local zoning and/or land use ordinances, and
2. (Local/regional) solid waste management plan originally certified at the time of the application.

These letters need to be uploaded to the SW05 Public Participation module of GEOS.

In addition to the above, please complete the GEOS SW06 submittal<sup>1</sup> by uploading the required financial responsibility documentation, and sending the original documents to our offices, in care of Keith Stevens.

Lastly, this letter also serves to notify you that it is time to post notice and facilitate a final public hearing in accordance with O.C.G.A. § 12-8-24(d) and Rule 391-3-4-.03(4). Records of the final public hearing notice, public advisory sign display, and the typed transcript of the public hearing will also need to be uploaded to GEOS, to the SW05 Public Participation.

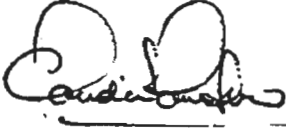
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<sup>1</sup> Ensure that the instrument is associated with the permit application (select the first option under the Application Information \*Purpose of this Financial Assurance submittal)

Preston Inert Landfill  
Permit Number PBR147-035IL  
Proposed Air Curtain Destructor Facility  
Notification of Design and Operational Plan Review Completion  
30-Jan-26  
Page 2 of 2

If you have any questions or require additional information, please contact me at (470) 251-4253.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claudia M. Montero', written over a horizontal line.

Claudia M. Montero, P.E.  
Environmental Engineer  
Permitting Unit - Solid Waste Program

cc: Keith Stevens, Beverly Tipton, Claudia Montero, William Cook, GA EPD  
Derrick Williams, GA EPD NE District - Athens

File: GEOS Submission ID: 964992



***Northeast Georgia Regional  
Solid Waste Management Authority***  
305 Research Drive | Athens, Georgia 30605-2795  
(706) 369-5650 | Fax (706) 369-5792

**Brad Rickard**  
Chairman

August 15, 2024

Josh Evans  
2351 Preston Road  
Good Hope, GA 30641

Re: Preston Inert Landfill – Letter of Consistency Request

To Whom It May Concern,

This letter is provided as a determination of consistency with the Northeast Georgia Regional Solid Waste Management Plan (2021-2031). The review considered a proposal to add the use of a self-contained Incinerator (i.e. air curtain incinerator) that will burn tree trash, yard debris, and other inert waste as an alternative to burying. The project would be located at 2351 Preston Road, Good Hope, Georgia 30641. The Northeast Georgia Regional Solid Waste Management Authority determines that the proposal is consistent with the Regional Solid Waste Management Plan and Walton County's applicable sections within it. Please refer to the attached Final Report for any recommendations associated with the Northeast Georgia Regional Solid Waste Management Authority's determination.

If you have any questions regarding this letter, please contact the Northeast Georgia Regional Commission at (706) 369-5650.

Sincerely,

A handwritten signature in black ink, appearing to read "BRAD RICKARD".

**Brad Rickard**  
Chairman

Historic Walton County Courthouse  
111 South Broad Street  
Monroe, Georgia 30655



(770) 267-1301  
FAX:(770) 267-1400  
[www.waltoncountyga.gov](http://www.waltoncountyga.gov)

## BOARD OF COMMISSIONERS

August 6, 2024

Josh Evans  
2351 Preston Road  
Good Hope, GA 30641

Re: Preston Inert Landfill

To Whom It May Concern,

This letter is provided as a determination of consistency with the Northeast Georgia Regional Solid Waste Management Plan (2021-2031). The review considered a proposal to add the use of a self-contained Incinerator that will burn tree trash, yard debris, and any other inert waste as an alternative to burying. The project would be located at 2351 Preston Road, Good Hope, Georgia 30641. Walton County determines that the proposal is consistent with the Regional Solid Waste Management Plan and Walton County's applicable sections with a recommendation to the applicant that storage areas containing pot ash are covered, lined, or have stormwater retention areas in place to prevent downstream effects of stormwater runoff.

If you have any questions regarding this letter, please contact Walton County Planning & Development at (770) 267-1485.

Sincerely,

A handwritten signature in black ink, appearing to read "David G. Thompson", with a long, sweeping horizontal line extending to the right.

David G. Thompson, Chairman  
Walton County Board of Commissioners



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Jeffrey W. Cown, Director**

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

August 5, 2024

Kyle Cotton  
Operations Manager  
Preston Inert Landfill  
2351 Preston Road  
Good Hope, Georgia 30641

**Re:** Synthetic Minor Application No. 29174, Dated February 1, 2024  
Facility AIRS No.: 297-00062

Dear Mr. Cotton:

Enclosed please find Air Quality Permit No. 2411-297-0062-S-01-0 for the construction and operation of an air curtain burner at Preston Inert Landfill in Good Hope, Georgia.

Note that any future modifications that might affect potential emissions from your facility will require review and possible permitting through this office.

The following types of correspondence should be sent to the Division personnel indicated:

- Testing notices and test results: Dan McCain – Unit Coordinator, Stationary Source Compliance Program
- All other required notifications and reports: Derrick Williams – District Manager, Northeast District, 745 Gaines School Road, Athens, Georgia 30605

Thank you for your cooperation. If you have any questions or need more information, please contact me at 470-604-9525 or via email at [bradley.belflower@dnr.ga.gov](mailto:bradley.belflower@dnr.ga.gov).

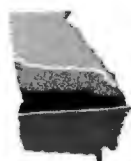
Sincerely,

Bradley Belflower  
Environmental Engineer  
Stationary Source Permitting Program

Enclosure

cc:Nick Irwin

PERMIT NO. 2411-297-0062-S-01-0  
ISSUANCE DATE: 08/05/2024



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

**Facility Name:** Preston Inert Landfill  
**Facility Address:** 2351 Preston Road  
Good Hope, Georgia 30641 Walton County  
**Mailing Address:** 2351 Preston Road  
Good Hope, Georgia 30641  
**Facility AIRS Number:** 04-13-297-00062

is issued a Permit for the following:

**Construction and operation of an AirBurners FireBox Model S330 air curtain burner. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.**

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 29174 dated February 1, 2024; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages.



*Jeffrey W. Cown*

Jeffrey W. Cown, Director  
Environmental Protection Division

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

**Permit No.**  
**2411-297-0062-S-01-0**

**Page 1 of 5**

**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall comply with all applicable provisions of the "New Source Performance Standards" as found in 40 CFR 60, Subpart A, "General Provisions" and 40 CFR 60, Subpart CCCC, "Standards of Performance for Commercial and Industrial Solid Waste Incineration Units" for the operation of the air curtain burner (Source Code: ACB1).  
[40 CFR 60, Subparts A and CCCC]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2411-297-0062-S-01-0**

**Page 2 of 5**

- 2.2 The Permittee shall only burn the following materials for the air curtain burner (Source Code: ACB1):  
[40 CFR 60.2245(b)]
- a. 100 percent wood waste;
  - b. 100 percent clean lumber; and
  - c. 100 percent mixture of only wood waste, clean lumber, and/or yard waste.
- 2.3 The Permittee shall not cause, let, suffer, or allow emissions from the air curtain burner (Source Code: ACB1) the opacity of which is greater than the following:  
[40 CFR 60.2250]
- a. Ten (10) percent (as determined by the average of three 1-hour blocks consisting of ten 6-minutes average opacity value) during operation; and
  - b. Thirty-five (35) percent (as determined by the average of three 1-hour blocks consisting of ten 6-minutes average opacity value) during the startup period that is within 30 minutes of operation.
- 2.4 The Permittee shall limit the total hours of operation for the air curtain burner (Source Code: ACB1) to less than 2,912 hours during any consecutive twelve-month period.  
[391-3-1-.03(2)c]
- 2.5 The Permittee shall not burn "Yard Trimmings" in the air curtain burner (Source Code: ACB1).
- "Yard Trimmings" means leaves, brush, grass, clippings, shrub and tree prunings, discarded Christmas trees, nursery and greenhouse vegetative residuals, and vegetative matter resulting from landscaping development and maintenance other than mining, agricultural, and silvicultural operations.  
[391-3-1-.03(2)(c), 391-3-4-.08(2), and 391-3-4-.01(85)]
- 2.6 The Permittee shall comply with all applicable provisions of 40 CFR 60 New Source Performance Standards (NSPS), Subpart A – "General Provisions" and Subpart III – "Standards for Stationary Compression Ignition Internal Combustion Engines", for the operation of the diesel-fired engine (Source Code: ENG1).  
[40 CFR 60 Subpart III]
- 2.7 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ – "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and the applicable provisions of Subpart A, "General Provisions" as defined in Table 8 of 40 CFR 63 Subpart ZZZZ for operation of the diesel-fired engine (Source Code: ENG1).  
[40 CFR 63 Subpart ZZZZ]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2411-297-0062-S-01-0**

**Page 3 of 5**

**3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.
- 3.2 The Permittee shall not cause, let, permit, suffer or allow visible emissions from any fugitive source to equal or exceed 20% opacity.  
[391-3-1-.02(2)(n)2]

**4. Process & Control Equipment**

- 4.1 Routine maintenance shall be performed on all pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The record shall be retained for at least five years following the date of such maintenance.  
[391-3-1-.02(6)(b)1]

**5. Monitoring**

- 5.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.  
[391-3-1-.02(6)(b)1]
- 5.2 The Permittee shall install, calibrate, maintain, and operate a non-resettable continuous monitoring system (or device) for the air curtain burner (Source Code: ACB1) to track the hours operated and to record the cumulative total hours of operation. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1(i)]

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2411-297-0062-S-01-0**

**Page 4 of 5**

- b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
- 6.2 Within 60 days after achieving the maximum charge rate which the air curtain incinerator will be operated, but no later than 180 days after the initial startup, the Permittee shall conduct initial test for opacity on the air curtain burner (Source Code: ACB1) in accordance with 40 CFR 60, Appendix A, Method 9, to verify that the opacity meets the limits in Permit Condition 2.3.  
[40 CFR 60.2250 and 40 CFR 60.2255]
- 6.3 The Permittee shall after the initial test of opacity, conduct annual opacity test on the air curtain burner (Source Code: ACB1), no more than 12 calendar months following the date of the previous test. The test report shall be submitted to the Division within 60 days. All reports must be kept onsite and available for review or submittal for five (5) years.  
[40 CFR 60.2255 and 40 CFR 60.2260]

**7. Notification, Reporting and Record Keeping Requirements**

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:  
Mr. Sean Taylor  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta GA 30354
- 7.2 The Permittee shall keep the following records in a permanent form suitable for inspection and submission to the Division. Either paper copy or electronic formats are acceptable. The records shall be retained for at least five (5) years following the date of entry.  
[40 CFR 60.2260 and 391-3-1-.02(6)(b)1]
- a. The result of the initial opacity testing (each 6-minute average) for the air curtain burner (Source Code: ACB1).

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit No.  
2411-297-0062-S-01-0**

**Page 5 of 5**

- b. The result of the annual opacity testing (each 6-minute average) for the air curtain burner (Source Code: ACB1).
  
- 7.3 The Permittee shall use the hour meter required by Permit Condition 5.2 to determine and record the following:  
[391-3-1-.02(6)(b)1]
  - a. The cumulative total hours of operation of the air curtain burner (Source Code: ACB1) at the end of every calendar month.
  - b. The total operating hours for the air curtain burner (Source Code: ACB1) for the consecutive twelve-month period ending with each calendar month
  
- 7.4 The Permittee shall keep monthly records of the number of hours for the air curtain burner (Source Code: ACB1) usage by recording the hour meter(s) gauge monthly usage. The Permittee shall retain these records for five (5) years from date of record. The Permittee shall use the monthly usage data to calculate the combined twelve-month rolling total usage for each calendar month and notify the Division in writing within 15 days if the combined twelve-month rolling total usage from the air curtain burner equals or exceeds 2,912 hours.  
[391-3-1-.02(6)(b)1]

**8. Special Conditions**

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
  
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."



# Walton County Planning and Development

126 Court Street, Annex 1, Monroe GA 30655

May 9, 2024

To Whom It May Concern

From: Charna Parker  
Director, Planning and Development

RE: Firebox use at existing Preston Road Inert Landfill

This letter will serve as notice that the Preston Road Inert Landfill located off Preston Road and being identified as Parcel C20120025A is currently in operation as a legal non-conforming inert landfill, which would allow the use of a Firebox Incinerator as an accessory use.

The use of Firebox Incinerators is recognized by EPD as an allowable use in Inert Landfills which require an Air Quality Permit and Solid Waste Permit prior to utilization. These permits must be obtained and presented to the department prior to utilization of the incinerator at the Preston Road Inert Landfill.





# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Jeffrey W. Cown, Director**

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

### NARRATIVE

TO: Cynthia Dorough  
FROM: Bradley Belflower  
DATE: March 28, 2024

Facility Name: **Preston Inert Landfill**  
AIRS No.: 297-00062  
Location: Good Hope, Georgia (Walton County)  
Application No.: 29174  
Date of Application: February 1, 2024

### Background Information

Preston Inert Landfill proposes to operate an air curtain burner in Good Hope, Georgia. The facility is classified as a PSD minor source because potential emissions are below 250 tpy and it is not one of the 28 named source categories under PSD. The facility currently has no air quality permit. The facility is a synthetic minor source with regard to Title V regulations.

### Purpose of Application

Application No. 29174 was received on February 1, 2024, for the construction and operation of an air curtain burner. The air curtain burner will be an AirBurners FireBox Model S330. A public advisory expired on March 15, 2024. No comments were received.

### Updated Equipment List

Source Code	Description	Installation Date	Construction Date
ACB1	AirBurners FireBox Model S330 air curtain burner	2024	2024
ENGI	74.5 hp (55 Kw) diesel engine	2024	2024

### Emissions Summary

Potential to emit (PTE) calculation is based on maximum throughput of 13.0 tons/hour wood waste and 2,912 hours per year [8 hours/day \* 7 days/week \* 52 weeks/year] of operation of the air curtain burner, per permit Condition 2.4. The PTE calculations are based on emission factors derived in *Air Curtain Incinerator Emission Factor Determination*, dated April 4, 2017, which was included with Application No. 29174. This document does not include emission factors for HAP emissions. HAP emissions were determined using the most conservative emission factors approved by the Division.

$$\text{PM/PM}_{10}/\text{PM}_{2.5} = (13.0 \text{ ton/hr}) * (1.5 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 28.4 \text{ tons/yr}$$

$$\text{NO}_x = (13.0 \text{ ton/hr}) * (1.0 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 18.9 \text{ tons/yr}$$

$$\text{SO}_2 = (13.0 \text{ ton/hr}) * (0.1 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 1.9 \text{ tons/yr}$$

$$\text{CO} = (13.0 \text{ ton/hr}) * (2.6 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 49.2 \text{ tons/yr}$$

$$\text{VOC} = (13.0 \text{ ton/hr}) * (0.9 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 17.0 \text{ tons/yr}$$

$$\text{Total HAPs} = (13.0 \text{ ton/hr}) * (0.302 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 5.7 \text{ tons/yr}$$

$$\text{HCl (Individual HAP)} = (13.0 \text{ ton/hr}) * (0.171 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 3.2 \text{ tons/yr}$$

**Facility-Wide Emissions**  
(in tons per year)

Pollutant	Potential Emissions	Actual Emissions
PM	28.4	28.4
PM <sub>10</sub>	28.4	28.4
PM <sub>2.5</sub>	28.4	28.4
NO <sub>x</sub>	18.9	18.9
SO <sub>2</sub>	1.9	1.9
CO	49.2	49.2
VOC	17.0	17.0
Max. Individual HAP	5.7	5.7
Total HAP	3.2	3.2

**Regulatory Applicability**

**40 CFR 60 Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units**

Because the air curtain burner commenced construction after June 4, 2010 it is subject to the requirements of Subpart CCCC. Air curtain burners that burn only 100 percent wood waste, 100 percent clean lumber; and 100 percent mixture of only wood waste, clean lumber, and/or yard waste are only required to meet the requirements of 40 CFR 60.2245 through 60.2260.

391-3-1-.02(2)(c) – Incinerators

Because the air curtain incinerator is subject to 40 CFR 60 Subpart CCCC, it is not subject to Georgia Rule (c) [see 391-3-1-.02(2)(c)6.(vi)].

40 CFR 60 Subpart IIII – “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines”

Subpart IIII regulates the compression ignition engines (on the diesel engine) constructed after July 11, 2005 and manufactured after April 1, 2006. The diesel engine was constructed after July 11, 2005 and manufactured after April 1, 2006, so it is subject to Subpart IIII. The facility must comply with the emission standards and opacity requirement under NSPS Subpart IIII by purchasing certified engine. The facility indicated that the diesel engine is a USEPA Tier 4 certified engine.

40 CFR Part 63 Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”

This facility is an area source for HAPS. The diesel engine is constructed after June 12, 2006. Therefore, it is considered new stationary reciprocating internal combustion engines (RICE) and it is subject to 40 CFR 63 Subpart ZZZZ. 40 CFR 63 Subpart ZZZZ [40 CFR 63.6590(c)] states that new stationary RICE located at an area source, must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII. No further requirements of MACT apply to this engine.

**Permit Conditions**

Condition 2.1 states the general applicability of 40 CFR 60 Subparts A and CCCC for the operation of the air curtain burner (ACB1).

Condition 2.2 limits materials combusted in the air curtain burner (ACB1) to 100 percent wood waste, 100 percent clean lumber; and 100 percent mixture of only wood waste, clean lumber, and/or yard waste per the requirements of Subpart CCCC.

Condition 2.3 limits the opacity from the air curtain burner (ACB1) per the requirements of Subpart CCCC.

Condition 2.4 limits the hours of operation for the air curtain burner (ACB1) to 2,912 hours per year [8 hours/day \* 7 days/week \* 52 weeks/year] to ensure that the air curtain burner (ACB1) is a synthetic minor source.

Condition 2.5 prohibits the facility from burning yard trimming in the air curtain burner (ACB1). This restriction is due to Georgia’s Solid Waste Management Rules [see 391-3-4-.08(2)].

Condition 2.6 states the general applicability of 40 CFR 60 Subparts A and IIII for the operation of the diesel fired engine (ENG1).

Condition 2.7 states the general applicability of 40 CFR 63 Subparts A and ZZZZ for the operation of the diesel fired engine (ENG1).

Conditions 3.1 and 3.2 incorporate Georgia Rule (n) to minimize fugitive dust for the entire facility.

Conditions 4.1 requires the facility to conduct routine maintenance.

Conditions 5.2 requires the facility to monitor the hours of operation for the air curtain incinerator.

Conditions 6.2 and 6.3 incorporate the requirements for initial and annual opacity testing on the air curtain burner (ACB1) per the requirements of Subpart CCCC.

Condition 7.1 requires the facility submit written notification of startup.

Condition 7.2 requires the facility to maintain recordkeeping of the initial opacity test and annual opacity test for the period of five years per the requirements of Subpart CCCC.

Conditions 7.3 and 7.4 require the facility to maintain recordkeeping and reporting of the total operating hours of the air curtain burner (ACB1) to track compliance with the hours of operation limit in Condition 2.4.

### **Toxic Impact Assessment**

A TIA was not required to be performed.

### **Summary & Recommendations**

I recommend that Permit No. 2411-297-0062-S-01-0 be issued to Preston Inert Landfill for the construction and operation of an air curtain burner in Good Hope, Georgia. The Preston Inert Landfill air curtain burner will be a synthetic minor source. It is assigned to the Northeast District (Athens) office for compliance responsibility. A 30-day Public Advisory expired on March 15, 2024. No comments received.

**Addendum to Narrative**

The 30-day public review started on June 12, 2024, and ended on July 12, 2024. Comments were not received by the Division.

126 Court Street  
Monroe, Ga. 30655



(770) 267-1485  
(770) 267-1407 FAX

## Zoning Certification Letter

February 23, 2024

Property Location: Preston Inert Landfill  
Inert Landfill – C2010025A00  
2370 Preston Road, Good Hope, Georgia  
Owner: Preston Inert Landfill LLC – 2351 Preston Road, Good Hope,  
Georgia 30641

Walton County Board of Commissioners meeting held on October 5, 1999 indicates that the conditional use for an inert landfill for 67.20 at 2370 Preston Road, Good Hope, was approved.

Should you need further assistance, please feel free to contact me at 770-267-1319.

A handwritten signature in blue ink that reads "Tracie Malcom".

Tracie Malcom  
Zoning Coordinator  
Walton County Planning and Development



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

**Jeffrey W. Cown, Director**

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

**NARRATIVE**

TO: Cynthia Dorrough  
FROM: Bradley Belflower  
DATE: March 28, 2024

Facility Name: **Preston Inert Landfill**  
AIRS No.: 297-00062  
Location: Good Hope, Georgia (Walton County)  
Application No.: 29174  
Date of Application: February 1, 2024

**Background Information**

Preston Inert Landfill proposes to operate an air curtain burner in Good Hope, Georgia. The facility is classified as a PSD minor source because potential emissions are below 250 tpy and it is not one of the 28 named source categories under PSD. The facility currently has no air quality permit. The facility is a synthetic minor source with regard to Title V regulations.

**Purpose of Application**

Application No. 29174 was received on February 1, 2024, for the construction and operation of an air curtain burner. The air curtain burner will be an AirBurners FireBox Model S330. A public advisory expired on March 15, 2024. No comments were received.

**Updated Equipment List**

Source Code	Description	Installation Date	Construction Date
ACB1	AirBurners FireBox Model S330 air curtain burner	2024	2024
ENG1	74.5 hp (55 Kw) diesel engine	2024	2024

**Emissions Summary**

Potential to emit (PTE) calculation is based on maximum throughput of 13.0 tons/hour wood waste and 2,912 hours per year [8 hours/day \* 7 days/week \* 52 weeks/year] of operation of the air curtain burner, per permit Condition 2.4. The PTE calculations are based on emission factors derived in *Air Curtain Incinerator Emission Factor Determination*, dated April 4, 2017, which was included with Application No. 29174. This document does not include emission factors for HAP emissions. HAP emissions were determined using the most conservative emission factors approved by the Division.

$$\text{PM/PM}_{10}/\text{PM}_{2.5} = (13.0 \text{ ton/hr}) * (1.5 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 28.4 \text{ tons/yr}$$

$$\text{NO}_x = (13.0 \text{ ton/hr}) * (1.0 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 18.9 \text{ tons/yr}$$

$$\text{SO}_2 = (13.0 \text{ ton/hr}) * (0.1 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 1.9 \text{ tons/yr}$$

$$\text{CO} = (13.0 \text{ ton/hr}) * (2.6 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 49.2 \text{ tons/yr}$$

$$\text{VOC} = (13.0 \text{ ton/hr}) * (0.9 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 17.0 \text{ tons/yr}$$

$$\text{Total HAPs} = (13.0 \text{ ton/hr}) * (0.302 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 5.7 \text{ tons/yr}$$

$$\text{HCl (Individual HAP)} = (13.0 \text{ ton/hr}) * (0.171 \text{ lb/ton}) * (2,912 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 3.2 \text{ tons/yr}$$

**Facility-Wide Emissions**  
(in tons per year)

Pollutant	Potential Emissions	Actual Emissions
PM	28.4	28.4
PM <sub>10</sub>	28.4	28.4
PM <sub>2.5</sub>	28.4	28.4
NO <sub>x</sub>	18.9	18.9
SO <sub>2</sub>	1.9	1.9
CO	49.2	49.2
VOC	17.0	17.0
Max. Individual HAP	5.7	5.7
Total HAP	3.2	3.2

**Regulatory Applicability**

**40 CFR 60 Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units**

Because the air curtain burner commenced construction after June 4, 2010 it is subject to the requirements of Subpart CCCC. Air curtain burners that burn only 100 percent wood waste, 100 percent clean lumber; and 100 percent mixture of only wood waste, clean lumber, and/or yard waste are only required to meet the requirements of 40 CFR 60.2245 through 60.2260.

391-3-1-.02(2)(c) – Incinerators

Because the air curtain incinerator is subject to 40 CFR 60 Subpart CCCC, it is not subject to Georgia Rule (c) [see 391-3-1-.02(2)(c)6.(vi)].

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**Addendum to Narrative**

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# DESIGN & OPERATION PLAN AIR CURTAIN DESTRUCTOR

FOR  
PRESTON INERT LANDFILL, LLC  
WALTON COUNTY, GEORGIA

JANUARY 2026

## OWNER/OPERATOR:

PRESTON INERT LANDFILL, LLC  
2351 PRESTON ROAD  
GOOD HOPE, GEORGIA 30641  
(770) 417-7464

## RESPONSIBLE OFFICIAL:

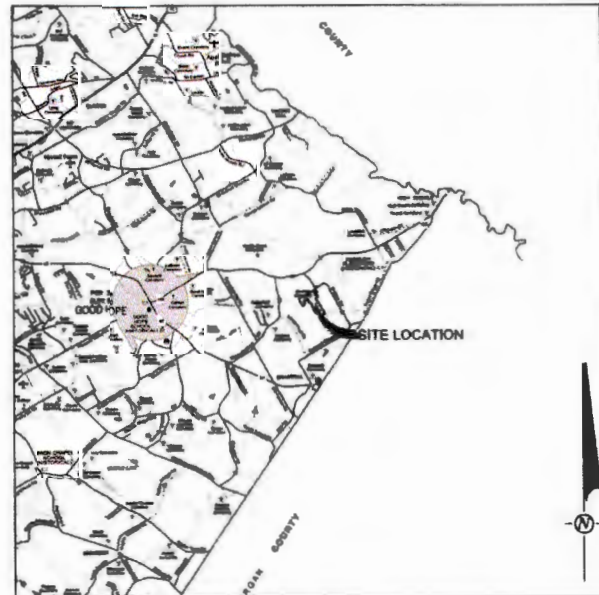
KYLE COTTON, OPERATIONS MANAGER  
(770) 417-7464 (EMERGENCY 24-HOUR CONTACT)

## FACILITY ADDRESS:

PRESTON INERT LANDFILL  
PERMIT-BY-RULE NO PBR-147-35L  
2351 PRESTON ROAD  
GOOD HOPE, GEORGIA 30641  
LATITUDE 33.78899°  
LONGITUDE -83.55199°

## INDEX TO DRAWINGS

- TITLE SHEET
- 1 BOUNDARY SURVEY
- 2 SITE PLAN
- 3 OPERATIONS PLAN & OPERATIONAL FLOW DIAGRAM



### VICINITY MAP

SCALE 1 INCH = 1 MILE

IMAGE COURTESY OF:

GEORGIA DEPARTMENT OF TRANSPORTATION (GDOT), DATED 2022 (WALTON COUNTY)



APPROXIMATE SCALE IN MILES

## LEGEND

### EXISTING FEATURES

FACILITY PROPERTY LINE	---
BOUNDARY PROPERTY LINE (APPROXIMATE)	- - - -
LIMITS OF 100-FT. BUFFER REQUIRED BY PERMIT-BY-RULE INERT LANDFILL	=====
10-FT TOPOGRAPHIC ELEVATION CONTOUR	- - - - -E70-
5-FT TOPOGRAPHIC ELEVATION CONTOUR	- - - - -E75-
SITE WETLANDS (APPROXIMATE)	[Patterned Box]
50-FT WETLANDS BUFFER	- - - - -
STREAM	====
POND / UNPAVED TRIBUTARY	.....
25-FT STATE WATER BUFFER (APPROXIMATE)	- - - - -
LIMITS OF 100-YEAR FLOODPLAIN	=====
PUBLIC ROAD RIGHT-OF-WAY	R/W
UNPAVED ROAD ON SUBJECT SITE	=====
OCCUPIED DWELLING	[Square]
OTHER ENCLOSED STRUCTURE (NOT AN OCCUPIED DWELLING)	[Diamond]
500-FT OCCUPIED DWELLING BUFFER	- - - - -

### PROPOSED FEATURES

UPLAND AREA DESIGNATED FOR AIR CURTAIN DESTRUCTOR OPERATION & WASTE STORAGE	[Shaded Box]
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P.O. Box 214  
Pell City, Georgia 30264  
404-368-0200  
www.esi-engineering.com



01/21/26









## Environmental Protection Division

### Georgia Air Protection Branch Permit Search Engine

AIRS Number:

Select an AIRS Number

Facility Name:

Preston Inert Landfill x

Permit Number/SIC Code:

[Search Permits](#)

[Clear Search](#)

<u>AIRS Number</u>	<u>Facility Name</u>	<u>Permit</u>	<u>Issuance Date</u>	<u>Other Documents</u>	<u>Permit Type</u>
297-00062	Preston Inert Landfill	<a href="#">2411-297-0062-S-01-0</a>	5-Aug-2024	<a href="#">Narrative</a>	SIP

# Walton County, GA

**Parcel Number** C2010025A00  
**Location Address** PRESTON RD  
**Legal Description** TR#3 66.61AC  
 (Note: Not to be used on legal documents)  
**Class** C5-Commercial  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**Zoning** A1  
**Tax District** Walton County (District 04)  
**Millage Rate** 33.44  
**Acres** 66.61  
**Neighborhood** 09615-LANDFILL INERT (09615)  
**Homestead Exemption** No (S0)  
**Landlot/District** 86 / 2



[View Map](#)

## Owner

PRESTON INERT LANDFILL LLC  
 2351 PRESTON RD  
 GOOD HOPE, GA 30641

Type	Description	Calculation Method	Square Footage	Frontage	Depth	Acres	Lots
Commercial	09615-AC-LANDFILL INERT	Acres	1,843,024	0	0	42.31	0
Commercial	09615-AC-LANDFILL INERT	Acres	1,058,508	0	0	24.3	0

## Accessory Information

Description	Year Built	Dimensions/Units	Identical Units	Value
Shop, Comm or Industrial	2022	50x100 / 0	0	\$69,700

Permit Date	Permit Number	Type	Description
04/11/2022	22040026	COMMERCIAL	STORAGE BUILDING 100% TY 23
		CONDITIONAL USE	CU99735

## Sales

Sale Date	Deed Book / Page	Plat Book / Page	Sale Price	Reason	Grantor	Grantee
11/12/2019	4493 249	116 197	\$0	Deed of Gift	HOLDER LEONARD P	PRESTON INERT LANDFILL LLC
8/18/1989	300 321	104 040	\$0	Unqualified Sale	HOLDER LEONARD P	

## Valuation

	2023	2022	2021	2020
Previous Value	\$359,600	\$355,700	\$355,700	\$355,700
Land Value	\$359,600	\$359,600	\$355,700	\$355,700
+ Improvement Value	\$0	\$0	\$0	\$0
+ Accessory Value	\$69,700	\$0	\$0	\$0
= Current Value	\$429,300	\$359,600	\$355,700	\$355,700

## Photos



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

The Walton 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](#)  
[Last Data Upload: 4/18/2024, 6:02:43 AM](#)

[Contact Us](#)

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 **Schneider**  
GEO SPATIAL