

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Request for Determination of Insignificant Activity
Date: Wednesday, September 6, 2023 7:35:11 AM
Attachments: [emaillogo3_386eeef7-9537-400b-9927-e1be1f25d61b.png](#)
[Request for Determination of Insignifiant Activity MC 2023-09-05.pdf](#)

From: Mark Cummings <mark.cummings@ecomaterial.com>
Sent: Tuesday, September 5, 2023 4:50 PM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Greg Forte <Greg.Forte@tn.gov>
Subject: [EXTERNAL] Request for Determination of Insignificant Activity

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

We request a Determination of Insignificant Activity and Permit Termination for the following locations:

Legal name: EM Resources LLC
Site name: EM Resources - Gorman Woodyard Fly Ash Transloading
Site address: 4997 Trace Creek Road, McEwen, Stewart County
Facility ID: 43-0127
Permit 980655 issued September 28, 2022

Legal name: EM Resources LLC
Site name: Clarksville Fly Ash Transloading (one unit)
Site Address: 931 Alfred Thun Road, Clarksville, Montgomery County
Facility ID: 63-0403 -01
Permit 080586 September 6, 2022
Facility ID: 63-0403-02
Permit 080565 issued September 6, 2022 (one unit)

EM Resources LLC would like terminate the three referenced permits, two at Clarksville and one at Gorman/McEwen and is submitting request for a determination of insignificant activity for each location.

Attached is a flow diagram showing the transfer of the fly ash from the tanker truck to the railcar. The generator and compressor engines are shown by the two x's on the trailer. The generator provides the electricity and the compressor transfers the material. The fly ash starts in the tanker truck and is pneumatically conveyed into the railcar. Air that is displaced by the fly ash is exhausted from the railcar to the trailer-mounted portable dust collector and filtered through the dust collector at removal efficiency of 99.9%. Clean air is then vented to the atmosphere.

A recalculation of air emissions show the sites should be classified as "insignificant activities" under 1200-03-09-.04(2)(a)3. The revised potential emissions calculations show each site to be less than 5 tons per year. The four transloaders at Clarksville would be identical to the ones at Gorman/McEwen and would have the same emissions.

The internal combustion engines, two for each tranloader (one for the generator that supplies electricity and one for the compressor that moves the material) are each rated at 20 HP or less (.0025 MMBTU or less) but would be subject to 40 CFR 63 Subpart ZZZZ or 40 CFR 60 Subpart JJJJ. Since units are on wheels and transportable, they qualify as nonroad engines under 40 CFR § 1068.30. To maintain this nonroad designation, the engines will remain on site for less than 12 months.

If there is anything else that you need, please do not hesitate to contact me by telephone at (470) 470-599-3836 or by email at mark.cummings@ecomaterial.com.

Thank you,

Mark Cummings

Sr Environmental Manager



P: (470) 599-3836

M: (470) 599-3836

mark.cummings@ecomaterial.com

Via Electronic Mail

September 5, 2023

Technical Secretary
Department of Environment and Conservation
Division of Air Pollution Control
312 Rosa L. Parks Avenue
Nashville, TN 37243

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Sincerely,

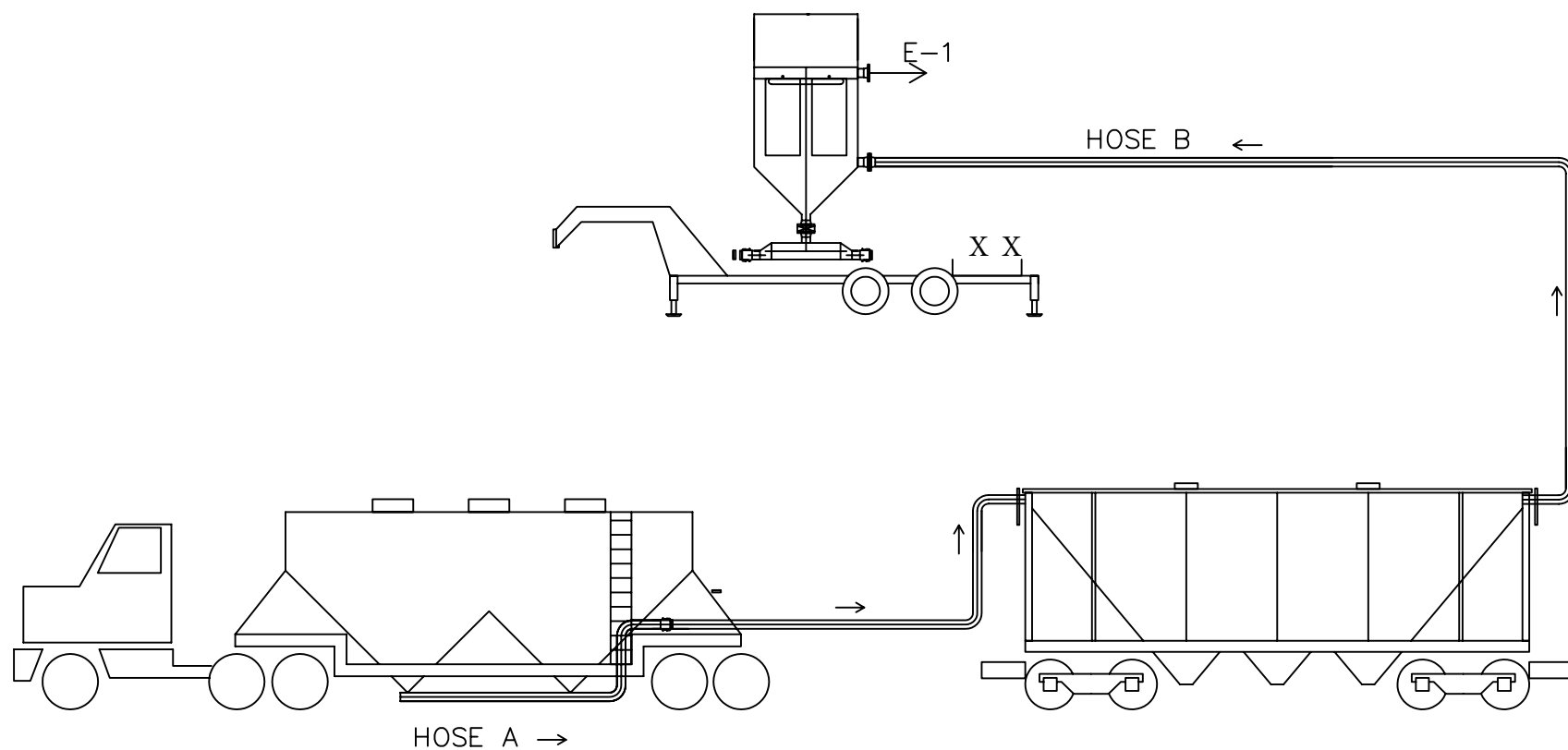


Mark Cummings
Sr. Environmental Manager

cc: Greg Forte, TDEC

PORTABLE BAGHOUSE RAIL CAR LOADING

FIGURE 1



Gorman/McEwen, Tennessee Terminal

Source: AP-42, Feb 12, 2011, Table 11.12-2 & 11.12-8 for uncontrolled for cement supplement

PTE <5 tons per year PM and combustion emissions are exempt under TAPCR 1200-03-09-.04.

Emission Source	Process Rate		Emission Factors			Short-term Emissions			Annual Emissions		
	Short-term (ton/hr)	Annual (ton/yr)	PM (lb/ton)	PM ₁₀ (lb/ton)	PM _{2.5} (lb/ton)	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)	PM (ton/yr)	PM ₁₀ (ton/yr)	PM _{2.5} (ton/yr)
1 Portable Baghouse	55.0	60,000	3.14	1.1	0.942	0.17270	0.06050	0.05181	0.09420	0.03300	0.02826
PTE in tons per year for 8760 hours per year:											
	1 Source		4 Sources								
PM	0.75297		3.01189								
PM10	0.26378		1.05512								
PM2.5	0.22589		0.90357								