



March 25, 2024

Ms. Rima Naji
Environmental Engineer
Georgia EPD – Solid Waste
Atlanta Tradeport, Suite 104
4244 International Parkway
Atlanta, GA 30354

RE: **Crisp County – U.S. 41S Site 2 MSW Landfill
Annual CCR Management & Dust Control Report
Permit No. 040-008D(MSWL)
LE 08525.16**

Dear Ms. Naji:

On behalf of Crisp County we are submitting this as a copy of the 2023 annual report to the subject facility's CCR management and fugitive dust control plan. As requested by EPD, we are submitting this report through the EPD GEOS system under the SW02 category; however, this is an annual report and not a minor modification.

At this time, the facility is not proposing changes to its permitted operational practices, or adding additional CCR customers or types of CCR, or otherwise deviating from the approved D&O plans. Therefore, the facility is not submitting an amended plan and requests the attached annual report be accepted.

The last load of CCR waste from the Crisp Power Commission facility was received on December 12, 2023. The Crisp Power Commission has informed the Crisp County US Hwy 41 MSW Landfill that it has completed all of its CCR waste removal from their coal-fired electric generating facility. The Crisp County US Hwy 41 MSW Landfill has ceased receiving CCR as of December 12, 2023. Crisp County requests termination of the CCR Management Plan for the Crisp County US Hwy 41 MSW Landfill.

Please contact me at 229-438-0522 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads 'Tod Lanier'.

Tod Lanier, PE
Vice-President

Enclosure: 2023 Annual CCR Management and Dust Control Report

Cc: Carl Gamble, Crisp County Landfill
Crisp County Landfill Operating Record



**ANNUAL CCR MANAGEMENT AND DUST
CONTROL REPORT**

FOR

Crisp County US HWY 41 MSW Landfill

CRISP COUNTY, GEORGIA

Project No. LE 08525.16

March 25, 2024



LANIER
ENGINEERING INC.

Prepared by:
Lanier Engineering, Inc.
1504 W. Third Avenue
Albany, Ga. 31707
(229) 438-0522

ANNUAL CCR MANAGEMENT AND DUST CONTROL REPORT

In accordance with the guidance document provided by the Georgia Department of Natural Resources, Environmental Protection Division, the following information is provided for compliance with the Solid Waste Regulations 391-3-4.

1. CCR and Non-CCR Waste received during the previous year

a. CCR Monofill

The Crisp County US HWY 41 MSW Landfill (CCLF) currently receives CCR waste for disposal in the active working face at the site of the CCR “block” disposal area; second working face. This area is limited to an approximately 200 foot by 400 foot disposal area located in Cell Nos. 10 and 11 on top of at least one lift of previously disposed waste, and against the existing prior-filled cell slopes as noted in Section 2 of the Operations Plan on Sheet 22 of the D&O Plan.

i. List of type(s) and source(s) of CCR

The only source of CCR waste received at the facility is the coal-fired electric generating facility operated by the Crisp Power Commission as required by Section 54, Paragraph 5 of the Operations Plan on Sheet 22 of the D&O Plan. The waste consists of coal combustion residuals from a U.S. coal-fired generating facility which burned bituminous coal, sub-bituminous coal, or lignite. No new CCR waste streams were accepted by the facility during this reporting period. The last load of CCR waste from the Crisp Power Commission facility was received on December 12, 2023. The Crisp Power Commission has informed the Crisp County US Hwy 41 MSW Landfill that it has completed all of its CCR waste removal from their coal-fired electric generating facility. Therefore, no further CCR waste from the Crisp Power Commission facility will be received at the Crisp County US Hwy 41 MSW Landfill. The facility does not utilize CCR material as a solidification agent for liquid wastes.

ii. Annual amount of CCR

The CCR material received at this facility between January 01, 2023 and December 31, 2023 had a total recorded weight of 64,000 tons. This falls above the estimated total annual weight of 34,500 tons shown in Section 54 of the Operations Plan on Sheet 22 of the D&O Plan. While the total annual tonnage for 2023 is above the estimated limit shown in the Operations Plan of the current D&O Plan, the facility is designed to withstand a waste mass consisting entirely of CCR material. Therefore, no adjustments are needed to the plan or design components related to stability, leachate collection, or base grade settlement.

iii. Daily maximum amount of CCR

The maximum amount of CCR material received in any given day between January 01, 2023 and December 31, 2023 had a recorded weight of 1,735 tons. (On days when CCR waste was received, the average daily amount for disposal in 2023 had a recorded weight of 753 tons). While the maximum daily tonnage for 2023 is above the estimated limit shown in the Operations Plan of the current D&O Plan, the facility is designed to withstand a waste mass consisting entirely of CCR material. Therefore, no adjustments are needed to the plan or design components related to stability, leachate collection, or base grade settlement.

b. Comingled CCR and Non-CCR Waste

i. List of type(s) and source(s) of CCR, and other types of non-CCR waste, such as municipal, industrial, or commercial solid waste

Not applicable. Crisp County US HWY 41 MSW Landfill (CCLF) did not comingle any CCR waste with Non-CCR waste. CCR waste was “block” or mono filled as noted above.

2. Waste Placement, Cover, and Recovery

a) Management and maximum area of the working face

The facility does not utilize CCR material as a solidification agent for liquid wastes. CCR material is restricted to the working face of the “block” disposal area, as noted above, in such a manner that it is easily incorporated with available equipment.

Management of the working face and maximum area of the working face are maintained at a size that is compatible with the facility’s available equipment for spreading and compacting waste, and for suppressing dust in accordance with Section 54 of the Operations Plan on Sheet 22 of the D&O Plan. The typical working face area is 200 feet by 200 feet. However, occasionally the working face size may be adjusted to support unusual weather activity, temporary volume adjustments to the waste stream, to safely stage waste loads to accommodate truck traffic and allow disposal of waste loads during daily operations. The working face size may increase to a maximum of 350 feet by 350 feet. This maximum size does not persist for more than a day.

b) Waste placement and compaction for CCR lifts and comingled waste

CCR waste is spread in uniform layers approximately 2 feet thick, and compacted to its smallest practical volume. Trucks which bring CCR waste to the CCR “block” disposal area dump loads directly at the working face. Dozers and compactors are used to spread, and compact the CCR waste.

c) Leachate outbreaks frequency, corrective actions taken, and if there is a need to install drainage layers such as chimney drains

No leachate outbreaks were observed in layers of waste containing CCR waste during this reporting period. Therefore, no CCR waste leachate outbreak corrective actions were necessary.

d) Daily cover of comingled CCR and non-CCR waste

Procedures for the placement of daily cover were conducted in accordance with Section 54 of the Operations Plan on Sheet 22 of the D&O Plan.

e) Statement verifying that daily inspection reports are kept on-site in accordance with the current D&O Plans.

Records of all CCR waste transported to the CCR “block” disposal area along with daily logs and operational records are retained at the facility’s scale house office building. The Operations Manager Daily Log includes the Observation Report to ensure compliance with regular solid waste operations, and any dust control logs maintained at the site. The Operations manager keeps these items in the office in the scale house or in the operations vehicle during normal operating hours. A sample dust suppression log is attached in Appendix A. At his discretion, the Manager may add notes in the comments section of the observation report, or if action items are identified, such as leachate outbreaks or dust control-related issues, the Manager may designate an employee to take corrective action immediately, prior to documenting the comment.

f) Management of solidification operation using CCR as a solidification agent, and sample records of paint filter tests, if applicable

Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR for liquid waste solidification.

g) Recovery of previously disposed CCR for beneficial reuse, if applicable

Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not recover previously disposed CCR material for beneficial reuse.

3. Fugitive Dust Control

a) Actions taken to control CCR fugitive dust from CCR disposal unit, roads, conditioning areas, and solidification operation; and effectiveness of those actions

The Operator utilizes the following measures to minimize the CCR from becoming airborne:

- ensure all trucks transporting CCR at the facility are covered
- reduce or halt operations during high wind events
- operation of a water spray system which includes passes with a water wagon, water wheel, and use of impacted sprinkler heads supplied by an above ground pump
- apply more frequent cover as needed.

Keeping the trucks covered is the most effective way to prevent the escape of dust during transport. Occasionally, trucks were not covered properly, and the Operator indicated to the driver to correct this.

The water wheel proved most effective controlling dust site-wide. Impact sprinkler heads around the cells were also occasionally used, but were not a primary control.

b) Records of Citizen Complaints specifically related to CCR Management, if applicable

No citizen complaints related to dust control have been received. Forms for recording these complaints are kept on-site in the scale house office building. Employees who may answer the phone are trained to record them on the appropriate form.

c) Recommendations to improve dust control measures in the future, if applicable to CCR Materials

Adding water has proved most effective. As described above, the dust control measures currently being utilized at the landfill facility have adequately addressed the CCR acceptance. No additional recommendations are made at this time.

4. Leachate Collection and Removal System (LCRS)

a) Any known issues with the LCRS that are directly attributed to CCR

During this reporting year, no known issues with the LCRS were observed directly attributed to disposal of CCR.

5. Storm Water - Management System

a) Narrative describing measures used to ensure that surface water contacting CCR and non-CCR waste has not been discharged into the stormwater management system

Since all the CCR disposed at the facility is kept within interior slopes, surface water contacting the CCR material is directed and collected in the leachate collection system and does not discharge into the stormwater management system. The CCR working face was managed to ensure that surface water contacting CCR waste was not discharged into the stormwater system during this reporting period. This was accomplished by placing and compacting CCR material away from the side slopes, using soil diversion berms near side slopes and by sloping the working face into the waste mass. The stormwater management system is directed to permitted sediment ponds.

6. Waste Compatibility

a) Any incompatibility issues and corrective measures taken

CCR received at the landfill is from the same source whose material was used as the basis of design for the original CCR Management Permit. Additionally, its 'as received' physical condition (i.e. moisture and grain size) has remained generally consistent throughout the disposal process and no new CCR waste streams were accepted by the facility during this reporting period. No known issues with CCR material compatibility were identified during this reporting period.

b) For a solidification process, if CCR is used as a solidification agent

i) List of type(s) and source(s) of CCR and types of liquid waste streams received for solidification prior to disposal

Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR waste in a solidification process.

ii) Sample records of compatibility analyses

Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR waste in a solidification process.

7. Groundwater Monitoring

a) The Environmental Monitoring Unit will assess groundwater monitoring data and will determine if the groundwater monitoring plan requires revision.

The approved groundwater monitoring plan is in place and the facility is currently in compliance. No revisions to the groundwater monitoring plan are proposed at this time.

8. Emergencies

a) Any events or circumstances that represented an operational or environmental emergency and the corrective actions taken specific to the management of CCR.

No operational or environmental emergency events or circumstances specific to the management of CCR were noted during this reporting period. New hires received appropriate safety training in accordance with their duties.

9. Documentation of Notification to Local Governments

The owner or operator shall notify the local governing authorities of the county, and any city within the county, in which the landfill is located upon submittal of an amended Plan to EPD. Copies of the correspondence to local governing authorities must be provided to EPD with the amended Plan submittal.

An amended plan is not being submitted as part of the Annual CCR report at this time. The local Governments were previously notified upon the submittal of the previous plan. Copies of the notification letters are attached in the Appendix.

APPENDIX

APPENDIX A
SAMPLE LOG

APPENDIX B
NOTIFICATION LETTERS



THE BOARD OF COMMISSIONERS OF CRISP COUNTY

PHONE
229.276.2673

210 SOUTH 7TH STREET
CORDELE, GEORGIA 31015

FAX
229.276.2639

www.crispcounty.com

October 01, 2018

Honorable Sam. N. Farrow, Chairman
Crisp County Board of Commissioners
210 S 7th Street
Cordele, Georgia 31015

**Subject: Crisp County US41S MSW Landfill
CCR Management Plan**

Dear Commissioner Farrow:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."*

The Crisp County US41S MSW Landfill is located within Crisp County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Carl Gamble
Public Works Director

Cc: Landfill Operating Record
Gregg Bacon, Lanier Engineering
Tom Patton, County Administrator



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October 01, 2018

Honorable John Wiggins, Commission Chairman
City of Cordele
501 North 7th Street
Cordele, Georgia 31015

**Subject: Crisp County US41S MSW Landfill
CCR Management Plan**

Dear Commissioner Wiggins:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, **and any city within the county**, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

The Crisp County US41S MSW Landfill is located within Crisp County, and the City of Cordele is also in Crisp County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Carl Gamble
Public Works Director
Crisp County

Cc: Landfill Operating Record
Sam N. Farrow
Gregg Bacon, Lanier Engineering
Tom Patton, County Administrator



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October 01, 2018

Honorable Craig Huckaby, Mayor
City of Arabi
PO Box 177
Arabi, Georgia 31712

**Subject: Crisp County US41S MSW Landfill
CCR Management Plan**

Dear Mayor Huckaby:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, **and any city within the county**, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

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Sincerely,

Carl Gamble
Public Works Director

Cc: Landfill Operating Record
Sam N. Farrow
Gregg Bacon, Lanier Engineering
Tom Patton, County Administrator