BROWNE
AND COMPANY, LLC
3312 Northside Drive • Bldg D, Suite 220
Macon, Georgia 31210
Phone: 478-743-4843 Browne1234@aol.com

April 1, 2025

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

Re: **WI - Taylor County Landfill**
Annual CCR Management & Dust Control Report
Permit No. 133-003D(SL)
Proj. No. 842-10-0104

Dear Ms. Naji:

On behalf of the WIN Waste Innovations - Taylor County Landfill we are submitting a copy of the annual report for the subject project. This is submitted as a minor modification, through GEOS SW02, as requested by Georgia EPD.

At this time, the facility is not proposing changes to its permitted operational practices, or adding additional CCR customers or types of CCR shown in the permitted plan. In addition, the facility does not plan to exceed the approved CCR/non-CCR ratio, or otherwise deviate from the approved D&O Plan.

If you have any questions, please call.

Sincerely,

Jeff Browne, P.E.
President

cc: Trey Allen

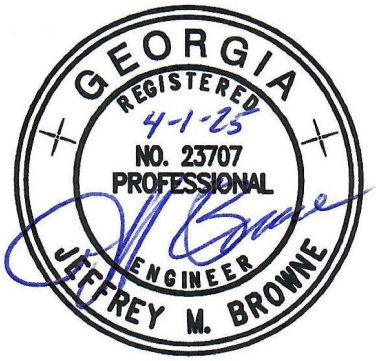
Annual CCR Management and Dust Control Report

Taylor County Landfill
WIN Waste Innovations

208 Southern States Road
Mauk, GA 31058

Permit Number: 133-003D(SL)
Taylor County, Georgia

April 2025



BROWNE
AND COMPANY, LLC
3312 Northside Drive • Bldg D, Suite 220
Macon, Georgia 31210
Phone: 478-743-4843 Browne1234@aol.com

Browne and Company, LLC PEF004508 Exp. 06/30/2026

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
      i. List of type(s) and source(s) of CCR
      ii. Annual amount of CCR
      iii. Daily maximum amount of CCR

Not applicable. Taylor County Landfill (TCLF) did not take any CCR waste in a CCR monofill, or monofill in the MSW landfill facility.

   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

The homogenous CCR-type waste received at the facility generated by Jacksonville Electrical Authority (JEA), Northside Generating Station, was approximately 47,000 tons. This waste product is a mix of coal combustion residuals and petroluem coke residue from power generation. The fuel ratio of coal to petcoke, as specified by EPA's requirements, does not meet the standard to define the waste product as CCR. However, for purposes of permitting and disposal at TCLF, the facility treats it as CCR. In addition, TCLF took construction and demolition debris from Georgia Power's Plants Branch, Mitchell and McDonough being decommissioned, and also took CCR from Georgia Power's Plant Scherer. The total tonnage of this material received in 2024 was approximately 92,300 tons, with some residual CCR material in it. It is estimated approximately 50% of this waste was CCR, or 46,150 tons. Other non-CCR waste disposed at the facility includes all wastes acceptable at the facility based on the solid waste handling permit, including municipal solid waste, commercial waste, industrial waste, and nonhazardous sludges.

      ii. Annual amount of CCR

93,150 tons

      iii. Daily maximum amount of CCR

1189 tons (The average daily amount for disposal in 2024 was 333 tons, with a maximum of 1189 tons.)

iv. Annual amount of non-CCR waste

762,651 tons

v. Daily maximum amount of non CCR waste

3059 tons **(The average daily amount for disposal in 2024 was 2724 tons, with a maximum of 3059 tons.)**

vi. Maximum ratio of CCR to non-CCR waste

1:8.2 **(This ratio of CCR to non-CCR disposed of during 2024 does not exceed the maximum [33%] considered in the design calculations.)**

2. Waste Placement, Cover, and Recovery

a) Management and maximum area of the working face

CCR material not used in solidification is restricted to the working face of each cell in such a manner that it is easily incorporated into the municipal waste landfill with available equipment. Some of the CCR received at the facility was incorporated in the solidification process and some was directly comingled with other waste at the working face. Any CCR waste included in the disposal stream did not restrict proper operations at the working face.

The working face is maintained at a size that is compatible with the facility's available equipment for spreading and compacting waste, and for suppressing dust. The typical working face area is 200 feet by 200 feet. However, occasionally the working face size is adjusted to support unusual weather activity, temporary volume adjustments to the waste stream, to safely stage different waste loads to accommodate truck traffic and allow blending 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

Solid waste is spread in uniform layers approximately 2 feet thick, and compacted to its smallest practical volume. Trucks that bring waste to the active area dump loads directly or using the tipper at the working face. Dozers and compactors spread, compact and blend the waste. Most of the CCR material used for a solidification agent is then used on interior slopes as alternate daily cover. Any CCR material disposed directly at the active working

face is blended in with MSW waste during the day's regular disposal activities, and compacted as described above.

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

Disposing and solidifying CCR did not create additional frequency of outbreaks. If leachate outbreaks are identified during daily inspections, they are repaired in accordance with the procedures outlined in the D&O plan, item 16, Sheet 55. The frequency of outbreaks is defined as occasional, depending on factors such as recent rainfall and areas of operation. Since large isolated blocks of CCR are not disposed during typical daily operations, CCR disposal does not restrict proper operations at the working face. The disposal practices are intended to not create layers of compacted coal ash, and therefore does not increase the occurrence of leachate outbreaks from a reduction in infiltration rates. In addition, when returning to a previously disposed area, the operator excavates windows into the existing layer as the new daily operations begin, using an excavator or a tipped dozer blade. This ensures any lenses are broken open to ensure infiltration through the waste to the leachate collection system at the cell floor.

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

Alternate daily cover (ADC) generated from the solidification operations is only used on interior slopes. (If it is placed in the working face when it's located at an outside slope, it is treated the same as the other MSW disposed on exterior slopes, and covered with regular soil daily cover.) Solidified CCR used for ADC is typically blended with soil as the daily cover is placed by dumping the material on interior slopes along with cover soil, and spreading with dozers.

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

The following daily logs are maintained on site:
- Operations Manager Daily Log
- Rainfall Log
- Water Truck and Recirculation Log

The Operations Manager Daily Log includes the checklist items to ensure compliance with

regular solid waste operations, and any dust control logs maintained at the site. The Operations manager keeps these items in his office in the scalehouse or in his 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 daily log, 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.

The Rainfall Log is kept on the active shelf in the scalehouse as part of the operating record.

The Water Truck Log & Recirculation Log are kept in the water truck during normal operating hours. Use of water to control dust is recorded in the log.

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

Records for modifications and approvals for solidification are maintained in the Operating Record, and applicable paint filter tests are kept in a log in the Operations Manager's office in the scalehouse.

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

Not applicable.

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:

- ensures all trucks transporting CCR are covered
- reduces or halts operations during high wind events
- operates a water spray system, to include passes with a water wagon, supplemented with impact sprinkler heads, supplied by the existing irrigation well, when additional control is needed
- applies 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.

Similarly, there were several days during the past year when the Operator ceased CCR disposal during high wind periods.

The water wagon proved most effective controlling dust site-wide. In addition a pair of water dust suppression cannons were purchased for use and are available at the solidification / disposal area, or relocated to the railyard. This system is effective in suppressing dust through misting. Once the CCR material is solidified for use as ADC, its dusty characteristics are significantly reduced. Therefore, adding more frequent cover was not needed.

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 on site. 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.

4. Leachate Collection and Removal System (LCRS)
   a) Any known issues with the LCRS that are directly attributed to CCR

No known issues with the LCRS have been 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 almost all the CCR disposed at the facility is kept within interior slopes, surface water contacting the material infiltrates the site and is directed to the leachate collection system. The stormwater management system is entirely directed to permitted sediment ponds. The pond outfalls are monitored semi-annually as part of the approved groundwater and surface water monitoring plan. Monitoring for appendix III (and IV) constituents is part of the plan for surface water points.

6. Waste Compatibility
   a) Any incompatibility issues and corrective measures taken

No known issues with compatibility have been attributed to disposal of CCR.

   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

All CCR-type waste used for solidification at the facility was generated by Jacksonville Electrical Authority (JEA), Northside Generating Station. The waste product is a mix of coal combustion residuals and petroleum coke residue from power generation.

The liquid wastes can include waste process paint sludge, off-spec latex paint, off-spec beverages, liquid soaps and similar materials, but only leachate was used in 2023.

      ii. Sample records of compatibility analyses

If liquid wastes are accepted, they are categorized by the site as special waste. New special waste is reviewed to ensure it meets acceptability requirements, and is compatible with other wastes. Special waste is manifested for disposal. Manifests and special waste reviews are kept on file in the facility Operating Record. (A sample is included in Appendix B.)

Employees involved with the disposal and solidification of liquid waste and CCR are trained to note any unexpected color changes, unusual odors or evidence of dangerous reactive activity. If this occurs, disposal is stopped immediately, and the Operations Manager is notified.

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.

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 such events or circumstances were noted during this period. The facility holds weekly

safety briefings, which include discussions of the current disposal and solidification locations and any new activities. New hires receive 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.

The local Governments were previously notified upon the submittal of the previous plan. Copies of the notification letters are attached in Appendix C.

APPENDIX

Appendix A
Sample Log

TAYLOR COUNTY LANDFILL DUST SUPPESSION

MONTH: **July**

DATE	# OF LOADS	LOCATION	EMPLOYEE NAME
7/1/24	5	Roads & workface	Gus Gray
7-2-24	12	8 loads land 4 rail yard	R.J.
7-3-24	15	10 landfill 5 rail yard	R.J.
7-4-24	16	10 landfill 6 rail yard	R.J.
7-5-24	10	8 landfill 2 rail yard	R.J.
7-6-24	1½" rain	0 loads.	R.J.
7-7-24	1" rain	0 loads.	R.J.
7-8-24	½" rain	0 loads.	R.J.
7-9-24	0.	0. loads.	R.J.
7-10-24	0.	0. loads.	R.J.
7-11-24	10 loads	6 loads to landfill 4 to rail yard	R.J.
7-12-24	10 loads	6 loads to landfill 4 to rail yard	R.J.
7-13-24	12 loads	10. landfill 2. to rail yard.	R.J.
7-14-24	11 loads	9 landfill 2 to rail yard.	R.J.
7-15-24	½" rain	0 loads.	R.J.
7-16-24	1½" rain	0 loads.	R.J.
7-17-24	3½"	0 loads.	R.J.
7-18-24	4 loads	3 to land fill 1 to rail yard	R.J.
7-19-24	4 loads.	4 to land fill	R.J.
7-20-24	5 loads	4 to land fill 1 to rail yard	R.J.
7-21-24	½" rain	0 loads	R.J.
7-22-24	1" rain	0 loads	R.J.
7-23-24	0 loads	0 loads	R.J.
7-24-24	1" rain	0 loads.	R.J.
7-25-24	0 loads	0 loads.	R.J.
7-26-24	0 loads	0 loads.	R.J.
7-27-24	0 loads	0 loads	R.J.
7-28-24	¼" rain	0 loads	R.J.
7-29-24	2½" rain	0 loads	R.J.
7-30-24	0	0 loads	R.J.
7-31-24	½" rain	0 loads.	R.J.

Appendix B
Sample Special Waste Review*

* Note: The names of Taylor County Landfill customers are not public information. Identifying information about the source has been redacted from the attached pages.

WIN WASTE INNOVATIONS

GENERATOR WASTE PROFILE WORKSHEET

Area To be completed by WIN Waste Innovations – Representative

SW Designee Number: _____ Profile Number: 916-PS-24041 Approval Date: 8/7/24

Landfill (Check):

☒ Taylor County Landfill, Mauk, GA 478-862-2610

8/8/24

GENERATOR INFORMATION

Frequency: (Check One) ☐ One Time Event ☒ Continuous Waste Stream ☒ Weekly ☐ Monthly ☐ Other			
Generator Name: [redacted]		Phone No: [redacted]	
Generator's Physical Address: [redacted]		Forest Park	
State: Ga	Zip Code: 30297	Fax No:	
Generator's Mailing Address: [redacted]	City: Forest Park		
State: Ga	Zip Code: 30297	State I.D. No:	SIC Code:
Generator/Generator Designee Contact Name: [redacted]		Email Address: [redacted]	
Physical (Site) Address of Waste Stream Profiled: [redacted]			
City: Newnan	Ga	Coweta	

BILLING CUSTOMER INFORMATION

Customer Name: [redacted]		Contact Person: [redacted]	
Address: [redacted]	City: Birmingham	State: AL	Zip: 35207
Phone No: [redacted] Fax No.:		Email Address: [redacted]	

TRANSPORTER INFORMATION

Transporter Name: [redacted]		Contact Person: [redacted]	
Address: [redacted]	City: Lagrange	State: GA	Zip: 30240
Phone No: [redacted] Fax No.:		Email Address: [redacted]	

WASTE STREAM INFORMATION

Common Name of Waste: Coal and Coal/Soil Mixture
Process Generating Waste: Coal Pile Removal
Type of Waste: ☒ INDUSTRIAL PROCESS ☐ POLLUTION CONTROL WASTE
Physical State at 70 degrees F: ☒ SOLID ☐ SEMI-SOLID ☐ POWDER ☐ LIQUID ☐ OTHER
Method of Shipment: ☒ BULK ☐ DRUM ☐ BAGGED ☐ OTHER/explain: _____
Estimated Volume: Cubic Yards _____ Tons 20 Other _____ Permanent Waste Stream? ☒ Yes ☐ No
Special Handling Instructions: To be mixed with MSW waste at working face for Disposal

COMPOSITION BREAKDOWN

Color:	Odor (describe):	Free Liquids	% Solids:	pH:	Flash Point	Phenol
Black/Soil	None	☐Yes ☒NO Content: ____%	100	NA	NA Degrees F	NAppm

Physical Description/Characteristics of Waste: Waste Coal and Coal/Soil mixture from Coal Pile Removal

REPRESENTATIVE SAMPLE CERTIFICATION

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA § 40 CFR 261 .20 © guidelines or equivalent rules? ☒YES ☐ NO	
Sample Date: 11-30-2023	☒ Composite Sample ☐ Grab Sample
Sample's Employer: [redacted]	Date: 12-21-2023
Sampler's Name (printed): [redacted]	Signature:
Analytical testing performed and MSDS sheets submitted with this profile worksheet: (please circle) ☒ TCLP ☐ Paint Filter Test ☐ MSDS Sheets ☐ Other (describe): _____	

Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Required Parameters for this Profile

Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2, 4-D, 2, 4, 5, -TP Silvex as defined in § 40 CFR 261.33?	☐ Yes ☒ No
Does this waste or the generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide Or Hydrogen Cyanide as defined in § 40 CFR 261.23?	☐ Yes ☒ No
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCB's) as defined in § 40 CFR Part 761?	☐ Yes ☒ No
Does this waste contain regulated concentrations of listed hazardous wastes defined by § 40 CFR 261.31, 261.32, 261.33, Including RCRA F-Listed Solvents?	☐ Yes ☒ No
Does this waste contain regulated concentrations of 2, 3, 7, 8-Tetrachlorodibenzodioxin (2, 3, 7, 8-TCCD), or any other Dioxin as defined in § 40 CFR 261.31?	☐ Yes ☒ No
Is this a regulated Toxic Material as defined by Federal and/or State Regulations?	☐ Yes ☒ No
Is this a regulated Radioactive Waste as defined by Federal and/or State Regulations?	☐ Yes ☒ No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State Regulations?	☐ Yes ☒ No
Is this waste generated at a Federal Superfund Clean Up Site?	☐ Yes ☒ No

GENERATORS CERTIFICATION

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true and accurate description of the waste material being offered for disposal. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste, medical or infectious waste, or any other waste material this facility is prohibited from accepting by law. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I understand that WIN Waste Innovations, Taylor County Landfill, can only receive Non-Hazardous Waste.

The generator will notify WIN Waste Innovations, Taylor County Landfill of any changes in character or quantity of the waste prior to delivery. An annual, updated analytical report (if applicable) will be submitted to WIN Waste Innovations, Taylor County Landfill each year for the length of time the waste is disposed of in the above-mentioned disposal site.

[redacted] [redacted]

AUTHORIZED REPRESENTATIVE NAME AND TITLE (PRINTED) COMPANY NAME

[redacted] 7-31-2024

AUTHORIZED REPRESENTATIVE SIGNATURE DATE

The Generator is responsible for completing the Signature Authorization and/or Third Party Signature Authorization for Disposal, if applicable. Only when Generator of the waste is not authorizing designee(s) to sign in their behalf and will sign all documents and manifests will page 3 not be required.

Approved permanent special waste profiles are subject to the Renewal Process Knowledge Certification process to remain active for disposal of waste. Generator will be notified by the disposal facility/landfill designee 60 days prior to expiration date and all requested information for recertification must be received 10 days before expiration date for processing to prevent inactivation status.

Signature Authorization and/or Third Party Signature Authorization

The Signature Authorization and/or Third Party Signature Authorization form must be completed by the Generator of the Waste to represent Generator's Designee(s), when the Generator of the Waste Stream is *NOT* signing documents for special waste approval and WIN Waste Innovations preprinted manifest. NO EXCEPTIONS.

As generator of the waste stream, I herby certify that I am authorized to approve the names of personnel and/or authorized agents that will sign on behalf of the Generator.

Generator of Waste Stream (Company or Individual)	
Generator's Signature	
Print Signature & Title	
Generator's Address	
Telephone Number	
Date	

The following individuals/broker designees are authorized to sign as a representative(s) of the generator or as an agent for the generator for the following purposes (check those that apply):

- ☐ 1. Complete and sign Generator Waste Profile Worksheets.
- ☐ 2. Sign contracts to dispose and/or transport material.
- ☐ 3. Sign certifications necessary to comply with landfill requirements.
- ☐ 4. Sign manifests to initiate shipment to disposal facility.
- ☐ 5. Other, _____

When applicable, the authorized designee will be responsible for all notification or information requested by the generator.

Approved List of Authorized Individuals/Broker Designees by Generator:

Name of Individual	Title	Name Of Company	Telephone No.

New Special Waste Profiles

I have reviewed, uploaded, and submitted all the documents for this profile.

This profile has been approved and setup through Wastebits and TRUX.

Profile Number: 096-PS-24041

Approval Date: 8/7/24

Expiration Date: 8/6/27

Signature: Candace Graves Date: 8/7/24

I have reviewed all documents and approve.

GM signature: Date: 8/8/24

WIN WASTE INNOVATIONS®

PERFORMANCE FOR THE PLANET

Appendix C
Notification Letters

WASTE INDUSTRIES www.wasteindustries.com

208 Southern States Rd | Mauk, GA 31058 Taylor County Landfill

March 23, 2017

Honorable Randall F. Nelson, Chairman
Taylor County Board of Commissioners
7 Ivy Street
Butler, Georgia 31006

Subject: **WI - Taylor County Landfill**
CCR Management Plan

Dear Commissioner Nelson:

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 Taylor County Landfill is located within Taylor 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,

Roy Walton
General Manager

Cc: Jeff Browne, P.E.

WASTE INDUSTRIES www.wasteindustries.com

208 Southern States Rd | Mauk, GA 31058 Taylor County Landfill

March 23, 2017

Honorable Walter Turner, Mayor
City of Reynolds
P.O. Box 386
Reynolds, Georgia 31076-0386

Subject: **WI - Taylor County Landfill**
CCR Management Plan

Dear Mayor Turner:

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 Taylor County Landfill is located within Taylor County, and the City of Reynolds is also in Taylor 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,

Roy Walton
General Manager

Cc: Jeff Browne, P.E.