



Richard E. Dunn, Director

Land Protection Branch

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Dec 12, 2022

Chairman Neal Stanley
Telfair County Board of Commissioners
91 Telfair Avenue, Suite A
McRae-Helena, Georgia 31055

**SUBJECT: Telfair County – Telfair Co - CR 144 MSWL
Draft Site Limitations
Proposed Lateral Expansion
Permit Number 134-015D(MSWL), Submission ID: 498688**

Dear Chairman Stanley:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the September 30, 2022, revised, *Site Acceptability Report, Proposed Lateral Expansion, Telfair County Subtitle "D" SWLF* prepared by Advanced Environmental Management. Based on the data submitted, EPD has drafted "Site Limitations" which would form the basis for design of the proposed landfill in a manner that complies with *Georgia's Rules for Solid Waste Management*. A copy of these is attached.

Comments on the proposed facility's site suitability report and the draft "Site Limitations" are welcome. However, if EPD is to consider such comments prior to determining if a Site Suitability Notice is warranted for this facility, they must be received prior to January 12, 2023. Please note that issuance of a Site Suitability Notice by EPD does not constitute a permitting decision for the proposed facility and comments regarding siting issues may be considered up to the time a final permitting decision is made.

Please feel free to contact Beverly Tipton at 470-524-5790 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C Mueller".

Charles J. Mueller, Chief
Land Protection Branch

cc: Andy Selph, Telfair County Landfill Director
Jim Guentert, Keith Stevens, Beverly Tipton, William Cook, GA EPD
Darryl Webb, AEM

Draft Site Limitations
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1. The area considered for acceptability includes only that within the line labelled as “Proposed Property Boundary (Permit Boundary)” on Advanced Environmental Management’s (AEM) Figure 2.1 dated August 2022.
2. Waste shall not be placed outside of the area identified as “Limits of Existing Waste” and Limits of Proposed Waste” as shown AEM’s Figure 2.1 dated August 2022.
3. A liner and leachate collection system shall be constructed under all areas proposed for solid waste disposal. Since a seasonal high-water table has not been determined the liner shall be constructed at least 10 feet above the groundwater elevation contours shown on AEM’s Figure 2.1, dated August 2022. Any perched groundwater zones encountered during excavation of the site shall be drained entirely.

Alternatively, an underdrain system shall be constructed beneath the waste to prevent the water table from rising to within five feet of the bottom of the liner system. The project engineer shall make periodic quality control inspections while the underdrain system is under construction and shall certify that it has been properly designed and installed to prevent groundwater from coming within five feet of the bottom of the liner system. The outfalls of the underdrain system shall be incorporated into the facility's groundwater monitoring program.

4. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.
5. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells in existence at the time these site limitations are finalized.
6. A minimum 25-foot undisturbed buffer shall be maintained between the waste disposal area and any on-site springs, intermittent or perennial streams or surface water bodies except as permitted by the United States Army Corps of Engineers (USACE) and allowed by EPD.
7. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted by the USACE and allowed by EPD. A statement certifying that wetlands will not be impacted because of construction activities at the site shall be submitted. This statement shall be signed and stamped by the professional engineer responsible for the Design and Operational (D&O) Plan for the subject site. Wetland areas shall be delineated on the D&O Plan.

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8. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of Horse Creek and its perennial and intermittent tributaries.
9. The facility shall not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in a washout of solid waste or material to pose a hazard to human health and the environment.
10. All soil borings, monitoring wells and piezometers that have been completed/installed at this site, shall be plugged, and abandoned in accordance with the Water Well Standards Act. Additionally, all soil borings, monitoring wells and piezometers located within the proposed waste footprint shall be abandoned by overdrilling and filling with a non-shrinking cement/bentonite grout mixture via tremie pipe from the bottom to within 10 feet of the base of the landfill. The remaining borehole shall be filled with hydrated bentonite. The abandonment of all borings/piezometers/monitoring wells shall be supervised by a professional geologist (PG) or professional engineer (PE) registered to practice in the State of Georgia. A report documenting the abandonment shall be submitted to EPD prior to cell construction. This documentation shall be signed and stamped by the responsible professional geologist or engineer registered to practice in the State of Georgia.
11. Groundwater, surface water, and methane monitoring systems shall be installed at the site. Sampling parameters, sampling schedules, monitoring well construction, and spacing shall adhere to the guidelines established in the EPD's *Rules of Solid Waste Management, Chapter 391-3-4*. The system design and monitoring requirements shall be detailed in a groundwater and surface water monitoring plan and methane monitoring plan that are prepared in accordance with the Georgia Manual for Groundwater Monitoring, EPD's September 2015 document, "Methane Monitoring at Solid Waste Disposal Facilities" and current USEPA Region IV guidance and are approvable by EPD.