

August 23, 2023

Mr. James Guentert, P.G.  
Georgia Environmental Protection Division  
Solid Waste Management Program  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354

**Subject: Georgia Power Company – Plant Wansley  
Proposed CCR Landfill Expansion  
Permit # 074-005D(CCR)  
Heard County  
GEOS Submittal ID 738258**

Dear Mr. Guentert:

On March 16, 2023, the Solid Waste Management Program of the Environmental Protection Division (GA EPD) provided comments following its review of the *Site Acceptability Report for Proposed CCR Landfill Expansion, Plant Wansley* (SAR). These comments have been reviewed, and the SAR document has been revised to address them where appropriate. The revised SAR attached to this GEOS submittal therefore supersedes the original SAR document. This letter provides responses and explanations to the comments below.

## **GA EPD COMMENTS**

### **Comment No. 1:**

An updated site topographic map, signed by a Georgia RLS, should be submitted which shows the permit boundaries, buffers, and the current and proposed expansion waste limits. In addition, the proposed final waste limits should be added at a minimum to Figure 1-3, 2-1 and 2-7.

### ***Response:***

*A topographic map developed from survey data collected in early 2022 and signed by a Georgia PE has been prepared and included as **Appendix B** the revised SAR document. The approximate extent of the proposed Cell 4 Landfill expansion has been added to this requested drawing and to **Figures 1-3, 2-1, and 2-7** of the revised SAR. Note that the extent of the landfill expansion is approximate and that the actual limit of CCR waste placement*

*at Cell 4 may vary based on site limitations, permit details, and ongoing design refinements.*

**Comment No. 2:**

If applicable, the report should include a discussion and illustration of how the proposed CCR waste unit expansion will be constructed over the existing intermittent and perennial streams.

**Response:**

*The stream relocation is described in detail in the Section 404 permit application submitted to the U.S. Army Corps of Engineers (ACOE) on 21 April 2023. Section 1.4 of the SAR has been revised to reference that permit application document for more information. The permit can also be referenced in the ACOE public notice here: <https://www.sas.usace.army.mil/Portals/61/docs/Regulatory/publicnotices/20230516-SAS-2009-00552-Heard-SP-0616-JNR.pdf?ver=3JVokSdGYftJt93uXeOdeQ%3d%3d>*

**Comment No. 3:**

The intermittent and perennial streams presented in Figure 1-3 should also be shown in Figure 2-3 and 2-7.

**Response:**

*The intermittent and perennial streams have been added to **Figures 2-3 and 2-7** of the SAR.*

**Comment No. 4:**

The 2007 site suitability report identified 20 private wells within a one-half mile radius of the site, while the 2023 site suitability report indicates that there is only one. This discrepancy should be addressed.

**Response:**

*An additional records review was completed by Geosyntec in December 2022 to supplement the survey completed by NewFields in 2019. The updated review included inquiries to local county authorities. This review identified 23 potential drinking water wells within the ½ mile radius of the Site. It is not clear if these wells still exist or are in use, as some plot on roadsides, fence lines, or undeveloped properties. However, these 23 potential well locations are located upgradient of the Site or are hydraulically separated by groundwater divides. Relevant sections of the text of the SAR, including **Figure 1-4**, have been updated to reflect this change.*

**Comment No. 5:**

The groundwater potentiometric contours shown in Figure 2 likely do not accurately reflect the water table beneath Cells 1 and 2. Historic groundwater elevations determined at prior

existing piezometers such as GS-26, GS-25, GS-21, GS-17 should be used to guide contouring of the water table. For instance, the water table elevation ( $\approx 710$  feet) shown on Figure 2-7 near the former location of GS-25 is not consistent with the groundwater elevations (765 feet – 770 feet) determined at this location in 2006 and 2007 (Figure 3-3 and 3-4 in Appendix A).

**Response:**

*Previous potentiometric surface interpretations were generalized and based on the lack of current water level data beneath the cells. While the underlying geology and pre-construction topography of the Site likely influence the flow of groundwater beneath the lined cells, it is unlikely that current water levels are similar to those present prior to the grading, lining, and construction of the landfill cells in 2009-2010. A revised interpretation of the potentiometric surface has been included in the SAR which reflects a combination of the pre-construction groundwater conditions (topographic ridges and surface water drainages) and the expected reduction of water levels due to elimination of recharge in the area from the landfill cell construction. This revised potentiometric surface is included as **Figure 2-7** and replaces the previous figure in the report.*

**Comment No. 6:**

The geologic cross-section map and geologic cross-sections need to be modified/corrected as indicated below:

- Both the horizontal and vertical limits of the proposed waste expansion area should be shown on the cross-sections.
- An additional roughly E-W-oriented cross-section should be constructed that transects the proposed expansion area and at a minimum incorporates GWC-31, GWC-32, GWC-34, GS-102, GWC-8, GS-19, and GS-21.
- GS-108 which is included in A-A' should be shown on Figure 2-3.
- The water table elevation at the former location of GS-25 (A-A') is likely much higher as explained in Comment #5.
- The color and symbol for residual and saprolitic soils in the legend does not appear to match what is in the cross-sections.

**Response:**

*The geologic cross-sections and associated key map have been revised to address the comments provided by GA EPD.*

- *The approximate horizontal limits of the proposed expansion of the landfill have been added to the cross-sections. The vertical geometry of the landfill cells is still under consideration and is therefore not included in the cross-sections. These details will be provided in the major modification package for the CCR Landfill expansion.*
- *The additional cross-section (E-E') transecting the proposed Cell 4 area has been prepared and included in the figures (**Figure 2-4B**) of the revised SAR.*
- *GS-108 has been added to the cross-section key map.*
- *The revised seasonal high potentiometric surface presented in **Figure 2-7** and discussed in the previous comment has been added to the geologic cross-sections, replacing the previous groundwater surface, including at former boring GS-25.*
- *The color and hatching have been revised in the cross-sections as requested.*

If you have any questions or need additional information regarding this response, please contact Bret McClellan at 470-631-4519.

Sincerely,

Tyler Boyles  
Manager, Environmental Affairs  
Georgia Power Company

cc: William Cook  
Keith Stevens  
Tammy Buchli  
Beverly Tipton