



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

4244 International Parkway  
Suite 104  
Atlanta, Georgia 30354  
404-362-2537

December 11, 2019

John Kelly  
Brantley County Development Partners, LLC  
2255 Cumberland Parkway Building 1700  
Atlanta, Georgia 31029

RE: Draft Site Limitations for Brantley County Development Partners  
US 82 Solid Waste Handling Facility – South, Brantley County  
Proposed Municipal Solid Waste Landfill  
APL 01301

Dear Mr. Kelly:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the *Site Assessment Report for the Brantley County Development Partners, LLC (BCDP), US 82 Solid Waste Handling Facility-South* prepared by Innovative Engineering Strategies, LLC (IES), dated December 2016 and revised October 2019. 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 15, 2020. 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 John Sayer at 404-362-2559 if you have any questions.

Sincerely,



Charles J. Mueller, Chief  
Land Protection Branch

Enclosure

cc: Jim Guentert, Keith Stevens, John Sayer, William Cook, Susan Wood GA EPD  
EPD Coastal District  
Michael Biers, IES

File: Brantley County – US 82 Solid Waste Handling Facility - South [APL 01301], Permit

**Draft Site Limitations**  
**Brantley County- US 82 Solid Waste Handling Facility - South**  
**Proposed Municipal Solid Waste Landfill**  
**December 11, 2019**  
**Page 1 of 2**

1. The area considered for acceptability includes only the area within the proposed permit boundary shown on Innovative Engineering Strategies, LLC (IES) Figure 1-02, *Boundary Survey and Topographic map of Site*, revision 2, dated October 2019.
2. Waste shall not be placed outside of the area identified as “Areas Favorable for Disposal of Solid Waste” shown on IES’s Figure 4-01, *Areas Favorable and Unfavorable for Municipal Solid Waste Landfilling*, revision 2, dated October 2019.
3. A liner and leachate collection system shall be constructed under all areas proposed for municipal solid waste disposal. The bottom of the liner system shall be constructed a minimum of five feet above the seasonal high groundwater contours shown on IES’s Figure 2-01, *Boring Locations and Seasonal High Groundwater Table Map*, revision 2, dated October 2019 and no lower than an elevation of 60 feet. An underdrain system shall be installed at the seasonal high groundwater surface under all landfill cells to ensure that groundwater cannot rise to within five feet of the bottom of the liner system. Furthermore, following construction, a demonstration shall be provided with each environmental monitoring report that shows there is a minimum five-foot separation between the water table and the bottom of the liner system.
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.
6. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted by the United States Army Corps of Engineers (USACE) and allowed by EPD. A statement certifying that wetlands will not be impacted as a result 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 Plan for the subject site. Wetland areas shall be delineated on the Design and Operational Plan.
7. 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.
8. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of the Satilla River, the Little Satilla River and their 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. Any modifications to the 100-year floodplain shall not cause a rise in the 100-year floodplain of more than 0.10 feet at any point.

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**December 11, 2019**  
**Page 2 of 2**

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 Facilities" and current USEPA Region IV guidance and are approvable by EPD. The outfall of all underdrain systems shall be incorporated into the facility's groundwater monitoring system.
12. Structural fill shall be required to fill the existing ponds and raise the surface grade so that it is a minimum of five feet above the seasonal high potentiometric surface shown on IES's Figure 2-01 *Boring Locations and Seasonal High Groundwater Table Map*, revision 2, dated October 2019 and to at least an elevation of 60 feet. This structural fill must meet requirements presented in the construction quality assurance plan of the Design and Operational (D&O) Plan.