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08/26/2021

Honorable Lace Futch, Chairman
Solid Waste Management Authority of Atkinson County
64 Arthur Davis Jr. Drive
Willacoochee, Georgia 31650

SUBJECT: Atkinson County – SR 50 MSW and C&D Landfill
Proposed Vertical Expansion of C&D Landfill
Permit Number 002-009D(MWSL), Submission ID: 536212

Dear Chairman Futch:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the February 2021, Site Assessment Report for the C&D Landfill Vertical Expansion, Atkinson County – SR 50 MSW and C&D Landfill, Permit No. 002-009D (MSWL) prepared by Innovative Engineering Strategies, LLC (IES). 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 September 22, 2021. 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 470-251-2592 if you have any questions.

Sincerely,

Charles J. Mueller, Chief
Land Protection Branch

Enclosure

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

Draft Site Limitations

Atkinson County – SR 50 MSW and C&D Landfill

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1. The portions of the site considered for this review include only those areas located south of the line labelled “Conservation Easement Boundary”, shown on Geo-Environmental Technologies, Inc’s Plat Number SP-1a, Site Plan for Topography, 100-Year Floodplain & Wetlands, dated September 12, 2001, Revision 2.
2. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
3. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the facility property boundaries.
4. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and on-site surface water or wetlands, except as permitted by the US Army Corps of Engineers 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 Plan for the subject site. Wetland areas shall be delineated on the Design and Operational Plan.
5. If, during excavation of the site, any springs or seeps are detected, EPD shall be notified immediately, and protective designs shall be incorporated into the facility’s design and operational plans, such that sampling of the spring or seep can be incorporated into the groundwater monitoring plan.
6. All erosion control measures and/or diversion ditches shall conform to the Erosion and Sediment Control Act.
7. No solid waste shall be disposed at or below the 100-year floodplain elevation of 198 feet above mean sea level. The proposed facility must not restrict the flow of the 100-year flood or reduce the temporary water storage capacity of the 100-Year floodplain.
8. A liner and leachate collection system shall be constructed under all areas proposed for the disposal of municipal solid waste. The liner system shall be constructed at least five feet above the seasonal high-water table. Because the seasonal high-water table will likely be higher than the elevations depicted on the potentiometric surface map in the site assessment report, an underdrain system shall be constructed under the liner system to prevent the water table from rising to within five feet of the liner system. The liner system shall not be installed below a mean sea level elevation of 212 feet around the northern and western perimeters of the disposal area. In the central portion of the site, the liner system shall not be installed below a mean sea level elevation of 215 feet. The project engineer

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shall make periodic quality control inspections while the underdrain system is under construction and must certify the proper installation of the system. In the portion of the site now proposed expansion of the construction and demolition waste landfill, waste shall not be placed below a mean sea level elevation of 215 feet. An underdrain shall likewise be placed beneath all areas proposed for waste disposal, to prevent groundwater from rising to within five feet of the bottom-of-waste elevations. The outfalls of the underdrain system shall be incorporated into the facility's groundwater monitoring program.

9. Soil borings, monitoring wells and piezometers 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.
10. 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.