



Richard E. Dunn, Director

EPD Director's Office

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05/28/2020

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

**SUBJECT: Site Suitability Notice for
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 in addition to your application, EPD has determined that the applicable siting standards can be met in accordance with Chapter 391-3-4-.05(1), provided the attached "Site Limitations" are met. This determination is based on information provided to date for EPD review and is subject to revision prior to permit issuance should errors be found in the submitted information or new information be provided relevant to this determination. This letter denotes only the demonstration of the ability to comply with siting standards for the proposed site and does not constitute approval to begin construction or operation of the disposal site. This letter does not constitute a permit for the proposed solid waste landfill.

Before a permit may be issued for the proposed solid waste disposal site, a Design and Operational Plan (D&O Plan), prepared in accordance with Chapter 391-3-4-.07(1), must be submitted for consideration by the EPD.

Additionally, the appropriate governing authority must hold a public hearing regarding the proposed landfill no less than two weeks prior to the issuance of any permit. At least 30 days prior to the public hearing, notices of the public hearing must be posted at the proposed site and advertised in the legal organ of the county or counties in which the proposed solid waste disposal facility will be located. A transcript of the public hearing proceedings and a reaffirmation of zoning consistency must be submitted to EPD prior to a final decision regarding the issuance of a permit for the proposed solid waste disposal facility.

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After our review and evaluation of the D&O Plan, and the other required submittals, a Solid Waste Handling Permit will be either issued or denied. This Site Suitability Notice shall terminate upon a final decision to issue or deny the requested permit. Failure to submit to EPD an approvable Design and Operational Plan within one year from this date may result in permit denial.

Sincerely,



Richard E. Dunn, Director
Environmental Protection Division

Attachment

cc: Brantley County Board of Commissioners
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

Site Limitations
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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, the Turtle River and their perennial and intermittent tributaries.

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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 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.