



March 23, 2022

Ms. Rima Naji  
Environmental Engineer  
Georgia EPD – Solid Waste  
Atlanta Tradeport, Suite 104  
4244 International Parkway  
Atlanta, GA 30354

**RE: Crisp County – U.S. 41S Site 2 MSW Landfill  
Annual CCR Management & Dust Control Report  
Permit No. 040-008D(MSWL)  
LE 08525.16**

Dear Ms. Naji:

On behalf of Crisp County we are submitting this as a copy of the annual report to the subject facility's CCR management and fugitive dust control plan.

At this time, the facility is not proposing changes to its permitted operational practices, or adding additional CCR customers or types of CCR, or otherwise deviating from the approved D&O plans. Therefore, the facility is not submitting an amended plan and requests the attached annual report be accepted.

Please contact me at 229-438-0522 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads 'Tod Lanier'.

Tod Lanier, PE  
Vice-President

Enclosure: 2021 Annual CCR Management and Dust Control Report

Cc: Carl Gamble, Crisp County Landfill  
Crisp County Landfill Operating Record

**ANNUAL CCR MANAGEMENT AND DUST  
CONTROL REPORT**

FOR

**Crisp County US HWY 41 MSW Landfill**

CRISP COUNTY, GEORGIA

Project No. LE 08525.16

March 23, 2022



**LANIER**  

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**ENGINEERING** INC.

Prepared by:  
Lanier Engineering, Inc.  
1504 W. Third Avenue  
Albany, Ga. 31707  
(229) 438-0522

## ANNUAL CCR MANAGEMENT AND DUST CONTROL REPORT

In accordance with the guidance document provided by the Georgia Department of Natural Resources, Environmental Protection Division, the following information is provided for compliance with the Solid Waste Regulations 391-3-4.

### 1. CCR and Non-CCR Waste received during the previous year

#### a. CCR Monofill

**The Crisp County US HWY 41 MSW Landfill (CCLF) currently receives CCR waste for disposal in the active working face at the site of the CCR “block” disposal area; second working face. This area is limited to an approximately 200 foot by 400 foot disposal area located in Cell Nos. 10 and 11 on top of at least one lift of previously disposed waste, and against the existing prior-filled cell slopes as noted in Section 2 of the Operations Plan on Sheet 22 of the D&O Plan.**

#### i. List of type(s) and source(s) of CCR

**The only source of CCR waste received at the facility is the coal-fired electric generating facility operated by the Crisp Power Commission as required by Section 54, Paragraph 5 of the Operations Plan on Sheet 22 of the D&O Plan. The waste consists of coal combustion residuals from a U.S. coal-fired generating facility which burned bituminous coal, sub-bituminous coal, or lignite. No new CCR waste streams were accepted by the facility during this reporting period. The facility does not utilize CCR material as a solidification agent for liquid wastes.**

#### ii. Annual amount of CCR

**The CCR material received at this facility between January 01, 2021 and December 31, 2021 had a total recorded weight of 2,693 tons. This falls below the estimated total annual weight of 34,500 tons shown in Section 54 of the Operations Plan on Sheet 22 of the D&O Plan.**

#### iii. Daily maximum amount of CCR

**The maximum amount of CCR material received in any given day between January 01, 2021 and December 31, 2021 had a recorded weight of 435 tons. (On days when CCR waste was received, the average daily amount for disposal in 2021 had a recorded weight of 269 tons). While the maximum daily tonnage for 2021 is above the estimated limit shown in the Operations Plan of the current D&O Plan, the facility is designed to withstand a waste mass consisting entirely of CCR material. Therefore, no adjustments are needed to the plan or design components related to stability, leachate collection, or base grade settlement.**

b. Comingled CCR and Non-CCR Waste

- i. List of type(s) and source(s) of CCR, and other types of non-CCR waste, such as municipal, industrial, or commercial solid waste

**Not applicable. Crisp County US HWY 41 MSW Landfill (CCLF) did not comingle any CCR waste with Non-CCR waste. CCR waste was “block” or mono filled as noted above.**

2. Waste Placement, Cover, and Recovery

- a) Management and maximum area of the working face

**The facility does not utilize CCR material as a solidification agent for liquid wastes. CCR material is restricted to the working face of the “block” disposal area, as noted above, in such a manner that it is easily incorporated with available equipment.**

**Management of the working face and maximum area of the working face are maintained at a size that is compatible with the facility’s available equipment for spreading and compacting waste, and for suppressing dust in accordance with Section 54 of the Operations Plan on Sheet 22 of the D&O Plan. The typical working face area is 200 feet by 200 feet. However, occasionally the working face size may be adjusted to support unusual weather activity, temporary volume adjustments to the waste stream, to safely stage waste loads to accommodate truck traffic and allow disposal of waste loads during daily operations. The working face size may increase to a maximum of 350 feet by 350 feet. This maximum size does not persist for more than a day.**

- b) Waste placement and compaction for CCR lifts and comingled waste

**CCR waste is spread in uniform layers approximately 2 feet thick, and compacted to its smallest practical volume. Trucks which bring CCR waste to the CCR “block” disposal area dump loads directly at the working face. Dozers and compactors are used to spread, and compact the CCR waste.**

- c) Leachate outbreaks frequency, corrective actions taken, and if there is a need to install drainage layers such as chimney drains

**No leachate outbreaks were observed in layers of waste containing CCR waste during this reporting period. Therefore, no CCR waste leachate outbreak corrective actions were necessary.**

- d) Daily cover of comingled CCR and non-CCR waste

**Procedures for the placement of daily cover were conducted in accordance with Section 54 of the Operations Plan on Sheet 22 of the D&O Plan.**

- e) Statement verifying that daily inspection reports are kept on-site in accordance with the current D&O Plans.

**Records of all CCR waste transported to the CCR “block” disposal area along with daily logs and operational records are retained at the facility’s scale house office building.** The Operations Manager Daily Log includes the Observation Report to ensure compliance with regular solid waste operations, and any dust control logs maintained at the site. The Operations manager keeps these items in the office in the scale house or in the operations vehicle during normal operating hours. A sample dust suppression log is attached in Appendix A. At his discretion, the Manager may add notes in the comments section of the observation report, or if action items are identified, such as leachate outbreaks or dust control-related issues, the Manager may designate an employee to take corrective action immediately, prior to documenting the comment.

f) Management of solidification operation using CCR as a solidification agent, and sample records of paint filter tests, if applicable

**Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR for liquid waste solidification.**

g) Recovery of previously disposed CCR for beneficial reuse, if applicable

**Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not recover previously disposed CCR material for beneficial reuse.**

## **Annual Report**

### **3. Fugitive Dust Control**

a) Actions taken to control CCR fugitive dust from CCR disposal unit, roads, conditioning areas, and solidification operation; and effectiveness of those actions

**The Operator utilizes the following measures to minimize the CCR from becoming airborne:**

- ensure all trucks transporting CCR at the facility are covered**
- reduce or halt operations during high wind events**
- operation of a water spray system which includes passes with a water wagon and use of impacted sprinkler heads supplied by an above ground pump**
- apply more frequent cover as needed.**

Keeping the trucks covered is the most effective way to prevent the escape of dust during transport. Occasionally, trucks were not covered properly, and the Operator indicated to the driver to correct this.

The water wagon proved most effective controlling dust site-wide. Impact sprinkler heads around the cells were also occasionally used, but were not a primary control.

b) Records of Citizen Complaints specifically related to CCR Management, if applicable

**No citizen complaints related to dust control have been received. Forms for recording these complaints are kept on-site in the scale house office building. Employees who may answer the phone are trained to record them on the appropriate form.**

c) Recommendations to improve dust control measures in the future, if applicable to CCR Materials

**Adding water has proved most effective. As described above, the dust control measures currently being utilized at the landfill facility have adequately addressed the CCR acceptance. No additional recommendations are made at this time.**

#### 4. Leachate Collection and Removal System (LCRS)

a) Any known issues with the LCRS that are directly attributed to CCR

**During this reporting year, no known issues with the LCRS were observed directly attributed to disposal of CCR.**

#### 5. Storm Water - Management System

a) Narrative describing measures used to ensure that surface water contacting CCR and non-CCR waste has not been discharged into the stormwater management system

**Since all the CCR disposed at the facility is kept within interior slopes, surface water contacting the CCR material is directed and collected in the leachate collection system and does not discharge into the stormwater management system. The CCR working face was managed to ensure that surface water contacting CCR waste was not discharged into the stormwater system during this reporting period. This was accomplished by placing and compacting CCR material away from the side slopes, using soil diversion berms near side slopes and by sloping the working face into the waste mass. The stormwater management system is directed to permitted sediment ponds.**

#### 6. Waste Compatibility

a) Any incompatibility issues and corrective measures taken

**CCR received at the landfill is from the same source whose material was used as the basis of design for the original CCR Management Permit. Additionally, its 'as received' physical condition (i.e. moisture and grain size) has remained generally consistent throughout the disposal process and no new CCR waste streams were accepted by the facility during this reporting period. No known issues with CCR material compatibility were identified during this reporting period.**

b) For a solidification process, if CCR is used as a solidification agent

i) List of type(s) and source(s) of CCR and types of liquid waste streams received for solidification prior to disposal

**Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR waste in a solidification process.**

ii) Sample records of compatibility analyses

**Not Applicable. Consistent with the approved CCR Management Plan, the CCLF facility did not use CCR waste in a solidification process.**

## 7. Groundwater Monitoring

a) The Environmental Monitoring Unit will assess groundwater monitoring data and will determine if the groundwater monitoring plan requires revision.

**CCR is currently being placed in the disposal area on which the current groundwater monitoring plan is based. Therefore, the current monitoring network remains adequate for detection of CCR impacts. As CCR disposal operations began after or near the date of the last groundwater monitoring event, no CCR impacts have been noted or would be expected at this time. Should impacts be detected in the future, however, the current plan provides for adequate assessment and corrective actions. No revisions to the groundwater monitoring plan are deemed necessary at this time.**

## 8. Emergencies

a) Any events or circumstances that represented an operational or environmental emergency and the corrective actions taken specific to the management of CCR.

**No operational or environmental emergency events or circumstances specific to the management of CCR were noted during this reporting period.**

## 9. Documentation of Notification to Local Governments

The owner or operator shall notify the local governing authorities of the county, and any city within the county, in which the landfill is located upon submittal of an amended Plan to EPD. Copies of the correspondence to local governing authorities must be provided to EPD with the amended Plan submittal.

**An amended plan is not being submitted as part of the Annual CCR report at this time. However, an updated plan with minor revisions is currently under review by EPD, as part of the 5-year permit renewal and updated D&O Plans. The local Governments were previously notified upon the submittal of the previous plan. Copies of the notification letters are attached in the Appendix.**

# APPENDIX



**APPENDIX A**  
**SAMPLE LOG**



**APPENDIX B**  
**NOTIFICATION LETTERS**



# THE BOARD OF COMMISSIONERS OF CRISP COUNTY

PHONE  
229.276.2673

210 SOUTH 7TH STREET  
CORDELE, GEORGIA 31015

FAX  
229.276.2639

[www.crispcounty.com](http://www.crispcounty.com)

October 01, 2018

Honorable Sam. N. Farrow, Chairman  
Crisp County Board of Commissioners  
210 S 7th Street  
Cordele, Georgia 31015

**Subject: Crisp County US41S MSW Landfill  
CCR Management Plan**

Dear Commissioner Farrow:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."*

The Crisp County US41S MSW Landfill is located within Crisp County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Carl Gamble  
Public Works Director

Cc: Landfill Operating Record  
Gregg Bacon, Lanier Engineering  
Tom Patton, County Administrator



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October 01, 2018

Honorable John Wiggins, Commission Chairman  
City of Cordele  
501 North 7th Street  
Cordele, Georgia 31015

**Subject: Crisp County US41S MSW Landfill  
CCR Management Plan**

Dear Commissioner Wiggins:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, **and any city within the county**, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

The Crisp County US41S MSW Landfill is located within Crisp County, and the City of Cordele is also in Crisp County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Carl Gamble  
Public Works Director  
Crisp County

Cc: Landfill Operating Record  
Sam N. Farrow  
Gregg Bacon, Lanier Engineering  
Tom Patton, County Administrator



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October 01, 2018

Honorable Craig Huckaby, Mayor  
City of Arabi  
PO Box 177  
Arabi, Georgia 31712

**Subject: Crisp County US41S MSW Landfill  
CCR Management Plan**

Dear Mayor Huckaby:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, and any city within the county, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

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Sincerely,

Carl Gamble  
Public Works Director

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Sam N. Farrow  
Gregg Bacon, Lanier Engineering  
Tom Patton, County Administrator