

04/10/2026

Thomas Rathke  
U.S. Sugar  
201 Oxnard Drive  
Port Wentworth, GA 31407

**SUBJECT: Draft Site Limitations for Chatham County – US Sugar Savannah Refinery  
Proposed Lateral Expansion of the Private Industrial Landfill  
Permit No. 025-018D(LI)  
GEOS Submission ID: 890550**

Dear Mr. Rathke:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the November 25, 2024, *Assessment Report – Landfill Permit Modification*, as revised September 2, 2025 and prepared by AECOM. 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 Comprehensive Rules and Regulations Subject 391-3-4, Solid Waste Management* (Rules). These rules can be accessed online at <https://rules.sos.state.ga.us/GAC/391-3-4>.

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 within 30 days of the issuance of this letter. 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 Beverly Tipton at 470-524-5790 if you have any questions.

Sincerely,



Sarah B. Visser, Chief  
Land Protection Branch

Enclosure

cc: Keith Stevens, Beverly Tipton, William Cook – GA EPD  
EPD Coastal District  
Andrew Dowding, P.E. – AECOM

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1. The area considered for acceptability includes only that surveyed property boundary identified as “Existing Landfill Permit Boundary,” “Proposed Landfill Permit Boundary,” and “200 Foot Buffer” on AECOM’s Site *Topographic Map*, Appendix A, dated 7-31-2024.
2. Waste shall not be placed outside of the areas defined by the lines identified as “Proposed Landfill Permit Boundary” on AECOM’s *Topographic Map*, Appendix A, dated 7-31-2024.
3. The bottom of waste within the area defined as “Proposed Landfill Permit Boundary” shall be constructed a minimum of five feet above the seasonal high groundwater elevation of 8.754 feet, North American Vertical Datum 1988 (NAVD88), as shown on AECOM's Appendix D, *Potentiometric Map*, dated August 26, 2025.

As an alternative to placing the waste a minimum of 5 feet above the seasonal high water table referenced above, an underdrain system may be constructed beneath all areas proposed for waste disposal. The design engineer shall make periodic inspections of the underdrain system during construction and shall certify that the underdrain system is designed to prevent groundwater elevations from rising to within five feet of the bottom-of-waste elevations at any point between the drain lines.

Any perched groundwater zones encountered during excavation of the site shall be drained entirely, if possible, otherwise an underdrain system shall be required to maintain vertical separation from the waste

4. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary.
5. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells in existence at the time of Site Limitations issuance.
6. 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, except as permitted by the United States Army Corps of Engineers (USACE) or EPD.
7. If non-rippable rock (bedrock) is encountered at an elevation above the approved base of the waste unit or if non-rippable rock is removed during excavation, at least five (5) feet of clean, compacted, rubble-free fill shall be placed above the non-rippable rock. Alternatively, an engineered layer (soil or a combination of soils and geosynthetics) shall be placed and compacted between the non-rippable rock and the base of the waste unit. The engineered layer shall include:

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- a. One (1) foot of soil with a hydraulic conductivity equal or lower than  $1 \times 10^{-5}$  cm/sec constructed over one (1) foot of structural fill, or
- b. If a geosynthetic is used, the geosynthetic will have a hydraulic conductivity equivalent to or less than one (1) foot of  $1 \times 10^{-5}$  cm/sec soil and will be placed on a minimum of two (2) feet of structural fill.

Installation of an alternative engineered layer over rock shall be documented and certified by a Professional Engineer or Professional Geologist registered in the State of Georgia and shall be included in the CQA report for the cell being constructed.

8. Impacts to wetlands and state waters shall not occur unless authorized by the United States Army Corps of Engineers and approved by EPD in writing. Authorization by the United States Army Corps of Engineers alone does not constitute compliance with the Georgia Water Quality Control Rules, Chapter 391-3-6, including but not limited to Rule 391-3-6-.03. A minimum fifty (50)-foot undisturbed buffer shall be maintained between the waste disposal boundary, as defined in Georgia Solid Waste Management Rules Rule 391-3-4-.07(1)(b), and all wetlands and state waters. The buffer shall remain undisturbed and shall not be used for grading, construction access, or material placement. Alternatively, a request to reduce the required buffer may be submitted for EPD approval. Any such request shall include a certification signed and sealed by a professional engineer and supporting documentation demonstrating that the proposed design, construction, and operation will not result in adverse impacts to wetlands or state waters, including limits of disturbance and erosion and sedimentation control measures consistent with O.C.G.A. § 12-7-6. Wetlands and state waters as shown on AECOM's Topographic Map, Appendix A, dated 7-31-2024, waste disposal boundaries, and limits of disturbance shall be clearly delineated on the approved Design and Operational Plan. The Design and Operational Plan shall be implemented as approved to prevent unauthorized impacts to wetlands and state waters.
9. All erosion control measures shall conform to the *Erosion and Sediment Control Act, Georgia Comprehensive Rules and Regulations Subject 391-3-4 Solid Waste Management* (Rules), and be protective of all perennial and intermittent streams and tributaries. Runoff from the entire facility must be routed at all times, either directly or via properly designed conveyance systems, to permanent sediment control impoundments:
10. 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.
11. All soil borings and piezometers that have been completed/installed at this site shall be plugged and abandoned. Abandonments shall be performed in accordance with the Water Well Standards Act. Additionally, all soil borings and piezometers located within the proposed

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waste footprint shall be abandoned by over-drilling 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 and piezometers 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.

12. The existing pond located within the future waste unit boundaries must be drained, and soil backfilled to the prior surface water elevations. This structural fill must be constructed a minimum of five feet above the seasonal high groundwater elevation of 8.754 feet (NAVD88), as shown on AECOM's Appendix D, *Potentiometric Map*, dated August 26, 2025, and must meet requirements in the construction quality assurance plan of the Design and Operational Plan.