



Richard E. Dunn, Director

Land Protection Branch

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06/22/2022

Mr. Dirk Verhoeff, Executive Director
Dalton-Whitfield Solid Waste Authority
587 Gazaway Road
Dalton, Georgia 30721

**SUBJECT: Site Suitability Notice For
Whitfield County – Dalton-Whitfield Solid Waste Management Authority
Baled Carpet Waste Landfill Proposed Expansion
Permit Number 155-048D(LI), Submission ID: 544436**

Dear Mr. Verhoeff:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the *Site Acceptability Baled Carpet Waste Landfill, Permit Number 155-048(LI) Report, Whitfield County, Georgia* report (revised June 2021) and a June 17, 2021 response letter prepared by Atlantic Coast Consultants (ACC).

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 proposed disposal site expansion. This letter does not constitute a permit for the proposed solid waste landfill expansion.

Please note that EPD has made minor changes to the existing Site Limitations 5, 6 and 11 in the attached Site Limitations based on comments to the draft site limitations submitted by ACC in an August 17, 2021 letter.

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

Additionally, the appropriate governing authority must hold a public hearing regarding the proposed landfill expansion 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 expansion of the 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 expansion.

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After our review and evaluation of the D&O Plan, and the other required submittals, a Solid Waste Handling Permit for the expansion 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 of the expansion.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Dunn", with a stylized flourish at the end.

Richard E. Dunn, Director
Environmental Protection Division

Attachment

cc: Keith Stevens, Beverly Tipton, Jim Guentert, William Cook, GA EPD
EPD Mountain District, Cartersville
Charles Adams, ACC

Site Limitations
Dalton-Whitfield Baled Carpet Waste Landfill
Proposed Horizontal Expansion
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1. The area considered for acceptability includes only that identified as “Limits of Site Acceptability” shown on Atlantic Coast Consulting (ACC), *Seasonal High Water Table Map*, Figure 9C, dated June 2021.
2. Waste shall not be placed outside of the area identified as “Proposed Limits of Waste” shown on ACC’s *Seasonal High Water Table Map*, Figure 9C, dated June 2021.
3. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.
4. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
5. 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.
6. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted by the USACE. 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.
7. The bottom of the waste shall be kept a minimum of ten feet above the groundwater contours shown on ACC’s *Seasonal High Water Table Map*, Figure 9C, dated June 2021. Alternatively, an underdrain system can be installed beneath all areas of waste and connected to the existing underdrain system to maintain a five-foot separation between the waste and the water table. The project engineer shall make periodic quality control inspections while the underdrain system is under construction and shall certify that it has been properly designed and installed to prevent groundwater from coming to within five feet of the bottom of the waste.

A perforated conveyance pipe and stone backfill or equivalent conveyance system shall be placed in the intermittent stream channel within the proposed expansion area and an underdrain system shall be installed above the conveyance system to prevent groundwater from rising to within five feet of the bottom of the waste. The outfall(s) of the underdrain system must be incorporated into the groundwater monitoring plan for the site.

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8. No blasting of bedrock shall be conducted. 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:
 - a. One (1) foot of soil with a hydraulic conductivity equal or lower than 1×10^{-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) of 1×10^{-5} cm/sec soil and will be placed on a minimum of two (2) feet of structural fill.
9. 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.
10. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of the Conasauga River and its perennial and intermittent tributaries.
11. Structural fill shall be required to fill the existing sediment pond and any other areas where the surface grade needs to be raised. This structural fill must meet requirements presented in the construction quality assurance plan of the Design and Operational (D&O) Plan.
12. 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.
13. 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.

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14. This site is in a seismic impact zone as defined in the Rules for Solid Waste Management (Chapter 391-3-4-.05 (1) (g)). The design engineer must certify that all containment structures are designed to resist the maximum horizontal ground acceleration for the site. Therefore, the registered professional engineer preparing the design and operational plan must stamp and sign each engineering drawing with the accompanying notation:

I have reviewed the information presented in this drawing, and in my professional opinion, all containment structures are designed to resist a maximum horizontal ground acceleration of 0.22g in 250 years.

15. 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.