

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch 4244 International Parkway Suite 104 Atlanta, Georgia 30354 404-362-2537

November 15, 2019

Honorable Pete Stephens Chairman, Decatur County Board of Commissioners P.O. Box 726 Bainbridge, Georgia 39818

RE: Draft Site Limitations for Decatur County Solid Waste Facility Permit No. 043-011D (MSWL) Proposed Landfill Expansion

Dear Mr. Stephens:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the *Limited Site Assessment Report for the Decatur County Solid Waste Handling Facility Major Modification Interim C&D Landfill Expansion* prepared by Innovative Engineering Strategies, LLC (IES), dated May 2019. Additional information was submitted by IES in and accompanying an August 8, 2019 response letter and September 6, 2019 response letter. 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 December 27, 2019. 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.

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Please feel free to contact John Sayer at 404-362-2559 if you have any questions.

Sincerely,

Charles J. Mueller, Chief Land Protection Branch

Enclosure

cc: Jim Guentert, Keith Stevens, John Sayer, William Cook, Susan Wood GA EPD EPD Southwest District Michael Biers, IES

File: Decatur County – Decatur County Solid Waste Facility [043-011D (MSWL)] (PER)

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- 1. The area considered for acceptability includes only the area within the existing and new permit boundary shown on Innovative Engineering Strategies, LLC (IES) *Sheet 3 of 14, Topographic Map of Site*, dated March 2019 and edited 09/06/19.
- 2. Waste shall not be placed outside of the area identified as "Existing Waste Unit Boundary", "Future Waste Unit Boundary", "C&D Cell No. 1" and "Limits of C&D Landfill Expansion" shown on IES's *Sheet 3 of 14*, *Topographic Map of Site*, dated March 2019 and edited 09/06/19.
- 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 of the municipal solid waste landfill cells shall be constructed a minimum of five feet above the seasonal high groundwater contours shown on IES's *Sheet 3 of 14, Topographic Map of Site,* dated March 2019 and edited 09/06/19. The bottom of the C&D waste cell shall be constructed a minimum of five feet above the seasonal high groundwater contours shown on IES's *Sheet 3 of 14, Topographic Map of Site,* dated March 2019 and edited 09/06/19. The bottom of the C&D waste cell shall be constructed a minimum of five feet above the seasonal high groundwater contours shown on IES's *Sheet 3 of 14, Topographic Map of Site,* dated March 2019 and edited 09/06/19 and range from no less than an elevation of 190 feet at the southeast corner of existing C&D Cell No. 1 to no less than an elevation of 185 feet at the northwest corner of the proposed C&D waste unit expansion.
- 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 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.
- 7. If during construction/excavation of the site, any springs or seeps are discovered, EPD shall be immediately notified and protective measures shall be incorporated into the facility's Design and Operational Plan to prevent contamination of the spring or seep. Sampling of the spring or seep shall also be incorporated into the facility's groundwater sampling plan.

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- 8. 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). 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.
- 9. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of Swamp Creek, Mill Creek and their perennial and intermittent tributaries.
- 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 so as to pose a hazard to human health and the environment. Any modifications to the 100-year floodplain shall not cause a rise in the 100-year floodplain of more than 0.10 feet at any point.
- 11. All soil borings, monitoring wells and piezometers that have been historically 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.
- 12. 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.

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x = 16

13. The existing ponds 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 contours shown on IES's *Sheet 3 of 14*, *Topographic Map of Site*, dated March 2019 and edited 09/06/19, and must meet requirements in the construction quality assurance plan of the Design and Operational Plan.