



Richard E. Dunn, Director

Land Protection Branch

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404-362-2537

04/13/2021

Kyle McGee, Deputy Director of Public Works
Columbus Consolidated Government
7900 Pine Grove Way
Columbus, Georgia 31907

**SUBJECT: Draft Site Limitations for Muscogee County – Pine Grove MSW Landfill
Proposed Vertical Expansion and Class 4 Composting Facility
Permit Number 106-016D(MSWL), Submittal ID:501163**

Dear Mr. McGee:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the following documents:

- *Site Acceptability Report: Pine Grove MSW Landfill Vertical Expansion and Class 4 Composting Facility Permitting* prepared by Atlantic Coast Consulting (ACC).
- December 18, 2020, Response to EPD Comments and additional information submitted by ACC.
- February 24, 2021, Response to EPD Comments and additional information submitted by ACC.

Based on the data submitted, EPD has drafted “Site Limitations” which would form the basis for design of the proposed solid waste handling facility 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 May 12, 2021. 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: Keith Stevens, John Sayer, Spencer Nelson, Jim Guentert, William Cook, GA EPD
EPD West Central District, Macon
Monte Jones, ACC

Draft Site Limitations
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1. Class 4 composting shall only be conducted within the area identified as “Proposed Class 4 Active Compost Area” shown on Atlantic Coast Consulting (ACC), Figure 6, *Proposed Class 4 Compost Area Seasonal High Groundwater Surface*, revised 12/18/20.
2. The base of the Class 4 composting pad shall be kept a minimum of five feet above the groundwater elevation contours and a minimum of five feet above the ground surface in the area shaded blue on Atlantic Coast Consulting (ACC), Figure 6, *Proposed Class 4 Compost Area Seasonal High Groundwater Surface*, revised 12/18/20.
3. The Design and Operational Plan shall include a plan to mitigate and control odors generated from the Class 4 composting operations.
4. A minimum 200-foot undisturbed buffer shall be maintained between the Class 4 composting facility and the property line.
5. A minimum 500-foot buffer shall be maintained between the Class 4 composting facility and any adjacent residences and/or water supply wells.
6. A minimum 25-foot undisturbed buffer shall be maintained between the Class 4 composting facility and any on-site springs, intermittent or perennial streams or surface water bodies.
7. A minimum 50-foot undisturbed buffer shall be maintained between the Class 4 composting facility 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 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.
8. 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.
9. The Class 4 composting facility shall not be located in the 100-year floodplain. Any 100-year flood elevation(s) on the site must be shown on the Design and Operational Plan.
10. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of Wolf Creek and its perennial and intermittent tributaries.

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11. All temporary piezometers at this site shall be plugged and abandoned in accordance with the Water Well Standards Act. Additionally, all piezometers or monitoring wells located within the proposed Class 4 composting facility footprint shall be over drilled and filled with a non-shrinking cement/bentonite grout mixture via tremie pipe from the bottom to within 10 feet of the base of the compost pad. 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 the compost pad 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. The groundwater and surface water monitoring system shall be updated as appropriate for the proposed Class 4 composting facility. 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.