



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Director's Office
2 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, Georgia 30334
404-656-4713

Mr. Charlie Gray
Eagle Point Landfill, LLC
300 Colonial Center Parkway, Suite 320
Roswell, GA 30076

FEB 23 2018

**SUBJECT: Site Suitability Notice for Eagle Point
MSW Landfill Proposed Horizontal and Vertical Expansion
Forsyth County APL 05801**

Dear Mr. Gray:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the *Hydrogeologic Assessment Report, Eagle Point Landfill – Lateral and Vertical Expansion*, dated September 20, 2016, revised February 27, 2017 and prepared by Bunnell-Lammons Engineering, Inc. (BLE).

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

Before a permit may be issued for the proposed solid waste disposal site, a Design and Operational Plan (D&O Plan), prepared in accordance with Chapter 391-3-4-.07(1), must be submitted for consideration by the EPD. After our review and evaluation of the D&O Plan, a Solid Waste Handling Permit 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.

Prior to a final decision regarding the issuance of a permit for operation of the proposed solid waste disposal facility, the appropriate governing authority must hold a public hearing regarding the proposed landfill no less than two weeks prior to the issuance of any permit. At least 30 days prior to the public

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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 solid waste disposal facility will be located. A transcript of the public hearing proceedings must be submitted to EPD prior to a final decision regarding the issuance of a permit for the proposed solid waste disposal facility.

Sincerely,

A handwritten signature in blue ink that reads "Richard E. Dunn". The signature is stylized and cursive.

Richard E. Dunn, Director
Environmental Protection Division

Attachment

cc: Honorable Todd Levent, Chairman, Forsyth County Board of Commissioners
GA EPD
EPD Mountain District – Cartersville
Claudia Moeller, HHNT

File: Forsyth County – Eagle Point MSW Landfill [APL 05801] (PER)

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Site Limitations
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1. The area considered for acceptability includes only that within the line identified as “Proposed Cell Boundary” shown on Bunnell-Lammons Engineering’s (BLE), Figure 2, *Boring Location Plan* dated 9/20/16.
2. A liner and leachate collection system shall be constructed under all areas proposed for solid waste disposal. The bottom of the liner system in the proposed horizontal expansion area shall be constructed a minimum of ten feet above the potentiometric surface contours shown on BLE’s Figure 10, *Seasonal High Water Table Elevation Contour Map*, dated 9/20/16.
3. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells. Adjacent houses, wells, and the 500-foot buffer shall be shown on the Design and Operational Plan.
4. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.
5. A minimum 100-foot buffer shall be maintained between the waste and the cultural features identified on BLE’s Figure 2.
6. The landfill unit shall have the following minimum setbacks from the Etowah River:
 - a. Waste shall not be placed within 600 feet of the Etowah River.
 - b. Grading activities associated with the landfill development shall not take place within 300 feet of the Etowah River.
 - c. Floodplain – reclamation areas shall not be located within 200 feet of the Etowah River.The above minimum setbacks shall be delineated on the Design and Operational Plan.
7. If non-rippable rock (bedrock) is encountered at an elevation above the approved base of the liner system, 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 liner system. 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.

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.

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8. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and any on-site springs, intermittent or perennial streams or surface water bodies except as allowed by EPD.
9. No solid waste shall be disposed of in the stream channels of any perennial or intermittent streams unless an underdrain system with a 5-foot vertical separation is provided between the invert of the centerline of the streams and a double liner system. The double liner shall be extended out from the centerline of the stream channel for a distance of 50 feet on both sides of the channel.
10. A waste excavation and soil-sampling plan for the C&D waste cells shall be included in the Design and Operational Plan, for EPD approval, prior to issuance of a permit. The plan shall include, but not be limited to, the method and sequence of waste excavation, soil sampling procedures and analytical parameters.
11. This site is located 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 0.14g in 250 years.

Additionally, since portions of the facility were constructed with a demonstration of stability based on a maximum ground acceleration of 0.22g in 250 years, it is my professional opinion that all containment structures are designed to resist a maximum horizontal ground acceleration of 0.22g in 250 years.

12. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of the Etowah River and its perennial and intermittent tributaries.
13. Disturbance of wetlands is prohibited and solid waste shall not be disposed of within 50 feet foot buffer except as permitted by the United States Army Corps of Engineers (ACOE). 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.

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14. All soil borings, monitoring wells and piezometers 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.
15. Disturbance of wetlands is prohibited and solid waste shall not be disposed of within 50 feet foot buffer except as permitted by the United States Army Corps of Engineers (ACOE). 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.
16. 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. The liner system shall be kept a minimum of five-feet above the 100-year floodplain. 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.
17. 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 monitoring plan that is prepared in accordance with the Georgia Manual for Groundwater Monitoring and is approvable by EPD. The outfall of any and all underdrain systems shall be incorporated into the facility's groundwater monitoring plan.
18. The facility shall be designed and operated to control the transport of soil offsite or beyond the facility's erosion and sediment control perimeter. Transport of sediment by natural erosive processes and by vehicular transport shall be accounted for.

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19. The facility shall be designed and operated to minimize odor. Operational or design considerations to satisfy this condition may include, but are not limited to, applying additional (or more frequently applying) cover over waste, installing an odor monitoring system, or reducing the amount received of wastes known or suspected to contribute the most to odor production.

20. Within cells where five percent or greater, by mass, biosolids (or other waste streams that required solidification prior to disposal) is being or has been disposed, the facility shall be designed to demonstrate that fill will not contribute to movement of the waste mass. Future landfilling over such areas must be preceded by a survey of liquid levels within the waste mass, which shall be submitted to EPD along with a demonstration that resumption of landfilling will result in a stable waste mass.