GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Jeffrey W. Cown, Director

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

Jun 18, 2024

Jennifer McNelly
Vice President Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd. NE
Atlanta, Georgia 30308

RE: Draft Site Limitations for Georgia Power, Plant Hammond
Huffaker Road - Proposed Parcel F Coal Combustion Residual (CCR) Landfill
Floyd County, Georgia
Submittal ID: 771782

Dear Ms. McNelly:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the January 5, 2024, *Site Acceptability Report, Addendum to Huffaker Road Landfill (Permit Number 057-022D(LI)), Parcel F Lateral Expansion – Rome, Floyd County, Georgia,* prepared by Stantec Consulting Services and a January 5, 2024 response letter from Georgia Power.

These documents can be accessed on the EPD web page at:

- https://epd.georgia.gov/public-announcements-0/land-protection-branch-public-announcements
- https://epd.georgia.gov/ccr-draft-site-limitations

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 July 24, 2024. 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,

Charles J. Mueller, Chief
Land Protection Branch

Enclosure

cc: Jim Guentert, Beverly Tipton - GA EPD
Brian Love, Keith Stevens, William Cook – GA EPD
David Gibbons, Bret McClellan - Georgia Power

Draft Site Limitations
Georgia Power- Plant Hammond, Huffaker Rd
Proposed Parcel F CCR Landfill
06/18/2024

1. The area considered for acceptability includes only the area delineated by the line "Proposed CCR Permit Limits" on Stantec Consulting Services (Stantec) Figure 2-1, *Existing Conditions Topographic Map, 2022*, dated 12/14/23.

2. Waste shall not be placed outside of the area delineated by the line "Proposed Waste Limits" on Stantec's Figure 2-1, *Existing Conditions Topographic Map, 2022*, dated 12/14/23.

3. A composite liner and leachate collection system, as required by 40 CFR 257.70, shall be constructed under all areas proposed for CCR disposal. The bottom of the liner system shall be constructed a minimum of five feet above the groundwater elevation contours and a minimum of ten feet above the three intermittent streams within the proposed waste limits shown on Stantec's Figure 2-7, *Composite Seasonal High Potentiometric Surface Map*, dated 11/9/23.

   An underdrain system shall be placed in each drainage ravine containing a stream within the proposed waste areas and shall be designed to maintain the water table, within the drainage ravines, at an elevation no higher than depicted on Stantec's Figure 2-7, *Composite Seasonal High Potentiometric Surface Map*, dated 11/9/23. The outfall of the underdrain systems must be incorporated into the groundwater monitoring plan for the site.

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 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries. The 200-foot buffer may be disturbed if approved by the EPD.

6. 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) and allowed by EPD. A statement certifying that wetlands will not be impacted as a result of construction activities at the site and that the requirements of 40 CFR 257.61 have been met shall be submitted prior to the date of initial receipt of CCR in the CCR unit. This statement shall be signed and stamped by the professional engineer responsible for the Design and Operational (D&O) Plan for the subject site. Wetland areas shall be delineated on the D&O Plan.

7. A minimum 25-foot undisturbed buffer shall be maintained between the waste disposal area and any onsite springs, intermittent or perennial streams or surface water bodies, except as allowed by EPD.

8. If during excavation of the site, any springs or seeps are discovered, precautions shall be taken to implement protective designs into the facility's design and operational plans. Also, the spring or seep shall be incorporated into the facility's groundwater monitoring plan.

9. 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.

10. 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:

    i. 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

    ii. 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.

11. Structural fill shall be required in some portions of the expansion area to achieve the required base grade elevations. Structural fill shall meet the requirements of the Construction Quality Assurance Plan within the EPD approved Design & Operational Plan.

12. All erosion control measures and/or diversion ditches shall conform to the latest edition of the *Manual for Erosion and Sediment Control in Georgia* and be protective of Smith Creek and its perennial and intermittent tributaries. All drainage structures must be routed to a permanent sediment control impoundment.

13. This site is in a seismic impact zone as defined in the Rules for Solid Waste Management (Chapter 391-3-4-.05(1)(g) and 391-3-4.10(3)(a)). 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 0.24g in 250 years.

14. Groundwater and surface water 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 that are prepared in accordance with the applicable parts of the 1991 *Georgia Manual for Groundwater Monitoring* and current USEPA Region IV guidance and are approvable by EPD.

15. All soil borings, monitoring wells and piezometers that have been completed/installed at this site, shall be plugged, and abandoned, except for those locations that will be used as monitoring wells for the proposed landfill. Abandonments shall be performed 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.