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

11/04/2026

Park Carrere, Executive Vice President
Waste Eliminator, LLC
514 Main Street SW
Gainesville, GA30501

SUBJECT: Draft Site Limitations
Hall County – Gainesville Waste and Recycling C&D Landfill
Proposed Lateral Expansion
Permit No. 069-017D(C&D)
GEOS Submission ID: 970560

Dear Mr. Carrere:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the December 8, 2025, *Hydrogeologic Assessment Report – Compost Facility Expansion* for the Hall County – Gainesville Waste and Recycling C&D Landfill, prepared by Bunnell Lammons Engineering (BLE).

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 Comprehensive Rules and Regulations Subject 391-3-4, Solid Waste Management* (Rules). These rules can be accessed online at https://rules.sos.state.ga.us/GAC/391-3-4.

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 within 30 days of the issuance of this letter. 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,

Sarah B Visser

Sarah B. Visser, Chief
Land Protection Branch

Enclosure

cc: Keith Stevens, Beverly Tipton, William Cook – GA EPD
Derrick Williams – EPD Northeast District
Zack Thompson – Mayor, City of Gainesville
Kevin Berry, P.E. – HHNT
Thomas O-Shea, P.G. – BLE

1. The area considered for acceptability includes only that surveyed property boundary identified as "Permitted Property Boundary" and "Proposed Expansion Property Boundary" on Bunell Lammons Engineering's (BLE) *Site Topography and Boring Location Plan*, Figure 2, dated 10-8-2025.

2. Waste shall not be placed outside of the area defined by the lines identified as "Existing Cells" and "Future Cells" on BLE's *Site Topography and Boring Location Plan*, Figure 2, dated 10-8-2025.

3. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the property boundary.

4. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells in existence at the time of Site Limitations issuance.

5. No solid waste shall be placed less than 5 feet, with an underdrain system, above the potentiometric surface shown on *Figure 6 - Composite High Water Table Elevation Contour Map* prepared by Bunnell-Lammons Engineering, Inc., dated 10-18-2012 and signed and sealed on 11-20-2012.

   If an underdrain is not to be utilized, no solid waste shall be placed less than 10 feet above the potentiometric surface. The project engineer shall make periodic quality control inspection while the underdrain system, if utilized, is under construction, and shall certify the proper installation of the system. EPD may approve of a minor modification to the proposed bottom of waste limits in some areas based on an updated groundwater potentiometric surface map developed from subsurface data collected after the existing waste has been removed.

6. 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) foot 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 Construction Quality Assurance report for the cell being constructed.

7. All existing waste in the buffers and the proposed landfill footprint shall be removed. A waste excavation and soil-sampling plan shall be submitted as part of the Design and Operational Plan to be approved prior to the issuance of a solid waste handling permit. The plan shall include at a minimum the method and sequence of waste excavation, soil sampling procedures, and analytical parameters.

8. A groundwater contamination and methane assessment investigation shall be designed and completed under the direction of a qualified professional geologist registered to practice in the State of Georgia. The investigation shall be conducted to determine the presence and extent of groundwater contamination and methane exceedances, if any, which may be associated with existing waste at the site. A work plan to implement the investigation shall be included in the Design & Operational Plan for EPD approval prior to conducting the investigation. The investigation shall be implemented as a condition of a solid waste handling permit. A report documenting the results of the groundwater contamination and methane assessment investigation shall be submitted to EPD upon its completion.

9. Any groundwater contamination or methane exceedances identified during the investigation referenced above shall be addressed in a Corrective Action Plan (CAP) prepared by a qualified professional geologist or engineer registered to practice in the State of Georgia. The CAP shall be incorporated as a minor modification to the Design & Operational Plan for the subject site.

10. 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 over-drilling 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.

11. Impacts to wetlands shall not occur unless authorized by the United States Army Corps of Engineers and approved by EPD in writing, where applicable. A minimum fifty (50) foot undisturbed buffer shall be maintained between the waste disposal boundary, as defined in Rule 391-3-4-.07(1)(b) of the Georgia Rules for Solid Waste Management, and all wetlands. The buffer shall remain undisturbed and shall not be used for grading, construction access, or material placement.

Alternatively, a request to reduce the required buffer may be submitted to EPD for approval. Any such request shall include a certification signed and sealed by a Professional Engineer and supporting documentation demonstrating that the proposed design, construction, and operation will not result in adverse impacts to wetlands. The request shall also include the proposed limits of disturbance and erosion and sedimentation control measures consistent with O.C.G.A. § 12-7-6.

Wetlands identified to remain on BLE's *Site Topography and Boring Location Plan*, Figure 2, dated 10-8-2025, shall be clearly delineated on the approved Design and Operational (D&O) Plan, together with the waste disposal boundaries and limits of disturbance. A statement certifying that the facility has been designed such that implementation of the approved plans will not impact the wetlands identified to remain in BLE's *Site Topography and Boring Location Plan*, Figure 2, dated 10-8-2025 and shown on the D&O Plan shall be submitted. The certification shall be signed, sealed, and dated by the Professional Engineer responsible for the D&O Plan for the subject site.

12. 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.

13. A minimum 50-foot undisturbed buffer shall be maintained between the composting operation and any on-site springs, intermittent or perennial streams, or surface water bodies, except as permitted by United States Army Corps of Engineers (USACE) or EPD.

14. 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.

15. If during construction or excavation of the site any springs or seeps are discovered, EPD shall be notified immediately and protective designs must be incorporated into the facility's design and operational plans, such that the spring or seep can be incorporated into the facility's groundwater monitoring system.

    Any perched groundwater zones encountered during excavation of the site shall be drained entirely, if possible, otherwise an underdrain system shall be required to maintain vertical separation from the waste. The outfall of the underdrain system shall be sampled as part of the facility's groundwater and surface water monitoring plan.

16. This site is in a seismic impact zone as defined in the Rules for Solid Waste Management Rule 391-3-4.05(1)(g). The design engineer must certify that all containment structures are designed to resist the maximum horizontal ground acceleration specified in 391-3-4-.05(1)(g) for the site and include a statement in the design documents indicating the maximum horizontal ground acceleration used in the design. Therefore, the registered professional engineer

preparing the Permit Drawings 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 0.129g, or the maximum expected horizontal acceleration at the ground surface with a 90% or greater probability that the acceleration will not be exceeded in 250 years as determined by the United States Geological Survey's Earthquake Hazards Program, as of the date of Site Limitations issuance, whichever is more conservative.*

17. All erosion control measures shall conform to the Georgia *Erosion and Sedimentation Act*, *O.C.G.A. 12-7-1*, *Georgia Comprehensive Rules and Regulations Subject 391-3-4 Solid Waste Management* (Rules) and be protective of all perennial and intermittent streams and tributaries. Runoff from the entire facility must be routed at all times, either directly or via properly designed conveyance systems, to permanent sediment control impoundments.

18. Groundwater, surface water, and methane monitoring systems shall be installed at the site. The groundwater monitoring system shall include some monitoring wells completed in the bedrock. Foliation and joint orientation and lineament analysis shall be considered in determining bedrock monitoring well locations. Sampling parameters, sampling schedules, monitoring well construction, and spacing shall adhere to the guidelines established in the 1991 EPD document, *Georgia Manual for Groundwater Monitoring*, the September 2021 EPD document, *Monitoring of Surface Water and Underdrain Systems at Solid Waste Facilities*, the September 2015 EPD document, *Methane Monitoring at Solid Waste Disposal Facilities*, and current USEPA Region IV guidance. The system design and monitoring requirements shall be detailed in groundwater, surface water, and methane monitoring plans that are approvable by EPD and are prepared in accordance with *Georgia Comprehensive Rules and Regulations Subject 391-3-4 Solid Waste Management* (Rules), and the guidance documents mentioned above.

19. To meet the requirements of Rule 391-3-4-.05(1)(c) and Rule 391-3-4.16(6)(b) for Class 3-6 composting facilities and anaerobic digestion facilities, the owner or operator shall demonstrate that the facility is designed and operated in such a way that it does not pose a bird hazard to aircraft. This demonstration shall be submitted as part of the Design and Operation Plan and placed in the operating record. Additionally, according to Rule 391-3-4-.05(1)(c), the owner or operator shall notify any applicable airport within a 5-mile radius and the Federal Aviation Administration (FAA). Documentation shall be submitted to EPD that the notification criteria above have been satisfied.