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Jul 02, 2024

Grady Saxon, County Administrator
Jenkins County Board of Commissioners
P.O. Box 792
Millen, Georgia 30442

**SUBJECT: Draft Site Limitations for Jenkins Co-CR54 Phase 2 MSWL & C&D Site Proposed
C&D Horizontal and Vertical Expansion
Permit No.: 082-005D(SL)
GEOS Submission ID: 711039**

Dear Mr. Saxon:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the June 21, 2023, revised, *Hydrogeologic Assessment Report - Horizontal and Vertical Assessment, Jenkins Co C&D Landfill* prepared by Bunnell Lammons Engineering, Inc. (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*. 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 prior to August 2, 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: Keith Stevens, Beverly Tipton, William Cook, GA EPD
EPD East Central District
Curtis Reynolds, Harbin Engineering

Draft Site Limitations
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1. The area considered for acceptability includes only that within the line identified as “Permit Boundary” for the Phase II landfill on Bunnell Lammons Engineering Inc’s (BLE), *Site Topography and Boring Location Plan*, Figure 2, dated 10-4-23.
2. Waste shall not be placed outside of the area defined by the line identified as “200-foot buffer” on BLE’s, *Site Topography and Boring Location Plan*, Figure 2, dated 10-4-23.
3. The bottom of the waste shall be kept a minimum of 15 feet above the groundwater elevation contours shown on BLE’s Figure 10 *Long-Term Seasonal High Groundwater Elevation contour map – December 2018 to May 2022*, dated 10-4-23, and no more than two feet lower than the elevation of the line labelled “Proposed Landfill Base Grades” along the Cross-Sections shown in Figure 8A, *Geologic Profile Cross-Section A-A’*, Figure 8B, *Geologic Profile Cross-Section B-B’*, Figure 8C, *Geologic Profile Cross-Section C-C’* dated 10-9-23.

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.

4. If during 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.
5. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary. Existing waste located between the former 50-foot and 100-foot buffer and the new 200-ft buffer may remain, however future waste disposal cannot occur in the 200-foot buffer.
6. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
7. 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.

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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 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 (D&O) Plan for the subject site. Wetland areas shall be delineated on the D&O Plan.
9. All erosion control measures shall conform to the Erosion and Sediment Control Act, the Rules for Solid Waste Management, and be protective of Oak Cane Branch and all its intermittent and perennial 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.
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 to pose a hazard to human health and the environment.
11. This site is located in a seismic impact zone as defined in the 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 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 0.18g in 250 years.
12. All soil borings, monitoring wells and piezometers that have been 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.

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13. 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, Subject 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 1991 *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 and are approvable by EPD.