



Jeffrey W. Cown, Director

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Dec 12, 2023

Mr. Johnny Poore
Executive Director
172 Roger Brown Drive
Barnesville, Georgia 30204

Subject: Lamar County - Lamar Co - Cedar Grove Regional MSWL
Permit No. 085-007D(MSWL)
GEOS Submittal ID: 684104

Draft Site Limitations: Proposed Horizontal Expansion of Parcel B

Dear Mr. Poore:

The Solid Waste Management Program of the Georgia Environmental Protection Division (EPD) has completed its review of the April 2023, revised, "*Report of Site Suitability Lamar County Regional (Cedar Grove) MSW Landfill Addition of Property for Ancillary Activity*" and a response to comments dated March 8, 2023, prepared by Browne and Company, LLC. The proposed horizontal expansion includes the addition of Parcel B. The "*Report of Site Suitability Lamar County Regional (Cedar Grove) MSW Landfill Addition of Property for Ancillary Activity*" also includes Parcel C, for informational purposes only, which has a Materials Recovery Facility (MRF) application under GEOS submittal ID: 739864. 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 January 16, 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: Tilden Bemby, West Central District EPD; William Cook, EPD; Beverly Tipton, EPD; Keith Stevens, EPD; Jeff Browne, Browne and Company, LLC.

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1. The area considered for acceptability includes only that area enclosed within the property boundary lines labelled as “Parcel A” and “Parcel B” on Browne and Company, LLC Sheet 1 of 2, Property Boundary & Legal Descriptions, dated March 8, 2023.
2. Placement of waste shall be limited to only the areas north of the Existing Vertical Expansion Area, as shown on Hodges, Harbin, Newberry & Tribble, Inc.'s Sheet 1 of 1, Site Topographic Information, dated October 7, 2002. Limitations regarding the placement of waste within the Existing Vertical Expansion Area will depend on subsurface information obtained from new borings drilled in that area after waste mining activities have been completed. A supplemental report shall be submitted to EPD upon completion of waste mining activities within this area and the acquisition of new subsurface information. EPD reserves the right to rescind site acceptability for the Existing Vertical Expansion Area, should information be obtained to indicate that the area is not suitable for the placement of waste. No waste shall be disposed of within Parcel B on Browne and Company, LLC Sheet 1 of 2, Property Boundary & Legal Descriptions, dated March 8, 2023.
3. A minimum 500-foot buffer must be maintained between the waste disposal boundary and any adjacent residential structures and/or water supply wells.
4. A minimum 200-foot undisturbed buffer must be maintained between the waste disposal boundary and the proposed property boundaries referenced on Hodges, Harbin, Newberry & Tribble, Inc.'s Sheet 1 of 1, Site Topographic Information, dated October 7, 2002.
5. Since no information is available regarding the 100-year floodplain in the site vicinity, no waste shall be placed below the 754-foot topographic interval as shown in the northwestern corner of the Hodges, Harbin, Newberry & Tribble, Inc.'s Sheet 1 of 1, Site Topographic Information, dated October 7, 2002.
6. A liner and leachate collection system must be placed beneath all areas proposed for waste disposal. The liner system must be constructed at least 5-feet above the seasonal high-water table. Given the recent waste mining activities and excavation at the site, the potential for greater subsurface infiltration of precipitation and possible groundwater mounding has increased. Therefore, the bottom of the liner system shall be installed 7.5-feet above the potentiometric contours shown on Qore Property Sciences, Inc.'s Plate No. 2 - Boring Location Map of the report entitled Site Characterization Report, Waste Areas 1 and 2, Grove Street Extension, Municipal Solid Waste Landfill, Lamar County, Georgia, dated February 27, 2002. As an alternative to constructing the liner system 7.5-feet above the water table, an underdrain system could be constructed between the liner system and the water table to ensure that the seasonal water table does not rise to within 5-feet of the bottom of the liner system. The applicant must demonstrate, through standard engineering analysis, that the underdrain would keep the groundwater from rising, at any point between the drain lines, to within 5-feet of the liner. The outfall of the underdrain must be sampled as part of the facility's groundwater monitoring plan.

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7. During excavation of the site, if bedrock is encountered at an elevation above the water table, at least 5-feet of clean, compacted, rubble free soil shall be placed above the bedrock. Bottom of waste elevations shall be no less than 5-feet from the bedrock elevations at any location.
8. 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.
9. The Waste Disposal Boundary as defined in the Solid Waste Management Rules, Chapter 391-3-4, shall not be within 50-feet of any U.S. Army Corps of Engineers jurisdictional wetlands. All plan sheets in the proposed facility's Design and Operational Plan must contain a statement that no jurisdictional wetlands will be adversely affected by construction and operation of the proposed facility. The statement must be stamped and signed by the responsible design engineer.
10. All borings/piezometers located in the proposed footprint must be abandoned in accordance with the Water Wells Standards Act. The borings must be over-drilled and filled with a non-shrinking cement/bentonite mixture via tremie pipe to within 10-feet of the maximum depth of waste. Within 10-feet of the maximum depth of waste, the boring must be filled with bentonite. Any remaining annular space can be backfilled with soil cuttings. Borings located outside of the waste footprint may be abandoned by pulling the casing and backfilling with a cement/bentonite mix. The abandonment of all boring/piezometers must be supervised by a professional geologist (PG) or professional engineer (PE) registered to practice in the State of Georgia. The supervising PG/PE must submit a report of the abandonment to EPD and certify that the boring/piezometers were abandoned in accordance with the Water Wells Standards Act.
11. All erosion control measures and/or diversion ditches must conform to the *Erosion and Sediment Control Act*. All drainage structures must be designed and constructed in accordance with the *Manual for Erosion and Sediment Control in Georgia*. All drainage structures must be channeled to permanent sediment control impoundment.