



ENVIRONMENTAL PROTECTION DIVISION

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Nov 15, 2024

Johnny Poore, Executive Director
Lamar County Regional Solid Waste Authority
172 Roger Brown Drive
Barnesville, Georgia 30204

**SUBJECT: Draft Site Limitations for Lamar County – Cedar Grove Regional MSWL
Proposed MSWL Lateral Expansion
Permit No.: 085-007D (MSWL)
GEOS Submission ID: 714223**

Dear Mr. Poore:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the September 9, 2024, revised, *Hydrogeologic Assessment Report – Lateral Expansion, Cedar Grove MSW 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, Solid Waste Management (Rules)*. These rules can be accessed online at <https://rules.sos.state.ga.us/GAC/391-3-4>. These “Site Limitations” supersede and replace draft site limitations dated December 12, 2023 for the same permitted facility.

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 December 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: Keith Stevens, Beverly Tipton, William Cook – GA EPD
EPD West Central District
Nathan Dunn – Cedar Grove Landfill, LLC
Jeff Browne, P.E. – Browne and Company, LLC

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1. The area considered for acceptability includes only that within the line identified as “Existing Property Boundary” and “Lateral Expansion Property Boundary” for the MSW landfill on Bunnell Lammons Engineering Inc’s (BLE), *Site Topography and Boring Location Plan*, Figure 2, dated 9-9-2024.
2. Waste shall not be placed outside of the area defined by the line identified as “composite 200-foot undisturbed property buffer, 50-foot wetlands buffer, and 25-foot limits of disturbance buffer” on BLE’s, *Site Topography and Boring Location Plan*, Figure 2, dated 9-9-2024.
3. A supplemental report shall be submitted to EPD upon completion of waste mining activities prior to cell construction in areas where waste was excavated. EPD reserves the right to rescind site acceptability should information be obtained to indicate that the area is not suitable for the placement of waste.
4. A liner and leachate collection system must be placed beneath all areas proposed for waste disposal. The bottom of the liner system shall be kept a minimum of 5 feet above the groundwater elevation contours shown on BLE’s Figure 10 *Long-Term Seasonal High Water Table Map – January 2002 to January 2024*, dated 9-9-2024.

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.

5. 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.
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

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- 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.

- 7. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary.
- 8. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
- 9. 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) and allowed by EPD.
- 10. 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 the landfill has been designed so that implementation of the Design and Operational Plan will not impact wetlands delineated on April 4, 2022, 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.
- 11. All erosion control measures shall conform to the *Erosion and Sediment Control Act, Georgia Solid Waste Management Rules, Subject 391-3-4*, 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.
- 12. 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.

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13. 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.

14. 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 prepared in accordance with Georgia Solid Waste Management Rules, Subject 391-3-4, the guidance documents mentioned above, and are approvable by EPD.