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

Sep 30, 2026

Zane Thomas
Packaging Corporation of America
5494 Clyattville Lake Park Road
Valdosta, GA 31601

SUBJECT: Draft Site Limitations for Lowndes County – Packaging Corp. of America
Proposed Vertical Expansion of the Private Industrial Landfill
Permit No. 092-016D(LI)
GEOS Submission ID: 941323

Dear Mr. Thomas:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the July 16, 2025, *Site Suitability Assessment Report for the Packaging Corporation of America Industrial Landfill Vertical Expansion* prepared by Harbin Engineering (Harbin). 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
EPD Southwest District
Curtis Reynolds, P.E. – Harbin

1. The area considered for acceptability includes only that surveyed property boundary identified as "Industrial Waste Landfill Facility Limits" on Harbin's *Potentiometric Map*, Figure 11, dated 1-17-2024.

2. Waste shall not be placed outside of the areas defined by the lines identified as "Waste Limits / Phase Boundary" on Harbin's *Potentiometric Map*, Figure 11, dated 1-17-2024.

3. The bottom of waste within the area defined as "Proposed Landfill Permit Boundary" shall be constructed a minimum of five feet above the seasonal high groundwater elevation shown on Harbin's *Potentiometric Map*, Figure 11, dated 1-17-2024.

   To meet the minimum five-foot separation requirement, the facility may construct an underdrain system beneath all areas proposed for waste disposal. The design engineer shall make periodic inspections of the underdrain system during construction and shall certify that the underdrain system is designed to prevent groundwater elevations from rising to within five feet of the bottom-of-waste elevations at any point between the drain lines.

4. A minimum 100-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary.

5. 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.

6. 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.

7. 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.

   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.

8. 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 x 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 x 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.

9. 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 Harbin's *Existing Conditions*, Figure 3, dated 7-14-2025, 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 on Harbin's *Existing Conditions*, Figure 3, dated 7-14-2025, 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.

10. All erosion control measures shall conform to the *Erosion and Sediment Control Act, O.C.G.A. 12-7-1, and 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.

11. 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.

12. 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.

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 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.