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

10/21/2026

Shawn Jordan, County Manager
McIntosh County Board of Commissioners
1200 North Way
Darien, GA 31305

SUBJECT: Site Suitability Notice
McIntosh County – King Road MSW Landfill
Proposed Lateral Expansion
Permit No. 098-003D(SL)
GEOS Submission ID: 919782

Dear Mr. Jordan:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the following documents:

- *Hydrogeologic Assessment Report – Lateral and Vertical Expansion* for the McIntosh County King Road MSW Landfill, dated 3-21-2025, prepared by Bunnell Lammons Engineering (BLE).
- *Aquatic Resources Delineation Report* for the McIntosh County Landfill, dated 4-14-2026, prepared by Inver Environmental Consulting, LLC.

Based on the data submitted in addition to your application, EPD has determined that the applicable siting standards can be met in accordance with *Georgia Comprehensive Rules and Regulations Subject 391-3-4, Solid Waste Management* (Rules) Rule 391-3-4-.05(1), provided the attached Site Limitations are met. This determination is based on information provided to date for EPD review and is subject to revision prior to permit issuance should errors be found in the submitted information or new information be provided relevant to this determination. This letter denotes only the demonstration of the ability to comply with siting standards for the proposed site and does not constitute approval to begin construction or operation of the disposal site. This letter does not constitute a permit for the proposed solid waste landfill.

Following the issuance of this Site Suitability Notice, the public participation requirements of Rule 391-3-4-.03(3), including the Facility Issues Negotiation (FIN) process described in O.C.G.A. §12-8-32, must be fulfilled. The FIN process must be initiated within 15 days of receipt of this Notice by publicizing that the Notice was received and within 45 days of receipt of this Notice hold a public meeting in accordance with O.C.G.A. §12-8-32(c).

Before a permit may be issued for the proposed solid waste disposal site, a Design and Operation Plan (D&O Plan), prepared in accordance with Rule 391-3-4-.07, must be submitted for consideration by EPD.

Additionally, the appropriate governing authority must hold a public hearing regarding the proposed landfill no less than two weeks prior to the issuance of any permit. At least 30 days prior to the public hearing, notices of the public hearing must be posted at the proposed site and advertised in the legal organ of the county or counties in which the proposed solid waste disposal facility will be located. A transcript of the public hearing proceedings and a reaffirmation of zoning consistency must be submitted to EPD prior to a final decision regarding the issuance of a permit for the proposed solid waste disposal facility.

After our review and evaluation of the D&O Plan, and the other required submittals, a Solid Waste Handling Permit will either be issued or denied. This Site Suitability Notice shall terminate upon a final decision to issue or deny the requested permit. Failure to submit to EPD an approvable D&O Plan within one year from the date of this Notice my result in permit denial or termination of the permit application.

Please feel free to contact Beverly Tipton at 470-524-5790 if you have any questions.

Sincerely,

Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division

Enclosure

cc: Keith Stevens, Beverly Tipton, William Cook – GA EPD
Nathan Dunn – McIntosh County Landfill, LLC
Beth Stevenson – EPD Coastal District
Jeff Browne, P.E. – Browne & Co.
Timothy Daniel, P.G. – BLE

1. The area considered for acceptability includes only that surveyed property boundary identified as "McIntosh County King Road MSW Landfill Property Boundary" and "Proposed Expansion Area in Study" on Bunell Lammons Engineering's (BLE) *Boring Location Plan*, Figure 2, dated 1-17-2025.

2. A liner and leachate collection system must be placed beneath all areas proposed for waste disposal. The bottom of the liner system shall be constructed a minimum of 5 feet above the seasonal high groundwater elevations shown on BLE's *Long-Term Seasonal High Composite Groundwater Elevation Contour Map*, Figure 11, dated 1-17-2025.

   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 bottom of the liner system. The outfall of the underdrain system shall be sampled as part of the facility's groundwater and surface water monitoring plan.

3. Where waste excavation had occurred or waste was previously placed, an underdrain system shall be constructed between the liner system and the water table, as needed to ensure that the seasonal high-water table does not rise to within five feet of the bottom of the liner system. The underdrain system shall be designed by a Georgia registered professional engineer. A demonstration shall be submitted that the underdrain system is designed to prevent groundwater from reaching within five feet of the bottom of the liner at any point between the drain lines. The outfall(s) of underdrain systems must be incorporated into the surface water monitoring plan for the site.

   To meet the minimum five-foot separation requirement, groundwater elevation data shall be obtained from below the proposed waste footprint, where waste excavation had occurred or waste was previously placed, to demonstrate groundwater levels consistent with the seasonal high potentiometric surface shown on BLE's *Long-Term Seasonal High Composite Groundwater Elevation Contour Map*, Figure 11, dated 1-17-2025. The groundwater data shall be measured from a minimum of three piezometers per construction phase or stage.

4. Waste shall be removed in accordance with the EPD approved waste excavation plan.

5. Where existing subgrade elevations fall below approved base grades in the expansion area, structural fill shall be placed to reach design elevations. Structural fill shall meet the requirements of the EPD approved Construction Quality Assurance Plan within the EPD approved Design & Operational Plan.

6. A supplemental report shall be submitted to EPD upon completion of waste mining activities and prior to cell construction in areas where waste was excavated or previously placed in accordance with the approved Waste Excavation Plan. The supplemental report shall include, at minimum, the results of soil confirmation sampling beneath the excavation and any groundwater data obtained from within the proposed waste footprint, including data obtained

from piezometers as specified in Site Limitation #3, as applicable. 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.

7. Existing groundwater contamination associated with the McIntosh County King Road MSW landfill is being addressed under an existing approved correction action plan which will remain in effect until such time the facility is released from corrective action. The corrective action plan shall be incorporated into the expanded facility's design and operation plan by reference to ensure that any residual contamination is addressed, where applicable.

8. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary. This buffer shall apply to Churchill Road where present in the expansion area at the time of D&O Plan approval.

9. 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.

10. 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 United States Army Corps of Engineers (USACE) or EPD.

11. 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.

12. 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 on Inver Environmental Consulting, LLC's (Inver) drawing titled *Request Area Overview – McIntosh County Landfill*, Figure 2, dated 3-22-2026, shall be clearly

delineated on the approved Desing 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 on Inver's *Request Area Overview – McIntosh County Landfill*, Figure 2, dated 3-22-2026 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.

13. 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 0.13g, 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.

14. 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.

15. 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.

16. 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.

17. 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.