



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Jeffrey W. Cown, Director

Land Protection Branch

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12/12/2025

The Honorable Jay Paul
Oglethorpe County Commission Chairman
105 Union Point Road
P.O. Box 261
Lexington, GA 30648

**SUBJECT: Draft Site Limitations for Oglethorpe County – US 78 C&D Landfill
Proposed C&D Phase III Lateral Expansion
Permit No.: 109-003D(C&D) GEOS Submission ID: 804057**

Dear Chairman Paul:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the November 5, 2025, revised, *Site Suitability Hydrogeologic Investigation Report – Proposed Oglethorpe County Phase III Expansion C&D Landfill*, prepared by Atlas Technical Consultants LLC (Atlas). 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 prior to January 9, 2026. 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.

Once site suitability is determined, the public participation requirements of Rule 391-3-4-.03(3), including the Facility Issues Negotiation process described in O.C.G.A. 12-8-32, must be fulfilled.

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

Sincerely,

Sarah Visser, Chief
Land Protection Branch

Enclosure

cc: Keith Stevens, Beverly Tipton, William Cook – GA EPD
EPD Northeast District
Jeff Sharp– Oglethorpe County Planning Director
Morgan Mullins, P.G. – Atlas

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1. The area considered for acceptability includes only that surveyed property boundary identified as “Existing Property Boundary” and “Lateral Expansion Property Boundary” for the C&D landfill on Atlas Technical Consultants, LLC’s (Atlas) *Proposed Phase III C&D Landfill Expansion Concept Plan*, Figure 7.1 and 7.2, dated 10-12-2023.
2. Waste shall not be placed outside of the area defined by the lines identified as “Phase III A Footprint,” “Phase III B Footprint,” “Phase III C Footprint,” and “Phase III D Footprint” on Atlas’s *Proposed Phase III C&D Landfill Expansion Concept Plan*, Figure 7.1 and 7.2, dated 10-12-2023.
3. The bottom of waste units shall be constructed a minimum of 10 feet above the groundwater elevation contours shown on Atlas’s Figure 6 *Potentiometric Surface Map*, dated 7-24-2023.

As an alternative to placing the waste a minimum of 10 feet above the groundwater contours referenced above, an underdrain system may be constructed 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. 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.

5. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundary.
6. 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.
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. 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
 - b. If a geosynthetic is used, the geosynthetic will have a hydraulic conductivity equivalent to or less than one (1) foot 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.

9. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted for impacts 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 13, 2023 and shown in the Design and Operational Plan 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.
10. 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 0.14g in 250 years, or the maximum expected horizontal acceleration at the ground surface with a 98% or greater probability that the acceleration will not be exceeded in 50 years as determined by the United States Geologic Survey's Earthquake Hazards Program, as of the date of Site Limitations issuance, whichever is more conservative.

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11. A minimum 75-foot undisturbed buffer shall be maintained between the waste disposal boundaries and the tributaries of Grove Creek located along the southern boundary of the C&D Phase II Landfill as shown on Atlas Figure 2, Grading Concept Plan dated 10-22-20.
12. All erosion control measures shall conform to the *Erosion and Sediment Control Act*, 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.
13. 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.
14. 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.
15. 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 Comprehensive Rules and Regulations Subject 391-3-4 Solid Waste Management* (Rules), the guidance documents mentioned above and are approvable by EPD.