

Richard E. Dunn, Director

Land Protection Branch 4244 International Parkway Suite 104 Atlanta, Georgia 30354

404-362-2537

June 25, 2019

Mr. Guy Eberhardt Mead Road Environmental, LLC 990 Riverside Drive Macon, Georgia 31210



SUBJECT:

Draft Site Limitations for

Bibb County - Mead Road

Proposed C&D Landfill Expansion Bibb County, Georgia 011-029D

Dear Mr. Eberhardt:

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

- Report of Hydrogeologic Investigation, Bibb County- MRE, Mead Road C&D Landfill, dated April 19, 2002 and prepared by Geotechnical & Environmental Consultants, Inc.
- Report of Hydrogeologic Site Evaluation, Proposed Construction and Demolition Landfill, Phase 2 Mead Road Tract, Bibb County, Georgia, dated January 22, 2016 and prepared by Southern Geotechnical Consultants.
- Supplemental Hydrogeologic Evaluation, Proposed Construction & Demolition Landfill, Phase 2 Mead Road Tract dated May 5, 2017 and prepared by Southern Geotechnical Consultants.
- Report of Hydrogeologic Site Evaluation, Proposed Construction and Demolition Landfill, Phase 2 Mead Road Tract, Bibb County, Georgia, dated March 20, 2019 and prepared by Southern Geotechnical Consultants.
- Hofstadter & Associates, Wetlands Survey, DWG. No. A1, Sheet 1 of 1, dated 04/10/2018
- August 13, 2018 letter from USACE concurring with wetlands delineation conducted by Southeastern Environmental Associates, LLC

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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 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 August 3, 2019. 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 John Sayer at 404-362-2559 if you have any questions.

Sincerely,

Charles J. Mueller, Chief Land Protection Branch

Enclosure

cc: Jim Guentert, Keith Stevens, John Sayer, William Cook, Susan Wood GA EPD EPD West Central District – Macon Kelvin Seagraves, Hofstadter & Associates

File: Bibb County – Mead Road C&D Landfill [011-029D] (PER)

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Draft Site Limitations

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- 1. The area considered for acceptability includes only that delineated by the property line shown on Hofstadter & Associates, Inc., DWG No. A1, Sheet 1 of 1, Wetlands Survey, dated 04/10/2018. Within that delineated property, only the 69.189-acre upland area minus buffer and other requirements detailed in 3 through 6 and 9 below, is acceptable for placement of waste.
- 2. Waste shall be kept a minimum of 10 feet above the groundwater elevation contours shown on Southern Geotechnical Consultant (SGC) LLC's Perched Potentiometric Surface Contour Map (Figure 2F), dated 3/25/19 and no lower than an elevation of 295 feet.

As an alternative, waste can be kept a minimum of 10 feet above the groundwater elevation contours shown on SGC's Regional Potentiometric Surface Contour Map (Figure 2G), dated 3/25/19 and no lower than an elevation of 295 feet. The "perched" groundwater identified by SGC at the site shall be drained by upgradient interceptor trenches or other engineered measures. If at any time during landfill design and construction. EPD determines that the "perched" groundwater identified by SGC cannot be effectively drained, waste limits shall be modified so that they are kept a minimum of 10 feet above the groundwater elevation contours shown on SGC's, Perched Potentiometric Surface Contour Map (Figure 2F), dated 3/25/19. In addition to upgradient interceptor trenches, an underdrain system shall be required beneath the landfill cells to ensure that groundwater cannot rise to a level higher than five feet below waste. Furthermore, to demonstrate that groundwater can be maintained at least five feet below the proposed base grade, a minimum five-foot deep, temporary piezometer shall be installed in each cell and gauged for a minimum of 24 hours to verify groundwater separation prior to waste filling. The temporary piezometers shall be plugged and abandoned following gauging and prior to waste acceptance with the procedures described in Site Limitation #8.

- 3. No waste shall be placed in the areas labeled "Approximate Location-Active Inert Site" or "Approximate Location of Alum", as shown on Geotechnical & Environmental Consultant's Figure 10c, dated January 5, 1999. This limitation may be eliminated if the waste in these areas is removed and acceptable documentation of the removal submitted to EPD for review prior to acceptance of waste at the facility.
- 4. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
- 5. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.

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- 6. A minimum 25-foot undisturbed buffer shall be maintained between the waste disposal boundaries and any on-site springs, intermittent or perennial streams or surface water bodies except as allowed by EPD. Documented springs and streams at the site are shown on SGC's Springhead/Seep Location Map (Figure 2J), dated 3/25/19 and SGC's Figure 1B, dated 5/22/17, respectively. Buffers shall also be required, except as allowed by EPD, around any other springs and surface water features that are discovered during landfill development.
- 7. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of the Ocmulgee River and its perennial and intermittent tributaries.
- 8. All soil borings, monitoring wells and piezometers that have been historically completed/installed at this site, shall be plugged and abandoned 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 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.
- 9. 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). A statement certifying that wetlands will not be impacted as a result of construction activities at the site 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. 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 so as to pose a hazard to human health and the environment. Any modifications to the 100-year floodplain shall not cause a rise in the 100-year floodplain of more than 0.10 feet at any point.

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11. 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 EPD's Rules of Solid Waste Management, Chapter 391-3-4. The system design and monitoring requirements shall be detailed in a groundwater and surface water monitoring plan and methane monitoring plan that are prepared in accordance with the Georgia Manual for Groundwater Monitoring, EPD's September 2015 document, "Methane Monitoring at Solid Waste Facilities" and current USEPA Region IV guidance and are approvable by EPD. The outfall of any and all underdrain systems shall be incorporated into the facility's groundwater and surface water monitoring plan.