

03/08/2021

Jason Crosby, Facility Manager  
Georgia Petroleum  
1620 James P. Rodgers Drive  
Valdosta, GA 31601

**SUBJECT: Draft Site Limitations  
Lowndes County, Georgia - Georgia Petroleum Solidification Facility  
Application for Solid Waste Handling Permit  
GEOS Submittal ID - 479083**

Dear Mr. Crosby:

The Solid Waste Management Program of the Environmental Protection Division (EPD) received, on November 5, 2020, the Site Acceptability Study for the Georgia Petroleum Solid Waste Processing Facility prepared by Resolve Environmental Engineering, Inc., dated April 24, 2020. Additional information was received on January 11, 2021. These documents can be accessed on the EPD web page at <https://epd.georgia.gov/public-announcements-0/land-protection-branch-public-announcements>.

Based on the data submitted, EPD has drafted "Site Limitations" which would form the basis for design of the proposed solidification facility in a manner that complies with Georgia's Rules for Solid Waste Management. The Draft Site Limitations are attached.

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 April 5, 2021. Please note that issuance of Draft Site Limitations 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 Serena Broska at 404-362-4524 if you have any questions.

Sincerely,



Charles J. Mueller, Chief  
Land Protection Branch

Attachment: Draft Site Limitations

Cc: Lowndes County Board of Commissioners  
GA EPD - Keith Stevens, William Cook, Susan Wood (via email)  
EPD Southwest District - Lisa Myler (via email)  
Ian Lundberg, P.E. - Resolve Environmental Engineering, Inc.  
File: GEOS Submittal ID - 479083

**Draft Site Limitations**

**Lowndes County- Georgia Petroleum Solidification Facility  
Proposed Solid Waste Handling Facility**

1. The area considered for acceptability includes the 5.15-acre parcels shown on the *Solid Waste Handling Permit Boundary* figure provided on January 11, 2021 by Resolve Environmental Engineering, Inc.
2. Solid waste handling operations shall not be conducted in any wetlands, as defined by the U.S. Army Corps of Engineers, unless evidence is provided to the Director, by the applicant, that use of such wetlands has been permitted or otherwise authorized under all other applicable state and federal law and rules. 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.
3. 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.



April 24, 2020

Georgia EPD Land Protection Branch  
Solid Waste Management Program  
4244 International Parkway, Suite 104  
Atlanta, GA 30354-3902

Attention: Keith Stevens  
Manager, Solid Waste Permitting Unit

Subject: Site Acceptability Study  
Georgia Petroleum Solid Waste Processing Facility  
1620 James P. Rodgers Drive, Valdosta, Lowndes County, GA 31601

Dear Mr. Stevens:

On behalf of Georgia Petroleum, Resolve Environmental Engineering, Inc. (Resolve) is pleased to provide this Site Acceptability Study that we have completed for the Georgia Petroleum proposed solid waste processing operation to be located at the existing oil recycling and centralized wastewater treatment facility at 1620 James P. Rodgers Drive in Valdosta, Georgia. The facility will receive non-hazardous liquid waste, as defined in Georgia Solid Waste Management Rule 391-3-4-.01(39). The liquid waste is solidified and then transported offsite for disposal at a permitted solid waste disposal facility. No waste is disposed at the site.

Liquid waste solidification will occur in a steel pit located within a concrete secondary containment system. The containment system interstice will be monitored to rapidly identify leaks from the primary containment pit. As a result, there is extremely low potential for this facility to pollute ground water. Accordingly, Resolve has based this siting evaluation upon the criteria for construction/demolition wastes, in accordance with Georgia EPD guidance in *Criteria for Performing Site Acceptability Studies for Solid Waste Landfills in Georgia* (i.e., Circular 14, updated 1997).

### **Zoning**

The site conforms to all local zoning and land use ordinances, as stated in the letter from the City of Valdosta Planning and Zoning Administrator that accompanies the solid waste processing permit application. The facility lies in an area zoned M-2 for industrial uses. Handling, storage and transfer of

industrial wastes is permissible in areas zones M-2, in accordance with City of Valdosta Land Development Regulations.

### **Floodplains**

The waste solidification operation is not located within a 100-year floodplain. The operation will be located in Zone X, an area of minimal flood hazard in accordance with FEMA mapping. This was verified through a review of National Flood Insurance Program Flood Boundary and Floodway Map for Lowndes County (Map 13185C0220E, revised September 26, 2008). The solidification pit location is presented on the attached National Flood Hazard Layer FIRMette.

### **Wetlands**

The proposed waste processing operation is located within a developed property that was graded, developed and has been in operation for more than 25 years. The operation is not located in wetlands, as defined by the U. S. Corps of Engineers.

### **Proximity to National Historic Sites**

The facility is not located within 5,708 yards of a National Historic Site. The closest National Historic Site is the Andersonville National Historic Site, located 108 miles northwest of the facility.

### **Proximity to County Boundaries**

The facility is not located within one-half mile of the Lowndes County boundary. The nearest county boundary is 5.1 miles northwest of the facility, near where Valdosta Highway (Highway 133) crosses the Little River.

### **Wellhead Protection**

The facility is not located within the inner or outer management zones of existing wells and springs used as sources of water supply for community public water systems serving municipalities, counties, and authorities. The closest such wells are located at the City of Valdosta Water Treatment Plant, at 3863 Guest Road. The plant extracts water from seven deep wells on City property surrounding the plant. The plant is located across the city from the Georgia Petroleum facility, 8.1 miles north of the subject facility.

**Closure**

If you have any questions about this Study, please feel free to contact the undersigned at (770) 650-9990.

Sincerely,  
Resolve Environmental Engineering, Inc.

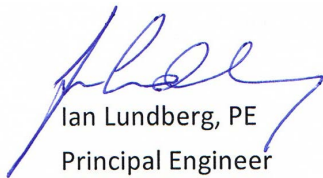
Ian Lundberg, PE  
Principal Engineer

Attachment: National Flood Hazard Layer FIRMette

**Closure**

If you have any questions about this Study, please feel free to contact the undersigned at (770) 650-9990.

Sincerely,  
Resolve Environmental Engineering, Inc.

  
Ian Lundberg, PE  
Principal Engineer

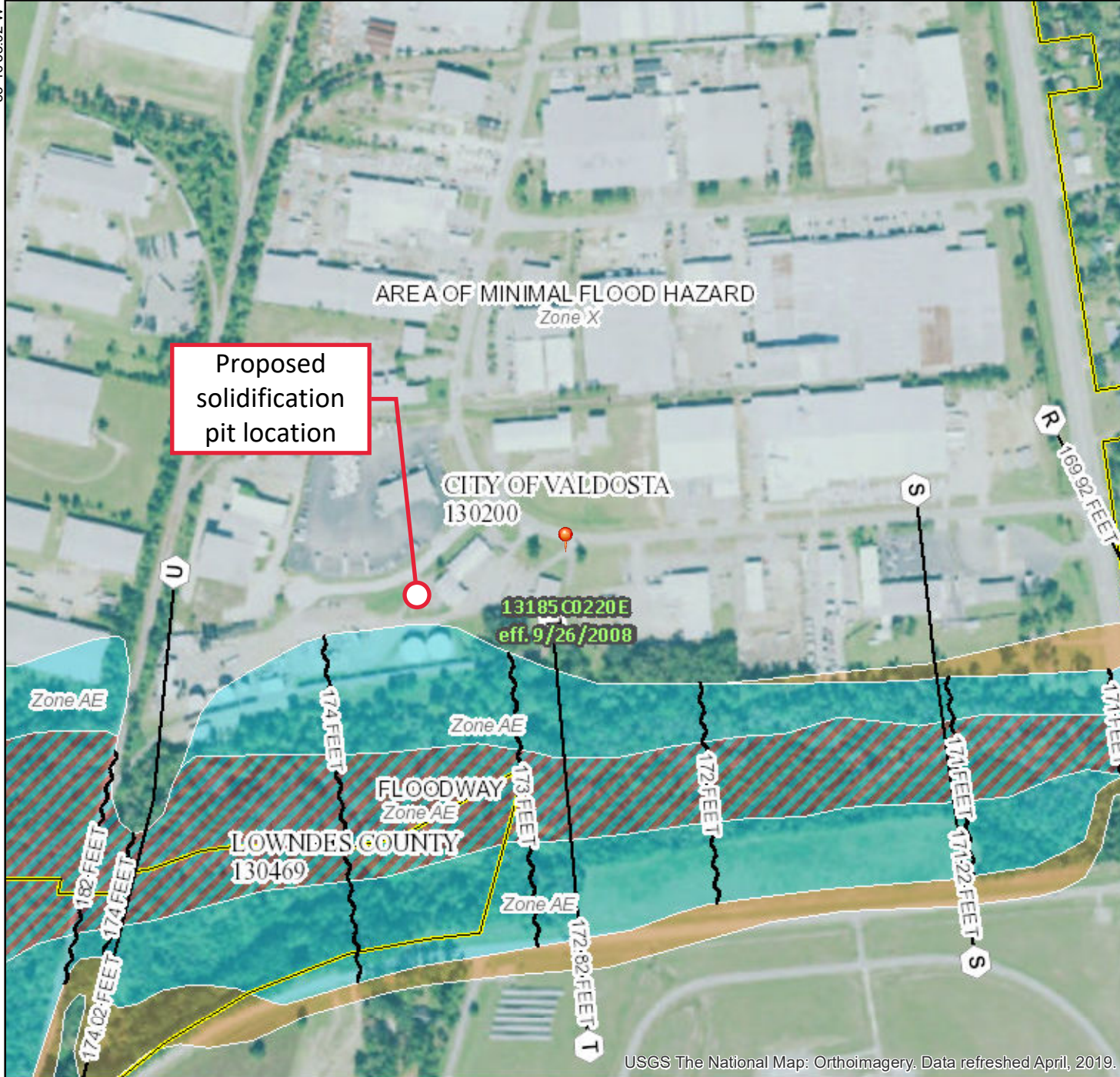


Attachment: National Flood Hazard Layer FIRMette

# National Flood Hazard Layer FIRMette



30°48'6.75"N



83°16'58.92"W

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D

OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall

OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance
		17.5 Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
OTHER FEATURES		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature

MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

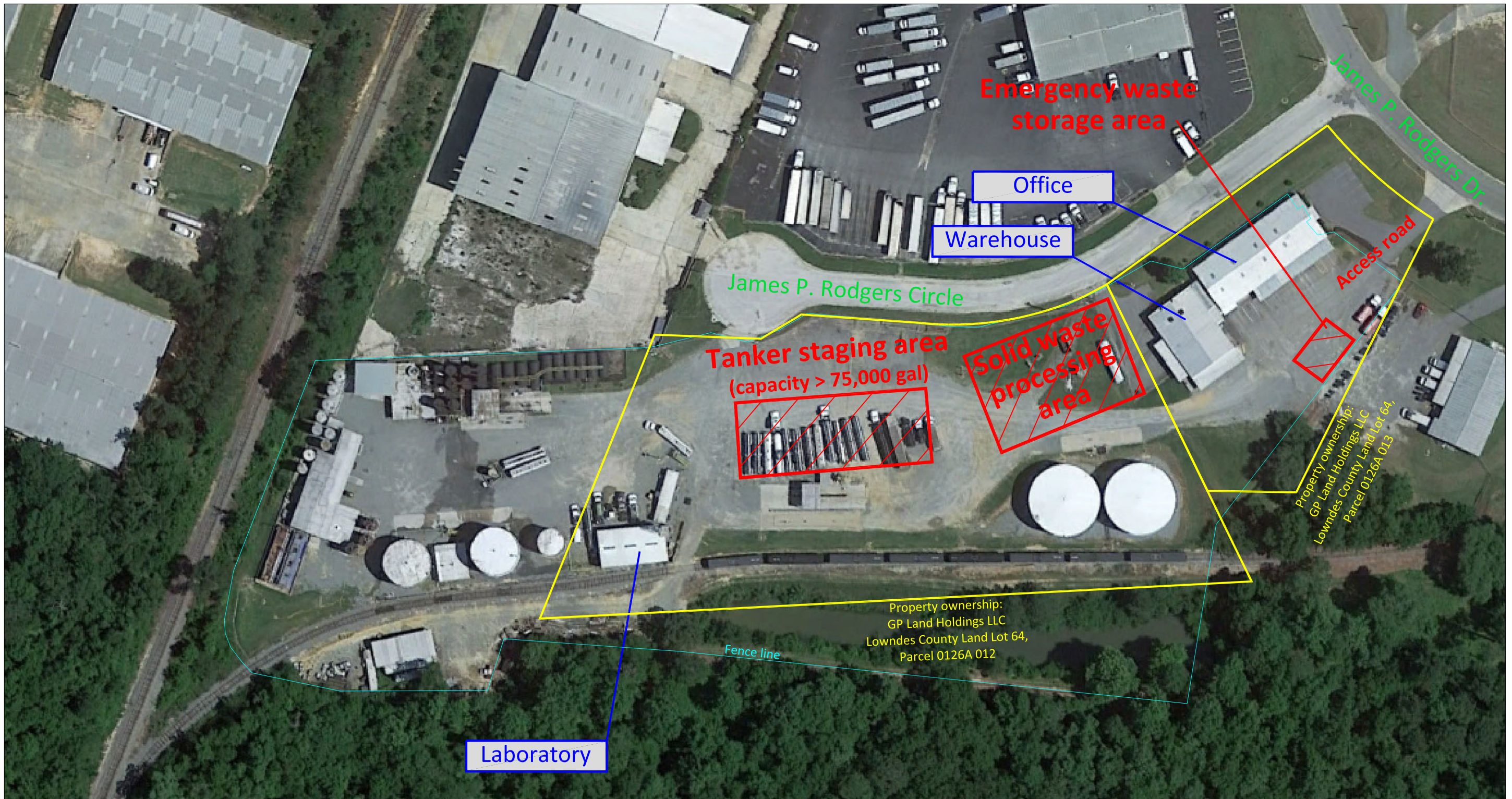
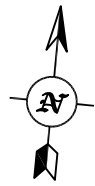
The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/24/2020 at 12:48:53 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



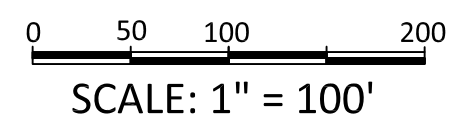
83°16'21.46"W

USGS The National Map: Orthoimagery. Data refreshed April, 2019.



**Notes:**  
 The solid waste handling permit boundary for the proposed operation is outlined in yellow and consists of two tracts: Lowndes County Land Lot 64, Parcels 0126A 012 and 0126A 013. The solidification pit, access roads and storage areas are shown in red. Existing tankage will not be used for or involved in solid waste processing. Liquids to be solidified will be stored in tankers and/or vac trucks within designated areas.

**Solid Waste Handling Permit Boundary**  
 Request for Site Suitability, GEOS Submittal 479083  
**Georgia Petroleum, Inc**  
 1620 James P. Rodgers Dr., Valdosta, Lowndes County, Georgia 31601



**Certification:**  
  
 Ian Lundberg, PE  
 Georgia PE Registration No. 22139

**Prepared by:**  
**RESOLVE ENVIRONMENTAL ENGINEERING, INC.**  
 1444 Waterford Green Drive, Marietta, GA 30068, Ph. (770) 650-9990