

ENVIRONMENTAL PROTECTION DIVISION  
PUBLIC NOTICE  
WATERSHED PROTECTION BRANCH

September 29, 2025  
Notice Issue Date

Pickens County  
City / County

October 29, 2025  
Notice Close Date

SAS-2006-00197  
Control Number

Sec. 401 Water Quality Certification

Whitestone Valley Landfill Expansion – US Army Corps of Engineers Sec. 404 Permit Application

This notice is issued to inform the public that a request has been received for water quality certification (WQC) in accordance with Section 401 of the Clean Water Act. The public is invited to comment during this 30-day period on the proposed activity. Information pertaining to the project is attached to this notice. Since the request is specific to the WQC, only comments pertaining to water quality are considered under the certification review process. Comments may be submitted via e-mail to: [EPD.WQC@dnr.ga.gov](mailto:EPD.WQC@dnr.ga.gov). Comments may also be provided in writing to: Program Manager, Wetlands Unit, 2 Martin Luther King, Jr. Dr. SE, Suite 1052 East, Atlanta, GA 30334. Include the words “Water Quality Certification Comment” and the Control Number above in the e-mail subject line or at the top of the first page of written comments to ensure that your comments will be forwarded to the appropriate staff. For additional information, contact Yaling Covey at [yaling.covey@dnr.ga.gov](mailto:yaling.covey@dnr.ga.gov).

Type of Permit Application: 401 Water Quality Certification

Applicable Law: Federal Clean Water Act, 33 U.S.C. § 1341

Applicable Rules: 40 CFR part 121

Description and Location of Proposed Activity:

Whitestone Valley Landfill, LLC is seeking a Section 401 Water Quality Certification for aquatic resource impacts associated with the expansion of an existing, active landfill to provide additional storage capacity and for continued operations and services to the surrounding area. The 137.36-acre project site is located north of Talona Creek, south of Old Whitestone Road East, west of Whitestone Road, and east of State Road 5 (GA-515) in Talking Rock, Pickens County, Georgia (34.548118, -84.514423). According to the 404 application, the proposed project consists of the phased expansion of the landfill, including the construction of Cells 2, 3, and 4 with additional connector cells between Cells 1 to 2 and Cells 3 to 4.

The project, as currently proposed, requires a USACE Section 404 permit and entails impacting 3,244 linear feet (LF) of intermittent stream. Specifically, the impacts would be associated with the construction of cells 1D, 2H, and 3 and associated infrastructure. To offset the loss in aquatic function associated with the above impacts, the applicant has proposed the purchase of 20,100.60 legacy stream credits from a U.S. Army Corps of Engineers approved mitigation bank servicing the project area.

Name and Address of Permit Applicant: Nathan Dunn  
Whitestone Valley Landfill, LLC  
1714 Old Whitestone Road  
Talking Rock, Georgia 30175



August 29, 2025

Ms. Yaling Covey  
Environmental Protection Division  
Georgia Department of Natural Resources  
19 M.L.K. Jr. Drive SW  
Atlanta, GA 30334

**Re: Whitestone Valley Landfill  
Clean Water Act Section 401 Water Quality Certification  
Pre-Filing Meeting Request  
HHNT Project No.:1218-010-01**

Dear Ms. Covey,

On behalf of Whitestone Valley Landfill, LLC (Whitestone), Hodges, Harbin, Newberry & Tribble, Inc. (HHNT) is submitting a Section 404/401 Joint Permit application for the Whitestone Valley Landfill (Landfill) to the U.S. Army Corps of Engineers and Georgia Department of Natural Resources Watershed Protection Branch. The entire Landfill property is approximately 227.69 acres, significant portions of the area are comprised of the existing landfill and associated infrastructure. This application proposes impacts to streams within the Landfill property. Associated with the Joint Permit Application, the project will require an Individual Water Quality Certification from the Environmental Protection Division, Watershed Protection Branch of the Georgia Department of Natural Resources. HHNT requested a pre-filing meeting regarding the Water Quality Certification on July 29, 2025, and is providing supplemental information for your review.

With regards to past property use, Whitestone is unaware of any previous industrial use other than the current land use. HHNT has prepared two historical aerial photographs which are included (1966 Aerial Photograph, 1993 Aerial Photograph).

The closest 305b / 303d listed stream is Talona Creek. The designated use is fishing, and this reach is listed as supporting. The nearest downstream reach which is not supported is Talking Rock Creek. The designated use is fishing, and the reach is listed as not supporting due to *Escherichia coli*.

Additionally, we have included a reduced copy of the Joint Permit application which has been submitted to the USACE for the proposed project. Please see below:

40 CFR 121.5 – Request for certification.

- (a) Where a project proponent is seeking certification from any certifying authority, the request for certification shall include the following minimum contents:
  - (1) If the request for certification is for an individual license or permit, it shall be in writing, signed, and dated and shall include the following:

- (i) A copy of the Federal license or permit application submitted to the Federal agency; and

**The submitted application is included in Appendix B.**

- (ii) Any readily available water quality-related materials that informed the development of the application.

**Included in Appendix A is a map depicting 303(b) listed waters and their status as supporting or not supporting.**

(b) If the certifying authority has not identified contents of a request for certification in addition to those identified in 121.5(a), the project proponent must include the additional contents identified in 121.5(b), as applicable, if they are not already included in the minimum contents for a request for certification.

(1) A description of the proposed activity, including purpose of the proposed activity and types of discharge that may result from the proposed activity

**On behalf of Whitestone Valley Landfill, LLC (Whitestone), Hodges, Harbin, Newberry & Tribble, Inc., (HHNT) is submitting an Individual Permit application pursuant to Section 404 of the Clean Water Act. The applicant is seeking this Individual Permit in order to construct additional waste disposal cells and stormwater ponds at the Whitestone Valley Landfill (Landfill) located in Pickens County, Georgia. The Landfill has been in operation since 2007. The Landfill is located at 1714 Old Whitestone Road in Talking Rock, Georgia.**

**The entire Landfill property is approximately ~227.69 acres and the Project Boundary (Project Boundary) is approximately 137.76 acres and contains current and future permitted waste disposal cells 2-4. Currently, Whitestone is proposing to expand the existing landfill within the Project Boundary. The expansion would involve constructing permitted cells 2, 3, and 4 along with adding additional cells that connect cells 1 and 2 and cells 3 and 4. In doing so, they will impact approximately ~3,244 linear feet of jurisdictional intermittent stream. The proposed Project Boundary is approximately ~137.36 acres and subset of the entire landfill property which is ~227.69 acres. The purpose of the project is to provide additional disposal capacity for the Landfill for continued operations and service to the surrounding area for the next 25 years. The areas south of the Project Area are part of the Future Development Area and will be constructed at a later date.**

**The Landfill is a Construction and Demolition (C&D) landfill that services multiple counties in North Georgia and Metro Atlanta. The facility is currently permitted through Georgia Environmental Protection Division (GAEPD) Solid Waste Management Program (Permit No. 112-008D (C&D)).**

**The Project Boundary consists of a currently active waste disposal cells and forested upland ridges that contain streams in the valleys between. These streams are headwater systems that flow into an unnamed tributary of Talona Creek, eventually contributing to Carters Lake and the Coosawattee River.**

**The Project Boundary and construction of the waste disposal cells, and stormwater ponds are currently permitted through the GAEPD Solid Waste Management Program (112-008D (C&D)). Current Design and Operation Plans were filed with GAEPD in December 2020 and**

show the design of the permitted waste disposal cells. The construction of permitted cells 2, 3, and 4 along with the connecting cells between existing cell 1 and permitted cell 2 and between permitted cells 3 and 4 will be located within the Project Boundary. The expansion between Cells 1 and 2 is considered a “piggyback expansion,” incorporating industry leading engineering techniques to increase storage capacities. Piggyback Landfills take advantage of airspace already designated for waste storage without increasing the horizontal footprint. Vertical cell construction utilizing this design method is not only proven, but it also drastically reduces land consumption and affiliated environmental impacts. The areas south of the Project Area are part of the Future Development Area and will be constructed at a later date.

The Landfill is located in the Coosawatee watershed (Hydrologic Unit Code (HUC) 03150102). Options for permittee responsible mitigation were explored both on-site and off-site. These options were not feasible due to the lack of available land to purchase. Therefore, Whitestone proposes to purchase mitigation through a mitigation bank. In all the applicant is requesting 3,244 linear feet of stream impacts for a total of 20,100.60 legacy credits, according the 2018 Georgia Standard Operating Procedures for Compensatory Mitigation, that will be purchased an approved mitigation bank for this project.

(2) The specific location of any discharges that may result from the proposed activity

**As listed above, the landfill expansion will impact approximately ~3,244 linear feet of jurisdictional intermittent stream.**

(3) Map or diagram of the proposed activity site, including proposed activity boundaries in relation to local streets, roads, and highways

**Figures of the proposed activity site can be found in the Joint Permit application included in Appendix B.**

(4) Description of current activity site conditions, including, but not limited to relevant site data, photographs that represent current site conditions, or other relevant information.

**The Project Area is made up of recently cleared areas, forested riparian buffer, and streams and wetlands. Site photographs are included in the Joint Permit application in Appendix B.**

(5) Dates on which the proposed activity is planned to begin and end and, if known, the approximate dates when discharges may commence

**Projected commencement of the project is dependent upon apprehension of all necessary permits, which are listed below in (6).**

(6) A list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed activity and the current status of each authorization

**The Landfill is a Construction and Demolition (C&D) landfill that services multiple counties in North Georgia and Metro Atlanta. The facility is currently permitted through Georgia Environmental Protection Division (GAEPD) Solid Waste Management Program (Permit No. 112-008D (C&D)).**

**Ms. Yaling Covey**

**August 29, 2025**

**Page 4 of 4**

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(7) Documentation that a prefiling meeting request was submitted to the certifying authority in accordance with applicable submission procedures, unless the prefiling meeting request was waived

**Please see attached prefiling meeting request (Appendix C).**

Please let us know if you have any questions.

Sincerely,

**HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.**



Rachael B. Sulkers, PWS  
Senior Ecologist

RBS/fm

*Enclosure*

Appendix A: Figures

Figure 1 - 1966 Aerial Photograph

Figure 2 - 1993 Aerial Photograph

Figure 3 - Impaired Streams Map

Figure 4 - Proposed Conditions Map

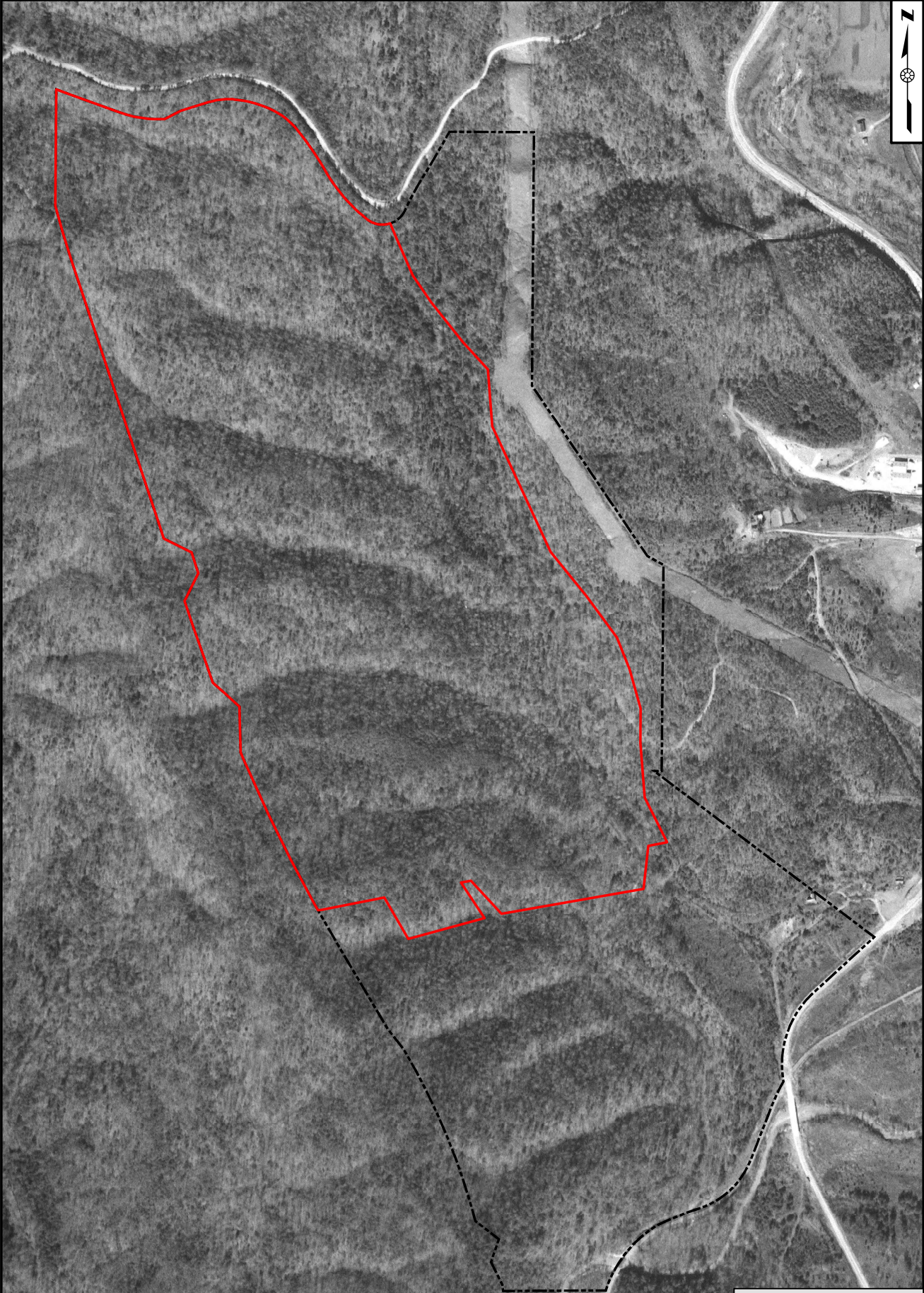
Appendix B: Joint Permit Application



Appendix C: Pre-Filing Meeting Request

## **APPENDIX A: FIGURES**

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- Figure 1 – 1996 Aerial Photograph
- Figure 2 – 1993 Aerial Photograph
- Figure 3 – Impaired Streams Map
- Figure 4 – Proposed Conditions Map

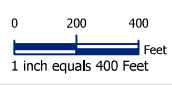


- Legend**
-  Project Boundary (~137.36 Ac.)
  -  Property Boundary (~227.69 Ac.)

- Notes:**
1. Aerial photograph obtained from USGS Earth Explorer, flown February 1966.
  2. Property Boundary obtained from drawing entitled "WV-D&O\_DWG-A.DWG" based on survey by Chastain & Associates, P.C.

**Figure 1 - 1966 Aerial Photograph**

Whitestone Valley C&D Landfill  
 Whitestone Valley Landfill, LLC  
 Pickens County, GA  
 1/15/2024





**DISCLAIMER:**  
 This drawing and the information contained herein is for general presentation purposes only and is a compilation of shapefile(s) provided by various source(s). The source and accuracy of the file(s) has not been verified by HHNT and therefore the drawing is not intended for use as an engineering drawing of for design purposes.



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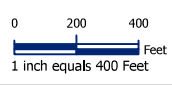


**Legend**  
 Project Boundary (~137.36 Ac.)  
 Property Boundary (~227.69 Ac.)

**Notes:**  
 1. Aerial photograph obtained from Google Earth Pro, dated 1993.  
 2. Property Boundary obtained from drawing entitled "WV-D&O\_DWG-A.DWG" based on survey by Chastain & Associates, P.C.

**Figure 2 - 1993 Aerial Photograph**

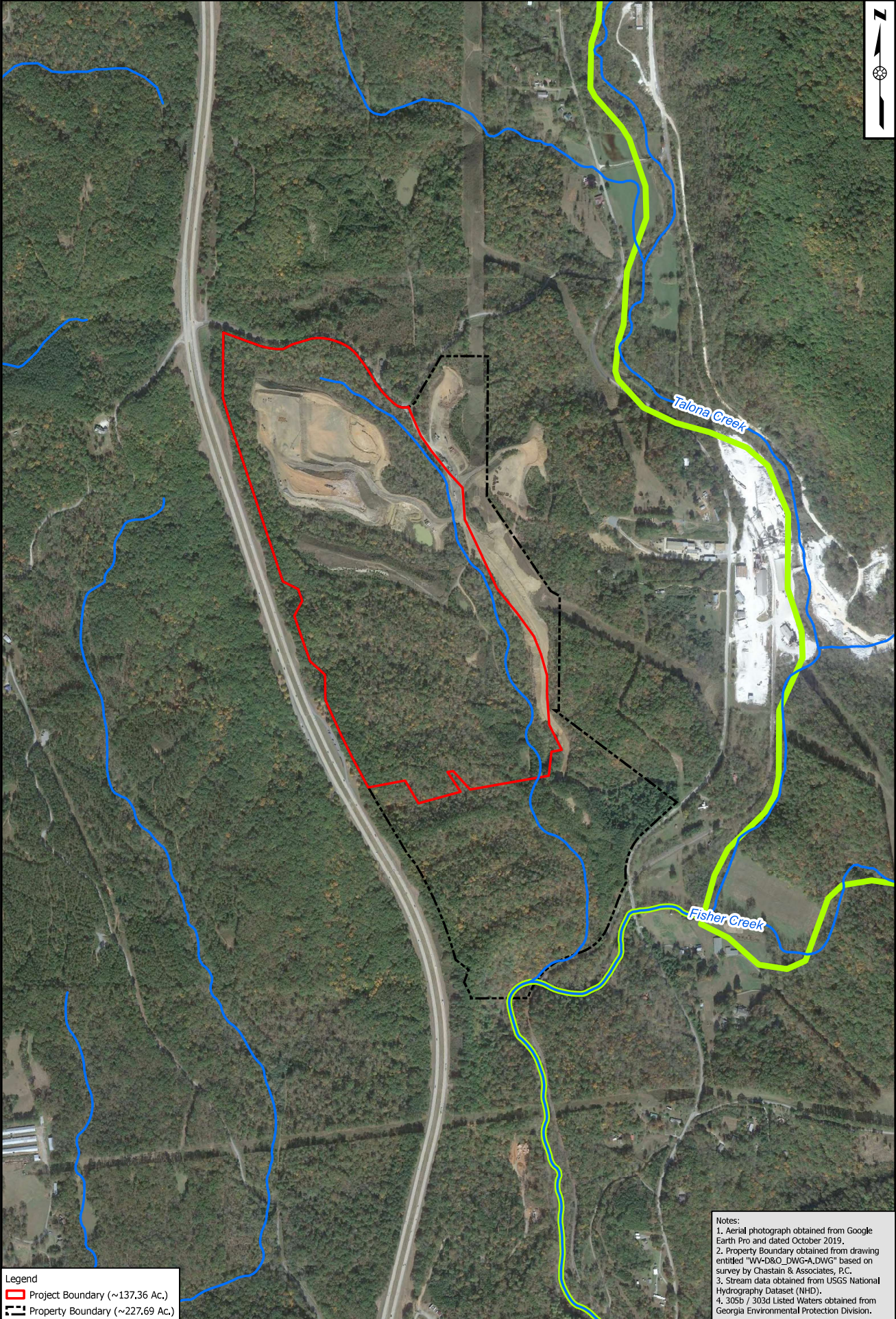
Whitestone Valley C&D Landfill  
 Whitestone Valley Landfill, LLC  
 Pickens County, GA  
 1/15/2024



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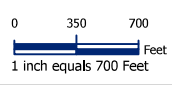


- Legend**
- Project Boundary (~137.36 Ac.)
  - - - Property Boundary (~227.69 Ac.)

- Notes:**
1. Aerial photograph obtained from Google Earth Pro and dated October 2019.
  2. Property Boundary obtained from drawing entitled "WV-D&O\_DWG-A.DWG" based on survey by Chastain & Associates, P.C.
  3. Stream data obtained from USGS National Hydrography Dataset (NHD).
  4. 305b / 303d Listed Waters obtained from Georgia Environmental Protection Division.

**Figure 3 - Impaired Streams Map**

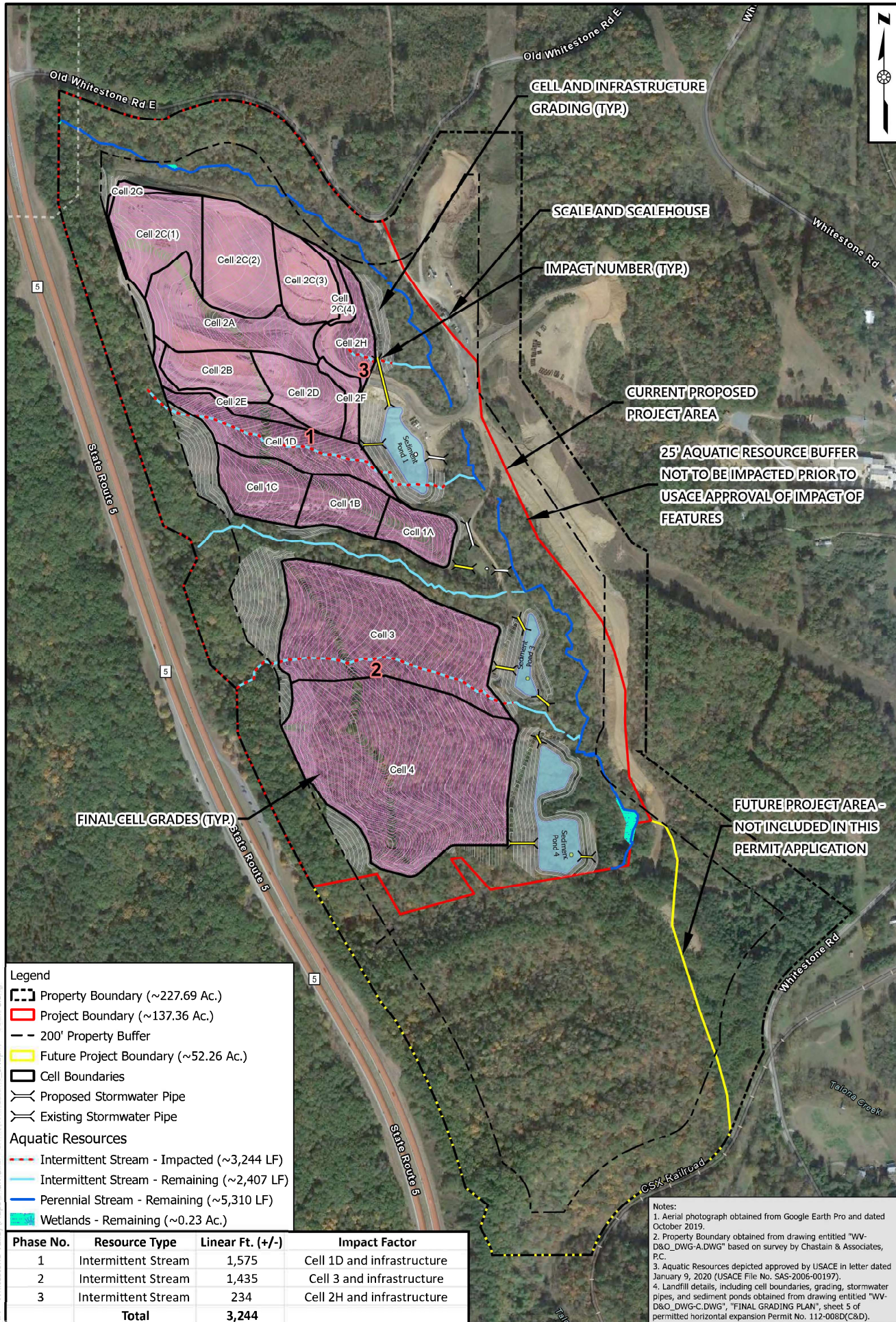
Whitestone Valley C&D Landfill  
 Whitestone Valley Landfill, LLC  
 Pickens County, GA  
 1/15/2024



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**Legend**

- Property Boundary (~227.69 Ac.)
- Project Boundary (~137.36 Ac.)
- 200' Property Buffer
- Future Project Boundary (~52.26 Ac.)
- Cell Boundaries
- Proposed Stormwater Pipe
- Existing Stormwater Pipe

**Aquatic Resources**

- Intermittent Stream - Impacted (~3,244 LF)
- Intermittent Stream - Remaining (~2,407 LF)
- Perennial Stream - Remaining (~5,310 LF)
- Wetlands - Remaining (~0.23 Ac.)

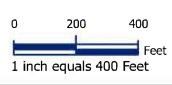
Phase No.	Resource Type	Linear Ft. (+/-)	Impact Factor
1	Intermittent Stream	1,575	Cell 1D and infrastructure
2	Intermittent Stream	1,435	Cell 3 and infrastructure
3	Intermittent Stream	234	Cell 2H and infrastructure
<b>Total</b>		<b>3,244</b>	

**Notes:**

- Aerial photograph obtained from Google Earth Pro and dated October 2019.
- Property Boundary obtained from drawing entitled "WV-D&O\_DWG-A.DWG" based on survey by Chastain & Associates, P.C.
- Aquatic Resources depicted approved by USACE in letter dated January 9, 2020 (USACE File No. SAS-2006-00197).
- Landfill details, including cell boundaries, grading, stormwater pipes, and sediment ponds obtained from drawing entitled "WV-D&O\_DWG-C.DWG", "FINAL GRADING PLAN", sheet 5 of permitted horizontal expansion Permit No. 112-008D(C&D).

**Figure 4 - Proposed Site Conditions Map**

Whitestone Valley C&D Landfill  
 Whitestone Valley Landfill, LLC  
 Pickens County, GA  
 6/2/2025



**DISCLAIMER:**  
 DEPICTED WATERS OF THE U.S. DELINEATION REMAINS AN OPINION OF HHNT UNTIL IT IS FORMALLY VERIFIED IN WRITING BY THE U.S. ARMY CORPS OF ENGINEERS VIA A FORMAL DETERMINATION LETTER.

**DELINEATED WETLANDS AND STREAMS HAVE NOT BEEN APPROVED BY ACOE.**

**HHNT**  
 HODGES, HARBIN,  
 NEWBERRY & TRIBBLE, INC.  
 Consulting Engineers

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## **APPENDIX C: PRE-FILING MEETING REQUEST**

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July 29, 2025

Environmental Protection Division  
Georgia Department of Natural Resources  
19 M.L.K. Jr. Drive SW  
Atlanta, GA 30334

**Re: Whitestone Valley Landfill  
Clean Water Act Section 401 Water Quality Certification  
Pre-Filing Meeting Request  
HHNT Project No.: 1218-010-01**

To Whom It May Concern:

On behalf of Whitestone Valley Landfill LLC (Whitestone), Hodges, Harbin, Newberry & Tribble, Inc. (HHNT) has submitted a Section 404/401 Joint Permit application for the Whitestone Valley Landfill (Landfill) to the U.S. Army Corps of Engineers and Georgia Department of Natural Resources Watershed Protection Branch on July 18, 2025. The entire Landfill property is approximately 227.69 acres; significant portions of the area are comprised of the existing landfill and associated infrastructure. This application proposes impacts to streams within the Landfill property. Associated with the Joint Permit Application, the project will require an Individual Water Quality Certification from the Environmental Protection Division, Watershed Protection Branch of the Georgia Department of Natural Resources. HHNT wishes to request a pre-filing meeting regarding Water Quality Certification.

Whitestone is proposing to expand the existing landfill within the Project Boundary. The expansion would involve constructing permitted cells 2, 3, and 4 along with adding additional cells that connect cells 1 and 2 and cells 3 and 4. In doing so, they will impact approximately ~3,244 linear feet of jurisdictional intermittent stream. The proposed Project Boundary is approximately ~137.36 acres and subset of the entire landfill property which is ~227.69 acres. The purpose of the project is to provide additional storage capacity for the Landfill for continued operations and service to the surrounding area for the next 25 years. The areas south of the Project Area are part of the Future Development Area and will be constructed at a later date.

The Landfill is a Construction and Demolition (C&D) landfill that services multiple counties in North Georgia and Metro Atlanta. The facility is currently permitted through Georgia Environmental Protection Division (GAEPD) Solid Waste Management Program (Permit No. 112-008D).

The Project Boundary consists of a currently active waste disposal cell and forested upland ridges that contain streams in the valleys between. These streams are headwater systems that flow into an unnamed tributary of Talona Creek, eventually contributing to Carters Lake and the Coosawattee River.

The Project Boundary and construction of the waste disposal cells, and stormwater ponds are being reviewed by the GAEPD Solid Waste Management Program (112-008D (C&D)). Current Design and Operation Plans were filed with GAEPD in December 2020 and show the design of the permitted waste disposal cells (attached). The construction of permitted cells 2, 3, and 4 along with the connecting cells between existing cell 1 and permitted cell 2 and between permitted cells 3 and 4 will be located within the Project Boundary. The expansion between Cells 1 and 2 is considered a “piggyback expansion,” incorporating industry leading engineering techniques to increase storage capacities. Piggyback Landfills take advantage of airspace already designated for waste storage without increasing the horizontal footprint. Vertical cell construction utilizing this design method is not only proven, but it also drastically reduces land consumption and affiliated environmental impacts. The areas south of the Project Area are part of the Future Development Area and will be constructed at a later date.

This letter serves as a Prefiling Meeting Request for Water Quality Certification from the Environmental Protection Division. Please let us know when you may have availability for this meeting. HHNT will provide the Joint Permit Application under separate cover.

Please let us know if you have any questions.

Sincerely,

Hodges, Harbin, Newberry & Tribble, Inc.



Rachael B. Sulkers, PWS  
Senior Ecologist

RBS/fm

*Enclosure*

- Figure 1 – 1966 Aerial Photograph
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- Figure 4 – Proposed Conditions Map
- Design and Operations Plan