



Jeffrey W. Cown, Director

Land Protection Branch

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Dec 12, 2023

Wright McLeod
Dixon Airline and Disposal, Inc.
1710 Dixon Airline Road
Augusta, Georgia 30906

**SUBJECT: Richmond County – Proposed Dixon Airline Road C&D Landfill
GEOS Submission ID: 572043**

Dear Mr. McLeod:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the Revision #4, September 2023, *Site Acceptability Report, for a Construction and Demolition Waste Landfill, Materials Recovery Facility and Class I Composting Facility* prepared by Russell Engineering, Inc. 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 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 16, 2024. 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 Beverly Tipton at 470-524-5790 if you have any questions.

Sincerely,

Charles J. Mueller, Chief
Land Protection Branch

Enclosure

cc: Keith Stevens, Beverly Tipton, Jim Guentert, William Cook, GA EPD
EPD East Central District, Augusta
David Russell, Russell Engineering.

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1. The area considered for acceptability includes only that within the line identified as “Existing Property Line and Proposed Permit Boundary” on Russell Engineering Inc’s (RE), *Boundary and Topographic Survey*, Sheet 2-4, revised 12/18/22.
2. Waste shall not be placed outside of the area defined by the line identified as “Proposed Waste Limit” on RE’s, *Boundary and Topographic Survey*, Sheet 2-4, revised 12/18/22.
3. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the facility permit boundary.
4. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells.
5. Existing inert waste shall be removed from the undisturbed buffers show on RE’s, *Boundary and Topographic Survey*, Sheet 2-4, revised 12/18/22.
6. 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) and allowed by EPD.
7. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted by the USACE and allowed by EPD. A statement certifying that wetlands will not be impacted because 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 (D&O) Plan for the subject site. Wetland areas shall be delineated on the D&O Plan.
8. The bottom of the waste shall be kept a minimum of 15 feet above the groundwater elevation contours shown on RE’s *Boring and Geologic Cross-Section Locations, Potentiometric Surface Map Historical Highs*, revised 12/18/22 and no lower than an elevation of 200 feet.

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.
9. Structural fill shall be required to fill the existing sediment ponds. This structural fill must meet requirements presented in the construction quality assurance plan of the D&O Plan.
10. All erosion control measures and/or diversion ditches must conform to the *Erosion and Sediment Control Act*. All drainage structures must be designed and constructed in accordance with the *Manual for Erosion and Sediment Control in Georgia*. All drainage structures must be channeled to permanent sediment control impoundment.
11. 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.

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12. All soil borings, monitoring wells and piezometers that have been 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 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.
13. This site is in a seismic impact zone as defined in the Rules for Solid Waste Management (Chapter 391-3-4-.05 (1) (g)). The design engineer must certify that all containment structures are designed to resist the maximum horizontal ground acceleration for the site. Therefore, the registered professional engineer preparing the design 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 0.20g in 250 years.

14. 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 1991 *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 and are approvable by EPD.