



Jeffrey W. Cown, Director

Land Protection Branch

4244 International Parkway
Suite 104
Atlanta, Georgia 30354
404-362-2537

Jan 31, 2025

Jennifer McNelly
Vice President Environmental Affairs
Georgia Power Company
241 Ralph McGill Blvd. NE
Atlanta, Georgia 30308

RE: Site Suitability Notice for Georgia Power, Plant Hammond
Huffaker Road - Proposed Parcel F Coal Combustion Residual (CCR) Landfill
Floyd County, Georgia
Permit No. 057-022D(LI), Submittal ID: 771782

Dear Ms. McNelly:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the January 5, 2024, *Site Acceptability Report, Addendum to Huffaker Road Landfill (Permit Number 057-022D(LI)), Parcel F Lateral Expansion – Rome, Floyd County, Georgia*, prepared by Stantec Consulting Services and a January 5, 2024 response letter from Georgia Power.

These documents can be accessed on the EPD web page at:

- <https://epd.georgia.gov/public-announcements-0/land-protection-branch-public-announcements>
- <https://epd.georgia.gov/ccr-site-limitations>

Based on the data submitted in addition to your application, EPD has determined that the applicable siting standards can be met in accordance with Georgia Solid Waste Management Rules (hereinafter Rule or Rules) 391-3-4.10, provided the attached “Site Limitations” are met. This determination is based on information provided to date for EPD review and is subject to revision prior to permit issuance should errors be found in the submitted information or new information be provided relevant to this determination. This letter denotes only the demonstration of the ability to comply with siting standards for the proposed site and does not constitute approval to begin construction or operation of the disposal site. This letter does not constitute a permit for the proposed solid waste landfill.

Please note that site limitations 5, 6, 7, 11, 14 and 16 have been modified for clarity from the draft site limitations dated June 18, 2024.

Before a permit may be issued for the proposed solid waste disposal site, Design and Operational (D&O) Plans, prepared in accordance with Rule 391-3-4-.10, must be submitted for consideration by EPD. After our review and evaluation of the D&O Plans, a Solid Waste Handling Permit will be either issued or denied.

This Site Suitability Notice shall terminate upon a final decision to issue or deny the requested permit. Failure to submit to EPD an approvable D&O Plans within one year from the date of this Notice may result in permit denial.

Sincerely,



Jeffrey W. Cown, Director
Environmental Protection Division

Enclosure

cc: Beverly Tipton, EPD
Brian Love, EPD
Keith Stevens, EPD
William Cook, EPD
Lauren Petty, Georgia Power
Tyler Boyles, Georgia Power
David Gibbons, Georgia Power
Bret McClellan - Georgia Power

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1. The area considered for acceptability includes only the area delineated by the line “Proposed CCR Permit Limits” on Stantec Consulting Services (Stantec) Figure 2-1, *Existing Conditions Topographic Map, 2022*, dated 12/14/23.
2. Waste shall not be placed outside of the area delineated by the line “Proposed Waste Limits” on Stantec’s Figure 2-1, *Existing Conditions Topographic Map, 2022*, dated 12/14/23.
3. A composite liner and leachate collection system, as required by *Georgia’s Rules for Solid Waste Management*, shall be constructed under all areas proposed for CCR disposal. The bottom of the liner system shall be constructed a minimum of five feet above the groundwater elevation contours and a minimum of ten feet above the three intermittent streams within the proposed waste limits shown on Stantec’s Figure 2-7, *Composite Seasonal High Potentiometric Surface Map*, dated 11/9/23.

An underdrain system shall be placed in each drainage ravine containing a stream within the proposed waste areas and shall be designed to maintain the water table, within the drainage ravines, at an elevation no higher than depicted on Stantec’s Figure 2-7, *Composite Seasonal High Potentiometric Surface Map*, dated 11/9/23. The outfall of the underdrain systems must be incorporated into the groundwater monitoring plan for the site.

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 permit boundaries. The 200-foot buffer may be disturbed if approved by EPD.
6. 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) and allowed by EPD. A statement certifying that the landfill has been designed so that implementation of the design and operational plans will not impact wetlands, delineated on December 8 – 11, 2020 and January 13-14, 2021, shall be submitted. This statement shall be signed and stamped by the professional engineer responsible for the design and operational plans for the subject site. Wetland areas shall be delineated on permit drawings.
7. Prior to the initial receipt of waste, a certification statement shall be placed in the operating record demonstrating that the requirements of 40 CFR 257.61(a) have been met. This statement shall be signed and stamped by the professional engineer responsible for the Design and Operational Plan for the subject site.

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8. A minimum 25-foot undisturbed buffer shall be maintained between the waste disposal area and any onsite springs, intermittent or perennial streams or surface water bodies, except as allowed by EPD.
9. If during excavation of the site, any springs or seeps are discovered, precautions shall be taken to implement protective designs into the facility's Design and Operational Plan. Also, the spring or seep shall be incorporated into the facility's groundwater monitoring 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 to pose a hazard to human health and the environment.
11. If non-rippable rock (bedrock) is encountered at an elevation above the approved base of the liner system, 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 liner system. The engineered layer shall include:
 - i. One (1) foot of soil with a hydraulic conductivity equal or less than 1×10^{-5} cm/sec constructed over one (1) foot of structural fill, or
 - ii. If a geosynthetic is used, the geosynthetic will have a hydraulic conductivity equivalent to or less than one (1) 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.

12. Structural fill shall be required in some portions of the expansion area to achieve the required base grade elevations. Structural fill shall meet the requirements of the Construction Quality Assurance Plan within the EPD approved Design & Operational Plan.
13. All erosion control measures and/or diversion ditches shall conform to the latest edition of the *Manual for Erosion and Sediment Control in Georgia* and be protective of Smith Creek and its perennial and intermittent tributaries. All drainage structures must be routed to a permanent sediment control impoundment.

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14. This site is in a seismic impact zone as defined in the Rules for Solid Waste Management Rule 391-3-4.10(3)(a). The design engineer must certify that all containment structures are designed to resist the maximum horizontal ground acceleration specified in Rule 391-3-4.10(4) 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 Plans 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 0.24g, 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 permit issuance, whichever is more conservative.

15. Groundwater and surface water 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 applicable parts of the 1991 *Georgia Manual for Groundwater Monitoring* and current USEPA Region IV guidance. The system design and monitoring requirements shall be detailed in groundwater and surface water monitoring plan that are prepared in accordance with the *Georgia Solid Waste Management Rules, Subject 391-3-4*, the guidance documents mentioned above and are approvable by EPD.
16. All soil borings, monitoring wells and piezometers that have been completed/installed within the permit boundary, 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 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.