



Jeffrey W. Cown, Director

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05/07/2025

Todd Ennis, Solid Waste Director
City of Griffin
236 Emlett Drive
Griffin, Georgia 30223

SUBJECT: Site Suitability Notice
Spalding County – City of Griffin, Shoal Creek Road C&D Landfill
Proposed Phase IV Expansion
Permit Number 126-010D(C&D) Submission ID: 642953

Dear Mr. Ennis:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the September 20, 2023, *Hydrogeologic Site Assessment/Site Suitability Report, Shoal Creek Road C&D Landfill, Phase 4 Expansion, City of Griffin-Spalding County, Georgia*, prepared by Geotechnical and Environmental Consultants, Inc.

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 Comprehensive Rules and Regulations Subject 391-3-4, Solid Waste Management* (Rules) rule 391-3-4-.05(1), provided the attached “Site Limitations” are met. The Site Limitations in this letter supersede the Site Limitations issued on November 22, 2024. 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.

Before a permit may be issued for the proposed solid waste disposal site, a Design and Operational Plan (D&O Plan), prepared in accordance with Rule 391-3-4-.07, must be submitted for consideration by the EPD.

Additionally, the appropriate governing authority must hold a public hearing regarding the proposed landfill no less than two weeks prior to the issuance of any permit. At least 30 days prior to the public hearing, notices of the public hearing must be posted at the proposed site and advertised in the legal organ of the county or counties in which the proposed solid waste disposal facility will be located. A transcript of the public hearing proceedings and a reaffirmation of zoning consistency must be submitted to EPD prior to a final decision regarding the issuance of a permit for the proposed solid waste disposal facility.

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After our review and evaluation of the D&O Plan, and the other required submittals, 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 Design and Operational Plan within one year from this date of this Notice may result in permit denial or termination of the permit application.

Sincerely,



Jeffrey W. Cown, Director
Georgia Environmental Protection Division

Attachment

cc: Keith Stevens, Beverly Tipton, Jim Guentert, William Cook, Tammy Buchli, GA EPD
Robert King, Paragon Consulting Group
EPD Mountain District/Atlanta

Site Limitations
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1. Waste in the Phase IV expansion area shall not be placed outside the line identified as “Proposed Waste Disposal Boundary” shown on Paragon Consulting Group (Paragon) Figure 2, *Landfill Expansion Site Plan*, printed on January 23, 2024.
2. The bottom of waste in the Phase IV expansion area shall be kept a minimum of 10 feet above the groundwater elevation contours shown on Paragon’s Figure 11, *Potentiometric Contour Map*, printed on February 21, 2024.

As an alternative to placing waste a minimum of 10 feet above the groundwater contours referenced above, an underdrain system may be constructed beneath all areas proposed for waste disposal. The design engineer shall make periodic inspections of the underdrain system during construction and shall certify that the underdrain system is designed to prevent groundwater elevations from rising to within five feet of the bottom-of-waste elevations at any point between the drain lines.

3. A minimum 500-foot buffer shall be maintained between the waste disposal boundary and any adjacent residences and/or water supply wells at the time of Site Limitation issuance.
4. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.
5. A minimum 50-foot undisturbed buffer shall be maintained between the waste disposal boundaries and all wetlands, except as permitted for impacts 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 Plan will not impact wetlands delineated in March 2020 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.
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 for impacts by the United States Army Corps of Engineers (USACE) and allowed by EPD.
7. 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 plans. Also, the spring or seep shall be incorporated into the facility’s groundwater monitoring plan.
8. 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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9. All erosion control measures shall conform to the *Erosion and Sediment Control Act, Solid Waste Management Rules, Subject 391-3-4*, and be protective of all perennial and intermittent streams and tributaries. Runoff from the entire facility must be routed at all times, either directly or via properly designed conveyance systems, to permanent sediment control impoundments.
10. This site is in a seismic impact zone as defined in *the Georgia Comprehensive Rules and Regulations Subject 391-3-4, Solid Waste Management (Rules)*. 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 0.12g, 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 Site Limitations issuance, whichever is more conservative

11. 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.
12. If non-rippable rock (bedrock) is encountered at an elevation above the approved base of the waste unit, 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 base of the waste unit. The engineered layer shall include:
- i. One (1) foot of soil with a hydraulic conductivity equal or lower 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) foot 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.

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13. Groundwater, surface water, and methane monitoring systems shall be installed at the site. The groundwater monitoring system shall include some monitoring wells completed in the bedrock. Foliation and joint orientation and lineament analysis shall be considered in determining bedrock monitoring well locations. Sampling parameters, sampling schedules, monitoring well construction, and spacing shall adhere to the guidelines established in the 1991 EPD document *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. The system design and monitoring requirements shall be detailed in groundwater, surface water, and methane monitoring plans 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.

14. All soil borings, monitoring wells and piezometers that have been completed/installed at this site, 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.