

January 31, 2023

Mr. William Cook  
Georgia Environmental Protection Division  
Solid Waste Management Program  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354

**Subject: Georgia Power Company – Plant Wansley  
Response to EPD Comments on the Site Acceptability Report  
Proposed CCR Landfill Expansion  
Permit Number 074-005D(CCR)  
GEOS Submittal ID 738258**

Dear Mr. Cook:

Enclosed please find submittal through GEOS of Georgia Power Company's (Georgia Power's) response to EPD comments on the August 2023 *Site Acceptability Report for Proposed CCR Landfill Expansion, Plant Wansley*, and related information (GEOS ID 738258). The comments were received in EPD's letter dated November 29, 2023. For clarity we have written out each comment followed by a written response. The responses have been prepared with assistance from our permitting consultant, Geosyntec Consultants, Inc.

## **GA EPD COMMENTS**

### **Comment No. 1:**

The site topographic map should be used as the base map for the groundwater elevation contours shown in Figure 2-7.

#### ***Response:***

*The potentiometric surface map in **Figure 2-7** has been revised to include the site topographic contours as a base map.*

### **Comment No. 2:**

The groundwater elevation shown at GWC-6 in Figure 2-7 does not match the elevation listed for the March 24, 2022, gauging event in Table 2-4.

#### ***Response:***

*The groundwater elevation shown on **Figure 2-7** and **Table 2-4** have been revised to address this discrepancy.*

**Comment No. 3:**

The depth-to-water measurements for at least the March 24, 2022, gauging event used to generate Figure 2-7 should be added to Table 2-4 in the report.

**Response:**

*Depth to water measurements for each of the gauging events has been added to Table 2-4, including March 24, 2022, in the revised version of the document.*

**Comment No. 4:**

The potential for poor foundation conditions related to alluvial soils that likely exist along the perennial stream in the proposed expansion area should be discussed in Section 2.7.3. Also, in accordance with Circular 14, wetlands and streams should be discussed in Section 4.1 and wetlands and streams buffers in Section 4.6.

**Response:**

*As requested, a discussion of alluvial soils and foundation conditions was added to Section 2.7.3 as follows:*

*In areas beneath the proposed CCR Landfill expansion, namely the perennial stream that is planned for realignment, alluvial material may be present that could constitute weak or poor foundation soils. These soils, should they be encountered, are to be removed and replaced with properly compacted structural fill prior to construction of the base grades for the proposed new landfill cell (Cell 4) to ensure proper foundation soils.*

*The first paragraph of Section 4.1 was updated to include a discussion of wetlands and streams as follows:*

*With the exception of the buffer areas discussed below and floodplain, stream, and wetland areas identified on Figure 1-2, there are no areas identified as unfavorable for siting of the CCR Landfill expansion. Any wetland and/or stream impacts, including stream relocation, will be permitted as required by the USACE 404 permitting process prior to disturbance. No karstic areas are present within the Piedmont province.*

*The following text was inserted into the second paragraph of Section 4.6 regarding wetlands and streams buffers as follows:*

*Wetlands and streams within the proposed CCR Landfill expansion area will be relocated or managed in accordance with the USACE 404 permitting process. Any additional wetlands or streams in the vicinity of the expansion area, if present, will maintain applicable buffers.*

**Comment No. 5:**

Section 2.3.2 should include a discussion of rock outcrops at or near the expansion site focusing on the orientation of joints and foliation.

**Response:**

*A discussion of rock outcrops, joints, and foliation has been added to Section 2.3.2.3. This includes historical measurements from previous investigations as well as new field measurements collected by Geosyntec in December 2023.*

**Comment No. 6:**

Section 2.7.1 should be expanded to discuss the potential enhanced permeability due to the presence of the Long Island Creek Fault and Katy Creek Fault.

**Response:**

*A more detailed discussion of these faults has been added as a second paragraph to Section 2.7.1 as requested.*

**Comment No. 7:**

The Golder (2018) report referenced in Section 2.7.1 should be included as an appendix in the landfill site acceptability report.

**Response:**

*The Geologic and Hydrogeologic Report (Golder, 2018) has been added as Appendix H to the revised Site Acceptability Report.*

**Comment No. 8:**

Groundwater elevations shown at GS-19 and GS-21 in cross-section E-E should be corrected to be consistent with the potentiometric surface map shown in Figure 2-7.

**Response:**

*Groundwater elevations were approximated on geologic cross-section E-E' in Figure 2-4B for abandoned locations GS-19 and GS-21 (borings completed in 2006 and abandoned in 2007).*

**Comment No. 9:**

The water table depicted in the expansion area in Figure 2-7 will change when the groundwater no longer discharges to the perennial and intermittent streams if they are backfilled as part of landfill development. The unpredictable nature of the change to the water table may result in an insufficient separation between the landfill base and groundwater in the proposed expansion area. The report should describe the planned landfill base grades above the perennial stream and/or proposed engineering measures to maintain the current water table in the expansion area.

**Response:**

*A discussion of the water table conditions following construction of the proposed landfill expansion has been added to Section 4.4, as follows:*

*Following realignment of the perennial stream and construction of the proposed CCR Landfill expansion area, it is possible that groundwater levels may change. Given the reduction of recharge areas due to liner installation and the rerouting of the perennial stream including all upstream flow, an overall rise in groundwater levels is not expected. Topographically low areas may be addressed by installing underdrains similar in design to those used in the previously permitted and constructed cells at the Site. Such underdrains, if needed, will be designed to accommodate expected flows and keep groundwater from rising to within 5-feet of the bottom of the liner system. Additionally, structural fill may be used if needed to ensure that landfill base grades maintain a minimum 5-foot separation from the seasonal high groundwater elevations.*

As stated in this transmittal letter, information and updates requested by EPD were incorporated into the January 2024 Site Acceptability Report for Proposed CCR Landfill Expansion at Plant Wansley. The Site Acceptability Report is sealed by a Professional Engineer and a Professional Geologist licensed to practice in the State of Georgia.

Should you have any questions regarding this response, please contact Bret McClellan at (470) 631-4519.

Sincerely,



Lauren Petty, P.G.  
Supervisor, Environmental Affairs  
Georgia Power Company

**Attachment:**

Site Acceptability Report, January 2024

**cc:**

Keith Stevens, Beverly Tipton, Jim Guentert, Brian Love – Georgia EPD  
Tyler Boyles - Georgia Power