



Richard E. Dunn, Director

Land Protection Branch

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404-362-2537

12/20/2022

Jason Maxwell, Senior Vice President, Operations
KaMin LLC
822 Huber Road
Macon, Georgia 31217

**SUBJECT: Wilkinson County – Draft Site Limitations for BASF Corporation - McIntyre Site #3
Private Industrial Landfill
Proposed Vertical and Horizontal Expansion
Permit Number 158-016D (LI), Submission ID: 569699**

Dear Mr. Maxwell:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the revised June 2022, *Site Suitability Report for the BASF McIntyre Site #3 Private Industrial Landfill* and August 18, 2021, and June 13, 2022, response letters prepared by Triple Point Engineering (TPE). 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 20, 2023. 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,

A handwritten signature in dark ink, appearing to read "C Mueller".

Charles J. Mueller, Chief
Land Protection Branch

Enclosure

cc: Keith Stevens, Beverly Tipton, Jim Guentert, William Cook, GA EPD
Anthony Rodriguez, Dan Wallace, TPE
Kevin Hudson, KaMin LLC

Draft Site Limitations
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1. The area considered for acceptability includes only that within the lines identified as “Property Line and Permit Boundary” and “Proposed New Property Line and Proposed Permit Boundary” on Triple Point Engineering’s (TPE), *Topographic & Boring Location Map*, Figure 7, dated July 2019.
2. Waste shall not be placed outside of the area defined by the lines identified as “Limits of Waste Per Jan 12, 2000, D&O Plan” and “Proposed Expansion Waste Limits” shown on TPE’s *Topographic & Boring Location Map*, Figure 7, dated July 2019.
3. A minimum 200-foot undisturbed buffer shall be maintained between the waste disposal boundary and the permitted property boundaries.
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 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.
6. 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.
7. The bottom of the waste within the area identified as “Limits of Waste Per Jan 12, 2000, D&O Plan” shown on TPE’s *Topographic & Boring Location Map*, Figure 7, dated July 2019, shall be no lower than the base grade elevations shown on Sheet 1 of 7, *Initial Grading Plan*, prepared by DSAAtlantic Tribble & Richardson, Inc., revised November 1999, included in the January 12, 2000-EPD approved D&O Plan. The bottom of the waste within the area identified as “Proposed Expansion Waste Limits” on TPE’s *Topographic & Boring Location Map*, Figure 7, shall be kept a minimum of five feet above the groundwater elevation contours shown on TPE’s *Potentiometric Surface Map*, Figure 8 and shall be no lower than an elevation of 370 feet. Furthermore, prior to backfilling, an underdrain system, consisting of a perforated conveyance pipe and stone backfill or equivalent conveyance system shall be placed in the center of the drainage area north of and through the existing sediment pond in the proposed expansion area in the southwest portion of the landfill to prevent groundwater from rising to within five feet of the bottom of waste. Details of the underdrain system construction shall be included in the D&O Plan for EPD approval. The outfall of the underdrain system must be incorporated into the groundwater monitoring plan for the site.

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8. Structural fill shall be required to fill the existing sediment pond and raise the surface grade in the proposed expansion area. This structural fill must meet requirements presented in the construction quality assurance plan of the D&O Plan.
9. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of the Little Commissioner Creek and its perennial and intermittent tributaries.
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. 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.
12. 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 0.14g in 250 years.

13. 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 Georgia Manual for Groundwater Monitoring, EPD's September 2015 document, "Methane Monitoring at Solid Waste Disposal Facilities" and current USEPA Region IV guidance and are approvable by EPD.