



Richard E. Dunn, Director

Land Protection Branch

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

January 25, 2021

Thomas Lewis
Director of Disposal Operations
911 Landfill Road
Dry Branch, Georgia 31020

**SUBJECT: Draft Site Limitations for Twiggs County – Wolf Creek MSW Landfill
Proposed Horizontal Expansion
Permit Number 143-008D(MSWL), Submittal ID:490713**

Dear Mr. Lewis:

The Solid Waste Management Program of the Environmental Protection Division (EPD) has completed its review of the revised December 16, 2020, *Hydrogeologic Assessment Report-Lateral Expansion: Wolf Creek MSW Landfill, Twiggs County, Georgia, Solid Waste Facility, Permit 143-008D (SL)* prepared by Bunnell-Lamon's Engineering (BLE). 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 February 26, 2021. 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 John Sayer at 404-362-2559 if you have any questions.

Sincerely,

Charles J. Mueller, Chief
Land Protection Branch

Enclosure

cc: Keith Stevens, John Sayer, Jim Guentert, William Cook, GA EPD
EPD West Central District, Macon
Matthew Cheek, HHNT

Draft Site Limitations
Wolf Creek Landfill, Municipal Solid Waste Landfill
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1. The area considered for acceptability includes only the area formed by the boundary lines labelled, “Existing Property Line” and “Expansion Property Line” shown on Bunnell-Lammons Engineering, Inc (BLE), *Figure 2, Site Topography and Boring Location Plan* dated June 12, 2020 and revised December 2020.
2. Waste shall not be placed outside of the “Existing Permitted Limit of Waste” and “Proposed Expanded Limit of Waste” shown on BLE’s *Figure 2, Site Topography and Boring Location Plan* dated June 12, 2020 and revised December 2020.
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.
6. A liner and leachate collection system shall be constructed under all areas proposed for solid waste disposal. The bottom of the liner system shall be constructed a minimum of ten feet above the groundwater contours shown on BLE’s *Figure 10, Long-Term Seasonal High Water Table Elevation Contour Map (2000-2020) Shallow Water-Bearing Zone*, dated June 12, 2020 and revised December 2020. In addition, an underdrain system shall be installed beneath all areas of waste. The project engineer shall make periodic quality control inspections while the underdrain system is under construction, and shall certify that it has been properly designed and installed to prevent groundwater from coming to within 5 feet of the bottom of the liner system. The outfalls of the underdrain system must be incorporated into the groundwater monitoring plan for the site.
7. If, during excavation of the site, any springs or seeps are detected, EPD shall be notified immediately, and protective designs shall be incorporated into the facility’s design and operational plans, such that sampling of the spring or seep can be incorporated into the groundwater monitoring plan.
8. All erosion control measures and/or diversion ditches shall conform to the *Erosion and Sediment Control Act* and be protective of Wolf Creek and Game Creek and their perennial and intermittent tributaries.

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9. 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 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 Plan for the subject site. Wetland areas shall be delineated on the Design and Operational 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. 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 located 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 0.1034g 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 Facilities" and current USEPA Region IV guidance and are approvable by EPD.