



April 28, 2026

Hameed Malik, Ph.D., PE
Director of Engineering & Environmental Services
Engineering Administration
City of Augusta
452 Walker Street, Ste. 110
Augusta, GA 30901

Dear Dr. Malik:

At the April 1, 2026 Planning Commission hearing on Georgia Waste Systems' application for a Special Exception to operate an Indoor Waste Sorting & Transfer Station, the Commission recommended approval with conditions recommended by Planning and Development Staff that includes obtaining a letter of consistency from your Department in accordance with Augusta's Solid Waste Management Plan (SWMP).

In accordance with the SWMP requirements, Georgia Waste Systems provides the following information:

In the 1990's, Georgia Waste Systems operated a Municipal Solid Waste (MSW) Transfer Station at 3946/3946A Goshen Industrial Blvd, Augusta, Georgia 30906 pursuant to the Georgia Environmental Protection Division's Permit by Rule (PBR-121-16 TS) (attached). In approximately 2000, the facility was leased to the City of Augusta, who operated a transload Single Stream recycling operation until approximately 2021. Given the current increase and projected growth of solid waste generation in Augusta and the surrounding areas, Georgia Waste Systems intends to return the facility to active operational status as a MSW Transfer Station under the existing Permit by Rule (PBR-121-16 TS), which has been in effect without interruption since 1994.

As indicated in Chapter 4 of the SWMP, approximately 8,000 businesses and institutions within the City of Augusta planning area utilize approximately 70 different private collection companies to collect and/or transport their solid waste and recyclables. Resumption of MSW Transfer Station operations at this facility will increase the available MSW post-collections opportunities for businesses served by private collection companies, will enhance the efficiencies of solid waste management collections of commercial and manufacturing businesses, and may promote reductions in the potential for traffic congestion of several major transportation corridors within the City. Further, as the City of Augusta continues its commercial and manufacturing growth and development in the southern portion of the City, the necessity for additional solid waste management options becomes a valuable resource to the City and its residents and businesses in order to maintain public health and environmental services.

Section 6.1 of the SWMP requests a description of how the facility will meet the goals and/or needs of the City with respect to:

The impact upon the collection capability within the planning area

By its very nature, a transfer station enhances the collection capabilities within areas generally, and the resumption of operations at Goshen Industrial Boulevard will positively impact collection operations and capabilities in the Augusta area by increasing the efficiency of waste collection efforts throughout the City and Richmond County. Resumed operations of the MSW Transfer Station will result in less cross-town traffic for collection vehicles, resulting in less wear and tear and longer lifespans of vehicles and related equipment. Further, MSW Transfer Station operations will allow for more efficient planning of collection routes throughout the planning area, which should reduce traffic congestion in more populated areas.



The impact upon disposal capacity identified in the planning area

A transfer station does not have direct impacts on disposal capacity because operations are not intended to have MSW remain at the transfer station for an extended period of time. However, a transfer station complements disposal facility operations by smoothing out transportation activities to final disposal facilities, which allows for more consistent daily disposal activities at landfills and other facilities.

The impact to waste reduction and recycling efforts within Augusta

The Goshen Industrial Boulevard MSW Transfer Station will be capable of handling co-transfers of single stream recyclables, which will serve to enhance the City's ability to meet the waste reduction goals outlined in Chapter 3 of the SWMP.

Section 6.1 of the SWMP also requests information on how the facility will impact the community in the following ways:

The impact to vehicle traffic and public safety around the proposed facility and throughout the planning area

As demonstrated by the DRI analysis as well as Staff Report having no comments or concerns from Traffic Engineering, there are no anticipated impacts to vehicle traffic and public safety around the proposed facility. The facility previously operated by the City of Augusta as a single stream recycling facility, and Goshen Industrial Boulevard already supports operations of another private collection hauler. With respect to impacts throughout the planning area, the MSW Transfer Station is anticipated to reduce vehicle traffic impacts in the area as a whole by allowing for more efficient waste collection operations.

The impact on natural or cultural resources within the planning area

There will be no impact to natural or cultural resources within the planning area as a result of the resumption of operations at the Goshen Industrial Boulevard MSW Transfer Station. The facility has already been constructed and minimal improvements will be needed, none of which will impact existing natural or cultural resources.

The impact to the financial viability of the existing solid waste management system within the planning area, both public and private

Because the MSW Transfer Station is anticipated to significantly reduce wear and tear on collection vehicles for those businesses that opt to utilize the facility's services, it is anticipated that Goshen Industrial Boulevard MSW Transfer Station will positively impact the financial viability of the existing solid waste management system by reducing operating costs for those businesses who choose to use it. Further, because – as we understand it – the City's existing contracts for residential waste collections require those vendors to use Augusta Deans Bridge Road Landfill, resumption of operations at the Goshen Industrial Boulevard MSW Transfer Station should have no appreciable negative impact on the financial viability of the public solid waste management system within the planning area.

The impact to individual and business solid waste management rates

As discussed above, use of the MSW Transfer Station is anticipated to reduce wear and tear on collection vehicles by reducing direct trips to landfills and resulting in longer vehicle lifespans. For those businesses who choose to use the transfer station, these cost savings should translate into lower rates for their customers. Regardless, Georgia Waste Systems does not anticipate that resumption of operations of the MSW Transfer Station will result in increased rates by individuals or businesses within the planning area.



The impact on the current solid waste management infrastructure within the planning area, both public and private

The only impacts to infrastructure are anticipated to be positive – through reduced wear and tear on vehicles, reduced road congestion, and more efficient collection routes.

Evidence that the proposed facility or facility expansion is sited in a location deemed suitable according to the criteria listed in this plan.

Georgia Waste Systems is proposing to resume operations at the Goshen Industrial Boulevard MSW Transfer Station. This facility is described in multiple sections of the SWMP as providing useful activities for the planning area. In Section 5.5, it is noted that this location would be a primary contingency location in the event of service disruptions at Augusta's landfill, which would allow diversion to other landfills in South Carolina and/or Georgia. Also, in Section 3.1.1 on pages 3-7 and 3-8, the facility is highlighted for being a processing facility that allows transfers to multiple facilities (including a landfill and a MRF). As an existing facility that is not in need of expansion to resume operations, this facility has been deemed suitable according to the SWMP.

Evidence that the proposed facility or facility expansion is sited in an area deemed suitable location consistent with local zoning ordinances.

As indicated by the Planning and Development Staff Report and the recommendations of the Planning Commission (attached), the facility is consistent with local zoning ordinances so long as the City Council issues a Special Exception permit.

Evidence that the proper public notification was given, including notification of all adjacent property owners.

Planning and Development staff properly publicized the public hearing on Georgia Waste Systems' Special Exception permit application. Further, under the amended version of O.C.G.A. § 12-8-26(b) that went into effect on January 1, 2026, so-called siting meetings in advance of written verifications are only required for solid waste disposal facilities, not permit-by-rule solid waste handling facilities like an MSW transfer station. As such, no additional public notice is required other than notices required by the City of Augusta's zoning ordinances.

Section 6.1 also includes other matters that the Engineering Committee is to consider on p. 6-3 of the SWMP.
Whether the facility is properly insured so that closure and post-closure care is assured.

As a permit-by-rule facility, the Goshen Industrial Boulevard MSW Transfer Station is not required to have insurance for closure and/or post-closure care. *See* DNR Rule 391-3-4-.06(1) & (3)(b). However, Georgia Waste Systems is a wholly-owned subsidiary of WM, a Fortune 250 company. As such, the company holds evidence of insurance of \$5 million for general commercial liability claims and umbrella coverage of \$15 million. The facility will operate in compliance with all applicable federal and state statutes as well as rules properly promulgated by the Georgia Environmental Protection Division. Finally, if operations were to cease in the future, the facility will conduct closure activities in accordance with applicable laws and regulations.

Whether there is a mitigation plan above and beyond financial assurance already required.

As a permit-by-rule facility, mitigation plans are not required, but as indicated above, the facility will operate in compliance with all applicable federal and state statutes as well as rules properly promulgated by the Georgia Environmental Protection Division, which includes good housekeeping requirements.



Past performance of other waste handling facilities owned/operated by the applicant.

WM successfully operates more than twenty transfer locations in the State of Georgia in compliance with applicable local, state, and federal regulations. Further, one of those transfer station locations is in nearby Grovetown, Georgia. Finally, as demonstrated when operations previously ceased in approximately 2000, the facility was previously maintained by Georgia Waste Systems in a condition that facilitated the City's use of the facility for over twenty years.

I trust the information supplied in this letter meets the requirements of the SWMP. If you have any additional questions or requests additional information, please feel free to contact Michael B. Stowe at (904)504-8559 or mstowe@wm.com directly.

Sincerely,

Thomas L Lewis

Thomas Lewis
Area Director of Post-Collections and Transfer

Cc: John Manton, III (w/ enclosures)
Tracey Shrader
Michael Stowe



May 21, 2026

Dr. Hameed Malik, Ph.D., PE
Director of Engineering & Environmental Services Engineering Administration
City of Augusta
452 Walker Street, Ste. 110
Augusta, GA 30901

**Re: WM-Augusta Transfer Station-Goshen Industrial Blvd
Permit No.: PBR-121-16TS
Response to Request for Additional Information — Goshen Industrial Blvd. Transfer Station
Consistency Review**

Dear Mr. Malik:

Thank you for your May 2, 2026 email requesting additional information in connection with Augusta Engineering & Environmental Services' review of Georgia Waste Systems' ("GWS") April 28, 2026 request for a Consistency Letter regarding the resumption of operations at the Goshen Industrial Boulevard MSW Transfer Station (PBR-121-16 TS). GWS appreciates the Department's diligence and is pleased to provide the following responses to assist the Engineering Committee in completing its recommendation to the Augusta Commission.

[Responses to Initial RFI Questions](#)

1. What is the current waste collection & disposal service level within Augusta-Richmond County Service area?

GWS currently provides non-contractual commercial solid waste collection services within the City of Augusta service area. As indicated in the Solid Waste Management Plan ("SWMP"), approximately 8,000 businesses and institutions within the planning area utilize approximately 70 different private collection companies to collect and/or transport their solid waste and recyclables. The proposed Transfer Station would complement the existing waste collection and disposal services by enhancing the efficiency of post-collection operations for commercial and industrial generators, without altering existing residential service levels.

2. Will the proposed transfer station accept waste from other waste haulers and other localities?

Yes. Consistent with industry practice and the SWMP's recognition that private haulers serve the planning area's commercial sector, the Goshen Industrial Boulevard MSW Transfer Station will be available to accept non-hazardous municipal solid waste from other licensed collection companies operating in the area, at their choice and discretion. Acceptance of waste from third-party haulers will be subject to the facility's operational capacity limits and the conditions of PBR-121-16 TS, including the exclusion of hazardous waste.

3. Has GWS affiliation with other waste haulers serving Augusta-Richmond County residents & businesses?

GWS is a wholly-owned subsidiary of Waste Management, Inc., a Fortune 250 company. GWS is an independently operated solid waste collection company. WM does not have ownership interests in or affiliations with other waste hauling companies serving the Augusta-Richmond County area.



4. Where is GWS currently taking solid waste?

GWS currently delivers collected solid waste to the Richmond County Deans Bridge Road Landfill (EPD Permit No. 121-018D) for disposal.

5. What is the Transfer Station operation start date?

GWS proposes to begin operations as soon as practicable following receipt of the Special Exception permit from the Augusta Commission and any related administrative approvals. The facility requires minimal improvements to resume operations, as the existing infrastructure has been maintained since operations previously ceased.

6. What is the projected monthly waste stream tonnage to be received at the proposed transfer station?

GWS estimates that the facility will initially receive approximately 150 tons per day of municipal solid waste, which equates to approximately 3,300 tons per month based on standard operating days. This volume represents a modest fraction of the waste stream currently managed within the planning area. For context, the Deans Bridge Road Landfill currently receives approximately 1,869 tons per day. Additional third-party volumes, if any, would be additive to this baseline.

7. What is the projected monthly waste stream tonnage hauling to Richmond County Deans Bridge Road Landfill?

Upon commencement of Transfer Station operations, GWS intends to transport waste received at the facility to WM-owned and operated processing and disposal facilities. While GWS does not currently anticipate directing waste from the Transfer Station to the Deans Bridge Road Landfill on a routine basis, GWS is not opposed to continued use of the Deans Bridge Road Landfill for certain waste streams where operationally appropriate.

8. Is the Richmond County landfill current tipping fee acceptable to you?

Yes. GWS acknowledges that the current tipping fees at the Deans Bridge Road Landfill are competitive. It is anticipated that tipping fees at the Goshen Industrial Boulevard MSW Transfer Station will be higher than the County Landfill's fees, reflecting the additional handling and transportation costs inherent in transfer operations. This differential means that the Transfer Station will not undercut the County Landfill on price, and generators will choose to use the Transfer Station based on the operational efficiencies and convenience it provides rather than price advantage.

[**Responses to Supplemental Questions**](#)

1. What assurance is GWS providing guaranteeing quantifiable "no negative financial impact" on the Augusta Deans Bridge Road MSW Facility?

GWS respectfully submits that the resumption of Transfer Station operations will not have an appreciable negative financial impact on the Deans Bridge Road Landfill for the following reasons:

First, the scope of anticipated diversion is minimal relative to the landfill's total throughput. GWS's estimated initial volume of approximately 150 tons per day represents approximately 8% of the landfill's current daily intake of 1,869 tons per day. Given that the Deans Bridge Road Landfill receives waste from multiple counties and sources, the diversion of this comparatively modest commercial volume will not materially affect the landfill's revenue base.



Second, the SWMP's own capacity assessment confirms that the Deans Bridge Road Landfill has approximately 57.2 million cubic yards of remaining permitted airspace, an estimated remaining life of approximately 84.7 years, and an estimated completion date of March 18, 2110. Reducing the annual tonnage flowing to the landfill by a modest amount would, if anything, extend the facility's operational life — a positive financial outcome for Augusta.

Third, the SWMP establishes that the "need" criterion — defined as less than 10 years of disposal capacity remaining — is the initial screen for any finding of consistency. This criterion was designed to evaluate whether new *disposal* capacity is necessary. A transfer station is not a disposal facility and does not compete with a landfill for "disposal capacity" within the meaning of the SWMP. Rather, a transfer station complements disposal operations by smoothing transportation activities, which allows for more consistent daily disposal activities at landfills.

Fourth, the City's existing residential waste collection contracts require those vendors to use the Deans Bridge Road Landfill. GWS does not provide residential collection services under contract with the City, and the Transfer Station will serve commercial and industrial generators — not residential customers bound by Augusta's existing contracts. The City's residential waste revenue stream is therefore unaffected.

Fifth, GWS's tipping fees will be higher than the County Landfill's fees, which means the Transfer Station does not present a price-based competitive threat to the landfill. Generators who choose the Transfer Station will do so based on efficiency, convenience, and operational considerations — not lower cost.

GWS is committed to being a constructive partner in Augusta's solid waste management system and is willing to discuss mechanisms to address the City's concerns regarding financial impact, including periodic reporting of tonnage received at the facility or other reasonable cooperative arrangements, subject to appropriate review and approval by GWS's management.

2. Is it acceptable to GWS/WM to make it a condition to the zoning exception approval that solid waste received/collected at Goshen Industrial Blvd. Transfer Station will be disposed of at the Richmond County Deans Bridge Road MSW Landfill?

GWS respectfully submits that such a condition would be neither legally permissible nor practically workable, for the following reasons:

Legal Concerns. A condition requiring that all waste received at a privately-owned transfer station be disposed of exclusively at a government-owned landfill constitutes flow control — the practice of directing waste to a specific facility by government mandate. The United States Supreme Court has held that flow control ordinances that direct waste to a privately-owned facility violate the dormant Commerce Clause of the U.S. Constitution. *See C&A Carbone, Inc. v. Town of Clarkstown*, 511 U.S. 383 (1994). While the Supreme Court later recognized that flow control directed to a publicly-owned facility may survive constitutional scrutiny under certain fact-specific circumstances, *see United Haulers Ass'n v. Oneida-Herkimer Solid Waste Mgmt. Auth.*, 550 U.S. 330 (2007), such measures must be enacted through proper legislative channels — specifically, through adoption of a flow control ordinance — and not through conditions imposed on individual zoning approvals. Augusta has not adopted a flow control ordinance. Imposing what amounts to flow control through a zoning condition on a single private operator, without the procedural protections and uniform application of a properly enacted ordinance on all other private waste haulers within Richmond County, raises serious legal concerns under both the Commerce Clause and principles of equal protection.

Practical Concerns. A disposal mandate would deprive GWS of the operational flexibility that makes a transfer station beneficial to the community. The SWMP itself recognizes that the Goshen Industrial Boulevard facility provides value precisely because it enables transfers to multiple facilities, serving as a contingency location



that can divert waste to landfills in South Carolina and/or Georgia in the event of service disruptions at the Deans Bridge Road Landfill. Mandating disposal at a single facility would eliminate this contingency benefit that the SWMP specifically identifies and would be ***inconsistent*** with Section 5.5 of the SWMP.

Alternative Cooperative Approach. Although GWS cannot accept a mandatory flow control condition, GWS remains willing to work cooperatively with Augusta to address legitimate concerns about the financial viability of the public solid waste management system. GWS is open to discussing reasonable, voluntary arrangements that balance the City's interests with GWS's operational needs, consistent with applicable law.

Conclusion

GWS has demonstrated in its April 28, 2026 request for a Consistency Letter and in these supplemental responses that the resumption of operations at the Goshen Industrial Boulevard MSW Transfer Station is fully consistent with the Augusta Solid Waste Management Plan. The facility is recognized in the SWMP, has been permitted since 1994 without interruption, enhances collection capabilities, does not negatively impact disposal capacity, and poses no appreciable financial threat to the public solid waste management system.

GWS respectfully requests that the Engineering Committee recommend a finding of consistency with the SWMP and forward that recommendation to the Augusta Commission for approval. We remain available to discuss any further questions and look forward to a productive resolution of this matter.

Sincerely,

Thomas L Lewis

Thomas Lewis
Director of Post-Collections
South Atlantic Market Area

Cc: Charles Johnson
Michael Stowe
Tracey Shrader
Christina Deangelis



ENGINEERING & ENVIR. SVCS. DEPARTMENT

Hameed Malik, Ph.D., P.E., Director

June 3, 2026

VIA EMAIL

Georgia Waste System (GWS)
Attention: Thomas Lewis, Director of Post Collections
South Atlantic Market Area
300 Colonial Center Parkway, Suite 230
Roswell, GA 30076

RE: GWS Proposed Waste Transfer Station Establishment & Operation
Facility Consistency with Augusta, Georgia Solid Waste Management Plan
Consistency Letter Request

Dear Thomas Lewis,

This letter is in response to GWS's letter dated May 21, 2026, regarding its request for a "Consistency Letter" pursuant to the Augusta, Georgia Solid Waste Management Plan (SWMP) for the establishment and operation of a Waste Transfer Station within Augusta's jurisdictional boundaries.

Following its review of GWS's initial submittal dated April 28, 2026, Augusta Engineering and Environmental Services (AEES) provided an itemized response on May 2, 2026, requesting additional information necessary to complete its review of the proposed facility's consistency with the Augusta, Georgia SWMP. GWS's May 21, 2026 letter primarily addresses the comments and concerns identified in AEES's May 2, 2026 correspondence.

Section 6.1 of Augusta's current Solid Waste Management Plan establishes the criteria for issuance of a "Consistency Letter." AEES has completed its review of all information submitted by GWS in accordance with the criteria set forth in Section 6.1 and provides the following determination.

The information provided in GWS's May 21, 2026 submittal does not fully address the need for the proposed waste transfer station or its potential impact on the existing solid waste management infrastructure, including the Deans Bridge Road Municipal Solid Waste Landfill (DBRLF). Specifically, concerns remain regarding: (i) the impact on disposal capacity; (ii) the impact on the financial viability of the existing solid waste management system; and (iii) the impact on the current solid waste management infrastructure.

In its responses to Items 6 and 7 of the May 21, 2026 letter, GWS states that approximately 3,300 tons of waste per month would be diverted from the Deans Bridge Road Landfill. Based on current disposal volumes, this represents an estimated diversion of approximately 11 percent of the landfill's monthly waste intake. Such a reduction could have both operational and financial impacts on the DBRLF. Furthermore, the DBRLF currently maintains substantial remaining disposal capacity, and the need for the proposed transfer station has not been sufficiently demonstrated.



ENGINEERING & ENVIR. SVCS. DEPARTMENT

Hameed Malik, Ph.D., P.E., Director

Based on the information provided and AEES's review under the applicable SWMP criteria, AEES does not support issuance of the requested "Consistency Letter" at this time.

AEES will place this matter on the agenda for the July 14, 2026 meeting of the Augusta Commission Engineering Services Committee for discussion and consideration. Following its review, the Committee will make a recommendation to full Augusta Commission regarding approval or denial of GWS's request for a "Consistency Letter."

If you have any questions concerning this correspondence, please feel free to contact me at hmalik@augustaga.gov or (706)796-508.

Regards

Hameed Malik, Ph.D., PE
Director Engineering & Environmental Services
Augusta, GA