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-MEMBER OF THE STATE BAR OF GEORGIA

June 12, 2023

## VIA HAND DELIVERY

Hameed Malik, Ph.D., P.E. Director of Engineering, City of Augusta 452 Walker Street, Augusta, Georgia 30901

RE: Renovatio Solutions, LLC

Dear Dr. Malik:

I am hereby submitting on behalf of Renovatio Solutions, LLC it response to questions regarding solid waste handling facilities in Augusta-Richmond County, Georgia under Chapter 6 Land Limitation Element. As you are aware, Renovatio Solutions, LLC planning to develop a renewable fuel project at 1680 Dixon Airline Road Augusta, Georgia.

Please let me know if additional information is needed.

Sincerely,

Benjamin F. McElreath

cc Mr. Wesley McLeod

## **INTRODUCTION:**

Renovatio Solutions LLC (RSL) is a privately formed Georgia firm that is seeking to advance the USA renewable energy targets by utilizing its property at 1680 Dixon Airline Road, Augusta-Richmond County, Georgia, to develop a renewable fuel project whereby organic waste streams from MSW and biomass waste will be processed to produce renewable natural gas (RNG) or compressed natural gas (CNG) and other coproducts.

It should be noted that the Georgia legislature passed Bill 274 in 2011, amending the Georgia Code (Part 1, Article 2 of Chapter 8 of Title 12) that banned yard trimmings from MSW landfills and allowing the disposal of trimmings at lined MSW landfills with operating landfill gas collection systems. The bill states that it was designed to encourage beneficial reuse and promote bioenergy and renewable energy goals. The City of Augusta and Richmond County promote technologies that will reduce or eliminate the need to place these materials in landfills.

How the proposed facility or facility expansion will meet the specific goals and/or needs identified in the current Solid Waste Management Plan, including a description of:

## The impact upon the collection capability within the planning area.

There will be no significant impact upon the collection capability within the planning area. At the time of RSL's application to the Augusta Planning and Development Department for rezoning and Special Exception Use at the property, (approved in May 2022), the proposed residential MSW collector was not depositing its collected trash at the Augusta Landfill facility.

## The impact upon disposal capacity identified in the planning area,

The operation of the proposed biorefinery by RSL will have minimal impact in the planning area. The residential MSW entity that will supply RSL's biorefinery with waste is reported to be disposing approximately 2,080 TPY of waste to Augusta Landfill.

The diversion of that amount of waste to RSL's biorefinery will be negligible for the landfill as the biorefinery is expected to deliver approximately 4,896 TPY of preprocessed non-organic & non – recyclable waste each year to Augusta Landfill.

This slight increase in deposit to the landfill will represent additional revenue for the City of Augusta.

The impact to the waste reduction and recycling efforts within Augusta, specifically how the proposed facility or facility expansion will contribute toward waste reduction in the planning area.

The proposed residential waste collector currently delivers a small portion of its total waste to Augusta Landfill.

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<sup>&</sup>lt;sup>1</sup> https://www.google.com/search?client=firefox-b-1-d&q=augusta+solid+waste+management+plan+2022 - p. 29

By implementing its biorefinery in Augusta-Richmond County, RSL facility will serve to satisfy some sections of Augusta Solid Waste Management Plan (SWMP) goal #2 – Waste Reduction.

How the proposed facility or facility expansion and its operation will impact the community. Specifically, it will address:

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

RSL petition referenced Z-22-25 was approved and an Ordinance referenced 7825. Ordinance 7825, Section II (2) states that "the developer shall provide a completed Traffic Assessment Form to the Traffic Engineer of the Augusta Engineering Department to assess traffic impact study for the development depending on the information provided in the Traffic Assessment Form."

The completed Traffic Impact Worksheet study was prepared by Infrastructure Systems Management, LLC and submitted by RSL to the Augusta Engineering Department in September 2022.

The impact on natural or cultural resources within the planning area.

A Phase I ESA was performed at the project site and the findings confirmed that there are no contaminants, no historical artifacts nor any endangered species on the property.

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

The financial viability of Augusta Landfill and other similar facilities in the planning area will not be negatively impacted. In fact, the Augusta Landfill would gain financially due to a slight net increase in waste deposit to that facility.

Other existing facilities will not be affected as RSL's residential MSW collector does not make delivery to those locations.

The impact to individual and business solid waste management rates.

There will be no impact to individual and business solid waste management rates as RSL proposed biorefinery tipping fees will be comparable those of the City of Augusta.

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

The impact will be negligible on the current solid waste management infrastructure within the planning area because the proposed biorefinery will be sited close to an area already approved

Thus, building the proposed \$37MM new facility will have a positive impact on the City's tax revenue inflow from a new tax payer.

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

The proposed facility will be sited in an area that is deemed suitable according to the criteria listed in Augusta Solid Waste Management Plan (SWMP).

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In fact, RSL proposed project site is located close to an approved construction & demolition (C & D) landfill — Dixon Airline Recycling LLC which is reported in Section 5.2 of Augusta SWMP — page 53) to be included in the current planning area for such activities.

Further, a topographic survey was commissioned by RSL for the property located at 1680 Dixon Airline Road, Augusta-Richmond County, GA 30906. The findings confirmed that the proposed project location is not located within the 100 year flood plain.

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

This project is being proposed for development at a property that was rezoned from Agricultural (A) to Heavy Industrial (HI) by the Augusta Planning and Development Department in May 2022. In addition, the property was approved for Special Exception Use to develop a biorefinery at 1680 Dixon Airline Road, Augusta-Richmond County, Georgia 30906.

An Ordinance, referenced 7825, signed May 17, 2022, confirms the amendment to the Comprehensive Zoning Ordinance adopted by Augusta, Georgia Commission (effective September 16, 1997) regarding the changing of the Comprehensive Zoning Map from Zone A (Agricultural) to HI (Heavy Industrial) for property located at 1680 Dixon Airline Road, GA 30906.

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

The Augusta Planning and Development Department published in the Augusta Chronicle April 14, 2022 edition as well as erected signage at 1680 Dixon Airline Road, GA 30906 to notify and invite feedback from the public regarding the rezoning of this property from Zone A to HI.

There was no negative feedback from the public regarding this proposed development.

Submitted this 12th day of June, 2023

Benjamin F. McElreath, Co-Managing Member

Renovatio Solutions, LLC

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