DEVELOPMENTS OF REGIONAL IMPACT

Final Report

Northeast Georgia Regional Commission • 305 Research Drive, Athens, Georgia • www.negrc.org

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC's assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction's right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

Project I.D.:	DRI #4511
Name of Project:	GR-Regional Biosolids Processing Facility
Name of Host Jurisdiction:	City of Jefferson

Background

DRI review was initiated following the developer's request for land disturbance and development permits. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 7/21/2025 to 8/5/2025.

Proposed Development

Griffin Residuals, LLC, is proposing construction of an approximately 25,000 square-foot regional biosolids drying facility on a 3.50-acre site at 959 Concord Road in the City of Jefferson (parcel 092 003F). The facility would convert wastewater treatment biosolids from the Atlanta area into Class A residuals for agricultural use. In addition to the building, the site plan shows the locations of proposed and existing driveways, walls, concrete and gravel pads, sewer and water lines, and stormwater infrastructure. An existing utility easement is indicated just outside the site's southwestern border, and there is a drainage easement along its southeastern border. The site has been cleared of vegetation. According to the applicant, the DRI submittal was for the first phase of a two-phase project. Phase 1 represents about 75% of the overall project and has an estimated completion date of December 2026. The overall project has an estimated completion date of December 2027, but no other details were provided about the second phase of the project.

Compatibility with Existing Plans

Compatibility with Regional Plan

The site is identified as "Developing" on the Northeast Georgia Regional Plan's Regional Land Use Map (dated 6/15/2023). The Regional Plan recommends development that

- Enhances economic mobility and competitiveness
- Elevates public health and equity
- Supports and adds value to existing communities
- Creates housing that is diverse, adequate, equitable, and affordable

- Includes transportation choices and is well-connected with existing and planned transportation options, and
- Protects natural and historic resources.

The following table outlines the proposal's alignment with these recommendations:

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
Enhances economic mobility and competitiveness	Biosolid drying facilities typically do not directly create many jobs. However, they can provide economic benefits to a community by turning a waste product into a revenue-generating product. Additionally, area farmers may be able to reduce their fertilizer costs by using biosolids as a soil amendment, as biosolids are typically a less-expensive nutrient source than fertilizer.
Elevates public health and equity	There are some environmental health and equity risks of biosolids drying facilities, including the potential release of air pollutants and/or odors, as well as potentially high energy consumption from the drying process. Additionally, because they originate from wastewater, biosolids sometimes contain contaminants such as heavy metals or pharmaceuticals. These factors should be evaluated by the local government when considering this project, and it should be verified that the facility is properly designed to minimize potential risks. During the operation of the facility, it is essential that air, water, and biosolids outputs from the facility be monitored to ensure that pollutants remain below regulatory limits.
Supports and adds value to existing communities	The proposed biosolids facility would be located adjacent to one of Jefferson's wastewater treatment facilities. This close proximity would enable wastewater sludge to be transferred only a short distance from the wastewater treatment facility to the biosolids processing facility, and for water extracted from the biosolids to be transferred back to the wastewater treatment facility through a short sewer line. Additionally, this project is proposed as a regional facility that would convert wastewater treatment solids from the Atlanta area. For wastewater treatment facilities in the region that do not have their own drying equipment onsite, the proposed biosolids processing facility may provide them with a new and potentially closer option for disposing of their sewage sludge.
Creates housing that is diverse, adequate, equitable, and affordable	Not applicable for this project type.
Includes transportation choices and is well- connected with existing and planned transportation options	The applicant expects a low volume of traffic entering and exiting the site each day: 5-10 staff vehicles and 20-25 end dump tractor-trailers. To allow for one-way traffic flow through the site, the proposal includes two entrances on Concord Road. Additionally, there would be a direct vehicular connection with the adjacent wastewater treatment plant. The proposal is located next to a major interstate, I-85, which supports adequate access for heavy vehicles.
Protects natural and historic resources	As explained above in the "elevates public health and equity" section, biosolids processing facilities should be designed to minimize potential environmental risks, and outputs from them must be regularly monitored to ensure that pollutants remain below regulatory limits. No adverse impacts to historic resources are anticipated.

Compatibility with Regional Resource Management Plan

The chart below summarizes the number of acres within the site area as well as within a one-mile buffer around the site that contains 1) wetlands, 2) conservation land, 3) regionally important resources, and 4) threatened regionally important resources. Please refer to the footnotes for definitions for each of these terms.

Wetland, Conservation, and Regionally Important Resources

	Area Type	Area (Acres)	Percent of Area
SITE AREA (15.0 Acres)*	Wetland Acres[1]	0.01	0.1%
	"Conservation Land" [2]	0.01	0.1%
	Regionally Important Resource Land[3]	0	0.0%
	Threatened Regionally Important Resource Land[4]	0.01	0.1%
1 MILE BUFFER AROUND SITE (2,425.6 Acres)	Wetland Acres	422.5	17.4%
	"Conservation Land"	615.3	25.4%
	Regionally Important Resource Land	82.0	3.4%
	Threatened Regionally Important Resource Land	488.3	20.1%

**Note that the total site area listed here, 15 acres, is the area of parcel 092 003F. However, the site plan lists the total lot area as 3.5 acres, suggesting that only a portion of parcel 092 003F would be used for the proposed biosolids processing facility.*

Most of the acres noted in the above table are from a large wetland complex. No wetland acres are shown on the submitted site plan, but the National Wetlands Inventory shows a narrow area of wetlands that appears to extend to the southern corner of the site. Wetland boundaries from the National Wetlands Inventory are approximate, so determining whether wetlands do exist on the site would require a professional wetlands survey and site evaluation. There are no specific Regionally Important Resources within 1 mile of the site.

Potential Interjurisdictional Impacts

Natural Resources and Stormwater Management

There are no streams or floodplains present on the site. The applicant states that an estimated 65-70% of the site would be covered in impervious surfaces. The proposal includes a subsurface detention pond to manage stormwater. The proposal should be designed to minimize disruption to the existing streams, associated wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, rain gardens, and other green infrastructure should be incorporated into the project design. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements.

The applicant states that the project is unlikely to affect any of the environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources.

Transportation

No traffic study was completed for this project. The applicant estimates that the project will generate 20–25 daily trips by end dump tractor trailers per day, plus an additional 5–10 trips generated by facility staff and operations.

Water Supply and Wastewater

The project would be served by the City of Jefferson water and sewer systems with an estimated daily demand of 500 gallons/day for the water system and 50,000 gallons per day for the wastewater system. The large discrepancy between water consumption and wastewater generated is likely because a primary function of a biosolids drying facility is to

[1] Wetland acres are derived from the National Wetland Inventory (NWI)
[2] "Conservation" land is derived from the Northeast Georgia Regional Plan's Conservation and Development Map (6/15/2023).
[3] Regionally Important Resources were identified as a part of the Northeast Georgia Resource Management Plan for Regionally Important Resources (2/15/2018).
[4] This area represents the intersection between Conservation areas (identified on the Conservation and Development Map, 6/15/2023), adopted Regionally Important Resources (RIR), and "Developed" and "Developing" Regional Land Use areas (identified on the Regional Land Use Map,6/15/2023).

extract water from sludge generated by wastewater treatment plants. The applicant states that these demands can be covered by existing capacity. Water and sewer line extensions of approximately 600 feet would be required to serve the project.

Solid Waste

The applicant estimates the project would generate 5–10 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. According to annual tonnage reports from the Georgia Environmental Protection Division, almost all municipal solid waste (MSW) generated in Jackson County is disposed of in a landfill in Banks County. The applicant states that no hazardous waste would be generated.

Lifecycle Costs and Revenues

The applicant estimates that the project would be worth $30 million at build-out in 2027 and generate $230,000 in annual local taxes. On a per-acre basis, the project would be worth approximately $8.6 million and generate approximately $66,000 in tax revenue. Prior to approval, the City should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

Comments from Affected Parties

Alan Hood, Airport Safety Data Program Manager, Georgia Department of Transportation
This proposed construction of a 25,000 square foot regional biosolids drying facility on a 3.50 - acre site in the city of Jefferson is approximately 4.3 miles from Jackson County Airport (JCA). It is located outside of the FAA approach or departure surfaces, but does fall into the 5 mile recommended range between the closest point of the airport and the closest point of a hazardous wildlife attractant. As long as the biosolid drying facility is enclosed, it mitigates the hazard.

If any construction equipment or construction exceeds 200' AGL, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration according to the FAA's Notice Criteria Tool found here (https://oeaaa.faa.gov/oeaaa/oe3a/main/#/noticePrescreen). Those submissions for any associated cranes may be done online at https://oeaaa.faa.gov. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Jamie Dove, Public Development Director, Jackson County
(see attached)

DEPARTMENT OF PUBLIC DEVELOPMENT

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August 5, 2025

Carol Flaute
Northeast Georgia Regional Commission
305 Research Drive
Athens, GA 30605

RE: DRI #4511: GR-Regional Biosolids Processing Facility

Ms. Flaute,

Jackson County Public Development staff has reviewed the DRI package distributed for comment and would like to highlight a prior situation within unincorporated Jackson County that involved a similar type of facility. Specifically, this concerns a former waste processing operation known as Agri-Cycle, located at 1184 Main Street in Talmo.

Although the DRI package does not fully disclose the operational details of the proposed biosolids processing facility, staff has noted similarities in function and potential impacts when compared to Agri-Cycle.

Agri-Cycle began operation in 2005 as a facility designed to process poultry by-products and restaurant grease. After opening, the plant became a source of ongoing complaints from nearby residents due to strong odors. These complaints raised concerns regarding the facility's waste handling practices and its potential effects on surrounding resources.

In 2007, the Georgia Environmental Protection Division (EPD) ordered the immediate stop of all operations at Agri-Cycle. The enforcement action was initiated by multiple violations, including:

- Processing waste without appropriate screening or permits;
- Discharging untreated waste solids into a nearby State waterway;
- Over-application of wastewater to on-site spray fields;
- Construction and use of an unpermitted wastewater pond.

Furthering the situation, a fire broke out at the facility and a treatment pond in September 2007, immediately requiring emergency intervention and a lengthy legal process. These actions led to a permanent injunction against the facility. Ultimately, the site became a brownfield recognized by the Georgia EPD and a significant portion of taxpayer funding went into remediating the entirety of the site environmentally. This process has been ongoing for more than a decade and continues under the oversight of the Georgia EPD.

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While the exact process and operation of the proposed biosolids facility may differ from those used at Agri-Cycle, staff believes it is critical to share this history. The challenges experienced with Agri-Cycle serve as a cautionary example of the importance of proper permitting, operational transparency, and environmental precautions.

Jackson County staff respectfully requests that these concerns be carefully evaluated and that appropriate preventative measures be implemented should the proposed facility move forward. The goal is to ensure that past issues are not repeated.

Additionally, a comment has been submitted by the Jackson County UGA Extension Service, specifically addressing the potential agricultural and environmental impacts associated with the proposed facility. This comment is attached for review and consideration.

Sincerely,

Jamie Dove
Public Development Director

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July 25, 2025

To Whom It May Concern,

I have consulted with Dr. Lisa Baxter, the State Forage Specialist at the University of Georgia, College of Agriculture and Environmental Sciences. Dr. Baxter shared the following concerns regarding the use of biosolids and comparable products on pastures and hayfields in Georgia:

- We do not recommend the use of any biosolids or comparable products for use on pastures or hayfields in Georgia.
- These sources do not supply the necessary nutrients in the appropriate ratio for the species we grow here. Forages generally require a ratio of 4:1:3 for NPK for plant growth.
- This ratio is especially important in areas that have historically used chicken litter (or other manures) and already have elevated P levels in the soil.
- The testing of these materials for heavy metals and other compounds have been questionable at best in all previous cases I have dealt with.
- These materials have unknown impacts on soil pH and have the potential to elevate the soil pH beyond what is required to a point the soil is considered basic and structure is compromised.

As the UGA Agriculture and Natural Resources Agent in Jackson County, I have worked with multiple farmers who have used a variety of products in efforts to improve their soil over the years. While I recognize that the material produced at this plant may offer some soil-building benefits due to its organic content, I have serious concerns based on past experiences with similar products.

For example, one local farmer lost an entire year of forage production after applying a liquid byproduct from a Jackson County facility that killed his crop. Other producers have used injected processed waste that emitted strong odors, affecting thousands of nearby residents. In each case, obtaining reliable product analyses to help guide farmers and inform the public was extremely difficult.

Additionally, the potential presence of **PFAS chemicals** in these products is a growing concern. These substances can persist in the environment and pose risks to human health, livestock, and water quality.

For all of these reasons, any decision to apply such materials to farmland must be supported by **thorough, transparent testing** and **research-based information** to ensure the protection of both agricultural productivity and the broader environment.

Sincerely,

Greg Pittman
County Extension Coordinator/Agriculture & Natural Resources Agent
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