

**BONNELL ALUMINUM, INC.**

**POST CLOSURE CARE PERMIT RENEWAL APPLICATION**

**MARCH 29, 2024**

**RENEWAL APPLICATION REVISION 1**

**NOVEMBER 15, 2024**

**APPENDIX 4-H**

**FINANCIAL ASSURANCE**

**STATE OF GEORGIA  
ENVIRONMENTAL PROTECTION DIVISION  
LAND PROTECTION BRANCH  
HAZARDOUS WASTE**

**FINANCIAL ASSURANCE  
COVER PAGE**

Date: **May 29, 2024**

Georgia EPD Director  
Georgia Department of Natural Resources  
Environmental Protection Division  
2 Martin Luther King Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334

Attn: Land Protection Branch, Hazardous Waste

EPD Program Name: ☒ Hazardous Waste Management    ☐ Hazardous Waste Corrective Action

Facility Name(s): **Bonnell Aluminum, Inc.**

Address(s):    **25 Bonnell Street**  
                    **PO Box 428**  
                    **Newnan, Georgia 30263**

EPA ID(s):        **GAD003273224**

Contact Name:    **Janette Courtney, Division Environmental, Health & Safety Director**

Contact Number: **770-254-7665 Email: Janette.Courtney@bonnellaluminum.com**

Reason(s) for Financial Assurance:    ☐ Closure    ☒ Post Closure    ☐ Corrective Action    ☐ Liability

Type of Submittal:    ☐ Original Mechanism    ☐ Amendment    ☒ Rider



CITIZENS  
INTERNATIONAL TRADE DEPT.  
20 CABOT ROAD, M/S MMF-470  
MEDFORD, MA 02155 U.S.A.  
TEL: 1-888-868-0212  
FAX: 1-781-391-8701  
SWIFT BIC: CTZI US 33 XXX

Date: May 29, 2024

**Georgia Department of Natural Resources, Environmental Protection Division  
2 Martin Luther King Jr. Drive  
Suite 1054, East Tower  
Atlanta, GA 30334  
Attn: Land Protection Branch, Hazardous Waste**

Re: Our Standby Letter of Credit no. S000210  
Current Balance: \$9,435,000.00

Account of:  
Bonnell Aluminum, Inc.  
25 Bonnell Street  
Newnan, GA 30263

Please be advised that this Standby Letter of Credit has been automatically extended to the expiration date of **May 20, 2025** in accordance with its auto-extension clause.

This Letter is for notification purposes only.

Yours truly,

A handwritten signature in blue ink that reads "Matthc".

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Matthew Peck  
Trade Finance Operations  
Tel: 781-655-4378  
[DL-INSTANDBYLC@cfgcustomers.com](mailto:DL-INSTANDBYLC@cfgcustomers.com)

**TABLE 1: ANNUAL-TOTAL COSTS**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	ESTIMATED ANNUAL COSTS	CONTINGENCY	CONTINGENCY AMOUNT	TOTAL ESTIMATED ANNUAL COSTS	YEARS REMAINING	TOTAL ITEM DOLLARS	TOTAL DOLLARS
TABLE 2: CHROMIUM HYDROXIDE LANDFILL POST-CLOSURE CARE COST ESTIMATE	\$27,124	10%	\$2,712	\$29,836	30	\$895,092	\$7,516,258
TABLE 3: HAZARDOUS WASTE MANAGEMENT AREA POST-CLOSURE CARE COST ESTIMATE	\$27,034	10%	\$2,703	\$29,737	30	\$892,122	
TABLE 4: ALUMINUM HYDROXIDE LAND TREATMENT UNIT POST-CLOSURE CARE COST ESTIMATE	\$26,192	10%	\$2,619	\$28,811	30	\$864,336	
TABLE 5: TANK FARM UNIT POST-CLOSURE CARE COST ESTIMATE	\$18,372	10%	\$1,837	\$20,209	30	\$606,276	
TABLE 6: MONITORING WELL SAMPLING & MAINTENANCE	\$67,308	10%	\$6,731	\$74,039	30	\$2,221,164	
TABLE 7: SITE-WIDE MAINTENANCE COSTS	\$11,332	10%	\$1,133	\$12,465	30	\$373,956	
TABLE 8: SEMI-ANNUAL REPORT	\$46,500	10%	\$4,650	\$51,150	30	\$1,534,500	
TABLE 9: IN-SITU CHEMICAL OXIDATION	\$52,102	10%	\$5,210	\$57,312	1	\$57,312	
TABLE 10: IN-SITU BIO-REMEDIATION	\$65,000	10%	\$6,500	\$71,500	1	\$71,500	

**TABLE 2: CHROMIUM HYDROXIDE LANDFILL POST-CLOSURE CARE COST ESTIMATE**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
SITE INSPECTION (4 times/year)					\$400	\$27,124
a. Technician	8	hours	\$50	\$400		
MOWING AND FIRE ANT CONTROL					\$12,200	
a. Mowing And Fire Ant Application	12	months	\$1,000	\$12,000		
b. Fire Ant Control (Chemical Costs)	4	per unit	\$50	\$200		
ROUTINE EROSION REPAIR					\$1,900	
Soil Excavating, Hauling, Spreading, Compaction, and Seeding	1	per unit	\$1,900	\$1,900		
GROUNDWATER SAMPLE COLLECTION					\$7,700	
Metals Sample Collection	6	samples/yr	\$550	\$3,300		
VOC Sample Collection	6	samples/yr	\$550	\$3,300		
Appendix IX Metals Sample Collection	1	samples/yr	\$550	\$550		
Appendix IX Non-metals Sample Collection	1	samples/yr	\$550	\$550		
ANALYTICAL LAB COSTS					\$4,924	
Metals Analytical	6	samples/yr	\$42	\$252		
VOC Analytical	6	samples/yr	\$87	\$522		
Natural Attenuation Indicators & DHC	6	samples/yr	\$550	\$3,300		
Appendix IX Analytical	1	samples/yr	\$850	\$850		

Sample analysis costs include sample processing and bottles.

Sample collection costs include personell time, travel time, equipment costs.

One background well sample is collected for all of the HWMUs and the PCE plume.

**TABLE 3: HAZARDOUS WASTE MANAGEMENT AREA POST-CLOSURE CARE COST ESTIMATE**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
SITE INSPECTION (4 times/year)					\$400	\$27,034
a. Technician	8	hours	\$50	\$400		
MOWING AND FIRE ANT CONTROL					\$12,200	
a. Mowing And Fire Ant Application	12	months	\$1,000	\$12,000		
b. Fire Ant Control (Chemical Costs)	4	per unit	\$50	\$200		
ROUTINE EROSION REPAIR					\$1,900	
Soil Excavating, Hauling, Spreading, Compaction, and Seeding	1	per unit	\$1,900	\$1,900		
GROUNDWATER SAMPLE COLLECTION					\$11,000	
Metals Sample Collection	8	samples/yr	\$550	\$4,400		
VOC Sample Collection	8	samples/yr	\$550	\$4,400		
Appendix IX Metals Sample Collection	2	samples/yr	\$550	\$1,100		
Appendix IX Non-metals Sample Collection	2	samples/yr	\$550	\$1,100		
ANALYTICAL LAB COSTS					\$1,534	
Metals Analytical	8	samples/yr	\$42	\$336		
VOC Analytical	4	samples/yr	\$87	\$348		
Appendix IX Analytical	1	samples/yr	\$850	\$850		

Sample analysis costs include sample processing and bottles.

Sample collection costs include personell time, travel time, equipment costs.

One background well sample is collected for all of the HWMUs and the PCE plume.

**TABLE 4: ALUMINUM HYDROXIDE LAND TREATMENT UNIT POST-CLOSURE CARE COST ESTIMATE**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
SITE INSPECTION (4 times/year)					\$400	\$26,192
a. Technician	8	hours	\$50	\$400		
MOWING AND FIRE ANT CONTROL					\$12,200	
a. Mowing And Fire Ant Application	12	months	\$1,000	\$12,000		
b. Fire Ant Control (Chemical Costs)	4	per unit	\$50	\$200		
ROUTINE EROSION REPAIR					\$1,900	
Soil Excavating, Hauling, Spreading, Compaction, and Seeding	1	per unit	\$1,900	\$1,900		
GROUNDWATER SAMPLE COLLECTION					\$9,900	
Metals Sample Collection	10	samples/yr	\$550	\$5,500		
VOC Sample Collection	6	samples/yr	\$550	\$3,300		
Appendix IX Metals Sample Collection	1	samples/yr	\$550	\$550		
Appendix IX Non-metals Sample Collection	1	samples/yr	\$550	\$550		
ANALYTICAL LAB COSTS					\$1,792	
Metals Analytical	10	samples/yr	\$42	\$420		
VOC Analytical	6	samples/yr	\$87	\$522		
Appendix IX Analytical	1	samples/yr	\$850	\$850		

Sample analysis costs include sample processing and bottles.

Sample collection costs include personell time, travel time, equipment costs.

One background well sample is collected for all of the HWMUs and the PCE plume.

**TABLE 5: TANK FARM UNIT POST-CLOSURE CARE COST ESTIMATE**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
SITE INSPECTION (4 times/year)						
a. Technician	8	hours	\$50	\$400	\$400	\$18,372
MOWING AND FIRE ANT CONTROL						
a. Mowing And Fire Ant Application	12	months	\$1,000	\$12,000	\$12,200	
b. Fire Ant Control (Chemical Costs)	4	per unit	\$50	\$200		
GROUNDWATER SAMPLE COLLECTION						
VOC Sample Collection	6	samples/yr	\$550	\$3,300	\$4,400	
Appendix IX Metals Sample Collection	1	samples/yr	\$550	\$550		
Appendix IX Non-metals Sample Collection	1	samples/yr	\$550	\$550		
ANALYTICAL LAB COSTS						
VOC Analytical	6	samples/yr	\$87	\$522	\$1,372	
Appendix IX Analytical	1	samples/yr	\$850	\$850		

Sample analysis costs include sample processing and bottles.

Sample collection costs include personell time, travel time, equipment costs.

One background well sample is collected for all of the HWMUs and the PCE plume.



**TABLE 6: MONITORING WELL SAMPLING & MAINTENANCE**BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
MONITORING WELLS.					\$6,100	\$67,308
a. Monthly Inspection and Well Access Maintenance	8	hours	\$50	\$400		
b. Quarterly Inspection	64	hours	\$50	\$3,200		
c. Repair	1	each	\$2,500	\$2,500		
GROUNDWATER SAMPLE COLLECTION					\$50,050	
Quarterly Wells Analytical - VOCs	0	samples/yr	\$550	\$0		
Semi-Annual Wells Analytical - VOCs	42	samples/yr	\$550	\$23,100		
Annual Wells Analytical - VOCs	18	samples/yr	\$550	\$9,900		
Natural Attenuation Indicators & DHC	7	samples/yr	\$550	\$3,850		
Semi-Annual Stream Analytical	24	samples/yr	\$550	\$13,200		
ANALYTICAL LAB COSTS					\$11,158	
Quarterly Wells Analytical - VOCs	0	samples/yr	\$87	\$0		
Semi-Annual Wells Analytical - VOCs	42	samples/yr	\$87	\$3,654		
Annual Wells Analytical - VOCs	18	samples/yr	\$87	\$1,566		
Natural Attenuation Indicators & DHC	7	samples/yr	\$550	\$3,850		
Semi-Annual Stream Analytical	24	samples/yr	\$87	\$2,088		

Note: Sample analysis costs include sample processing and bottles.

Note: Sample collection costs include personell time, travel time, equipment costs.

**TABLE 7: SITE-WIDE MAINTENANCE COSTS**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	ITEM SUBTOTAL COSTS	TOTAL UNIT COSTS
FENCE INSPECTION					\$6,200	\$11,332
a. Inspect Monthly	24	hours	\$50	\$1,200		
b. Repair	1	per year	\$5,000	\$5,000		
SIGN REPLACEMENT					\$132	
a. Sign	2	per year	\$16	\$32		
b. Time (Local sign company to replace)	2	hr/year	\$50	\$100		
WEATHER ASSOCIATED MAINTENANCE					\$5,000	
Falling trees, ice damage, lightning strikes	1	per year	\$2,500	\$2,500		
Equipment for Maintenance/Repairs	1	per year	\$2,500	\$2,500		

<b>TABLE 8: SEMI-ANNUAL REPORT</b>  <b>BONNELL ALUMINUM, INC.</b> <b>NEWNAN, GEORGIA</b>			
ITEM	ITEM SUBTOTAL COSTS PER YEAR	TOTAL UNIT COSTS	
SEMI-ANNUAL REPORT		\$46,500	
Data Quality Evaluation & Database	\$12,000		
Text Preparation	\$8,500		
Figure Preparation	\$9,000		
Tables Preparation	\$8,000		
Review, Revise, and Finalize	\$9,000		

TABLE 9: IN-SITU CHEMICAL OXIDATION					
BONNELL ALUMINUM, INC. NEWNAN, GEORGIA					
ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	TOTAL UNIT COSTS
ISCO INJECTIONS					
a. Consultant Labor (Project Mgmt & Oversight)	1	Per Injection Event	\$20,000	\$20,000	
b. Chemicals (Sodium Persulfate)	5510	lbs	\$2.65	\$14,602	
c. Injection Contractor	1	Per Injection Event	\$15,500	\$15,500	
d. Equipment Rental & Supplies	1	Per Injection Event	\$2,000	\$2,000	
					\$52,102

**TABLE 10: IN-SITU BIO-REMEDIATION**

BONNELL ALUMINUM, INC.  
NEWNAN, GEORGIA

ITEM	QUANTITY	UNIT	UNIT COSTS	QUANTITY COSTS	TOTAL UNIT COSTS
ISBR INJECTION					
a. Consultant Labor (Project Mgmt & Oversight)	1	Per Injection Event	\$35,000	\$35,000	
b. ISBR Chemicals	1	Per Injection Event	\$20,000	\$20,000	
c. Equipment Rental & Supplies	1	Per Injection Event	\$10,000	\$10,000	
					\$65,000