Environment & Infrastructure Solutions
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USA

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www.woodplc.com

April 14, 2021

Mr. John Fonk
Unit Coordinator – Remedial Sites Unit
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334

Subject: **RCRA Part B Permit Renewal Application Revised Sections F, I and L for EPD Review**
Former Xerox Facility, Atlanta, Georgia
EPA I.D. No. GAD010103232

Dear Mr. Fonk:

On behalf of our client, Xerox Corporation, we are submitting for EPD review the attached revised Sections F, I and L of the RCRA Part B Permit Renewal Application for the former Xerox CRC facility (EPA I.D. No. GAD010103232) located on Fulton Industrial Boulevard in Atlanta, Georgia. These draft Sections have been revised as discussed during our conference call of February 10, 2021. Xerox has reviewed and approved these revised Sections for transmittal to EPD for review.

Please call us if you have any questions concerning this submittal.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

John M. Quinn, P.G.
Senior Geologist

A. David Alcott w/permission by D. Plopper
A. David Alcott
Principal

Attachment

cc: Julia Ispentchian – Xerox Corporation
Marcus Lathrop – Xerox Corporation

SECTION F - PROCEDURES TO PREVENT HAZARDS

F-1 - Waiver Request

F-1.a Security Procedures and Equipment

From 1975 to the early 1980s, a solvent blend was used in parts cleaning conducted in an area just inside the east side of the building. Tanks (2) for the new and used solvent blend were located just outside the southeast corner of the building, with underground piping connecting the tanks to the area of usage. In 1984, following discontinuation of these cleaning operations using solvent blends, the tanks and piping and, to the extent possible, associated contaminated soils were excavated and the excavations backfilled and covered with concrete that was designated the RCRA cap. Active groundwater and 2-PHASE vapor extraction systems were installed and operated until 1998; thereafter, active remediation was discontinued; active remedial system components and most of the facility monitoring wells were abandoned; and groundwater monitoring, in accordance with the approved Contingent Corrective Action Plan (CCAP) implemented in September 1998, was continued at monitoring wells located outside the building. These monitoring wells were constructed with concrete pads and locked steel protective covers. There are no known or suspected areas of surficial contamination or of exposure to contaminated groundwater. Current and planned future corrective actions under this proposed permit consist of monitoring groundwater levels and quality, semi-annual inspection and maintenance (as required) of the RCRA cap and of monitoring well pads and protective covers, and reporting.

Facility employees are present at the site during normal business hours. An after-hour electronic security system monitors for unauthorized entry into the building, alerting facility personnel and/or appropriate authorities if an alarm is activated. During more than 35 years of conducting closure/post-closure activities, there has been no instance of incidental damage or vandalism of the cap or monitoring wells. Individual warning signs are painted at selected locations on the RCRA cap with the legend "Closed RCRA Cap - Do Not Disturb".

F-1.b Waiver

A waiver of the aforementioned requirements of this section is not requested.

F-2 - Inspection Schedule

On a semi-annual basis Xerox contracted personnel, in conjunction with monitoring groundwater elevations and quality, inspect the closed RCRA Cap and monitoring wells. The inspection sheets used during this inspection are provided herein (Appendix F-1.) It is noted that facility employees occupy the site building but are not involved in on-going corrective action activities. Any inspections conducted by facility personnel as part of general building

security and general safety of building occupants are not related to the corrective action program and are not included herein.

F-2.a General Inspection Requirements

Inspection Requirements for Monitoring Equipment

- Instruments used during each sampling event to measure groundwater quality parameters are provided by qualified equipment vendors.

Inspection Requirements for Emergency and Safety Equipment

- Vehicles used by personnel conducting site inspections and sampling activities are supplied with fire extinguishers that are inspected annually and first aid kits that are resupplied as necessary.

Inspection Requirements for Security Devices

- Site monitoring wells and recovery wells are padlocked closed when not being monitored or serviced. Padlocks are inspected during scheduled sampling events. This inspection is documented on the Monitoring Well Inspection Sheet (provided in Appendix F-1).

Inspection Requirements for Operating and Structural Equipment

- The concrete cap covering the former tanks and associated piping areas and the well pads and protective covers are inspected at least semi-annually by Xerox contract personnel. A copy of the Closed RCRA Unit Inspection Log Sheet used is provided in Appendix F-1.

F-2a(1) Types of Problems

Copies of the Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet are provided in Appendix F-1. The types of problems to be checked are on the inspection sheets

F-2a(2) Frequency of Inspection

The inspection frequency for the various items scheduled for inspection is provided above in Section F-2.

F-2.b Specific Process Inspection Requirements

The Inspection Requirements for the former tanks area have been addressed in Section F-2.

F-2.c Remedial Action

If a problem is identified during inspection, it will be noted on the inspection sheet and the appropriate corrections or repairs will be made. Once the problem is corrected, it will be noted on the inspection sheet or in relevant field notes.

F-2.d Inspection Checklist

Copies of the Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet are included in Appendix F-1. The completed inspection sheets are stored for at least three years in a dedicated file at the office of Xerox' consultant (Wood Environment & Infrastructure Solutions, Inc.) at 1075 Big Shanty Road NW, Suite 100, Kennesaw, Georgia 30144.

F-3 - Preparedness and Prevention Requirements

Corrective actions, site inspections and groundwater monitoring, are conducted in a manner to minimize the possibility of a fire, explosion, or any release of hazardous constituents to the environment. Groundwater sampling equipment is electrically or battery operated; no fuels are used. When sampling, plastic sheeting is placed around the well to limit potential contact of sampling equipment with the ground. Purged groundwater is containerized on-site prior to disposal off-site at a permitted facility. Demonstration of facility compliance with preparedness and prevention requirements per 40 CFR Part 264 Subpart C, as these requirements relate to the current and planned future groundwater monitoring activities is provided below.

F-3.a Equipment Requirements

The following equipment is carried by contract personnel conducting corrective actions at the facility:

- Communication Equipment – All contract personnel have cell phones.
- Fire Control Equipment - Vehicles used by sampling personnel are outfitted with portable fire extinguishers. Additional portable fire extinguishers and fire hose stations are located throughout the building. Fire hydrants are located on property outside of the site building.
- Sampling personnel have first aid kits.

F-3.b Aisle Space Requirements

- This section is not applicable.

F-4 - Preventative Procedures, Structures and Equipment

- This section is not applicable.

F-5 - Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes

The hazardous constituents potentially contained in the ground water recovered from the monitoring wells or soil that may be excavated from the site are not expected to be ignitable, reactive or incompatible as removed from the site. Therefore the requirements of this section are not applicable.

APPENDIX F-1

FIELD INSPECTION SHEETS

(Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet)

FORMER XEROX CRC FACILITY, ATLANTA, GA
MONITORING WELL INSPECTION SHEET

INSPECTOR:_____ DATE/TIME:_____
COMPANY:_____ MONITORING WELL NO.:_____

ITEM	YES	NO	COMMENT
1. Well number clearly labeled on well vault or protective metal casing			
2. Metal protective casing or well cap secured with a padlock, and is the lock in good condition			
3. Well vault or metal protective casing free of standing water (dry)			
4. Concrete well apron (pad) in good repair			
5. Well cap present and in good condition			
6. Measuring point for water level clearly marked on top of well casing			
7. Warning language for monitoring well marked and legible			
8.Excess vegetation around well pad			
9. Evidence of ponded water around well vault or metal protective cover			
10. Damage to well vault or metal protective cover			
11. Insect infestation in or around the well (e.g.,ants, bees, wasps, etc.)			
12. Static water level (from top of casing) gauged (in feet and hundredths of feet)	X	X	
13. Gauge well depth (from top of casing) (in feet and hundredths of feet)	X	X	
14. Sediment accumulation measured (in feet and hundredths of feet)	X	X	
15. Is there significant variation in well depth between gauged reading and reported depth from well log?			

In the event of a "No" response to questions 1-7 or a "Yes" response to questions 8-11 and 15, modifications and/or re-measurements must be made within 45 days. Please note below any modifications completed as a result of the monitoring well inspection.

Item	Date of Completion of Modification	Signature/Company of Person Completing Modification

FORMER XEROX CRC FACILITY, ATLANTA, GA

Closed RCRA Unit Inspection Log Sheet

Regulated Unit

Item	Potential Problems	Status (A/U)	Condition	Nature of Repairs/ RemedialAction	Date of Repair
Surveyed Benchmarks	Not Present Not Visible				
Final Cover (Concrete)	Subsidence Cracked Caulking Condition				
Erosion Damage	Erosion Damage Ponded Water				
Biological Disturbance	Underslab Burrowing Impact of Insects				
Warning Signs	Missing Damaged Illegible				
Security Fence, Gates, Locks	Corrosion Damage				

Note: A = Acceptable

U =Unacceptable

All sections must be completed for each item inspected. Please make additional comments on the back of the form, as necessary.

Signature

Date

SECTION I - CLOSURE PLAN, POST-CLOSURE CARE PLAN AND FINANCIAL REQUIREMENTS

I-1 - Closure Plan

Closure of the underground storage tanks (USTs) and associated piping area was completed in 1984 in accordance with the Closure Plan. The Closure Plan, approved on July 20, 1984, consisted of the following activities:

1. Removal of final inventory of fluids (primarily water and spent solvent) from the 12,000-gallon waste UST and disposal as an F002 hazardous waste. Residual product from the 10,000-gallon fresh solvent USTs had been previously recovered. Tightness testing of the USTs was conducted in August 1982; the tanks tested tight.
2. Removal of the USTs and associated piping and disposal of both as hazardous waste.
3. Sampling of soils from the UST excavation and from beneath the associated piping
4. Site Restoration
5. Sample Evaluation
6. Closure Certification

A survey of the closure area is presented on Figure I-1.

Closure activities were conducted in October 1984, and consisted of the following:

1. The tanks and surrounding soils were removed down to the common "tie-down" concrete slab. Due to the presence of groundwater to a level above the top of the slab (at a depth of approximately 18 feet below ground surface), a groundwater sample (Sample 19) was collected for analysis (rather than soils being collected from adjacent to the base of the slab). The water sample was analyzed and PCE was detected at a concentration of 163 µg/L; TCE at 30 µg/L and 1,1,1-TCA at 35 µg/L were also detected. The concrete "tie-down" pad was left in place and the excavation was backfilled with rock dust from an off-site source and soil from the tank pit excavation.
2. Piping extending from the USTs along the east side of the building to the former parts cleaning area and adjacent soils were excavated to a depth of approximately 4 feet, 1 foot (±) below the piping. The excavated soils were stockpiled. Soil samples (Samples 1 through 17) were collected at approximate 20-foot intervals from the base of the trench excavation and composited. The PCE concentration of the composite sample was 1,401 µg/kg. The pipe trench excavation was backfilled with these excavated soils and with soils from the tank pit excavation.
3. During removal of the piping, evidence of a former leak was detected at the elbow joint where the pipe carrying waste solvent exited from the building to return to the tank area. An area around the pipe joint extending 25 feet along the side of the building, to 15 feet out from the building, and 10 feet deep was excavated. The soils, 140 cubic yards, were manifested for off-site disposal as a hazardous waste. Soil samples P-1 through P-4 were collected from the 4 sides of the excavation at a depth of approximately 6 feet; sample P-5 from the bottom of the excavation, at a depth of approximately 10 feet. PCE concentrations reported were: P-1 (76,000 µg/kg), P-2 (4,300 µg/kg), P-3 (2,400 µg/kg), and P-4 (64 µg/kg). The PCE concentration in the

excavation bottom sample (P-5) was 110,000 µg/kg (see Figure E-8). The excavation was filled with gravel.

4. In 1988, Law Environmental, Inc. constructed a RCRA cap over the former USTs and associated piping area. The report describing the construction of the concrete cover (the RCRA cap) and including an "as built" drawing is dated September 14, 1988. The "as built" drawing is reproduced in this Section as Figure I-2. The *Construction Report-Concrete Slab Installation, Xerox Facility* (1988) is in Appendix I-1.

5. The closure was certified on January 8, 1987 by the independent engineer of record (Camp, Dresser & McKee Inc.). The Closure Plan (approved July 20, 1984) and Closure Certification (January 8, 1987) are in Appendix I-2.

6. In the absence of clean closure, the area encompassing the former USTs and associated piping was closed in accordance with landfill requirements and was designated a Hazardous Waste Management Unit with contaminated groundwater and was issued Hazardous Waste Post-Closure Care Permit No. HW-070(D).

I-2 - Post-Closure Care Plan

A Post-Closure Care Plan is included to describe the on-going monitoring and maintenance that will occur for the Post-Closure Care period. This Post-Closure Care Plan describes the activities that will be performed to manage the closed USTs and associated piping area throughout the Post-Closure Care period in accordance with 40 CFR 264.117 and 118. This Plan describes groundwater monitoring and inspection and maintenance activities. Xerox will maintain a copy of the approved Post-Closure Care Plan and all revisions to the plan on-site until the post-closure report has been submitted and accepted by the Georgia EPD.

I-2.a Inspection Plan

The closed former USTs and associated piping area will be monitored and maintained throughout the Post-Closure Care period. Activities will consist of periodic inspections and required maintenance of the concrete (RCRA) cap and the groundwater monitoring wells. Inspections of the concrete cap and the monitoring wells will be made by trained personnel at least semi-annually. Records of inspection will be kept at Wood's office in Kennesaw. Checklists for the inspections of the concrete cap and wells are provided in Appendix F-1 of Section F of this Permit application

I-2.b Groundwater Monitoring Plan

Groundwater monitoring activities scheduled during the Post-Closure Care period will consist of sampling and analysis of appropriate monitoring wells as defined in Section E-8 of this application.

I-2.c Maintenance Plan

Maintenance of the closed former USTs and associated piping area will include the following:

1. Maintenance and Repair of the Cap - the concrete cap will be inspected at least semi-annually. Inspections are to detect any damage to the cap surface (cracks, deteriorated or missing joint sealant, vegetation growth through slab, etc.); erosion, settlement, or ponding of water on or against the slab; burrowing or infestation of ants or other insects; and any other observable adverse condition will be documented. The inspection along with any problems and repairs will be documented on the inspection form provided in Section F, Appendix F-1.

2. Groundwater Monitoring System- Groundwater monitoring wells will be inspected at least semi-annually and during sampling events to verify that visible portions of the wells are maintained. Well pads will be free of cracks, be in contact with the protective casing, and be stable (have a firm footing with the underlying soil); well casings will be structurally stable with minimal rusting or deterioration and have a tight fitting, lockable cover. The wells will be examined to confirm the measuring point is clearly marked and that the weepholes in the protective covers function to preclude water from ponding between the well casing and the outer protective covers. The inspections should confirm that vegetation is maintained to provide for unimpeded well access and that ants, wasps, spiders or other insects have not established permanent residence in or adjacent to the wells. Each well will be plumbed for the presence of sediment. Adverse conditions will be noted. The inspection along with any problems or repairs will be documented on the inspection form provided in Section F, Appendix F-1.

I-2.d Land Treatment

This section is not applicable to the Xerox facility.

I-2.e Post-Closure Care for Miscellaneous Units

This section is not applicable to the Xerox facility.

I-2.f Post-Closure Security

The closed RCRA cap and monitoring wells are located in unfenced areas outside of the building. However, facility workers or trespassers should not be subject to injury or exposure to potentially contaminated soil or ground water by their entry into areas where the closed RCRA Cap or the locked monitoring wells are located. Signage is provided to advise persons not to disturb the Cap or the monitoring wells. The signage for the closed RCRA Cap will read "Closed RCRA Cap: Do Not Disturb". The signage for the monitoring wells will read "Monitoring Well: Do Not Disturb".

I-2.g Post-Closure Contact

Mr. Marcus Lathrop, Xerox's Manager; Assessment and Environmental Operations, is the post-closure contact. Mr. Lathrop's mailing address and telephone number are:

800 Phillips Road, Building 0207-01Z
Webster, NY 14580
Telephone 585-422-9055

I-3 - Notices Required for Disposal Facilities

I-3.a Certification of Closure

A closure certification report for the former USTs and associated piping area was submitted by Camp, Dresser and McKee, Inc. on January 8, 1987. The Closure Plan and the CDM Certification are in Appendix I-2.

I-3.b Survey Plot

A surveyed plat of the former USTs and associated piping area is on file with the local zoning authority and with the Georgia EPD and is provided in Appendix I-3.

I-3.c Notice to Local Land Authority

In accordance with 40 CFR 264.119, Xerox submitted the attached plat (Appendix I-3) as notification to Fulton County indicating the location and dimensions of the former USTs and associated piping area. The plat has been stamped by the Clerk of Superior Court (Fulton County, Georgia), indicating it was filed and recorded.

I-3.d Post-Closure Certification

A post-closure certification in accordance with 40 CFR 264.120 will be submitted following the completion of post-closure activities.

I-3.e Notice in Deed to Property

In accordance with 40 CFR 264.119, the deed to the property on which the former USTs and associated piping area are located has been amended in Fulton County Deed Book with a notation that the land has been used to manage hazardous waste. A surveyed plat of the former USTs and associated piping area is on file with the local zoning authority and the GA EPD (See Appendix I-3).

I-4 - Closure Cost Estimate

The former USTs and associated piping area were closed in 1984 and certified in 1987. Therefore, a Closure Cost Estimate is not applicable.

I-5 - Financial Assurance Mechanism for Closure

The former USTs and associated piping area were closed in 1984. Therefore, a Financial Assurance Mechanism for Closure is not applicable.

I-6 - Post-Closure Cost Estimate

A Post-Closure Cost Estimate for the former USTs and associated piping area has been prepared in accordance with 40 CFR 264.144. The Post-Closure cost estimate for the current year of the application is provided in Appendix I-4. The estimate accounts for the cost of third-party services required to administer, operate, monitor and maintain the Post-Closure Care Plan and its related tasks.

Revisions of the estimate will be made and submitted to the Director within 30 days following permit modification approvals by the Director. The total cost estimate for Post-Closure Care for which Financial Assurance is required is provided in Appendix I-4.

I-7 - Financial Assurance Mechanism

Xerox is providing financial assurance for the site post-closure activities by use of Surety Bond in accordance with the requirements of 40 CFR 264.145.

A copy of the current mechanism is provided in Appendix I-4.

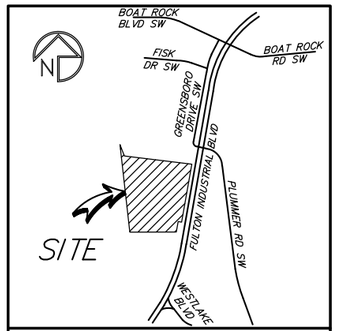
I-8 - Liability Requirements

The former USTs and associated piping area have been closed and do not possess a threat of liability due to sudden accidental occurrences arising from the operation of the facility. Therefore, this section is not applicable.

I-9 - State Financial Mechanism

Xerox will not request state assumption of the liability or the financial responsibility for the post-closure activities. Therefore, this section is not applicable to the Xerox facility.

FIGURES



LOCATION MAP
NOT TO SCALE

THIS POST-CLOSURE CARE NOTICE IS PROVIDED IN ACCORDANCE WITH THE REQUIREMENTS OF 40 CFR 264.119(1):

(I) THE LAND HAS BEEN USED TO MANAGE HAZARDOUS WASTE. SPECIFICALLY, A SOLVENT BLEND WAS USED IN FACILITY PARTS CLEANING OPERATIONS. THE PRODUCT SOLVENT BLEND WAS STORED IN A 10,000-GALLON UNDERGROUND STORAGE TANK LOCATED AT THE SOUTHEAST CORNER OF THE MANUFACTURING BUILDING AND TRANSFERRED THROUGH UNDERGROUND PIPING TO THE PARTS-CLEANING AREA (LOCATED INSIDE AND ADJACENT TO THE EAST SIDE OF THE BUILDING). THE SPENT SOLVENT WAS THEN RETURNED THROUGH UNDERGROUND PIPING TO A 12,000-GALLON UNDERGROUND STORAGE TANK LOCATED ADJACENT TO THE PRODUCT STORAGE TANK. THE CLOSURE ACTIVITIES INCLUDED REMOVAL AND DISPOSAL OF THE TANKS AND PIPING AND APPROXIMATELY 900 CUBIC YARDS OF POTENTIALLY IMPACTED SOILS. THE EXCAVATED AREAS WERE BACKFILLED AND COVERED WITH A CONCRETE CAP, THE "RCRA CAP". THE LIMITS OF THE AREA DESIGNATED AS THE HAZARDOUS WASTE REGULATED UNIT ARE IDENTIFIED ON THIS SURVEY.

(II) THE USE OF THE PROPERTY IS RESTRICTED UNDER 40 CFR SUBPART G REGULATIONS.

(III) THE SURVEY PLAT AND POST-CLOSURE CARE NOTICE HAVE BEEN FILED WITH FULTON COUNTY.

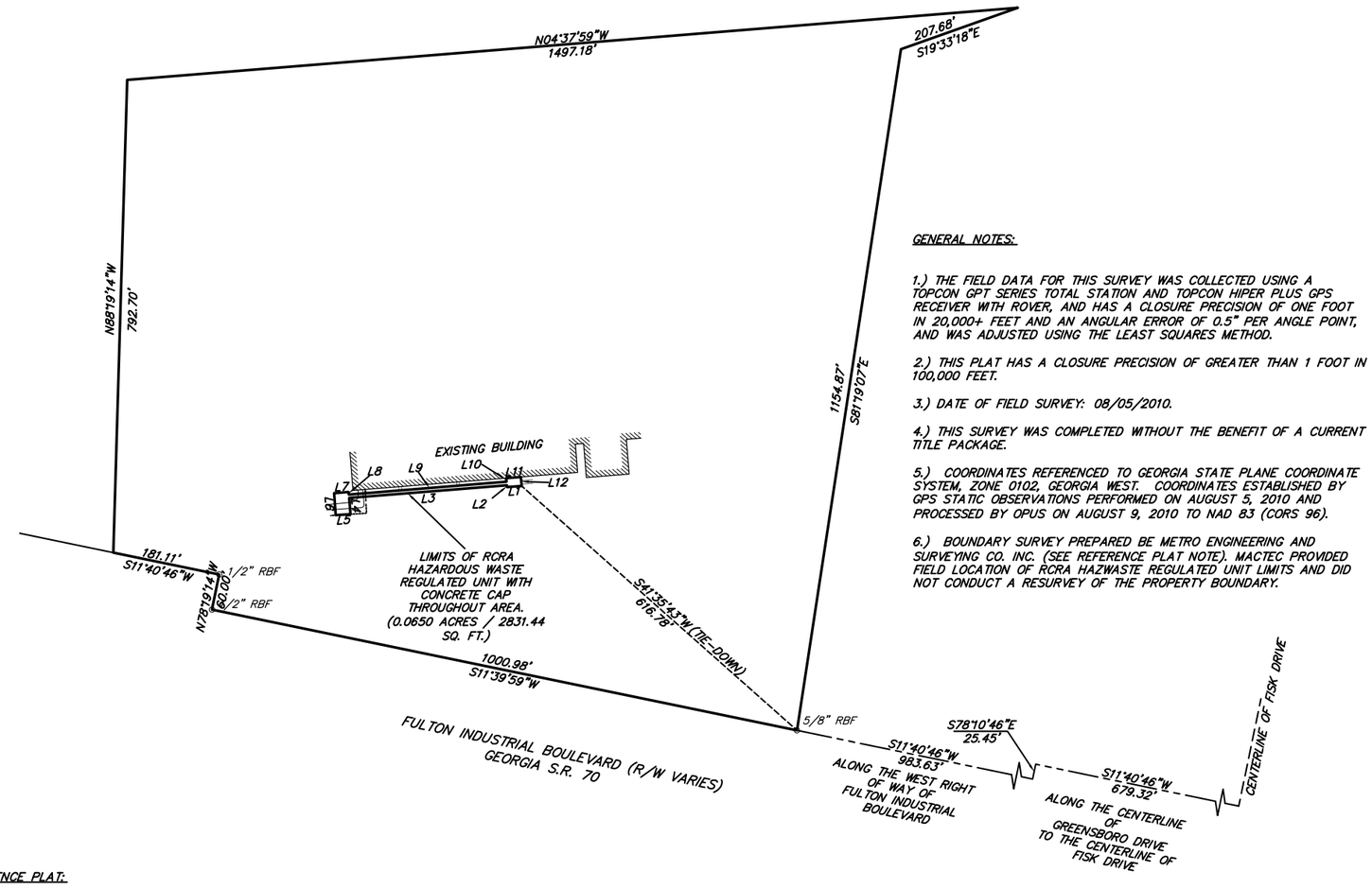
GRID NORTH
GEORGIA STATE PLANE
COORDINATE SYSTEM
(WEST ZONE)

LEGAL DESCRIPTION

All that tract or parcel of land lying and being in Land Lot 133 of the 14th District FF of Fulton County, Georgia, containing 0.0650 acres, and being more particularly described as follows:

COMMENCING at a point which is the intersection of the centerline of Fisk Drive and the centerline of Greensboro Drive; thence running along the centerline of Greensboro Drive South 11°40'46" West a distance of 679.32 feet to a point; thence running South 78°10'46" East a distance of 25.45 feet to a point on the westerly right of way of Fulton Industrial Boulevard; thence running along said right of way South 11°40'46" West a distance of 983.63 feet to a 5/8" rebar found; thence leaving said right of way and running South 41°35'43" West a distance of 616.78 feet to a point on the corner of a concrete slab, said point being the TRUE POINT OF BEGINNING; thence running along the edge of said concrete slab South 3°58'35" East a distance of 24.53 feet to a point; thence continuing along the edge of said concrete slab South 83°48'31" West a distance 2.96 feet to a point; thence continuing along the edge of said concrete slab South 4°34'46" East a distance 265.11 feet to a point; thence continuing along the edge of said concrete slab North 85°28'10" East a distance 27.29 feet to a point; thence continuing along the edge of said concrete slab South 4°00'25" East a distance 24.90 feet to a point; thence continuing along the edge of said concrete slab South 86°01'38" West a distance 36.95 feet to a point; thence continuing along the edge of said concrete slab North 4°44'24" West a distance 24.42 feet to a point; thence continuing along the edge of said concrete slab North 85°37'50" East a distance 4.30 feet to a point; thence continuing along the edge of said concrete slab North 4°38'31" West a distance 265.15 feet to a point; thence continuing along the edge of said concrete slab South 85°07'26" West a distance 6.06 feet to a point; thence continuing along the edge of said concrete slab North 4°34'54" West a distance 24.60 feet to a point; thence continuing along the edge of said concrete slab North 84°52'35" East a distance 15.24 feet to a point which is the TRUE POINT OF BEGINNING.

Said parcel described being an area "Limits of RCRA Hazardous Waste Regulated Unit" currently capped with concrete. Reference bearings were taken from a survey for Insite Atlanta, L.L.C., Lawyers Title Insurance Corporation, Xerox Corporation and Compass Bank by Metro Engineering and Surveying Company, Inc. dated 09-21-01.



LINE TABLE		
LINE	LENGTH	BEARING
L1	24.53	S03°58'35"E
L2	2.96	S83°48'31"W
L3	265.11	S04°34'46"E
L4	27.29	N85°28'10"E
L5	24.90	S04°00'25"E
L6	36.95	S86°01'38"W
L7	24.42	N04°44'24"W
L8	4.30	N85°37'50"E
L9	265.15	N04°38'31"W
L10	6.06	S85°07'26"W
L11	24.60	N04°34'54"W
L12	15.24	N84°52'35"E

GENERAL NOTES:

1.) THE FIELD DATA FOR THIS SURVEY WAS COLLECTED USING A TOPCON GPT SERIES TOTAL STATION AND TOPCON HIPER PLUS GPS RECEIVER WITH ROVER, AND HAS A CLOSURE PRECISION OF ONE FOOT IN 20,000+ FEET AND AN ANGULAR ERROR OF 0.5" PER ANGLE POINT, AND WAS ADJUSTED USING THE LEAST SQUARES METHOD.

2.) THIS PLAT HAS A CLOSURE PRECISION OF GREATER THAN 1 FOOT IN 100,000 FEET.

3.) DATE OF FIELD SURVEY: 08/05/2010.

4.) THIS SURVEY WAS COMPLETED WITHOUT THE BENEFIT OF A CURRENT TITLE PACKAGE.

5.) COORDINATES REFERENCED TO GEORGIA STATE PLANE COORDINATE SYSTEM, ZONE 0102, GEORGIA WEST. COORDINATES ESTABLISHED BY GPS STATIC OBSERVATIONS PERFORMED ON AUGUST 5, 2010 AND PROCESSED BY OPUS ON AUGUST 9, 2010 TO NAD 83 (CORS 96).

6.) BOUNDARY SURVEY PREPARED BE METRO ENGINEERING AND SURVEYING CO. INC. (SEE REFERENCE PLAT NOTE). MACTEC PROVIDED FIELD LOCATION OF RCRA HAZWASTE REGULATED UNIT LIMITS AND DID NOT CONDUCT A RESURVEY OF THE PROPERTY BOUNDARY.

REFERENCE PLAT:

1. SURVEY PREPARED FOR INSITE ATLANTA, L.L.C., LAWYERS TITLE INSURANCE CORPORATION, XEROX CORPORATION AND COMPASS BANK BY METRO ENGINEERING AND SURVEYING COMPANY, INC. DATED 09-21-01.

160 0 160
SCALE: 1" = 160'

SITE LOCATED IN LAND LOT 133
14th DISTRICT FF, FULTON COUNTY, GEORGIA.

REV	DATE	BY	SUB	APP		SURVEYED	
REV						K L FULLERTON	
REV						DRAWN	
REV						K L FULLERTON	
REV						CHECKED	
REV						M E BARTENFELD	
						IN CHARGE	
						F D SHIVER	
						DATE 08-09-10	

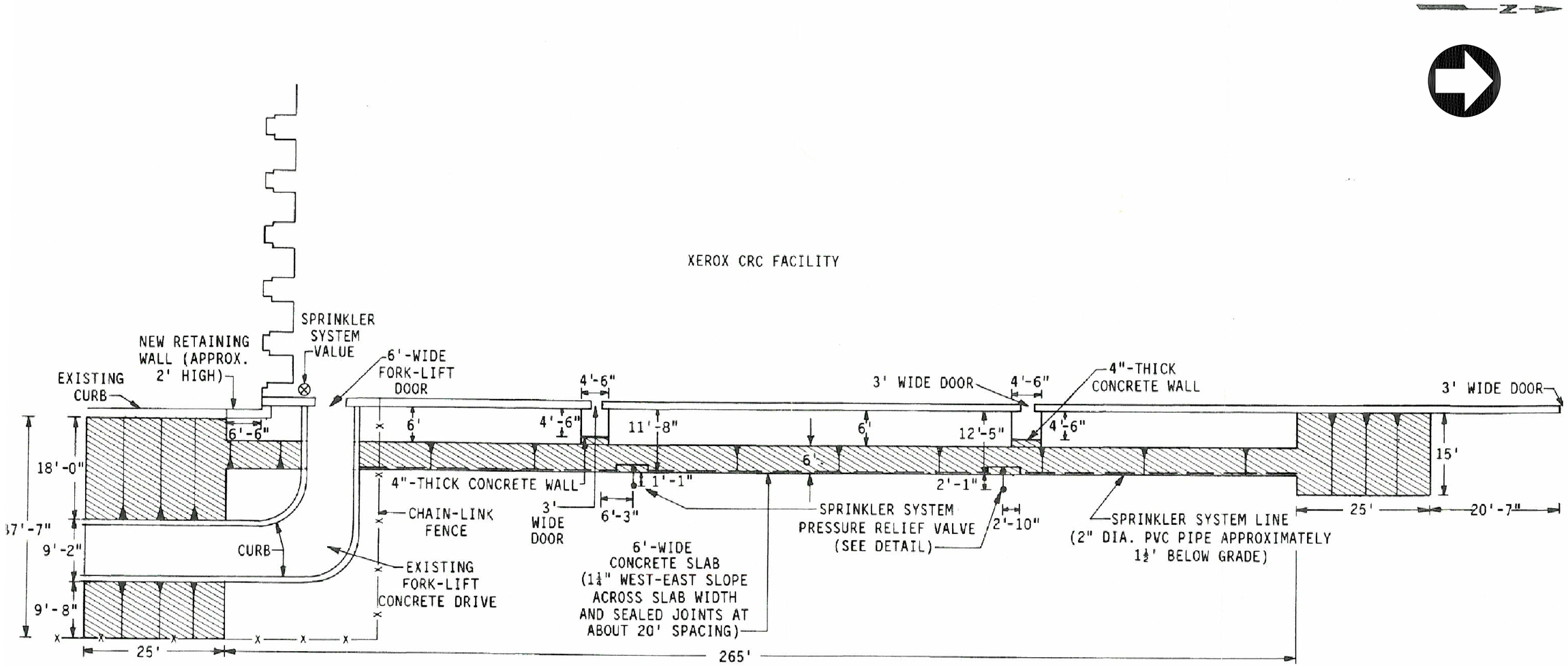
XEROX CORPORATION
6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA

wood.
ENVIRONMENT & INFRASTRUCTURE SOLUTIONS, INC.
1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

SURVEY OF
XEROX CORPORATION
LIMITS OF RCRA HAZARDOUS WASTE REGULATED UNIT

SCALE	
1" = 160'	
CONTRACT	
6122110362	
DWG. NO.	REV / PAGE NO
I-1	0

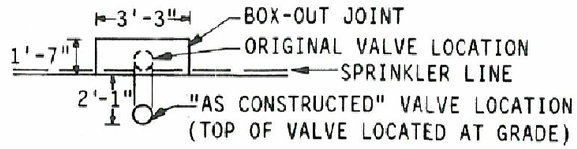
J:\Xerox\APRIL 2020\Xerox 080510_SURVEY.dwg — Layout 2 07/30/2020 11:29am tonys.gladstone



LEGEND

SHADED AREA INDICATES LOCATION OF 4" THICK CONCRETE (3000 PSI) SLAB WITH STEEL WIRE MESH AND UNDERLAIN WITH POLYETHYLENE SHEETING.

INDICATES DOWNWARD SLOPE (IN THE DIRECTION OF THE ARROWS) OF CONCRETE SLAB SURFACE.



NOT TO SCALE

NOTE: THE PURPOSE OF THIS NOT-TO-SCALE FIGURE IS TO ILLUSTRATE. FOR ACCURATE SURVEY INFORMATION, REFER TO THE DRAWING PREPARED BY LOWE ENGINEERS, INC.

SOURCE: CONSTRUCTION REPORT- CONCRETE SLAB INSTALLATION, XEROX FACILITY (LAW ENVIRONMENTAL INC., SEPTEMBER 14, 1988.)

XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

wood. Environment & Infrastructure Solutions, Inc.
1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

AS BUILT CONCRETE COVER (RCRA CAP)

JOB NO. 6122110362 FIGURE 1-2

PREPARED BY/DATE JQ 7/30/2020
CHECKED BY/DATE ADA 7/30/2020

APPENDIX I-1

CONSTRUCTION REPORT- CONCRETE SLAB INSTALLATION, XEROX FACILITY

LAW ENVIRONMENTAL, INC.

112 TOWNPARK DRIVE
KENNESAW, GEORGIA 30144-5599
404-421-3400

September 14, 1988

Xerox Corporation
800 Phillips Road
W-304-135
Webster, New York 14580

Attention: Mr. Eliott Duffney
Senior Environmental Engineer

Subject: Construction Report
Concrete Slab Installation
Xerox Facility
6700 Fulton Industrial Blvd.
Atlanta, Georgia
Law Environmental Job No. 55-433309

Gentlemen:

This report is to provide "as-built" construction information on the concrete slab which Law Environmental, Inc. has installed at the Xerox CRC facility on Fulton Industrial Boulevard in Atlanta, Georgia. The specified slab thickness of 4 inches and location of the slab described as a "cap" over a hazardous waste management unit (an area where solvent tanks and associated piping previously existed), were indicated to us on a reduced drawing titled "Removal Plan, Sheet 2 of 2." The scope of work was described in our December 14, 1987 proposal (No. LE-7023.80).

Site Conditions Prior to Slab Installation

The slab construction area is located along the eastern side of the existing Xerox CRC facility, which is presently functioning as a warehouse. Below-ground solvent tanks were originally located at the southeast corner of the facility. Buried piping extended northward, exterior of and parallel to the building for a distance of almost 300 feet, where the piping turned westward and entered the building. The tanks and piping had been removed and the excavations backfilled by others prior to slab construction.

Prior to slab construction, the slab area was relatively level and grass-covered. The ground surface generally sloped gently to the east toward a drainage swale which drains surface water southward to a storm-sewer catch basin southeast of the building.

At the southeast corner of the building, an approximately nine-foot-wide concrete drive extends east from a six-foot-wide door and then turns 90 degrees to the south followed by another 90 degree turn into the truck loading area. The chain link fence which encloses the truck loading area extends east from the building, and then turns 90 degrees to the south, enclosing the concrete driveway.

Ground surface elevation between the concrete driveway and truck parking area was 3 to 4 feet higher than the truck parking area surface. A low railroad tie retaining wall (two timber

ties high) extended along the east side of the truck loading dock area.

Concrete Slab

The extent of the concrete slab is shown on Figure 1 and on the drawing prepared by Lowe Engineers, Inc. which is enclosed in the pocket at the back of this report. The portion of the slab which overlies the area where the tanks were buried was constructed in two sections. One 18 by 25 foot section is located west of the existing concrete drive and the other, a 9.7 by 25 foot section, is on the east side of the drive. The eastern section of slab over the tank area slopes downward from the existing drive to the east. The western section of slab over the tank area slopes from the existing drive downward to the west to the top of the loading dock slab curb. Between the northwest corner of this western section and the southeast building corner, the railroad tie retaining wall was replaced with a concrete retaining wall approximately 8 feet long with a maximum height of about two feet.

Where the 6-foot wide portion of the new slab crosses the existing concrete driveway, concrete was poured to abut the concrete of the existing drive, using sealed joints between new and existing concrete. The existing chain link fence was temporarily removed during slab construction and then reinstalled. The 6-foot wide portion of slab has a total length

of approximately 265 feet.

There are two doorways in the east building wall adjacent to the 6-foot wide slab. Each doorway has a small exterior concrete pad with a short (about 3 feet high) concrete wall at the east edge of each pad. New slab concrete was poured to fill in the area between the 6-foot wide slab and the existing short walls. Each fill-in section has dimensions of about 1.5 by 4.5 feet.

The 6-foot wide section of slab was constructed to generally conform to existing ground surface elevation and to slope to the east. The completed slab was measured to have a fall from west to east ranging from 1/4 to 1-1/3 inches.

During excavation for the 6-foot wide slab, two pressure relief valves for an existing sprinkler system were encountered. A 2-inch diameter PVC sprinkler system line was found extending in a south-north direction approximately 12 feet from the building or generally along the east side of the 6-foot wide slab. At the relief valve locations, the sprinkler line is 11.7 and 12.4 feet from the building at the south and north valves, respectively. During the excavation, the PVC piping from the relief valves to the sprinkler line was damaged. The damaged piping was replaced and the south and north relief valves were relocated (for future access) east of the slab at distances of 1.1 and 2.1 feet, respectively.

In the new slab, the areas where the relief valves connected to the sprinkler line were boxed out of the initial

pour. These boxed out areas were poured separately and the joints were sealed with epoxy.

Along the length of the 6-foot wide slab, hand-tooled joints were constructed on approximately 20 foot centers and sealed with epoxy.

The northernmost section of concrete slab, 15 x 25 feet in plan dimension, slopes eastward from the building.

After excavation to the underslab level for the entire slab, the exposed soil surface was compacted with a manually-guided vibratory compactor. Visqueen (polyethylene sheeting) was placed over the subgrade as a moisture barrier. Reinforcing wire mesh was placed and 3,000 psi concrete was poured to complete the 4-inch thick slab. The surface of the slab was given a broom finish.

The soil excavated in reaching underslab level was placed between the 6-foot wide concrete slab and the existing building to promote drainage away from the building and the slab area. This fill was hand graded with rakes and watered.

Site Survey

The "as-built" concrete slab is shown on Figure 1, which is not a scale drawing and is only for use as an illustration. The surveyed slab location and elevations are presented on the drawing enclosed in the pocket at the back of this report. The drawing is to scale and was prepared by a licensed surveyor, Lowe Engineers, Inc. under subcontract to Law Environmental.

Acknowledgement

We appreciate the opportunity to perform this work for Xerox. If there are any questions concerning this report, please contact us.

Sincerely,

LAW ENVIRONMENTAL, INC.

Joseph A. Carris

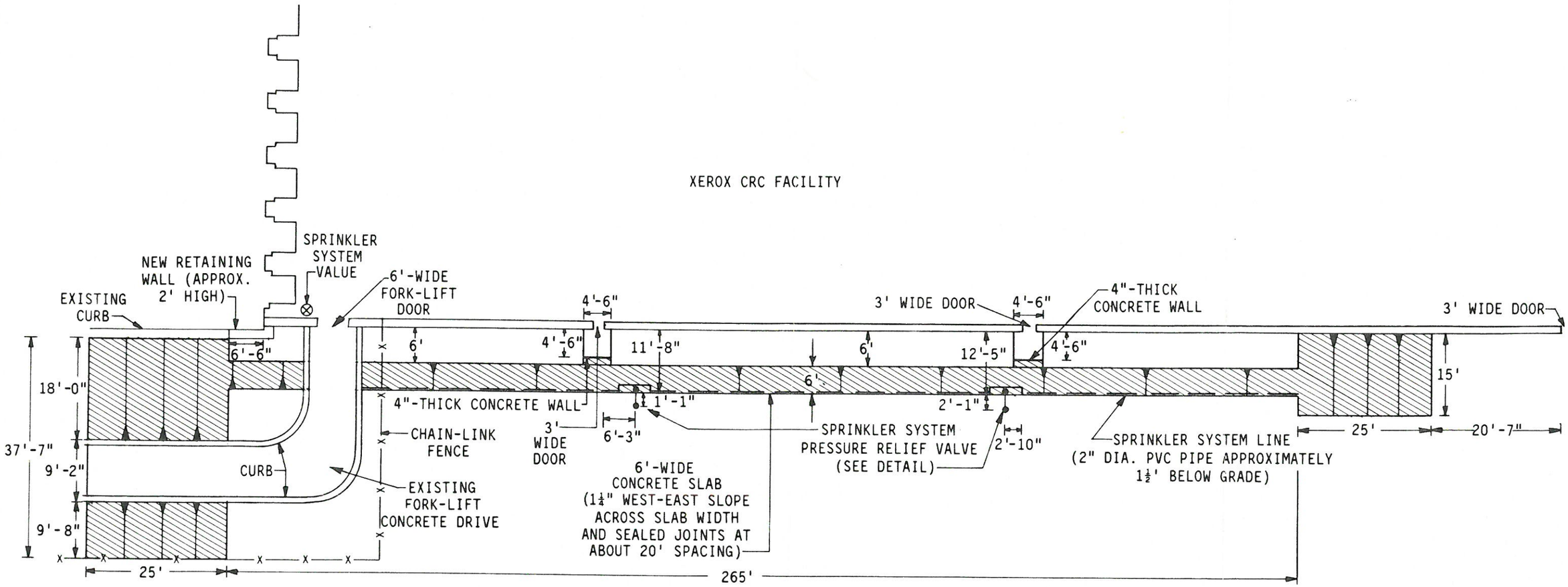
Joseph A. Carris, P.E.
Senior Engineer

L. David Wheeless

L. David Wheeless, P.E.
Principal Engineer

N

XEROX CRC FACILITY

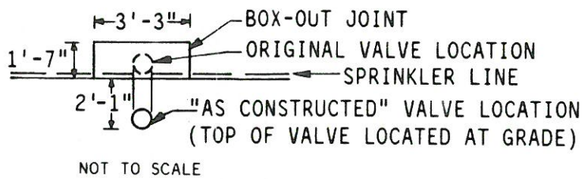


LEGEND

SHADED AREA INDICATES LOCATION OF 4" THICK CONCRETE (3000 PSI) SLAB WITH STEEL WIRE MESH AND UNDERLAIN WITH POLYETHYLENE SHEETING.

INDICATES DOWNWARD SLOPE (IN THE DIRECTION OF THE ARROWS) OF CONCRETE SLAB SURFACE.

NOTE: THE PURPOSE OF THIS NOT-TO-SCALE FIGURE IS TO ILLUSTRATE. FOR ACCURATE SURVEY INFORMATION, REFER TO THE DRAWING PREPARED BY LOWE ENGINEERS, INC.



NOT TO SCALE

PRESSURE RELIEF VALVE DETAIL

SCALE
NOT TO SCALE

XEROX FACILITY
6700 FULTON INDUSTRIAL BOULEVARD
ATLANTA, GEORGIA

LAW ENVIRONMENTAL INC.

"AS BUILT" CONCRETE SLAB

JOB NO.55-433309 FIGURE 1

APPENDIX I-2

CLOSURE PLAN AND CAMP, DRESSER AND MCKEE, INC. CERTIFICATION

Xerox Square
Rochester, New York 14644

CLOSURE PLAN

April 10, 1984

XEROX

Jennifer R. Kaduck
Unit Coordinator
Industrial & Hazardous Waste Management Program
Georgia Environmental Protection Division
270 Washington Streeet, S.W.
Atlanta, Georgia 30334

Re: Closure of Xerox Atlanta
EPA ID# GAD010103232

Dear Ms. Kaduck:

In response to your letter, we are enclosing a modified closure plan for our Atlanta facility. This plan now addresses the removal of both the 12,000 gallon waste storage tank and the 10,000 gallon fresh solvent tank. The generating equipment that supplied the waste tank (which included the supply pump and spray guns) was removed before the building was closed. This equipment was shipped to another one of our refurbishing facilities for reuse.

Listed below are responses to the information requested by Ms. Pierce:

(a) Both tanks are made out of steel, and the piping material is black iron.

(b) MEK was used at the plant prior to 1980 as a solvent for cleaning paint spray equipment. In 1980, Xerox switched from using solvent based paint to water based paint. As a result of this change, MEK was no longer needed for cleaning and its use was discontinued.

(c) The 10,000 gallon tank was always used for storage of fresh chlorinated solvent blends. These blends contained the following constituents:

methylene chloride
1,1,1 - trichloroethane
trichloroethylene
perchloroethylene
aliphatic hydrocarbons (mineral spirits)

Periodically, the percentage of these constituents were changed in the blend but the type of constituents remained the same.

The 12,000 gallon tank was always used as storage for waste solvent. The waste stream consisted of water (80 - 90%), solvent (10 - 20%) and solids (toner, dirt, etc.).

XEROX

(d) Both tanks were pressure tested in August, 1982, and tested tight. Attached are the results of this testing. The tanks have not been used since the date that they were tested.

We did not address your questions regarding the cost estimate and financial assurance requirements because we agree with your conclusion that both items will soon be moot. We plan to implement the closure plan in July or August, 1984.

If you need further information, don't hesitate to contact me at 716-422-3467.

Very truly yours,

David D. Day

David D. Day, P.E.
Environmental Engineer

DDD:to

Attachment

c: M. Pierce - Georgia EPD

Disc: EE06:2

C-30

XEROX CORPORATION

ATLANTA REFURBISHING CENTER

CLOSURE PLAN

This closure plan is established for the Xerox Atlanta Refurbishing Center located at 6077 Fulton Industrial Blvd., Atlanta, Georgia, 30336. The facility's EPA Identification Number is GAD010103232. The objective of this plan is to outline the procedure to be followed when closing the hazardous waste facility so that any threats to human health or the environment are minimized or eliminated in compliance with 40 CFR 265.112 of the Federal Hazardous Waste Regulations.

It is expected that closure of this facility shall occur in 1984. Partial closure is not contemplated. The hazardous waste activity covered by this plan is fresh solvent storage and waste solvent storage in closed underground tanks. No other hazardous waste treatment, storage, or disposal activities are performed at the facility. Closure shall occur when the storage tanks are no longer required either due to manufacturing process changes or cessation of operations at the facility.

The fresh solvent tank has a capacity of 10,000 gallons and the waste storage tank has a rated capacity of 12,000 gallons. The maximum anticipated quantity of solvent in storage at any given time at the facility is 10,000 gallons in the fresh tank and 12,000 gallons in the waste tank.

This plan shall be submitted to the appropriate regulatory authority at least 180 days prior to the anticipated date of implementation of this plan. If closure is required for any reason prior to the end of the facility's intended operating life, this plan shall also be valid for such action.

The exact procedure to be followed for closure and a timetable for these activities is as follows:

1) Submission of Plan

It shall be the responsibility of the Xerox NAMD Environmental Engineering area to submit this plan to the appropriate Federal and/or State agencies as required and to prepare and submit any required modifications or additions to this plan.

The person responsible for preparation of this plan and overseeing the implementation of the plan is:

David D. Day, P.E.
Environmental Engineer
Xerox Corporation
Xerox Square - W304
Rochester, New York 14644
(716) 422-3467

All questions and other correspondence regarding this plan should be directed to him at the above address.

2) Removal of Final Inventory of Waste

All wastes shall be removed from both the fresh solvent tank and the waste solvent tank as soon as possible after their generation. This involves pumping as much liquid as is physically possible from the storage tanks using a vacuum truck. These wastes shall be shipped off-site for disposal at a permitted disposal site. A licensed waste hauler shall transport the waste and the proper manifests shall be used for all shipments.

(Note, we are presently making plans to dispose of the final inventory of waste at the Rollins deep-well injection site in Baton Rouge, La.)

3) Negotiate Contracts

Upon receipt of approval of this closure plan, Xerox shall negotiate and enter into contracts with qualified firms to implement the activities outlined in this closure plan. It is anticipated that this shall be completed within forty days of receipt of the approval of the closure plan or receipt of the final volume of waste, whichever is later.

4) Dismantling of Tank

As soon as possible after negotiation of contracts, actual removal of the storage tanks shall begin. All liquid shall be removed from the piping, to the best of the contractor's ability, and disposed of as a hazardous waste. (Note, the piping should not contain any solvent since they are pitched back toward the tanks.) The tank shall be removed in compliance with the National Fire Protection Association's Flammable and Combustion Liquids Code NFPA 30 Appendix C. This code shall be utilized even though the waste is not flammable, combustible or ignitable.

The tank and the piping will not be decontaminated but, instead, will be disposed of as hazardous waste. Also, soil contaminated by any spillage that occurs during the dismantling process will be disposed of as a hazardous waste. The piping, and any contaminated soil, will be deposited inside the tanks to fill the void space. The tanks will then by shipped on a flat bed truck to a permitted hazardous waste disposal site for burial in a secure landfill. A licensed waste hauler shall transport the tanks and the proper manifests shall be used for all shipments.

5) Soil Sampling

Soil sampling will be conducted around the tank storage area and beneath the piping to insure that solvent did not spill or leak during the operation of the facility.

C-35

The two underground tanks are strapped to the same rectangular shaped concrete pad. The tanks were installed that way so that they would never "float" to the surface. Any leakage or spillage would have migrated down the sides of the tank, onto the top of the pad, and eventually off the sides of the pad. Therefore, soil contamination problems can be identified simply by sampling on each side of the pad. After the tanks have been removed and the pad has been uncovered, a total of four composite soil samples will be collected (one sample adjacent to each side of the pad and located approximately one foot from the pad). Each sample will be obtained using a hand auger advanced to a depth of one foot below the top elevation of the pad.

After the supply and waste piping is removed, soil samples will be collected from the pipe trench. Each sample will be obtained using a hand auger advanced to a depth of one foot below the pipe elevation. Samples will be collected on twenty foot intervals, so approximately ten samples will be collected. A composite of these samples will be obtained and analyzed. The remaining portion of the ten samples will be archived for a period of 60 days.

All soil samples will be placed in precleaned, teflon-lined screw cap, glass jars and sent to a laboratory for analysis. We estimate it will cost approximately $2,000 to perform the sampling and analytical work.

6) Site Restoration

After the soil samples have been collected, the excavated area will be restored to its original condition. The contractor will grade and seed the area, and be responsible for insuring that an erosion proof vegetation cover is established.

It is estimated that tank removal and site restoration will take no longer than thirty days.

7) Sample Evaluation

Leachate from each soil sample will be prepared in basic accordance with EP Toxicity Test Procedures. The resulting leachate will be analyzed for Volatile Halogenated Organics (601 Series). The 601 series will detect any and all of the chlorinated hydrocarbons present in the solvent blend(s) used during the operation of the system; however, we do not anticipate that contaminated soil will be found.

It will take 2-4 weeks to receive the results of the analyses. The results will be submitted to the Georgia Environmental Protection Division (GEPD) for their review. If a contamination problem does exist, Xerox will submit a proposal to the GEPD (for approval) outlining the details of further action that will be taken toward resolving the problem.

C-3

8) Certifying Closure

Completion of closure shall be certified to the appropriate Federal and/or State control agencies by an independent licensed professional engineer. This certification shall be performed by:

Camp, Dresser & McKee, Inc.
1945 The Exchange, N.W. - Suite 290
Atlanta, Georgia 30339
(404) 952-8643

Certification shall be submitted within thirty days following completion of closure at the facility.

Attachments

- NFPA 30 - Flammable and Combustible Liquids Code Appendix C
- Blueprints of Hazardous Waste Storage Tank
- Time Chart of Closure Activites

Disc: EE06:2

Xerox Corporation
Joseph C. Wilson Center for Technology
Rochester, New York 14644

XEROX

May 18, 1984

Jennifer R. Kaduck
Unit Coordinator
Industrial & Hazardous Waste Management Program
Department of Natural Resources
270 Washington Street, S.W.
Atlanta, Georgia 30334

Re: Closure of Xerox Atlanta
EPA ID #GAD010103232

Dear Ms. Kaduck:

This is in response to your letter dated April 23, 1984, which outlined your comments on our modified closure plan. This letter will serve as an addendum to the modified closure plan. Each item is addressed in the same order as outlined in your letter.

1. All tank connections are located on the top of the tanks. When the tanks are uncovered, soil samples will be collected around each tank connection. A composite of these samples will be obtained for each tank and analyzed for the parameters identified in the "Sample Evaluation" section.

2. The pressure testing report indicates that it is approximately ten feet from grade to the bottom of the tanks. This means that the top of the tanks are only two foot below grade. We feel that these field measurements are accurate.

   Also, the report indicates that the groundwater table is only 3½ feet below grade. If this situation is encountered when the tanks are removed, we will sample the groundwater rather than the soils. The groundwater samples will be analyzed for chlorinated solvents (601 series), and the results will give a true indication if solvent spillage occurred during the operation of the facility.

   We estimate that the solvent piping is buried approximately two feet underground and is located above the groundwater table. Therefore, we still plan to sample the soils underlying the pipe.

C-35

OX

3. Soil samples obtained from underneath the solvent piping will be collected at each pipe joint. The pipe probably was installed in twenty-foot sections so this means that the samples will be collected at twenty-foot intervals. Samples will also be collected any place where it appears that leakage occurred.

4. Test method 8240 will be used for extracting any volatile organics from the soil samples, instead of the modified EP Toxicity Test procedures identified in the closure plan. The sample will then be analyzed for Volatile Halogenated Organics (601 Series). Note in conducting the 601 Series, the concentration of each chlorinated solvent is identified and reported.

5. A background soil and/or water sample will be collected. See attached drawing for the approximate location where the background sample will be obtained.

Please let us know when the public notice procedures will be implemented. If you need further information, don't hesitate to call me at (716) 422-3467.

Very truly yours,

David D. Day

David D. Day, P.E.
Environmental Engineer

DDD/bb

Attachment

cc: M. Pierce - Georgia EPD

EE06:2

JOE D. TANNER
Commissioner

J. LEONARD LEDBETTER
Division Director

Department of Natural Resour

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

July 20, 1984

Mr. David D. Day, P.E.
Environmental Engineer
Xerox Corporation
Xerox Square
Rochester, New York 14644

RE: Xerox CRC Plant
Atlanta, Georgia

Dear Mr. Day:

On July 11, 1984 the time period for public comment on the referenced facility's proposed closure plan expired. We did not receive any comments or inquiries regarding your proposal. Therefore, please proceed with closure pursuant to your plan. Please inform us of the date soil samples will be taken so we can perform a site inspection at that time. After closure has been completed, you must submit the certification of closure that is required by $265.115 of Chapter 391-3-11-.10.

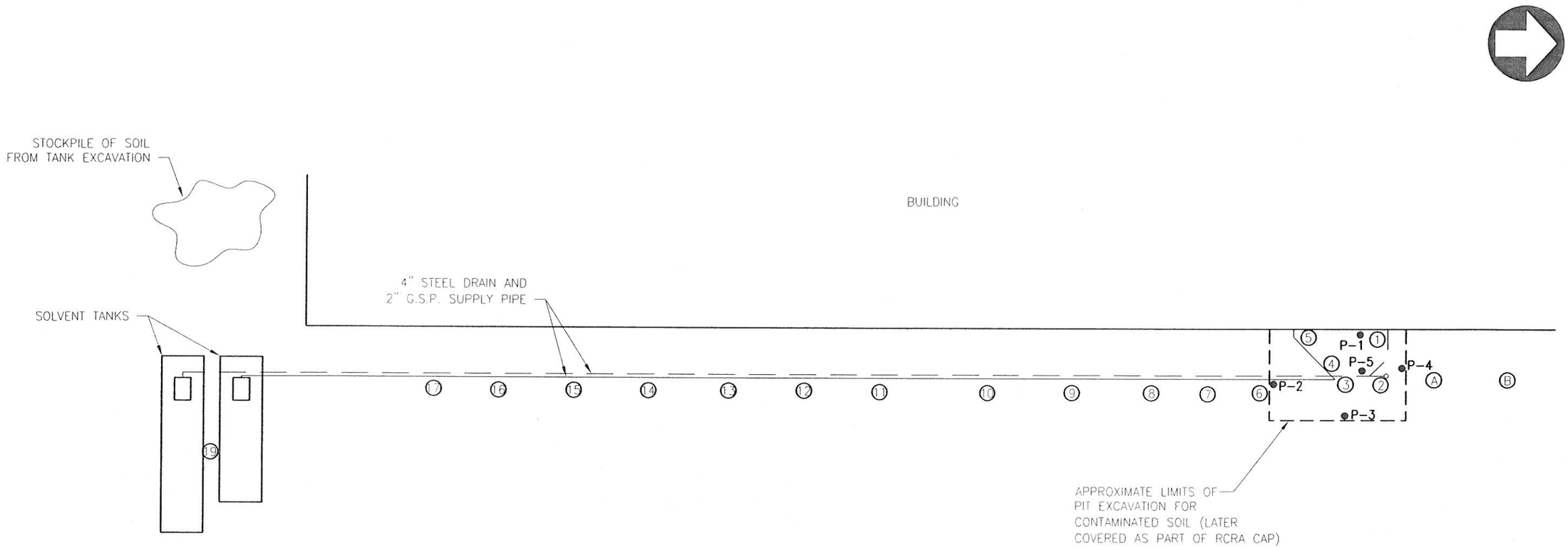
We appreciate your cooperation in this matter. If you have any questions, please contact Martha Pierce at 404/656-7802.

Sincerely,

John D. Taylor, Jr.
Chief
Land Protection Branch

JDT:mpb:16

File: Xerox Corporation (R)



LEGEND

(11) SAMPLE LOCATION

● **P-1** PIT SAMPLE

SOURCE: DRAWING CREATED FROM SCANNED XEROX DRAWINGS DATED JULY 19, 1984 AND NOVEMBER 16, 1984.

APPROXIMATE
SCALE IN FEET

0 20 40

XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

MACTEC
MACTEC Engineering and Consulting, Inc.
3200 TOWN POINT DRIVE, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

SOIL SAMPLING LOCATION-
CLOSURE PLAN

JOB NO. 12000-08-0019 FIGURE 1-1

PREPARED BY/DATE

CHECKED BY/DATE

Xerox, Atlanta (K)

CDM

environmental engineers, scientists, planners, & management consultants

CAMP DRESSER & McKEE INC.

1946 The Exchange N.W., Suite 280
Atlanta, Georgia 30339
404 952-6043

January 8, 1987

Docket # C-57

RECEIVED

JAN 13 1987

Environmental Protection Division
Land Protection Branch

Department of Natural Resources
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

Attention: Ms. Martha Pierce

Subject: Certification of Closure
Xerox Atlanta Facility
EPA ID #GAD010103232

Dear Ms. Pierce:

Camp Dresser & McKee Inc. acting as the independent engineer of record pursuant to 40 CER 264.115 certifies that the construction related activities outlined in the approved closure plan for the Xerox Corporation facility located at 6077 Fulton Industrial Boulevard, Atlanta, Georgia 30336, ID #GAD010103232 were carried out.

Although groundwater contamination was found on the site, the closure plan addresses only the physical removal of the two underground tanks and various piping.

If you have any questions, please feel free to contact me at any time.

Sincerely yours,

CAMP DRESSER & McKEE INC.

David A. Hamilton

David A. Hamilton, P.E.
Registered Professional Engineer

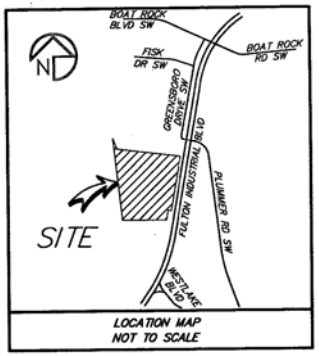
DAH/bc

File: 1162-2-SS

cc: Mr. Joseph Stulb, Xerox Corporation

APPENDIX I-3

SURVEYED PLAT OF THE FORMER USTS AND ASSOCIATED PIPING AREA



LOCATION MAP
NOT TO SCALE

THIS POST-CLOSURE CARE NOTICE IS PROVIDED IN ACCORDANCE WITH THE REQUIREMENTS OF 40 CFR 264.119(1):

(I) THE LAND HAS BEEN USED TO MANAGE HAZARDOUS WASTE. SPECIFICALLY, A SOLVENT BLEND WAS USED IN FACILITY PARTS CLEANING OPERATIONS. THE PRODUCT SOLVENT BLEND WAS STORED IN A 10,000-GALLON UNDERGROUND STORAGE TANK LOCATED AT THE SOUTHEAST CORNER OF THE MANUFACTURING BUILDING AND TRANSFERRED THROUGH UNDERGROUND PIPING TO THE PARTS-CLEANING AREA (LOCATED INSIDE AND ADJACENT TO THE EAST SIDE OF THE BUILDING). THE SPENT SOLVENT WAS THEN RETURNED THROUGH UNDERGROUND PIPING TO A 12,000-GALLON UNDERGROUND STORAGE TANK LOCATED ADJACENT TO THE PRODUCT STORAGE TANK. THE CLOSURE ACTIVITIES INCLUDED REMOVAL AND DISPOSAL OF THE TANKS AND PIPING AND APPROXIMATELY 900 CUBIC YARDS OF POTENTIALLY IMPACTED SOILS. THE EXCAVATED AREAS WERE BACKFILLED AND COVERED WITH A CONCRETE CAP, THE "RCRA CAP". THE LIMITS OF THE AREA DESIGNATED AS THE HAZARDOUS WASTE REGULATED UNIT ARE IDENTIFIED ON THIS SURVEY.

(II) THE USE OF THE PROPERTY IS RESTRICTED UNDER 40 CFR SUBPART G REGULATIONS.

(III) THE SURVEY PLAT AND POST-CLOSURE CARE NOTICE HAVE BEEN FILED WITH FULTON COUNTY.

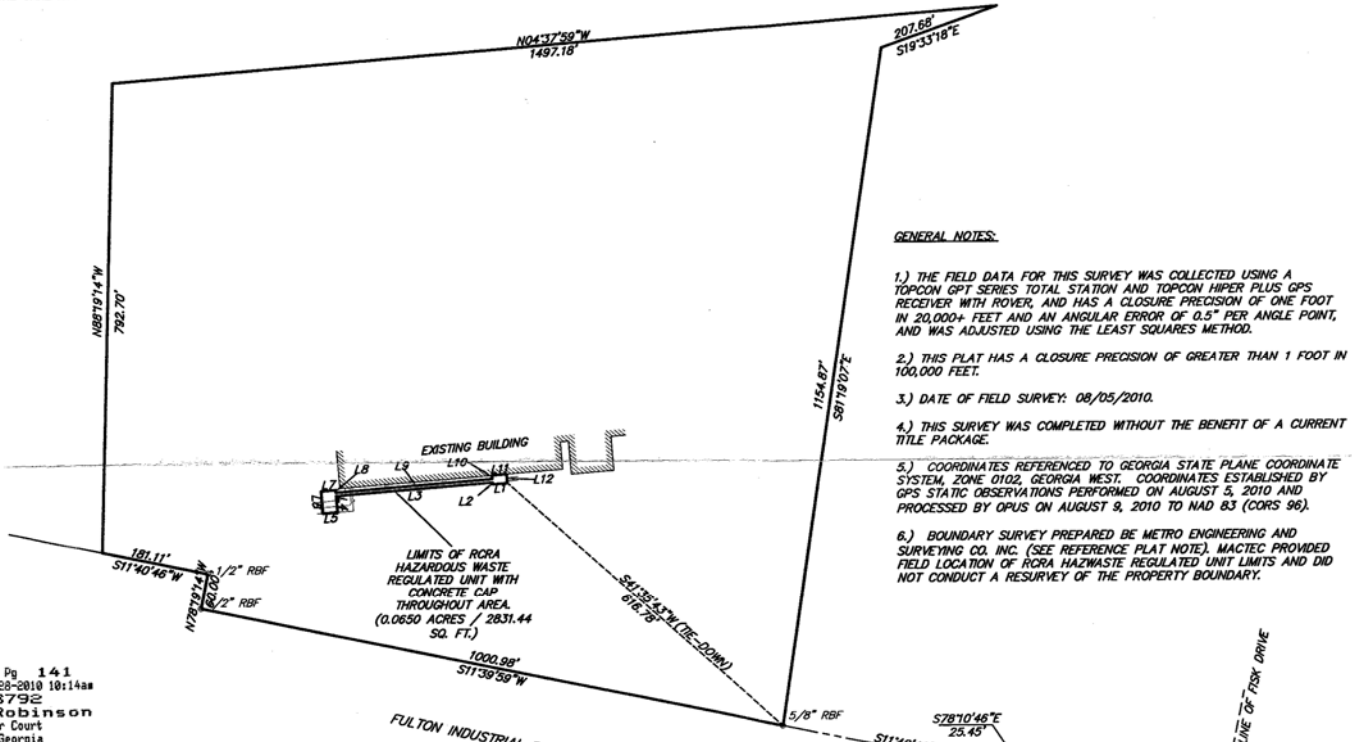
GRID NORTH
GEORGIA STATE PLANE
COORDINATE SYSTEM
(WEST ZONE)

LEGAL DESCRIPTION

All that tract or parcel of land lying and being in Land Lot 133 of the 14th District FF of Fulton County, Georgia, containing 0.0650 acres, and being more particularly described as follows:

COMMENCING at a point which is the intersection of the centerline of Fisk Drive and the centerline of Greensboro Drive; thence running along the centerline of Greensboro Drive South 11°40'46" West a distance of 679.32 feet to a point; thence running South 78°10'46" East a distance of 25.45 feet to a point on the westerly right of way of Fulton Industrial Boulevard; thence running along said right of way South 11°40'46" West a distance of 983.63 feet to a 5/8" rebar found; thence leaving said right of way and running South 41°35'43" West a distance of 616.78 feet to a point on the corner of a concrete slab, said point being the TRUE POINT OF BEGINNING; thence running along the edge of said concrete slab South 3°58'35" East a distance of 24.53 feet to a point; thence continuing along the edge of said concrete slab South 83°48'31" West a distance 2.96 feet to a point; thence continuing along the edge of said concrete slab South 4°34'46" East a distance 265.11 feet to a point; thence continuing along the edge of said concrete slab North 85°28'10" East a distance 27.29 feet to a point; thence continuing along the edge of said concrete slab South 4°00'25" East a distance 24.90 feet to a point; thence continuing along the edge of said concrete slab South 86°01'38" West a distance 36.95 feet to a point; thence continuing along the edge of said concrete slab North 4°44'24" West a distance 24.42 feet to a point; thence continuing along the edge of said concrete slab North 85°37'50" East a distance 4.30 feet to a point; thence continuing along the edge of said concrete slab North 4°38'31" West a distance 265.15 feet to a point; thence continuing along the edge of said concrete slab South 85°07'26" West a distance 6.06 feet to a point; thence continuing along the edge of said concrete slab North 4°34'54" West a distance 24.60 feet to a point; thence continuing along the edge of said concrete slab North 84°52'35" East a distance 15.24 feet to a point which is the TRUE POINT OF BEGINNING.

Said parcel described being an area "Limits of RCRA Hazardous Waste Regulated Unit" currently capped with concrete. Reference bearings were taken from a survey for Insite Atlanta, L.L.C., Lawyers Title Insurance Corporation, Xerox Corporation and Compass Bank by Metro Engineering and Surveying Company, Inc. dated 09-21-01.



Plats 352 Pg 141
Filed and Recorded Oct-28-2010 10:14aa
2010-0373792
Cathelene Robinson
Clerk of Superior Court
Fulton County, Georgia

LINE TABLE		
LINE	LENGTH	BEARING
L1	24.53	S03°58'35"E
L2	2.96	S83°48'31"W
L3	265.11	S04°34'46"E
L4	27.29	N85°28'10"E
L5	24.90	S04°00'25"E
L6	36.95	S86°01'38"W
L7	24.42	N04°44'24"W
L8	4.30	N85°37'50"E
L9	265.15	N04°38'31"W
L10	6.06	S85°07'26"W
L11	24.60	N04°34'54"W
L12	15.24	N84°52'35"E

GENERAL NOTES:

1.) THE FIELD DATA FOR THIS SURVEY WAS COLLECTED USING A TOPCON GPT SERIES TOTAL STATION AND TOPCON HIPER PLUS GPS RECEIVER WITH ROVER, AND HAS A CLOSURE PRECISION OF ONE FOOT IN 20,000+ FEET AND AN ANGULAR ERROR OF 0.5" PER ANGLE POINT, AND WAS ADJUSTED USING THE LEAST SQUARES METHOD.

2.) THIS PLAT HAS A CLOSURE PRECISION OF GREATER THAN 1 FOOT IN 100,000 FEET.

3.) DATE OF FIELD SURVEY: 08/05/2010.

4.) THIS SURVEY WAS COMPLETED WITHOUT THE BENEFIT OF A CURRENT TITLE PACKAGE.

5.) COORDINATES REFERENCED TO GEORGIA STATE PLANE COORDINATE SYSTEM, ZONE 0102, GEORGIA WEST. COORDINATES ESTABLISHED BY GPS STATIC OBSERVATIONS PERFORMED ON AUGUST 5, 2010 AND PROCESSED BY OPUS ON AUGUST 9, 2010 TO NAD 83 (CORS 96).

6.) BOUNDARY SURVEY PREPARED BE METRO ENGINEERING AND SURVEYING CO. INC. (SEE REFERENCE PLAT NOTE). MACTEC PROVIDED FIELD LOCATION OF RCRA HAZWASTE REGULATED UNIT LIMITS AND DID NOT CONDUCT A RESURVEY OF THE PROPERTY BOUNDARY.

REFERENCE PLAT:

1. SURVEY PREPARED FOR INSITE ATLANTA, L.L.C., LAWYERS TITLE INSURANCE CORPORATION, XEROX CORPORATION AND COMPASS BANK BY METRO ENGINEERING AND SURVEYING COMPANY, INC. DATED 09-21-01.

160 0 160
SCALE: 1" = 160'

GEORGIA REGISTERED No. 2904 PROFESSIONAL LAND SURVEYOR MICHAEL T. TENFIELD

SITE LOCATED IN LAND LOT 133
14th DISTRICT FF, FULTON COUNTY, GEORGIA.

REV	DATE	BY	SUB	APP
REV				
REV				
REV				
REV				

SURVEYED K L FULLERTON
DRAWN K L FULLERTON
CHECKED M E BARTENFELD
IN CHARGE F D SHIVER
DATE 08-09-10

XEROX CORPORATION
6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA

MACTEC Engineering and Consulting, Inc.
3200 TOWN POINT DRIVE, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400
FIRM#

SURVEY OF
XEROX CORPORATION
LIMITS OF RCRA HAZARDOUS WASTE REGULATED UNIT

SCALE 1" = 160'
CONTRACT 1200080019
DWG. NO. 1 REV PAGE NO 1

M:\surveying & mapping\Xerox\Xerox 080510 17X22.dwg - Layout 2 10/26/2010 1:17pm jhreed

STATE OF CONNECTICUT
COUNTY OF FAIRFIELD

(In re: Fulton County, Georgia)

XEROX CORPORATION, a New York corporation, herein referred to as Declarant, in conformity with and pursuant to Title 42, U. S. Code, Chapters 82 and 103, and 40 Code of Federal Regulations Part 265, hereby declares, that the following described tract or parcel of real property (hereinafter referred to as the Land) shall be encumbered as herein provided:

SEE EXHIBIT A, describing certain lands of 28.866 acres, more or less, attached hereto and incorporated herein by this reference.

A. The Land has been used to manage hazardous wastes; to wit, EPA hazardous waste No. F001 and F002, as defined by 40 CFR 261.32 (7-1-85 ed).

B. Following closure of the facility, use of the Land is restricted under 40 CFR Ch.1 (7-1-85 editions), Sec. 265.117 (c), which states:

> "Post-closure use of property on or in which hazardous wastes remain after closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of any containment system, or the function of the facility's monitoring system, unless the owner or operator can demonstrate to the Director - Georgia EPD either in the post-closure plan or by petition, through the procedures in Sec. 265.118 (c) or (f), as appropriate, that the disturbance:
>
> (1) Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment: or
>
> (2) Is necessary to reduce a threat to human health or the environment."

C. A survey of the type, location, and quantity of waste constituents remaining on the land, to the best knowledge and belief of Declarant, will be filed concurrently with this instrument, with the local zoning authority or the authority with jurisdiction over local land use, and with the Director - Georgia EPD.

GEORGIA Fulton County Clerk's Office Superior Court
Filed & Recorded Apr 4, 1989 at 1:19
Juanita Hicks CLERK

BOOK 12389 PAGE 252

This Declaration is made in compliance with applicable law, and as public notice of the existence of the matters herein disclosed. This restricting the use thereof within the constraints identified herein or by applicable law, with the express intention that all persons and parties may in any actions now or hereafter be governed accordingly.

XEROX CORPORATION

WITNESSES:

BY: _____
Edward L. Maier
Director, Real Estate Operations

ATTEST: _____
Martin S. Wagner
Asst. Secretary

_____
NOTARY PUBLIC

STATE OF CONNECTICUT
MY COMMISSION EXPIRES:

BARBARA L. HOWARD
Notary Public
My Commission Expires: 3/31/89

N.P. SEAL

CORP. SEAL

EXHIBIT A

All that tract or parcel of land lying and being in Land Lot 133 of the 14FF District of Fulton County, Georgia, and being more particularly described as follows:

TO FIND THE TRUE POINT OF BEGINNING, start at the point of intersection of the center line of Fisk Drive with the center line of Greensboro Drive; running thence south 11 degrees 45 minutes 00 seconds west along the center line of Greensboro Drive a distance of 679.32 feet to a point; running thence south 78 degrees 15 minutes 00 seconds east a distance of 25.45 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard (a 200 foot right-of-way); running thence south 11 degrees 45 minutes 00 seconds west along the westerly right-of-way line of Fulton Industrial Boulevard a distance of 983.63 feet to a point, such point being the TRUE POINT OF BEGINNING; running thence south 11 degrees 45 minutes 00 seconds west along said right-of-way line a distance of 1000.86 feet to a point; running thence north 78 degrees 15 minutes 00 seconds west a distance of 60.00 feet to a point; running thence south 11 degrees 45 minutes 00 seconds west a distance of 181.11 feet to a point; running thence north 88 degrees 15 minutes 00 seconds west a distance of 792.70 feet to a point in the center line of a proposed railroad easement; running thence north 04 degrees 33 minutes 30 seconds west along the center line of said proposed easement a distance of 1496.96 feet to a point; running thence south 19 degrees 29 minutes 30 seconds east a distance of 207.68 feet to a point; running thence south 81 degrees 15 minutes 00 seconds east a distance of 1154.87 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard and the true point of beginning; as per survey for "Xerox Corp." prepared by James Lucius Grant, Georgia Registered Land Surveyor No.1604 of Urban Engineers, Inc., dated August 27, 1973, and containing 28.866 acres according to said survey.

Together with a non-exclusive easement for purposes of ingress and egress over the following described tract of land:

All that tract or parcel of land lying and being in Land Lot 133 of the 14FF District of Fulton County, Georgia, and being more particularly described as follows:

TO FIND THE TRUE POINT OF BEGINNING, start at the point of intersection of the center line of Fisk Drive with the center line of Greensboro Drive; running thence south 11 degrees 45 minutes 00 seconds west along the center line of Greensboro Drive a distance of 679.32 feet to a point; running thence south 78 degrees 15 minutes 00 seconds east a distance of 25.45 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard (a 200 foot right-of-way); running thence south 11 degrees 45 minutes 00 seconds west along the westerly right-of-way line of Fulton Industrial Boulevard a distance of 1984.49 feet to a point, such point being the TRUE POINT OF BEGINNING; running thence north 78 degrees 15 minutes 00 seconds west a distance of 60.00 feet to a point; running thence south 11 degrees 45 minutes 00 seconds west a distance of 181.11 feet to a point; running thence south 88 degrees 15 minutes 00 seconds east a distance of 60.93 feet to a point located on the westerly right-of-way line of Fulton Industrial Boulevard; running thence north 11 degrees 45 minutes 00 seconds west along said right-of-way line to the true point of beginning; as per survey for "Xerox Corp." prepared by James Lucius Grant, Georgia Registered Land Surveyor No. 1604, of Urban Engineers, Inc., dated August 27, 1973.

The within described easement shall run with the land in favor of Grantee, its successors and assigns, until such time as the whole of the property described above

over which it runs is dedicated to and accepted by Fulton County, Georgia, for road purposes.

The property described above is conveyed subject to those certain restrictive covenants recorded in Deed Book 5577, Page 94, of the Real Property Records of Fulton County, Georgia, and to a railroad easement, a pole easement, an aerial easement, and a sanitary sewer easement, all contained within an eighty-five (85) foot strip along the western boundary line of subject property, as shown on said plat of survey dated August 27, 1973.

APPENDIX I-4

FINANCIAL ASSURANCE MECHANISM AND COST ESTIMATE FOR POST-CLOSURE CARE FOR WHICH FINANCIAL ASSURANCE IS REQUIRED

Marcus Lathrop
Manager, Assessment & Environmental Operations
OGC / EHSS

Xerox Corporation
800 Phillips Road
MS 0207-01Z
Webster, NY 14580

email.marcus.lathrop@xerox.com
tel. 585.422.9055
Fax 585.422.6390

April 2, 2021

Mr. John Fonk
Unit Coordinator – Remedial Sites Unit
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, S.E.
Suite 1054, East Tower
Atlanta, GA 30334

Re: 2021 Financial Assurance Demonstration
Former Xerox – Atlanta, Georgia Facility (GAD010103232)

Dear Mr. Fonk,

Enclosed please find a copy of the new Surety Bond to evidence Xerox's 2021 financial assurance demonstration for post-closure for Xerox's former facility located at 6077 Fulton Industrial Blvd., Atlanta, GA. Since our RCRA Permit is currently in active renewal, and terms have not been finalized, we have elected to inflate the previous independent cost estimate of $685,830 to establish the value of the 2021 financial assurance. The Implicit Price Deflator for the GNP was used and the value of this year's financial assurance is $693,811.

If there are any questions or concerns regarding this notification relative to Xerox's 2021 financial assurance demonstration, please contact me at 585-422-9055 or via e-mail at marcus.lathrop@xerox.com.

Sincerely,

Marcus Lathrop
Manager, Assessment and Environmental Operations
Global, Environment, Health, Safety and Sustainability

cc: Jonathan Nwagbaraocha - Xerox
Dennis O'Connell – GA EPD

ATTACHMENT A

SURETY BOND

Surety Bond Guaranteeing Performance of Closure and/or Post-Closure Care and/or Corrective Action

Performance Bond

Date bond executed: March 29, 2021
Effective date: March 31, 2021
Principal: Xerox Corporation
Type of Organization: Corporation

State of incorporation: New York
Surety(ies): Argonaut Insurance Company
EPA Identification Number, name, address, and closure and/or post-closure amount(s) for each facility guaranteed by this bond [indicate closure and/or post-closure care and/or corrective action amounts separately]: ID # GAD010103232 - 6077 Fulton Industrial Blvd., Atlanta, GA 30336
Closure Amount: $0 - Post Closure Amount: $ 693,810.58 - Corrective Action Amount: $0
Total penal sum of bond: $ 693,810.58
Surety's bond number: SUR0063102

Know All Persons By These Presents, That we, the Principal and Surety(ies) hereto are firmly bound to the State of Georgia in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Surety(ies) are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, et seq., to have a permit in order to own or operate each hazardous waste management facility identified above, and

Whereas said Principal is required to provide financial assurance for [closure and/or post-closure care and/or corrective action] as a condition of the permit, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance, and

Whereas the Surety(ies) is(are) a surety company(ies) authorized to do business in the State of Georgia;

Now, Therefore, the conditions of this obligation are such that if the Principal shall faithfully

perform closure, whenever required to do so, of each facility for which this bond guarantees closure, in accordance with the closure plan and other requirements of the permit as such plan and permit may be amended, pursuant to all applicable laws, statutes, rules, and regulations, as such laws, statutes, rules and regulations may be amended,

And, if the Principal shall faithfully perform post-closure care of each facility for which this bond guarantees post-closure care, in accordance with the post-closure plan and other requirements of the permit, as such plan and permit may be amended, pursuant to all applicable laws, statutes, rules and regulations, as such laws, statutes, rules, and regulations may be amended,

And, if the Principal shall faithfully perform corrective action of each facility for which this bond guarantees corrective action, in accordance with specified corrective action measures and other requirements of the permit, as such plan and permit may be amended, pursuant to all applicable laws, statutes, rules and regulations, as such laws, statutes, rules, and regulations may be amended.

Or, if the Principal shall provide alternate financial assurance as specified in paragraph 391-3-11-.05 of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division (hereinafter "EPD"), and obtain the EPD Director's written approval of such assurance, within 90 days after the date notice of cancellation is received by both the Principal and the EPD Director from the Surety(ies), then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety(ies) shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above.

Upon notification by the EPD Director that the Principal has been found in violation of the closure requirements of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division, Hazardous Waste Management, Chapter 391-3-11, for a facility for which this bond guarantees performance of closure, the Surety(ies) shall either perform closure in accordance with the closure plan and other permit requirements or place the closure amount guaranteed for the facility into the standby trust fund as directed by the EPD Director.

Upon notification by the EPD Director that the Principal has been found in violation of the post-closure requirements of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division, Hazardous Waste Management, Chapter 391-3-11, for a facility for which this bond guarantees performance of post-closure care, the Surety(ies) shall either perform post-closure care in accordance with the post-closure plan and other permit requirements or place the post-closure amount guaranteed for the facility into the standby trust fund as directed by the EPD Director.

Upon notification by the EPD Director that the Principal has been found in violation of the corrective action requirements of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division, Hazardous Waste Management, Chapter 391-3-11, for a facility for which this bond guarantees performance of corrective action, the Surety(ies) shall either perform corrective action in accordance with the specified corrective action measures and other permit requirements or place the corrective action amount guaranteed for the facility into the standby trust fund as directed by the EPD Director.

Upon notification by the EPD Director that the Principal has failed to provide alternate financial assurance as specified in paragraph 391-3-11-.05 and obtain written approval of such assurance from the EPD Director during the 90 days following receipt by both the Principal and the EPD Director of a notice of cancellation of the bond, the Surety(ies) shall place funds in the amount guaranteed for the facility(ies) into the standby trust fund as directed by the EPD Director.

The Surety(ies) hereby waive(s) notification of amendments to closure plans, permits, applicable laws, statutes, rules, and regulations and agrees that no such amendment shall in any way alleviate its(their) obligation on this bond.

The liability of the Surety(ies) shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety(ies) hereunder exceed the amount of said penal sum.

The Surety(ies) may cancel the bond by sending notice of cancellation by certified mail or overnight courier, return receipt requested to the owner or operator and to the EPD Director, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the Principal and the EPD Director as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety(ies), provided, however, that no such notice shall become effective until the Surety(ies) receive(s) written authorization for termination of the bond by the EPD Director.

Any notice or other communication required by this bond shall be deemed sufficient if sent by certified U.S. Mail or overnight courier, return receipt requested to the appropriate party at the following address:

Surety: Argonaut Insurance Company
Address: PO Box 469011, San Antonio, TX 78246

Principal: Xerox Corporation
Address: 201 Merritt 7, Norwalk, CT 06850

EPD Director: Judson H. Turner, Director
Address: Environmental Protection Division
Department of Natural Resources
2 Martin Luther King Jr. Dr., Suite 1054
Atlanta, Georgia 30334

It shall be the responsibility of each party to notify the other parties in writing of any change to its address stated above.

In Witness Whereof, the Principal and Surety(ies) have executed this Performance Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety(ies) and that the wording of this surety bond is substantially the same as the wording specified in paragraph 391-3-11-.05 of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division as such regulation was constituted on the date this bond was executed.

Principal Xerox Corporation
[Signature(s)]
[Name(s)]
[Title(s)]
[Corporate Seal]

Corporate Surety(ies) Argonaut Insurance Company
[Name and address] PO Box 469011, San Antonio, TX 78246
State of incorporation: Illinois
Liability Limit: $ not to exceed 95,621,000.00
[Signature(s)]
[Name(s) and title(s)] D-Ann Kleidosty, Attorney-In-Fact
[Resident Agent's Signature] N/A
[Corporate Seal]
[As applicable, Surety Bond should have attached Power of Attorney and Certificate of Authority of Attorney(ies)-In-Fact.]
[For every co-surety, provide signature(s), corporate seal, and other information in the same manner as for Surety above.]

Argonaut Insurance Company

Bond Number: SUR0063102

Deliveries Only: 225 W. Washington, 24th Floor
Chicago, IL 60606
United States Postal Service: P.O. Box 469011, San Antonio, TX 78246

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint:

D-Ann Kleidosty

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

$85,000,000.00

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 8th day of May, 2017.

ARGONAUT INSURANCE COMPANY CORPORATE SEAL 1948 ILLINOIS

Argonaut Insurance Company

by: _____

Joshua C. Betz, Senior Vice President

STATE OF TEXAS
COUNTY OF HARRIS SS:

On this 8th day of May, 2017 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.

KATHLEEN M. MEEKS
Notary Public, State of Texas
Comm. Expires 07-15-2021
Notary ID 557902-8

Kathleen M. Meeks
(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 29 day of March, 2021.

ARGONAUT INSURANCE COMPANY CORPORATE SEAL 1948 ILLINOIS

James Bluzard, Vice President-Surety

IF YOU HAVE QUESTIONS ON AUTHENTICITY OF THIS DOCUMENT CALL (210) 321 - 8400.

FINANCIAL STATEMENT
ARGONAUT INSURANCE COMPANY
STATUTORY BASIS as of 12/31/2019

ASSETS	
CASH & INVESTED ASSETS	$359,150,536.00
BONDS	$849,892,572.00
STOCKS	$603,960,156.00
INVESTMENT INCOME DUE AND ACCRUED	$5,883,954.00
PREMIUM BALANCES	$103,360,646.00
NET DEFERRED TAX ASSET	$38,388,316.00
REINSURANCE RECOVERABLE	$45,162,848.00
OTHER ASSETS	$44,646,911.00
TOTAL ASSETS	$2,050,445,939.00

LIABILITIES AND SURPLUS	
UNEARNED PREMIUMS	$279,951,003.00
LOSSES	$473,653,148.00
LOSS ADJUSTMENT EXPENSES	$142,367,334.00
COMMISSIONS	-$7,843,020.00
TAXES, LICENSES, AND FEES	$13,376,634.00
OTHER EXPENSES	$11,142,114.00
FUNDS HELD UNDER REINSURANCE TREATIES	$105,228,622.00
CURRENT FEDERAL AND FOREIGN INCOME TAXES	$862,931.00
REMITTANCES AND ITEMS NOT ALLOCATED	$1,531,874.00
AMOUNTS WITHHELD/RETAINED BY COMPANY FOR OTHERS	$7,409,994.00
PAYABLES TO PARENT, SUBSIDIARIES, & AFFILIATES	$2,042,440.00
PAYABLE FOR SECURITIES	$4,366,865.00
PROVISION FOR REINSURANCE	$16,461,981.00
CEDED REINSURANCE PREMIUMS PAYABLE	$41,418,748.00
OTHER ACCRUED EXPENSES AND LIABILITIES	$2,261,294.00
TOTAL LIABILITIES	$1,094,231,962.00
COMMON CAPITAL STOCK	$4,500,000.00
GROSS PAID IN AND CONTRIBUTED SURPLUS	$525,520,936.00
UNASSIGNED SURPLUS	$426,193,041.00
TOTAL SURPLUS TO POLICYHOLDERS	$956,213,977.00
TOTAL LIABILITIES & SURPLUS	$2,050,445,939.00

Lauren T. Welch, being duly sworn, says the she is VP US Financial Controller of Argonaut Insurance Company and that to the best of her knowledge, and belief, the foregoing statement is a true and correct statement of the financial condition of said Company as of the 31st of December, 2019.

Subscribed and sworn to before me this 1st day of May 2020

Notary Public

Lauren T. Welch, VP US Financial Controller

DEBBIE BAUMANN
My Notary ID # 129375987
Expires April 5, 2021

ATTACHMENT B

INFLATED COST ESTIMATE

COST ESTIMATE Former Xerox - Atlanta Facility	2019 Financial Assurance Estimate	70285-078 Jan-19

ONE TIME FINAL DECOMMISSIONING COSTS

NO.	ITEM	ESTIMATED QUANTITY	UNIT (EA, LF, LS)	UNIT PRICE	ESTIMATED COST
1	Engineering/Consulting	16	HR	$140.	$2,240
2	Well Abandonment	1	lump sum	$4,717.	$4,717
3	Piping/Equipment Disposal	1	lump sum	$5,005.	$5,005
4	Certification	1	EA	$2,500.	$2,500

2018 ESTIMATE DECOMMISSIONING COSTS:	$14,462
CONTINGENCY COSTS 15%	$2,169
TOTAL DECOMMISSIONING COST	**$16,631**

ASSUMPTION:

1. 14 monitoring wells to be abandoned (B-10, 10A,11, 11A, 11B, 11D, 12, 28, 28A, 28B, 29, 29A, 32, 33B)

ESTIM

NO.	ITEM	ESTIMATED QUANTITY	UNIT (EA, LF, LS)	UNIT PRICE	ESTIMATED COST
1	January sampling event	1	EA	$6,070.	$6,070
2	July Sampling event	1	EA	$3,770.	$3,770
3	Annual Site Specific Parameter Sample Analysis - 7 samples	7	EA	$59.	$413
4	Appendix IX analyses (2 samples per year)	2	EA	$1,210.	$2,420
	subtotal	annual sampling and analytical costs			**$12,673**
5	Cap inspection w/ EPD	1	EA	$1,360.	$1,360
6	March 2020 SA Report	1	EA	$3,140.	$3,140
7	October 2020 SA Report	1	EA	$3,610.	$3,610
	subtotal	annual inspection and reporting costs			**$8,110**

SUBTOTAL ANNUAL COSTS:	$20,783
CONTINGENCY COSTS 10%	$2,078
ANNUAL CORRECTIVE ACTIONS COSTS with Contingency:	**$22,861**

ASSUMPTIONS:

1. Corrective action monitoring is conducted annually 7 samples per year - site parameters)
2. Appendix IX sampling is conducted annually (two wells per year)
3. Corrective action provision is provided for a minimum period of 30 years
4. Semi annual site inspections to be conducted
5. Site reporting to be conducted semi-annually. Only one report will have sampling results.
6. Contingency factor is 10% due to constant nature of these costs
7. Pending Class 3 Permit modificiation impacts are not comprehended

ESTIMATED VALUE:

ITEM		Number Of Events	Est. Post Closure
ONE TIME CLOSURE / DECOMMISSIONING COST	$16,631	1	$16,631
ANNUAL CORRECTIVE ACTIONS COSTS (FOR 30 YEARS)	$22,861	30	$685,830
TOTAL			**$702,461**

2021 Financial Assurance:

GNP Implicit Price Deflator 2020Q3/2019Q3:	**1.0116**
Inflated annual CA costs for 30 years:	**$693,811**

SECTION L - CERTIFICATION

This Application for a Hazardous Waste Permit has been certified by a principal executive of Xerox Corporation and by a Professional Groundwater Scientist. These Certifications are provided on the following pages.

CERTIFICATION OF PERMIT APPLICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____

Marcus W. Lathrop Signature Date
Manager, Assessment and Environmental Operations
Xerox Corporation

PROFESSIONAL GROUNDWATER SCIENTIST CERTIFICATION

I certify that I am a qualified groundwater scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in ground water hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding ground water monitoring and contaminant fate and transport. I further certify that this report was prepared by me or a subordinate working under my direction.

Signed:_____

John M. Quinn, P.G.
Registered Professional Geologist
State of Georgia No. 878

Date: _____

Registered Professional Geologist's Mailing Address

Wood Environment & Infrastructure Solutions, Inc.
1075 Big Shanty Road NW, Suite 100
Kennesaw, GA 30144