

Section I

CLOSURE PLAN FOR
SURFACE IMPOUNDMENT

WILLIAM C. MEREDITH CO., INC.
EAST POINT, GEORGIA

ORIGINALLY SUBMITTED June 27, 1983

REVISION 1 May 30, 1985

REVISION 2 November 1, 1985

REVISION 3 January 10, 1986

REVISION 4 March 10, 1986

REVISION 5 June 6, 1986

REVISION 6 April 29, 2021

REVISION 7 July 7, 2023

REVISION 8 July 1, 2024

SECTION I-1

CLOSURE PLAN

I-1 Closure Plan Summary

The goal of the closure plan for W. C. Meredith Company's surface impoundment was to treat in situ the existing hazardous waste constituents to such extent that there would be no further danger to human health or to the environment. In addition, the remaining detoxified residues in the surface impoundment were capped with a polyethylene liner and the surface impoundment was closed with wastes in place.

From 1927 until November 7, 1985 the facility utilized an unlined earthen impoundment for the treatment of processed wastewater and contaminated storm water. The EPD classified the surface impoundment as a single regulated Hazardous Waste Management Unit (HWMU) subject to all pertinent RCRA requirements for closure and post-closure care. The former pond contained approximately 9,400 square-feet with 107,703 cubic feet of storage.

In order to obtain a Hazardous Waste Permit from the EPD, W. C. Meredith prepared a closure plan for the surface impoundment in June 1983. After subsequent review and revision, the plan was approved by EPD in June 1986. The impoundment was closed in-place using an In-Situ Biological Oxidation Detoxification System (ISBODS). This process consisted initially of segregated water and sludges within one end of the surface impoundment followed by constructing a treatment cell within the "clean" area using a 60-mil polyethylene liner. The ISBODS treatment involved mixing in mutant bacteria with micro-nutrients, emulsifiers, co-metabolites, and pH adjustment chemicals until the degradation was observed. Once reduction was achieved to appropriate levels, the batch was transferred to a polishing cell for final oxidation. Final detoxified residues were mixed with quick lime to encapsulate the residuals thus minimizing future leaching. They were then placed on top of a red clay bottom liner in the surface impoundment for final capping via placement of a 20-mil polyethylene synthetic impervious liner, two-feet of soil cover, and Bermuda grass cover. Water treated during the process was pumped through the plant biological sewer pretreatment system for discharge into the local sanitary sewer system via a permit.

Final treatment and capping of the HWMU was completed in late 1989 and documented in a December 1989 certificate of closure submitted to the EPD (see section I-3a). Currently the HWMU consists of a grassy area bounded by fencing with restricted access in accordance with permit requirements.

Since the impoundment was not “clean closed,” a RCRA Hazardous Waste Facility Permit for Post-Closure Care (Part-B Permit) was prepared and submitted to EPD. The Part-B Permit was approved in September 1998 (Permit No. HW-062(D)). From 1982 to 1989, a series of groundwater monitoring wells (MW-1 through MW-11, including MW-5R and 6R replacement wells) were installed to delineate the extent of groundwater contamination from the former impoundment. In addition, groundwater pumping/extraction well, PW-1 was installed for product removal and hydraulic control along the down-gradient end of the former impoundment. MW-5R, MW-6R, and MW-11 were designated as Point of Compliance (POC) wells for determining the nature and concentration of regulated constituents in the groundwater beneath the former impoundment. A program of semi-annual groundwater sampling and monitoring was initiated to comply with provisions of the Permit.

I-2 Post Closure Plan (270.14(b)(13))

The purpose of the Post Closure Plan is to provide a written plan for inspecting, monitoring, recording, testing and maintaining the hazardous waste surface impoundment closed as a landfill facility and required Post Closure Care and Corrective Action. The Post Closure Plan is designed to detect any changes that may cause a threat to human health and the environment.

William C. Meredith Company completed closure of the surface impoundment at its wood treating facility at 2335 Lawrence Avenue, East Point, Georgia on 11-1-89. Final closure was achieved by installing a compacted red clay liner, polyethylene synthetic impervious liner, and a clay cap with Bermuda grass cover. The HWMU was certified closed in December 1989. Since the HWMU was not “clean closed”, a RCRA Hazardous Waste Facility Permit for Post-Closure Care (Part-B Permit) was required. WCM was issued its first Part B Permit on September 30, 1988 (HW-062D). This permit was amended on March 30, 1993 and September 30, 1998 to incorporate and subsequently revise a corrective action plan for the closed surface impoundment. In March 1997, additional permit amendment(s) were issued for post-closure care. The -10- year permit was renewed on September 30, 1998 and November 8, 2010. This revised Permit is provided to satisfy requirements for an additional 10 year update to the existing permit.

A copy of WCM's Closure Plan for Hazardous Waste Surface Impoundment (originally Appendix H from the 1988 Part B Permit Application) is included as an attachment. Copies of the original Post Closure care Facility Permit and the two amendments for Corrective Action Plans are on file at Georgia EPD, Atlanta, Georgia and at the William C. Meredith Company, Inc. facility site in East Point, Georgia.

I-2a Post Closure Inspection Plan (270.14(b)(13); 264.118(a); 264.197(b); 264.197(c)(2); 264.226(d)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258(c)(1)(ii); 264.303(c); 264.310(b))

A comprehensive inspection as identified below of the closed surface impoundment will be made by a qualified company manager or registered engineer quarterly and after each three-inch 24-hour rain storm and any other significant rain event that could pose a threat of degradation to the closed surface impoundment. The inspection logbooks will document inspections of all areas of the facility requiring post closure care and Corrective Action.

A weekly visual inspection will be performed to supplement the comprehensive inspections. A copy of the weekly inspection checklist is included in Section F appendices. Recommendations for maintenance activities will be stated in the facility inspection logbook and will be given to the facility owner or operator for implementation.

1) Security Control Devices and Final Containment

Structures Inspection

(a) Inspect lock on fence gate and all fence and posts surrounding the closed surface impoundment to make sure all fencing is tight to posts and intact from ground to top of fence line. Be sure fence is continuous around entire closed surface impoundment with no breaks, gaps or pushed down sections. Inspect that warning signs are in place on the fence and that they are legible.

(b) Inspect upgradient reinforced concrete retaining wall for settling, cracking, movement, or leakage.

(c) Inspect concrete sump, sump pump, recycling system and wastewater storage tanks for settling, cracking, leaks and proper operation of pump.

(d) Document any items needing repair in the facility inspection logbook.

2) Erosion Damage Inspection

Inspect the entire cap area of the closed surface impoundment and the surrounding rock drainage trench for any rainwater erosion damage to the topsoil grass cover or surrounding areas. Document any areas of erosion needing repair in the facility inspection logbook.

3) Cover Settlement Inspection

Inspect the entire cap cover area of closed surface impoundment for any areas of settlement, cracking or sinking of the topsoil cover. Document any areas of cover settlement needing repair in the facility inspection logbook.

4) Vegetative Cover Condition Inspection

Inspect entire cap area of the closed surface impoundment for completeness and protectiveness of vegetative grass cover. Check for fire ant hills and treat as required with Ortho® Orthene (active = acephate) or equivalent. Document any deficiencies in the health or cover of the grass in the facility inspection logbook.

5) Integrity of Run-On/Run-Off Control Systems Inspection

(a) Inspect the concrete retaining wall, collection sump, pump, piping and tanks for leaks, breaks, settling or contamination transmittal or malfunctions.

(b) Inspect run-on/run-off crushed rock drainage trench surrounding the closed surface impoundment for malfunction due to run-on sand and silt, damming, settling or erosion of rock.

(c) Document any areas needing repair in the facility inspection logbook.

6) Cover Drainage System Function Inspection

Inspect entire cap area of the closed surface impoundment and surrounding drainage area to assure that the cover has a continuous downward slope from the center to both the east and west sides and that the cover has a continuous downward slope from the south end concrete retaining wall to the north end drainage swales. Inspect that the drainage areas outside the cover fenced area are not higher in elevation than the grassed cap area creating ponding on the lower cover surface and that the surrounding drainage carries the water away from the cover surface. Document any areas needing repair in the facility inspection logbook.

7) Leachate Collection Detection and Removal System Inspection

This section does not apply to W. C. Meredith Company.

8) Gas Venting System Inspection

This section is not applicable.

9) Groundwater Wells Condition Inspection

Inspect all ground water monitoring well locks, caps, protective casings, protective steel posts, concrete pads around protective casings for cracks, breaks, damage, dislodgment settlement or contamination. Check that all well caps are properly labeled with the well number and are legible. Ensure that the surveyed measuring points on top of the PVC inner casing are marked clearly with a notch.

10) Corrective Action System Inspection

Inspect all groundwater pumps, pumping wells (including PW-1 and any pumping wells installed in the future), pipelines, hoses, controls, meters, separators and wastewater treatment systems to ensure that they remain in proper operation. Document any areas needing repair in the facility inspection logbook.

11) Benchmark Integrity Inspection

Inspect the surveyor benchmark steel pins at the corners (just inside fence) of the closed landfill to assure that the pins are in place and have not been hit, moved, or damaged. Document any areas needing repair in the facility inspection log book.

I-2b Post Closure Monitoring Plan (270.14(b)(13); 264.118(b)(1); 264.197(b); 264.197(c)(2); 264.226(d)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258(c)(1)(ii); 264.303(c); 264.310(b))

A Post Closure Groundwater Monitoring Plan is provided in Section E.

I-2c Post Closure Maintenance Plan (270.14(b)(13); 264.118(b)(2); 264.197(b); 264.197(c)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258(c)(1)(ii); 264.310(b))

The owner/operator will hire personnel or contract the work out for the required preventive and corrective maintenance described below on an as needed basis as determined during quarterly or three-inch 24-hour rain event site inspections. The maintenance will include the surface impoundment area closed as a landfill and the ground water monitoring and corrective action pumping and treatment equipment. Site maintenance work to be performed will be determined by EPD, the Facility Manager or independent engineer.

1) Repair of Security Control Devices and Final Containment Structure.

Anticipated maintenance and repairs follow:

- a) Replace damaged fencing.
- b) Replace old gate locks.
- c) Re-tamping or replacing fence posts.
- d) Re-stapling fence to posts.
- e) Replacing missing or illegible warning signs.
- f) Repair/patch minor cracks in concrete retaining wall with hydraulic cement.
- g) Document all repairs performed in the Facility Inspection Logbook.

2) Erosion Damage Repair

Anticipated maintenance and repairs follow:

- a) Replace or add topsoil and grass seed to any areas of erosion of the top grassed area of the closed impoundment cap. Mulch grass seed to prevent run-off. Shovel, rake and tamp replacement topsoil in place.
- b) Replace any crushed stone in rock drainage trench if eroded away.
- c) Document all repairs performed in the Facility Inspection Logbook.

3) Correction of Settlement

Anticipated maintenance and repairs follow:

- a) Settling or sinking of areas adjacent to compacted cap edges. For settling fill settled area with compacted red clay then topsoil and grass/mulch over seeding.
- b) Settled areas on grass cap add topsoil with grass seed and mulch to level cap surface for proper drainage.
- c) Document all repairs performed in the Facility Inspection Logbook.

4) Mowing, Fertilizing and Other Vegetative Cover Maintenance

Anticipated maintenance and repairs follow:

- a) Fertilize the grass cover on the cap once per year.

- b) Mow the grass cover on the cap to four inches high nine times per year (once per month March through November).
- c) Reseed bare grass areas by scratching in new grass seed with a steel rake and covering with mulch.
- d) Water new seeded grass areas as needed to develop new grass coverage.
- e) Treat red ant hills with granules to eliminate damage to cover surface. Present control chemicals have the active ingredient acephate.
- d) Document all maintenance and repairs performed in the Facility Inspection Logbook.

5) Repair of Run-on and Run-off Control Structures

Anticipated maintenance and repairs follow:

- a) Repair any cracks in the cement retaining wall with hydraulic cement.
- b) Remove any fine silt or soil dams that have built up around edges of cap that might cause damming of water running off cap surface or created any increased elevation for surrounding surface water run on.
- c) Replace any crushed rock needed to carry away surface water exiting from the cap.
- d) Document all repairs performed in the Facility Inspection Logbook.

6) Leachate Collection Detection and Removal System Maintenance

This section does not apply to W. C. Meredith Company.

7) Well Maintenance

Anticipated maintenance and repairs follow:

- a) Replace damaged well locks.
- b) Replace damaged well caps.
- c) Keep well caps and protective casings and protective supports painted.
- d) Re-label well numbers on caps.

- e) If screens appear to be clogged affecting recharge of groundwater, the well will be redeveloped.
- f) Should any well become non-functional, properly abandon and replace with a new well adjacent to the existing well.
- g) Replace well balers, tape measures, baler lines as needed.
- h) Replace damaged concrete pads.
- i) Replace damaged bumper guards.
- j) Remark notches in PVC casings periodically denoting point of measurement.
- k) Document all repairs performed in the Facility Inspection Logbook.

8) Groundwater Pumping Well and Treatment Equipment Maintenance

Anticipated maintenance and repairs follow:

- a) Replace hoses on ground water pumps if signs of disintegration appear.
- b) Replace ground water pump parts and control parts as required to function.
- c) Replace air distributors, air pumps, water feed pumps in ground water treatment system.
- d) Supply nutrient feed system for ICB biological ground water treatment system.
- e) Replace activated carbon and sand in treated water filter when spent.
- f) Redevelop recovery wells if screens appear to be clogged.
- g) Maintain groundwater-oil separator.
- h) Document all repairs performed in the Facility Inspection Logbook.

9) Rationale To Be Used for Corrective Maintenance Activities

Corrective Maintenance Activities will be implemented whenever the Facility Manager or independent engineer determine from the facility inspection reports that repair or maintenance as described in above items is required in order to maintain the proper operation and integrity of all aspects of the Post Closure

Care and Corrective Action Plan at the W. C. Meredith Company, East Point, Georgia facility.

I-2d Land Treatment (40 CFR 270.14(b)(13); 264.280)

This section is not applicable as W. C. Meredith Company does not have any land treatment facilities.

I-2e Post-Closure Care for Miscellaneous Facilities (40 CFR 270.14(b)(13); 270.23(a)(3); 264.603)

This section is not applicable as W. C. Meredith Company has not treated, stored or disposed of hazardous waste in a Miscellaneous Unit.

I-2f Post Closure Security (40 CFR 270.14(b)(13); 264.117(b) & (c))

No hazardous wastes remain exposed at the completion of closure of the surface impoundment.

The closed surface impoundment area has a continuous fence around the entire capped area. The fence is five feet high and is constructed of welded steel wire fencing with openings no greater than two inches by four inches stapled securely to six inch diameter treated wood posts. The fence has a locked gate for entrance for inspections and maintenance activities. The wire fencing extends down to contact the ground. Signs are posted on the fence in all directions stating "No Trespassing – Authorized Persons Only".

The closed surface impoundment is in the interior portion of an industrial manufacturing property and is not close to public roads or livestock areas. The treating plant adjacent to the landfill has employees working three shifts per day and 24 hour watchmen on the weekends.

I-2g Post Closure Contact (270.14(b)(13); 264.118(b)(3))

The following person is responsible for storage and updating of the facility copy of the Post Closure Plan during the Post Closure Period.

Scott Schneider, Regulatory Manager
W. C. Meredith Company, Inc.
2335 Lawrence Avenue
(P.O. Box 90730)
East Point, Georgia 30364
Telephone: 404-767-2621

I-3 Notices Required for Disposal Facilities (270.14(b)(13))

I-3a Certification of Closure (270.14(b)(13); 264.115; 264.280))

Following is a copy of the Certification of Closure of the William C. Meredith Company, Inc. surface impoundment at 2335 Lawrence St., East Point, Georgia on 12-29-89.

WILLIAM C. MEREDITH COMPANY
INCORPORATED
WOOD PRESERVERS

STANDARD PRESSURE TREATMENTS WITH CREOSOTE OR PENTA

POST OFFICE BOX 90458
EAST POINT, GEORGIA 30364
TELEPHONE (404) 767-2621



December 29, 1989

Bert Langley
Hazardous Waste Management Program
Georgia EPD
205 Butler St., SE, Floyd Towers East
Atlanta, GA 30334

RE: CERTIFICATION OF CLOSURE AND SURVEY PLAT FOR HAZARDOUS WASTE
MANAGEMENT UNIT - GAD003323805 WILLIAM C. MEREDITH COMPANY, INC.

Dear Mr. Langley,

This registered letter contains the Certification of Closure and the Survey
Plat for the Hazardous Waste Management Unit at William C. Meredith Company,
Inc. at 2335 Lawrence Street, East Point, Georgia.

Sincerely,

Paul M. Castle
Vice President/General Manager

PMC:pb

Enclosure

WILLIAM C. MEREDITH COMPANY
INCORPORATED
WOOD PRESERVERS

STANDARD PRESSURE TREATMENTS WITH CREOSOTE OR PENTA

POST OFFICE BOX 90456
EAST POINT, GEORGIA 30364
TELEPHONE (404) 767-2621



CERTIFICATION OF CLOSURE
OF THE WILLIAM C. MEREDITH COMPANY, INC.
SURFACE IMPOUNDMENT AT
2335 LAWRENCE ST.
EAST POINT, GEORGIA

This certifies that the Hazardous Waste Management Unit (a surface impoundment) has been closed with waste left in place as a hazardous waste landfill unit in accordance with the specifications in the approved closure plans with the field changes implemented during the closure process recorded in the operating record.

Closure activities including treatment, decontamination, solidification, compaction and final cap installation were completed on 10-31-89. Grass hydroseeding and fence inclosure was completed on 11-6-89 and 11-7-89.

Charles H. Caban, P.E.
Charles H. Caban, P.E.
Registered Professional Engineer
Georgia Registration #8866
12/29/89
Date

Paul M. Castle
Paul M. Castle
Vice President/General Manager
William C. Meredith Co., Inc.
2335 Lawrence St.
East Point, Georgia 30344
12-29-89
Date

WILLIAM C. MEREDITH COMPANY
INCORPORATED

WOOD PRESERVERS

STANDARD PRESSURE TREATMENTS WITH CREOSOTE OR PENTA

POST OFFICE BOX 90456
EAST POINT, GEORGIA 30364
TELEPHONE (404) 767-2621



CERTIFICATION OF CLOSURE
OF THE WILLIAM C. MEREDITH COMPANY, INC.
SURFACE IMPOUNDMENT AT
2335 LAWRENCE ST.
EAST POINT, GEORGIA

This certifies that the Hazardous Waste Management Unit (a surface impoundment) has been closed with waste left in place as a hazardous waste landfill unit in accordance with the specifications in the approved closure plans with the field changes implemented during the closure process recorded in the operating record.

Closure activities including treatment, decontamination, solidification, compaction and final cap installation were completed on 10-31-89. Grass hydroseeding and fence inclosure was completed on 11-6-89 and 11-7-89.

Charles H. Caban P.E.

Charles H. Caban, P.E.
Registered Professional Engineer
Georgia Registration #8866

12/29/89

Date

Paul M. Castle

Paul M. Castle
Vice President/General Manager
William C. Meredith Co., Inc.
2335 Lawrence St.
East Point, Georgia 30344

12-29-89

Date

I-3b Survey Plat (270.14(b)(13); 264.116)

A copy of an August 2009 updated survey plat was previously provided in the 2009 Permit renewal, Section I along with the original December 1989 plat. Both plats indicate the location of the closed surface impoundment hazardous waste disposal unit that was submitted to the land use authority (Fulton County) and the Director of Georgia EPD. The updated plat provides enlarged writing for the location pins on the plat and adds the depth dimensions of the hazardous waste cell, the volume of the hazardous cell, and the hazardous waste constituents contained in the cell. The survey plat contains the required note restricting disturbance of the unit and is included as an attachment. Copies of the 1989 and 2009 survey plats are provided in the Appendix I Survey Plats.

A notice for the original December 29, 1989 filing of the survey plat with the Fulton County clerk's office is provided on the following page.

DILLARD, WESTMORELAND & WILSON, P. C.

999 PEACHTREE STREET, N. E.

SUITE 1700

ATLANTA, GEORGIA 30309

404 870-1900

TELECOPIER 404 870-1920

OF COUNSEL
DAN GREER

G. DOUGLAS DILLARD
GEORGE P. DILLARD
CARL E. WESTMORELAND, JR.
DICK WILSON, JR.
FRANK L. WILSON, III
LETHCO H. BROCK, JR.
EDWARD E. AUGUSTINE
JANET SHALLEY TODD
WILLIAM WOODSON GALLOWAY
GEORGE F. MAYNARD
CHERYL J. PENCE
SHAWN D. STAFFORD
JOHN H. IRBY

December 29, 1989

Mr. Paul M. Castle
Vice President/General Manager
William C. Meredith Company
2335 Lawrence Street
East Point, Georgia 30344

Re: Survey Plat

Dear Mr. Castle:

This letter is to advise you that the survey plat designating the Hazardous Waste Management Unit at W. C. Meredith Company, Inc. was filed December 29, 1989 with the Fulton County clerk's office. If you should have any questions, please call.

Very truly yours,

DILLARD, WESTMORELAND & WILSON, P. C.



Ellen Jugar
Legal Assistant

Enclosures

I-3c Post Closure Certification (270.14(b)(13); 264.120)

The Post Closure Care period will be completed in accordance with 40 CFR 264.120. Within 60 days of the time of Post Closure completion for the hazardous waste disposal unit the required certification that the post closure care period for the hazardous waste disposal unit was performed in accordance with the specifications of the approved post closure plan will be submitted to Georgia EPD with the required certification of the owner/operator and an independent registered professional engineer.

I-3d Post Closure Notices (270.14(b)(13); 270.14(b)(14); 264.119)

Per CFR 264.119 (a) see the aforementioned plats in the Appendix I Survey Plats. These survey plats were filed with the Deputy Clerk of the Superior Court of Fulton County, Georgia Office of Deeds and Land Records and illustrate and define the type, location and quantity of hazardous wastes disposed of within the hazardous waste cell.

Per CFR 264.119 (b)(1) in accordance with state law, a copy of the amendment to the company deed to the facility property filed with the Deputy Clerk of the Superior Court of Fulton County, Georgia Office of Deeds and Land Records on August 24, 2009 that will in perpetuity notify a potential purchaser that: (i) the land has been used to manage hazardous waste and (ii) the land use is restricted under 40 CFR Part 264, Subpart G regulations and that the survey plat contains a record of the restricted use, type, location and quantity of hazardous wastes disposed within the cell.

Per CFR 264.119 (b)(2) the company owner/operator certification statement for post closure notices indicates that the deed amendment and survey plat information required in CFR 264.119 (b)(1) has been recorded and is included on the following page. Copies of the deed amendment and survey plats are provided in labeled appendices.

I-3e Notice In Deed To Property

Included with the copy of the survey plat is the letter from our company attorney that the survey plat detailing the hazardous waste unit and the statement of restricted activities was filed at the county deed office. The recording notation of the deed office clerk is on the copy of the survey plat submitted (Book 346, Page 85, 8-10-09).

WILLIAM C. MEREDITH COMPANY
I N C O R P O R A T E D
WOOD PRESERVERS
STANDARD PRESSURE TREATMENTS WITH CREOSOTE OR PENTA

POST OFFICE BOX 90730
EAST POINT, GEORGIA 30364
TELEPHONE (404) 767-2621



March 3, 2010

Mrs. Lindsay Dean
Hazardous Waste Branch
Georgia EPD
Floyd Towers East
2 Martin Luther King Jr. Drive, SE, Suite 1154
Atlanta, GA 30334

RE: Company certification statement for Post Closure Notices for William C. Meredith Co., Inc.

This letter is certification that William C. Meredith Company, Inc. has recorded the notation on the deed of the facility property specified in 40 CFR Section 264.119 paragraph (b)(1).

Copies of the recorded amended facility property deed and the recorded survey plats (referenced on the amended deed) that contain the location and dimensions of the hazardous waste disposal cell, the restricted use statement and the quantity of hazardous waste contained are located in the RCRA facility Part B Permit in Section I, Appendix I-Post Closure. Recordings were made by the Clerk of the Superior Court in Fulton County, Georgia.

Paul M. Castle
Vice President/General Manager

I-4 Closure Cost Estimate (270.14(b)(15); 264.142)

Closure of the hazardous waste surface impoundment was completed on 12-29-89; therefore, a closure cost estimate is not required.

I-5 Financial Assurance Mechanism for Closure (270.14(b)(15); 264.143; 264.151)

Closure of the hazardous waste surface impoundment was completed on 12-29-89 and Georgia EPD released the facility from the financial assurance mechanism at the certification of closure.

I-5a Closure Trust Fund (270.14(b)(15); 264.143(a); 264.151(a)(1))

At the certification of closure on 12-29-89 the remaining funds in the Closure/Post Closure Trust Fund became the funding mechanism for the future Post Closure Trust Fund.

I-5b Surety Bond (270.14(b)(15); 264.143(b); 264.151(b)(c))

Closure was completed on 12-29-89. This is not applicable.

I-5c Closure Letter of Credit (270.14(b)(15); 264.143(d); 264.151(d))

Closure was completed on 12-29-89. This is not applicable.

I-5d Closure Insurance (270.14(b)(15); 264.143(e); 264.151(e))

Closure was completed on 12-29-89. This is not applicable.

I-5e Financial Test and Corporate Guarantee For Closure (270.14(b)(15); 264.143(f); 264.151(f), (h))

Closure was completed on 12-29-89; therefore, this is not applicable.

I-5f Use of Multiple Financial Mechanisms (270.14(b)(15); 264.143(g))

Closure was completed on 12-29-89; therefore, this is not applicable.

I-5g Use of Financial Mechanism for Multiple Facilities (270.14(b)(15); 264.143(h))

Closure at the company's only facility was completed 12-29-89; therefore, this is not applicable.

I-6 Post Closure Cost Estimate (270.14(b)(16); 264.144)

The most recent fiscal year costs are included as an attachment.

I-7 Financial Assurance Mechanism for Post Closure (270.14(b)(16); 264.145; 264.151)

The Financial Assurance Mechanism for Post Closure and Corrective Action has been submitted under separate cover.

I-7a Post-Closure Trust Fund (270.14(b)(16); 264.145(a); 264.151(a)(1))

A Post Closure Trust Fund was established in 1989 with the Bank of New York. A copy of the letter agreement with the bank of New York is provided on the following page.

I-7b through I-7g (270.14(b); 264.145(b); 264.151)

These sections are not applicable since these financial mechanisms were not used.



THE BANK OF NEW YORK MELLON

Insurance Trust & Escrow

April 29, 2008

Paul Castle, VP/General Mgr
William C. Meredith Company, Inc.
2335 Lawrence St.
East Point, Georgia 30344

Re: Replacement Trust Agreement between William C. Meredith Company,
Inc., and The Bank of New York

Dear Paul,

Enclosed is a copy of the Replacement Trust Agreement between William C. Meredith Company, Inc. (the Grantor) and The Bank of New York (the Trustee). This agreement replaces the prior agreement on file.

As noted in my previous fax, the original agreement has been forwarded via overnight mail to Carol A. Couch of the Georgia EPD.

Please feel free to contact me directly at 212-815-3195 or via email at dionne.thomas@bnymellon.com with any questions.

Sincerely,

Dionne Thomas
Assistant Treasurer

Global Corporate Trust
101 Barclay Street, New York, NY 10286

I-8 Liability Requirements (270.14(b)(17); 264.147)

I-8a Sudden Insurance (270.14(b)(17); 264.147(a))

This section is not applicable. William C. Meredith Company, Inc. is not an active permitted hazardous waste treatment, storage or disposal facility and is not required to maintain Sudden Liability Insurance for injury or damage to third parties.

I-8b Non-Sudden Insurance (270.14(b)(17); 264.147(b))

This section is not applicable. William C. Meredith Company, Inc. is not an active permitted hazardous waste treatment, storage or disposal facility and is not required to maintain Non-Sudden Liability Insurance for injury or damage to third parties.

I-8c Requests for Variance (270.14(b)(17); 264.147(c))

This section is not applicable.

I-9 State Financial Mechanism (270.14(b)(18))

I-9a Use of State Required Mechanisms (270.14(b)(18); 264.149)

This section is not applicable.

I-9b State Assumption of Responsibility (270.14(b)(18); 264.150)

This section is not applicable.