

AECS
American Environmental & Construction Services, Inc.
1170 Tidwell Road
Alpharetta, Georgia 30004



May 15, 2025

Mr. Matthew Schroeder
Unit Coordinator
Hazardous Waste Corrective Action Program
Land Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive, SE
Suite 1054 East Tower
Atlanta, Georgia 30334-9000

**Re: Request for Class 3 Permit Modification to
Terminate Hazardous Waste Facility Permit HW-092(D)
Former York Casket Hardware Facility
Lawrenceville, Georgia
EPA ID No. GAD 003 265 030**

Dear Mr. Schroeder,

Matthews International Corporation (Matthews) is submitting the enclosed *Corrective Action Plan for Clean Closure of the Former Electroplating Unit and Former Evaporation Unit* and making a Permit Modification Request to terminate Hazardous Waste Facility Permit HW-092(D). The former York Casket Hardware facility, located at 506 Maltbie Street, Lawrenceville, Georgia, is owned by Matthews and is regulated by the Georgia Department of Natural Resources, Environmental Protection Division (EPD) under Hazardous Waste Facility Permit HW-092(D). The facility has completed 30 years of post-closure care.

Matthews has met the requirements of 40 CFR 264.114 by excavating soil at two Resource Conservation and Recovery Act (RCRA) regulated units (RUs) and a drainage ditch (SWMU-15) impacted with site-specific metals and cyanide. Soil exceeding risk-based cleanup standards (specified in the November 15, 2024, *Interim Measures Work Plan for Clean Closure of the Former Electroplating and Evaporation Units*) were excavated to the water table or bedrock at the RUs, thus completely removing the RUs. The two RUs no longer exist; therefore, no post-closure requirements remain. The necessity for future groundwater monitoring and corrective action will be addressed with a consent agreement as presented in the enclosed corrective action plan (CAP) once Hazardous Waste Facility Permit HW-092(D) is terminated.

The soil excavation at the two RUs and Solid Waste Management Unit (SWMU)-15 was conducted in accordance with the November 15, 2024, *Interim Measures Work Plan for Clean Closure of the Former Electroplating and Evaporation Units* submitted as an interim measure Temporary Authorization Request approved by EPD on November 27, 2024.

Implementation of the soil interim corrective action began on December 30, 2024, when work began to remove the concrete cap at RU-2 and excavate RU-2. Excavation activities for the interim measures were completed on May 9, 2025, and the last excavated soil is scheduled to be disposed of at the Republic Oak

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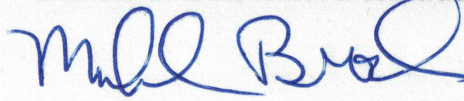
Grove Municipal Solid Waste Landfill on May 16, 2025. The Interim Measures Completion Report for Clean Closure of the Former Electroplating and Evaporation Units will be submitted to document completed interim measures corrective action activities under separate cover on or before May 30, 2025.

The regulations in 40 CFR Section §270.42(b) require a public comment period prior to making a final determination regarding the proposed permit modification. The public comment period will be from May 15 to July 14, 2025. A copy of the permit modification request and current Hazardous Waste Facility Permit will be available for review at the 1) Gwinnett County Collins Hill Public Library Branch at 455 Camp Perrin Road, Lawrenceville, Georgia 30043, and 2) EPD office located at 2 Martin Luther King, Jr. Drive, SE, Suite 1054 East Tower, Atlanta, Georgia 30334. A public meeting is scheduled for 4:00 pm to 5:00 pm on May 29, 2025, at the Gwinnett County Collins Hill Public Library Branch.

Thank you for your assistance in this matter, and if you have any questions, please feel free to contact us at (770) 754-6440 or (404) 545-0891.

Sincerely,

American Environmental & Construction Services, Inc.



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c: Mr. Larry Newport (Matthews)
Mr. Gary J. Toplak, P.E. (Toplak & Associates)

