

APPENDIX 14

FINANCIAL ASSURANCE AND LIABILITY MECHANISMS



July 30, 2007

Ms. Sherry Blunk
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Re: Schedule A (Trust Fund Account TBT005088)

Dear Ms. Blunk:

KW Plastics of California has adjusted the Trust Fund Account and revised the Schedule A to reflect the revised closure cost based on the new tank treatment System described in our Class 3 Permit Modification. Enclosed is the revised Schedule A Form 1154 adjusted to \$350,753.00.

The Funds on deposit are sufficient to meet the financial assurance requirements Stipulated by the Facility's Hazardous Waste Permit as confirmed in the attached statement from the Troy Bank and Trust Company.

I trust this correspondence meets your needs. However do not hesitate to contact me at 334-807-5124, if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynda Floyd".

Lynda Floyd
Sr. Vice President & Trust Officer

Cc: Roy Baggett, Trust Agent
John Putnam
Phillip Harris

Attachments: Updated Schedule A
Deposit Statement for Trust Account TBT005088

TRUST AGREEMENT/STANDBY TRUST SCHEDULE A

This Agreement demonstrates financial assurance for the following cost estimate(s) for the following facility(ies)/TTU(s):

Hazardous Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Cost Estimates for which Financial Assurance Being Demonstrated by this Agreement
CAD982436026	KW Plastics of California	1861 Sunnyside Court Bakersfield, California	Closure : \$350,753.00 Postclosure :
			Closure: Postclosure:
			Closure: Postclosure:
			Total : \$350,753.00

The cost estimates listed here were last adjusted on (date): 07/30/07.

This Agreement demonstrates financial assurance for liability coverage for the following facility(ies)/TTU(s):

Hazardous Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Liability Coverage Being Demonstrated by this Agreement
			Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: -----
			Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: -----
			Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: -----
			Total aggregate: \$0.00

The Liability coverage listed here is effective on (date): _____.

APPENDIX 15

SOLID WASTE MANAGEMENT UNITS AND AREA OF CONCERN

**SWMU INFORMATION SUMMARY TABLE
KW PLASTICS OF CALIFORNIA
BAKERSFIELD, CALIFORNIA**

SWMU NO.	SWMU DESCRIPTION AND INVESTIGATION RESULTS
1	<p>NAME: Truck Unloading Area and Receiving Hopper LOCATION: This unit is located on the eastern side of the operations building. PHYSICAL DESCRIPTION: The unit is an area approximately 60 feet wide and 90 feet long. The unit consists predominantly of concrete and steel and includes a truck unloading area, a receiving hopper, a conveyor belt, and an underground storm water sump. OPERATION: The unit is used to convey lead-impacted, polypropylene chips from transfer trucks to the recycling process and has been in operation since 1986. WASTE MANAGED: The unit manages lead-impacted, polypropylene chips. RELEASE INFORMATION: No releases are known to have occurred from this unit. PERMIT REQUIRED ACTION: No Further Action (NFA) FURTHER ACTION: Not Applicable</p>
2	<p>NAME: Trailer Parking Area LOCATION: This unit is located on the eastern edge of the property adjacent to SWMU No. 1. PHYSICAL DESCRIPTION: This unit is an area approximately 100 feet wide and 130 feet long. The unit consists of a parking area composed of concrete pavement and a sump. OPERATION: The unit is used for the storage of trailers containing lead-impacted, polypropylene chips until the recycling process is ready to receive the chips. The trailers can be stored for a maximum period of 144 hours. The unit has been in operation since the facility began production in 1986. WASTE MANAGED: The unit manages storm water runoff and indirectly manages lead-impacted, polypropylene chips contained within trailers until unloading. RELEASE INFORMATION: No releases are known to have occurred from this unit. PERMIT REQUIRED ACTION: NFA FURTHER ACTION: Not Applicable</p>

**SWMU INFORMATION SUMMARY TABLE
KW PLASTICS OF CALIFORNIA
BAKERSFIELD, CALIFORNIA**

SWMU NO.	SWMU DESCRIPTION AND INVESTIGATION RESULTS
3	<p>NAME: Recovery Ponds LOCATION: This unit is located 25 feet south of the operations building. PHYSICAL DESCRIPTION: This unit is composed of two water storage ponds with an area of approximately 52 feet long by 16 feet wide. The unit is constructed of concrete with high-density polyethylene plastic liner. OPERATION: This unit is used to hold non-hazardous recycled water until the water can be re-used within the recycling system. The unit has been in operation since the facility began production in 1986. WASTE MANAGED: The unit manages non-hazardous recycled water. RELEASE INFORMATION: No releases are known to have occurred from this unit. PERMIT REQUIRED ACTION: RCRA Facility Investigation (RFI) of soil and groundwater was required. RFI RESULTS: Seven water samples, two sediment samples, and sixty-four soil samples were collected and analyzed for pH, moisture, and lead during the RFI activities. Lead was not detected at concentrations exceeding the background levels for any samples. FURTHER ACTION: NFA</p>

**SWMU INFORMATION SUMMARY TABLE
KW PLASTICS OF CALIFORNIA
BAKERSFIELD, CALIFORNIA**

SWMU NO.	SWMU DESCRIPTION AND INVESTIGATION RESULTS
4	<p>NAME: Recycling Room LOCATION: The unit is located in the southeastern corner of the operations building. PHYSICAL DESCRIPTION: This unit has an approximate area of 6,100 square feet which is secondarily-contained by curbing and concrete walls along the perimeter. The unit is composed of three float separators, a wash tank, a granulator, three spin dryers, seven wastewater holding tanks, drainage trough, two sumps, a filter press, and all the related valves, augers, and piping. OPERATION: This unit is used to recycle lead-impacted, polypropylene chips. The chips are transferred from trailers directly into the first float separator for washing. From the first float separator, the chips are augered into the granulator followed by the second float separator for size reduction and additional washing. Following the second float separator, the chips are sent through a spin dryer that discharges to a wash tank. After the wash tank, the chips are piped into a second spin dryer which discharges into a third float separator. The "clean" chips are augered from the third float separator and into a third spin dryer. The chips are then discharged into the air drying system and subsequently discharged to the onsite storage silos. Lead-impacted wastewater from the process is treated a filter press and stored for reuse within the system. Lead-impacted sludges, debris, and filter cake generated by the system is baled, wrapped with plastic, and disposed in a commercial, hazardous waste landfill. The unit has been in operation since the facility began production in 1986. WASTE MANAGED: The unit manages lead-impacted polypropylene chips, sludges, filter cake, and wastewater. RELEASE INFORMATION: No releases are known to have occurred from this unit. PERMIT REQUIRED ACTION: NFA FURTHER ACTION: Not Applicable</p>

**AOC INFORMATION SUMMARY TABLE
KW PLASTICS OF CALIFORNIA
BAKERSFIELD, CALIFORNIA**

AOC NO.	AOC DESCRIPTION AND INVESTIGATION RESULTS
1	<p>NAME: Drainage Trough in Production Area</p> <p>LOCATION: This unit is located in the center of the operations building and adjacent to the western edge of SWMU No. 4 - Recycling Room.</p> <p>PHYSICAL DESCRIPTION: The unit is approximately 40 feet long, one foot wide, and one foot deep. The unit is constructed of concrete with a steel grate covering the entire length of the trough. A stainless steel, cut-off gate was installed after the RCRA Facility Assessment (RFA) to separate the trough from the Recycling Room.</p> <p>OPERATION: The unit is used to collect wastewater from the non-hazardous production area. Until the RFA, the drainage trough was connected to the drainage system for the Recycling Room.</p> <p>WASTE MANAGED: The unit manages non-hazardous wastewater from the production area.</p> <p>RELEASE INFORMATION: No releases are known to have occurred from this unit.</p> <p>PERMIT REQUIRED ACTION: RCRA Facility Investigation (RFI) of soil and groundwater was required.</p> <p>RFI RESULTS: Seven water samples, two sediment samples, and sixty-four soil samples were collected and analyzed for pH, moisture, and lead during the RFI activities. Lead was not detected at concentrations exceeding the background levels for any samples.</p> <p>FURTHER ACTION: No Further Action</p>