

July 22, 2024

Mr. Max Luick  
Bureau of Remediation and Waste Management  
Maine Department of Environmental Protection  
17 State House Station  
Augusta ME 04333

**Subject: Progress Report for April-June 2024  
Orrington Remediation Site  
Orrington, Maine**

Dear Mr. Luick:

Mallinckrodt US LLC submits this Progress Report (Report) for the Orrington Remediation Site (Site) in Orrington, Maine to Maine Department of Environmental Protection (DEP) pursuant to the Board of Environmental Protection (BEP) Order effective April 3, 2014, (Order), which incorporates with modifications the DEP's Compliance Order dated November 24, 2008. This Report covers activities at the Site for the period of April-June 2024.

If you have questions regarding this report, please contact David Kelley at 774-284-2207

Sincerely,



David Kelley  
Sr. Remediation Program Manager

cc: (all electronic copies)  
Kelly Bay – Director, Orrington Town Library  
Chris Backman- Town Manager, Town of Orrington  
Alan Snell– Chairman of Board of Selectman, Town of Orrington  
Stacy Ladner– Maine DEP  
Chris Swain- Maine DEP  
Patricia Duft – Mallinckrodt US LLC  
Aleava Frawley – Mallinckrodt US LLC

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**Q2 2024 Progress Report on Activities Completed in Compliance with Order**

Mallinckrodt US LLC (Mallinckrodt or Company) submits this Progress Report (Report) to the Maine Department of Environmental Protection (DEP) documenting activities completed at the Orrington Remediation Site (the Site) by the Company and its representatives, including previous, ongoing, and currently anticipated upcoming activities by category.

**General Site Activities**

- A technical team call was held by Mallinckrodt and Maine DEP call on March 6, 2023.
- Other discussions and correspondence took place during the period to discuss Site activities as needed.
- Continued inspection and maintenance of site erosion and stormwater controls.
- Paved Sump Maintenance:
  - Paved Sump removed on Sept.15, 2022.
  - Paved sump inlet pipe (Storm Drainpipe) removed on Sept. 13, 2022.
- Maintained the log of quantities of any visual mercury recovered (see Attached Log).
- Disposal options for elemental mercury have been evaluated and plans for disposal were discussed with Maine DEP. We are holding off on disposal until we complete work in other Plant areas.
- The on-site Maine DEP oversight inspector continued to participate in daily and weekly construction meetings in which current activities as well as a two-week look ahead are discussed. The on-site inspector also continued daily emails to summarize activities to ensure all parties agree on what is planned/accomplished.
- Continued operation of the perimeter air monitoring system and meteorological station
- Stockpile operations continue to support excavation material and rail car loading.

**Landfill 1** (*CMI Plan – Rev2 April 30, 2018; DEP Conditional Approval Letter May 10, 2018; CMI Plan – Rev2 May 17, 2018 (revised to incorporate all conditions in DEP CAL)*)

- No new activity

**Plant Area** (*Draft CMI Plan Feb. 13, 2017; Phase 1 Excavation Memo Rev1 Jan. 2, 2018; DEP Approval of Phase 1 Jan. 9, 2018*) **and Plant Area CMIP - Phase 1A** (*Retort-01 Area and Cell Building Pre-Trenching Work Plan July 9, 2019; DEP conditional approval on July 12, 2019*)

- SVE System operating with one blower extracting from SVE wells except (SVE-S-01, SVE-S-02, SVE-S-03, SVE-S-10, SVE-S-11, SVE-S-15, SVE-S-17, SVE-S-18, SVE-S-19, SVE-S-20, SVE-D-01, SVE-D-04, and SVE-D-07 which have been shutoff as part of the optimization plan.
- Performed monthly monitoring of the SVE system on April 2, 2024.
- Submitted 2024 1st Quarter Chloropicrin Area Report to Maine DEP on April 30, 2024
- SVE system was shut down on April 8, 2024, due to motor failure on blower 1. SVE system back in full time operation on April 23, 2024
- Performed monthly monitoring, including a rebalancing of the SVE system on May 9, 2024
- Installed motor on Blower #2 (Monday) May 13, 2024. Carmel Electric connected power to motor on Blower #2 (Thursday) May 16, 2024, Blower #2 back online as of (Thursday) May 16, 2024.
- SVE system switched from Blower #1 to Blower #2 on May 20, 2024. SVE system currently operating on Blower #2.
- Repaired two SVE system vaults, removed damaged concrete. Formed and placed new concrete around the vaults.
- Performed monthly monitoring and performance monitoring sampling the week of 6/24/24.
- Cleaned the SVE systems heat exchanger on 06/11/24.

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- Switched SVE system from blower #1 to blower #2 on 06/11/24.

**Plant Area Cell Building CMI Plan Scoping Memo and Associated Plans** (*dated Aug 7, 2019; DEP conditional approval Sept. 6, 2019*)

- Managed E&S controls maintenance.
- Submitted revised Plant Area Interim Closure Report to Maine DEP on July 16, 2021; Received Draft Dep Comments-Plant Area Interim Closure Report on Sept. 15, 2021.
- Plant Area Additional Soil Boring Work Plan submitted to Maine DEP on Dec. 16, 2021; Received approval with comments from Maine DEP on Jan. 3, 2022; Submitted revised Plant Area additional boring work plan to Maine DEP on Jan. 17, 2022; Received Maine DEP approval on Feb 2, 2022.
  - Drillers mobilized for soil borings & bedrock monitoring wells (Sevee led) on Feb. 14, 2022.
  - Draft Soil Boring logs were submitted to Maine DEP on May 3, 2022.

**Plant Area CMI Plan - Concrete and Utility Removal Scope of Work and Associated Plans**

- Draft Plant Area Concrete and Utility Removal Scope of Work Memo and drawings submitted to Maine DEP on 7/2/20; received Maine DEP approval on 7/24/20.
- Draft Plant Area CMIP
  - Concrete and Utility Removal-Addendum (CUR) submitted to Maine DEP on April 1, 2021.
  - Received correspondence from Maine DEP regarding modifications to the CUR Addendum on April 20, 2021. Resubmitted a Draft CUR Addendum 1 on Sept 27, 2021. Received a modified Plan approval letter from Maine DEP on October 4, 2021. Submitted a revised Draft CUR addendum 1 to Maine DEP on November 4, 2021. Received notification from Maine DEP on Dec 8, 2021, that Revised Draft CUR Addendum 1 was not acceptable.
  - Addendum 2 to Concrete and Utility Removal CMI Plan submitted to Maine DEP on March 1, 2022; Received Approval on Jan 3, 2023.
  - Discussed overall plans for the Catch Basin 6 Paved Sump CMI with Maine DEP on April 6 and 7, 2022. Submitted a Draft excavation plan for this area on April 22, 2022. Held a technical call with Maine DEP on April 27, 2022, to discuss and revisited the CUR addendum 1 with Maine DEP. Received Maine DEP approval to proceed with CUR Addendum 1- PA 11-1 and 11-2 and CB6-1 and CB6-2 on April 27, 2022.
  - Addendum 3 to the Concrete Utility and Removal CMI Plan submitted to Maine DEP on June 9, 2022. Portions of the Catch Basin #6 and Paved Sump area (CB6-1, CB6-2, CB6-3, and CB6-4) are being excavated under Addendum 3 to the Plant Area Concrete and Utility Removal (CUR) CMI Plan as approved by Maine DEP via email on June 2, 2022, and subsequent comments via memo on June 17, 2022
  - Addendum 4 to Plant Area Concrete and Utility Removal CMI Plan submitted to Maine DEP on Nov 2, 2023; Received letter from Maine DEP on Modification and Approval of Plant Area CMI Plan CUR Addendum 4 on Jan 4, 2024
  - Mallinckrodt provided an initial response to Maine DEP's letter of Jan. 4, 2024, on Feb. 5, 2024, and requested a meeting.
  - A meeting was held March 6, 2024, to discuss with Maine DEP.
  - Mallinckrodt provided a follow up response letter to the Maine DEP letter dated Jan. 4, 2024, and the technical meeting of March 6, 2024, on April 9, 2024

**Catch Basin #6 Paved Sump Correction Measures Implementation Plan** (*submitted on July 19, 2022*)

- Corrective Measures Implementation Plan (CMI) for excavation areas within overall limits of Catch Basin #6/ Paved Sump area as presented during our May 18, 2022, teleconference with Maine DEP.

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- To keep remedial excavations moving forward during preparation and DEP review of this CMI plan specific areas will be addressed under the CUR Addendum 3.
- Comments from Maine DEP received on Aug. 10 and 11, 2022.
- Responded to Maine DEP comments on Aug. 12, 2022.
- Maine DEP approval received on Aug. 24, 2022.
- Letter re: excavation limits in CB6-6, CB6-8, and CB6-10 submitted to Maine DEP on May 22, 2023.

**PA-5 Area** (*submitted as Addendum 2 to Concrete and Utility Area CMI plan; Received Maine DEP approval on Jan. 3, 2023*)

- Letter re: PA5-4 limits of excavation letter submitted to Maine DEP on May 23, 2023.
- “Approval” from Maine DEP on PA5-4 limits on May 31, 2023.

**Addendum 1 to Catch Basin #6/Paved Sump CMI Plan** (*submitted to Maine DEP on March 10, 2023*)

- Addendum 1 includes two excavation areas (CB6-14 & CB6-15) downgradient of former paved sump.
- Received letter from Maine DEP on June 2, 2023, responding to Mallinckrodt’s proposed Addendum 1 to the Catch Basin #6/Paved Sump CMI Plan with modifications.
- Provided an initial response on June 29, 2023, to the June 2, 2023, letter request to submit a report within 30 days detailing the work on the Cell Building Area that has been completed to date.
  - Submitted The revised Plant Area Interim Construction Closure Report which summarizes construction activities and additional closure activities completed to date in connection with the Cell Building remediation.
  - Received conditional approval from Maine DEP for Addendum 1 to the Catch Basin #6/Paved Sump CMI Plan on June 30, 2023.
  - Repaired access roads.
  - Conducted Site/shop maintenance.
  - Inspected E&S controls and performed maintenance as needed.
  - Conducted dewatering procedures as needed.
  - Performed maintenance on the SVE system.
  - Performed maintenance on the air monitoring systems.

**Schedule for Corrective Action in Remaining Plant Areas.**

- Maine DEP letter dated June 2, 2023, requested submittal of work plans for the remaining plant areas.
- Mallinckrodt submitted a response on July 20, 2023, expressing certain concerns and requesting a meeting with Maine DEP.
- Maine DEP letter received on July 31, 2023, requesting a detailed list of technical concerns and that a meeting be scheduled.
- Mallinckrodt provided a response on Aug. 31, 2023, detailing various technical concerns and provided available meeting dates.
- A meeting was held on Sept. 26, 2023, to discuss the Plant area.
- Maine DEP letter dated Oct. 2, 2023, requested Plant Area work plan be submitted by Nov. 2, 2023.
- Addendum 4 to Plant Area Concrete & Utility Removal CMI Plan submitted on Nov. 2, 2024.
- Agency Modification/Approval for Plant Area CMI Plan CUR Addendum 4 received on Jan. 4, 2024.
- Mallinckrodt responded on Feb. 5, 2024, and requested a meeting.
- A virtual meeting was held March 6, 2024, to discuss with Maine DEP.
- Mallinckrodt provided a follow up response letter to the Maine DEP letter dated Jan. 4, 2024, and the technical meeting of March 6, 2024, on April 9, 2024

**Northern Drainage Ditch** (*CMI Closure Report Nov. 27, 2017; DEP Approval Oct. 16, 2018*)

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- Continued to maintain erosion and sediment control measures.

**Southern Cove** (*CMI Closure Report Jan. 14, 2018, DEP Approval Aug 3, 2018*)

- Continued to maintain erosion and sediment control measures adjacent to the Cove.

**Short-Term Comprehensive Monitoring Plan** (*Revised ST CMP Feb. 24, 2017*)

- The Short-Term CMP includes monitoring of potential remediation impacts as well as ongoing monitoring of groundwater (GW), the GW extraction system (GWES) and Landfill 5.
- Conducted routine monitoring according to the Short-Term Comprehensive Monitoring Plan (CMP) during the week of April 23. April monitoring comprised monthly sampling of surface water and sediment in the vicinity of the Plant Area, and quarterly and semi-annual sampling in accordance with the Landfill 5 detection and assessment monitoring programs.
- Conducted routine monitoring according to the Short-Term Comprehensive Monitoring Plan (CMP) during the week of May 13. May monitoring comprised monthly sampling of surface water and sediment in the vicinity of the Plant Area.
- Conducted routine monitoring according to the Short-Term Comprehensive Monitoring Plan (CMP) during the week of June 24. June monitoring comprised monthly and quarterly sampling of surface water, sediment, and groundwater in the vicinity of the Plant Area, and quarterly monitoring according to the Landfills 1 and 3-5 GWES, Landfill 5, Site Perimeter, and Former Landfill 1 and Landfills 3-5 Vicinity monitoring programs.

**Groundwater Final GW Extraction System (GWES) Plan** (*Oct. 16, 2017; DEP Approval Jan. 9, 2018*)

- Following receipt of Maine DEP comments in the Final GWES design, submitted response and two revised drawings on Nov. 6, 2018, and received Maine DEP approval on Nov. 7, 2018, and began Final GWES construction on Dec. 3, 2018.
- Updated the force-main and electrical/communication conduit alignment and provided updated site plan to Maine DEP on Jan. 16, 2019. Maine DEP provided approval on Jan. 17, 2019.
- Continued management and maintenance of Final LF1 GWES

**Groundwater at Landfills 3,4,5** (*PD WP July 19, 2018*)

- Landfills 3-5 Bedrock Groundwater Testing Report and Extraction Design Plan (Design Plan) transmitted to Maine DEP on May 16, 2019. Maine DEP comments and conditional approval received June 13, 2019.
- Received Maine DEP approval on the Landfill 3-5 GWES design on Sept. 25, 2020.
- Began operation of Landfills 3-5 GWES on March 8, 2021.
- Continue management and maintenance of the LF 3-5 GWES

**Groundwater Model** (*Model Feb. 22, 2016, DEP Acceptance of Model Sept. 15, 2017*)

- No new activity

**Groundwater Treatment Plant (GWTP) Operation**

- Continued to collect mercury compliance samples from Outfall 001 (once per month with analysis per USEPA Method 1631) and Outfall 002 (one sample per quarter with analysis per USEPA Method 245.1) for transport to Katahdin Analytical Services (Katahdin) for analysis per the MEPDES permit dated May 3, 2019
- Provided support to CDM as necessary for ongoing remedial site activities including routine treatment of excavation/ construction water generated during remedial activities.
- The average daily flow for April through the GWTP was 56,527 gallons. The flows consisted of 178,888 gallons of dewatering with 84,519 gallons from the SSIT. There was no excavation

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dewatering for the month of April, only the TSSA's, which were precipitation. Total flow through the Plant was 1,695,821 gallons for January 2024.

- The average daily flow for May Through the GWTP was 51,807 gallons. The flows consisted of 101,006 gallons of dewatering with 62,117 gallons from the SSIT. There was no excavation dewatering for the month of May Total plant thru put was, 1,606,027 gallons for the May.
- The average daily flow for June through the GWTP was 52,975 gallons. The flows consisted of 123,879 gallons of dewatering with 61,180 gallons from the SSIT. There was no excavation dewatering for the month of June. Total plant thru put was, 1,589,252 gallons for June.
- Per the Woodard & Curran operator no TSS analysis was required during from April-June 2024.
- Provided support to Anchor QEA for their work associated with compiling Site data.
- Submitted the March 24 NetDMR, and the Toxscan Report on April. 2,2024. Submitted the April NetDMR and Toxscan Report on May 1, 2024. Submitted the May 2024 NetDMR, and the Toxscan Report on June 3, 2024.
- The generator turbo is in transit, still waiting for delivery.
- Contacted Carmel Electric to replace burned out exterior building lights, (Still waiting).
- Rewired electrical feed to raw water tanks.
- Cleaned float sections on the SSIT on/off sensor shaft.
- Pressure washed process area floors.
- Disconnected exterior line running to past Weir tank location.
- Removed from service and replaced expired pH reagents.
- Greased all pumps, motors, and compressor rotary lobe bearings.
- Replaced sticky SSIT vault door hinges and rusted doorknobs and vault handles. Upgraded alarm keypad due to off-hours visitors poking around the site.
- Pressure washed tanks and process area floor.
- Tuned up forklift.
- Disinfected SSIT and Silica tank, began to see algae forming on the CoMag weir.

**Other Site Activities**

- Completed routine site maintenance activities.

**A detailed summary of all results of sampling, tests, shipments from the Site and other data received by Mallinckrodt in the prior (previous) reporting period pursuant to this Order.**

- Air monitoring and meteorological data is collected continuously by the perimeter air monitoring system and stored in the computer system. Weekly reports are sent to Mallinckrodt. Mallinckrodt will notify the Maine DEP of exceedances in accordance with the updated notification protocol sent to Maine DEP on Aug. 28, 2018. An annual report of all data for the preceding year will be submitted to DEP by March 1 of the following year.
- Unvalidated data and laboratory reports are submitted to Maine DEP via the automated database system as they are available. Data validation is conducted by TechLaw as outlined in the Maine DEP approved Data Validation Protocol dated Jan. 29, 2018, and a summary of the validation results sent to Maine DEP and Mallinckrodt.
- Received laboratory analytical data from samples obtained in March according to the Short-Term CMP. Data were submitted to MEDEP following completion of internal quality control review.
- No laboratory analytical data were received in June. Data for June monitoring programs will be submitted to MEDEP following receipt of reports and completion of internal quality control review.

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**Completed Areas**

- Landfill Ridge Area (*CMI Closure Report Feb 3, 2017; DEP Acceptance Aug. 21, 2017*)
- Landfill 2 (*CMI Closure Report Dec 21, 2017; DEP Approval July 2, 2018*)
- Landfills 3, 4 and 5 (*CMI Closure Report July 25, 2017; DEP Acceptance Oct. 3, 2017*)
- Scrap Metal Yard (*CMI Closure Report July 25, 2017; DEP Acceptance Oct. 3, 2017*)
- Southerly Stream (*CMI Closure Report Nov. 15, 2017, DEP Approval Oct. 16, 2018*)
  - Continue to maintain erosion and sediment control measures and cap inspections as appropriate.

**A discussion of all tasks and actions scheduled for the coming reporting period including the date for initiating and completing such activities including percent completion where applicable.**

- Continue technical discussions with Maine DEP on remediation activities and pending submittals.
- Continue to include on-site Maine DEP oversight inspector in daily and weekly construction meetings.
- Continue to review the on-site Maine DEP oversight inspector emails outlining planned and completed activities to ensure no miscommunication.
- Continue operation of the perimeter air monitoring system.
- Continue stockpile management of excavated materials and loading railcars for shipment.
- Continue to maintain and improve erosion and sediment control measures and cap inspections as appropriate in completed areas listed above.
- Continue to monitor restored areas.

**Landfill 1** (*CMI Plan – Rev2 Apr 30, 2018; DEP Conditional Approval Letter May 10, 2018; CMI Plan – Rev2 May 17, 2018 (revised to incorporate all conditions in DEP CAL)*)

- Monitor and maintain restored areas as needed.

**Plant Area** (*Draft CMI Plan Feb 13, 2017; Phase 1 Excavation Memo Rev1 Jan 2, 2018; DEP Approval of Phase 1 Jan 9, 2018*) **and Plant Area CMIP - Phase 1A** (*(Retort-01 Area and Cell Building Pre-Trenching) DEP approval on July 12, 2019*)

- Submit monthly SVE monitoring data.
- Continue SVE operation and implement changes per SVE Optimization memo based on Maine DEP discussions approval and comments and ongoing monitoring results.
- Evaluate Soil performance monitoring data in the Chloropicrin areas and redevelop certain SVE wells.
- Conduct activities consistent with the SVE optimization plan.

**Plant Area Cell Building CMI Plan Scoping memo and associated plans** (*Aug. 7, 2019: DEP conditional approval Sept. 6, 2019*)

- Maintain erosion and sediment controls.
- Continue Ground water monitoring.

**Plant Area CMI Plan – Concrete and Utility Removal Scope of Work, Associated Plans, and Addendums**

- Draft Plant Area Concrete and Utility Removal Scope of Work Memo and Drawings submitted to Maine DEP on 7/2/20; Received Maine DEP approval on 7/24/20.

**Catch Basin #6 Paved Sump Correction Measures Implementation Plan** (*submitted to Maine DEP on July 19, 2022*)

- CB6 CMI Plan and PA5 CUR and CB6-Addendum 1 Areas
  - Conduct Site maintenance/ snow removal.
  - Conduct Dewatering procedures.
  - Continue to loadout soils as available.

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**Northern Drainage Ditch** (*CMI Closure Report Nov 27, 2017, DEP Approval Oct 16, 2018*)

- Continue to maintain erosion and sediment control measures.

**Southern Cove** (*CMI Closure Report Jan 14, 2018, DEP Approval Aug 3, 2018*)

- Monitor vegetation growth and maintain as needed.

**Short-Term Comprehensive Monitoring Plan** (*Revised ST CMP Feb 24, 2017*)

- Conduct Short-Term CMP remediation monitoring in accordance with the approved plan.
- Continue management and maintenance of GWES.

**Groundwater**

- Final GW Extraction System (GWES) Plan (*Oct 16, 2017; DEP Approval Jan 9, 2018*)
- Continue management and maintenance of LF1 GWES

**Groundwater at Landfills 3,4,5** (*PD WP Jul 19, 2018*)

- Continue management and Maintenance of Landfills 3-5 GWES operation.

**Groundwater Model** (*Model Feb 22, 2016, DEP Acceptance of Model Sept 15, 2017*)

- No planned activity

**Groundwater Treatment Plant (GWTP) Operation**

- Submit June 2024 NetDMR and Toxscans to MEDEP.
- Continue to support CDM, Sevee & Mahar, and Anchor QEA with ongoing remedial site activities as needed.
- Complete routine maintenance activities.

**Other Site Activities**

NA

**Tasks not completed as required, original and revised completion dates, reasons for delay, actions taken to minimize the delay and any other problems or anticipated problems.**

None



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**As of the end of June 2024 the quantity of waste shipped is shown below:**

**Leach Field – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 14 railcars, containing 1,379 tons (TSDf weight) of non-hazardous Leach Field soils, have been shipped off site to Republic facility in Niagara Falls, New York.

**Landfill Ridge – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 564 railcars, containing 55,158 (TSDf weight) tons of non-hazardous Landfill Ridge soils, have been shipped off site.
  - 534 railcars to the Republic disposal facility in Niagara Falls, New York
  - 30 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.

**Scrap Metal Yard – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 413 railcars, containing 40,556 tons (TSDf weight) of non-hazardous Scrap Metal Yard soils, have been shipped off site.
  - 412 railcars to the Republic disposal facility in Niagara Falls, New York
  - 1 railcar to the US Ecology Stablex disposal facility in Quebec, Canada.

**Northern Drainage Ditch – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 307 railcars, containing 29,440 tons (TSDf weight) of non-hazardous Northern Drainage Ditch soils, have been shipped off site.
  - 307 railcars to the Republic disposal facility in Niagara Falls, New York
  - 0 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.

**Southerly Stream – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 112 railcars, containing 10,583 tons (TSDf weight) of non-hazardous Southerly Stream soils, have been shipped off site.
  - 102 railcars to the Republic disposal facility in Niagara Falls, New York
  - 10 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.

**Landfill 2 – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 441 railcars containing Landfill 2 soils have been shipped off site to date.
  - 118 railcars of 11,557 tons (TSDf weight) of non-hazardous Landfill 2 soils
    - 108 railcars to the Republic disposal facility in Niagara Falls, New York
    - 10 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.
  - 323 railcars containing 31,497 tons (Site weight) of hazardous (listed waste) soils to the US Ecology Stablex disposal facility in Quebec, Canada

**Southern Cove – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 190 railcars containing 18,548 tons (TSDf weight) of non-hazardous Southern Cove sediments, have been shipped off site.
  - 190 railcars to the Republic disposal facility in Niagara Falls, New York
  - 0 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.

**Landfill 1 – Soil Excavation and Off-Site Disposal Is Complete**

- A total of 886 railcars of Landfill 1 soils have been shipped off site.
  - 676 railcars containing 66,111.70 tons (TSDf weight) of non-hazardous Landfill 1 soils.
    - 676 railcars to the Republic disposal facility in Niagara Falls, New York
  - 210 railcars containing 20,506.1 tons (TSDf weight) of hazardous Landfill 1 soils.
    - 210 railcars to the US Ecology Stablex disposal facility in Quebec, Canada

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**Plant Area Phase 1 – Soil Excavation and Shipments Are Complete**

- A total of 303 railcars containing 29,490.73 tons (TSDf weight) of non-hazardous soils have been shipped from the Site:
  - 283 railcars to the Republic disposal facility in Niagara Falls, New York
  - 20 railcars to the US Ecology Stablex disposal facility in Quebec, Canada.

**Plant Area Phase 1 A and Cell Building – Soil Excavation and Shipments Are Complete.**

- A Total of 707 rail cars of Plant Area Phase 1 A and Cell Building soils have been shipped off site.
  - 222 railcars containing 21,520.28 tons of non- hazardous soils (TSDf weight)
    - 221 railcars to the Republic disposal facility in Niagara Falls, New York
    - 1 railcar 97 tons to US ecology Stablex disposal facility in Quebec
  - 485 railcars containing 47,249.75 tons of hazardous Soils (site weight)
    - 485 railcars to the US Ecology Stablex disposal facility in Quebec, Canada

**Ongoing Plant Area Concrete & Utility Removal (CUR) and CB6 Paved Sump Soil Excavations & Shipments.**

- In Apr.-June 2024 0 rail cars of Plant Area CUR/ CB6 soils and concrete were shipped off Site.
  - 0 rail cars containing 1,168.75 tons Non-hazardous soils (site weight)
  - 0 Railcars containing 0 tons total CUR Haz (site weight)
- Totals Shipped to Date
  - A Total of 1501 phase CUR/ CB6 Non-Haz Cars.
    - 1501 railcars containing 146,244.10 tons total (site weight) Phase CUR/CB6 Non-Haz.
      - 1379 Railcars to the Republic disposal facility in Niagara Falls New York
      - 122 Railcars to Stabelex disposal facility in Quebec Canada.
  - A Total of 28 Phase IA/CUR Haz Cars.
    - 28 railcars containing 2,697.85 tons total (site weight) Phase IA/CUR Haz.
    - 28 Railcars to US Ecology Stabelex disposal facility in Quebec Canada.

**Elemental Mercury** (*see Attached Log*)

- 218 Lbs. total recovered since project inception.
- 0 Lbs. recovered in January- March 2024
- Shipments: NA

**General Debris**

- None.

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**Maine Hazardous Waste Fees** – Under the DEP Hazardous Waste Transporter Program, EQ Northeast, Inc. pays \$60/ton to the Maine Hazardous Waste Fund for hazardous wastes transported and disposed off-site. **Updated through Q2 2023. The total paid under this program is \$ \$6,080,151.00 (by rail) and \$ 1,800.00 (by Truck) Updated for Q4 2023**

- The 2nd Quarter 2017 report lists 13,150.65 tons of hazardous soil transported by rail and disposed off site for a total fee of \$789,039 which was paid 9/28/17.
- The 3rd Quarter 2017 report lists 14,125.95 tons of hazardous soil transported by rail and disposed off site for a total fee of \$847,557 which was paid 12/1/17.
- The 4th Quarter 2017 report lists 4,190.10 tons of hazardous soil transported by rail and disposed off site for a total fee of \$251,406 which was paid.
- On Nov 13, 2017, an additional 30 tons of hazardous waste was transported by truck and disposed off site for a total fee of \$1,800.
- The 1st Quarter 2018 report lists 0 tons of hazardous soil transported and disposed off site.
- The 2nd Quarter 2018 report lists 4,288.20 tons of hazardous soil transported by rail and disposed off site for a total fee of \$257,292 which was paid 8/22/18.
- The 3rd Quarter 2018 report lists 8,4170.10 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$ 505,026.00.
- The 4th Quarter 2018 report lists 7800.08 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$ 468,048.00.
- The 1st and 2nd Quarter 2019 report lists 0 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$ 468,048.00.
- The 3rd Quarter 2019 report lists 5,064.75tons of hazardous soils transported by rail and disposed of off site for a total fee of \$303,885.00/
- The 4th Quarter 2019 report lists 7,209.10 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$432,546.00.
- The 1st Quarter 2020 report lists 9547.5 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$572,850.00.
- The 2nd quarter 2020 report lists 8087.1 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$485,226.00.
- The 3rd Quarter 2020 report lists 7696.05 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$461,763.00.
- The 4th Quarter 2020 report lists 8963.7 tons of hazardous soils transported by rail and disposed of off site for a total fee of \$537,822.00.
- The 1st Quarter 2021 report lists 97 tons of hazardous soil transported by rail and disposed off site for a total fee of \$5,820.00.
- The 2nd Quarter 2021 report lists 16,275.12 tons of hazardous soil transported by rail and disposed of off site for a total fee of \$58,476.
- The 3rd Quarter 2021 report lists 389.8 tons of hazardous soil transported by rail and disposed of off Site for a total fee of \$23,388.
- The 4th Quarter 2021 report lists 1,333.45 tons of hazardous soil transported by rail and disposed of off Site for a total fee off \$80,007.

Maine Statute 1319-I requires transporters of regulated hazardous materials (per 49 CFR 172.101) by rail to pay 15 cents/ton on the shipments. As of Q4 2023, the total paid under this requirement is **\$ 75,405.42.**

**Additional information regarding the progress of the work**

- BeyondHoltraChem.com is periodically updated to reflect ongoing site activities.
- *On the Penobscot* newsletter is issued periodically to update area residents on the Site.

