

August 17, 2020

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

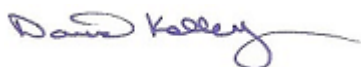
**Subject: Monthly Progress Report –July 2020
Orrington Remediation Site
Orrington, Maine**

Dear Mr. Swain:

This Monthly Progress Report is submitted to Maine Department of Environmental Protection (DEP) in compliance with reporting requirements in the Board of Environmental Protection (BEP) Order (Order) effective April 3, 2014 for the Orrington Remediation Site (Site) in Orrington, Maine, which incorporates, with modifications, the Compliance Order issued by the DEP dated November 24, 2008. This Report covers the period of **July 2020** and is submitted on behalf of Mallinckrodt US LLC.

If you have questions regarding this report, please contact me at 774-284-2207.

Sincerely,



David Kelley
Remediation Program Manager

cc: (all electronic copies)
Kelly Bay – Director, Orrington Town Library
Joseph Hayes- Interim Town Manager, Town of Orrington
Alan Snell– Chairman of Board of Selectman, Town of Orrington
Patricia Duft – Mallinckrodt US LLC
Susanne Miller – Maine DEP, Bangor
David Wright – Maine DEP

**MONTHLY PROGRESS REPORT
ORRINGTON REMEDIATION SITE
Orrington, Maine
July 2020**

Report Date August 17 , 2020

This Monthly Progress Report is submitted to the Maine Department of Environmental Protection (DEP) documenting the activities completed by Mallinckrodt US LLC (Mallinckrodt) and/or its representatives at the Orrington Remediation Site (the Site) along with a description of upcoming activities.

A discussion of all tasks and actions completed during the reporting period toward achieving compliance with the Order

- The monthly Mallinckrodt – Maine DEP call was Held on July 15, 2020 Aspects and DEP comments regarding the Plant Area Concrete and Utility removal CMI plan were discussed in detail. In addition, progress of work in the Cell building was discussed. Additional other discussions took place during the month to discuss Site activities as needed.
- Continued inspection and maintenance of site erosion and stormwater controls.
- Paved Sump Maintenance:
 - Inspection Dates 07/01, 07/06, 07/13, 07/14, 07/22, and 07/28.
 - Removed sediment accumulation upgradient of the paved sump on 07/29/2020.
- Maintained Log of quantities of any visual mercury recovered- **Attached**
- Disposal options for elemental Mercury have been evaluated and plans for disposal were discussed with Maine DEP. Disposal will occur after completion of the cell building excavations
- 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 Apr 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
 - Continued SVE system operation and groundwater monitoring
 - The system continued to operate all wells on one blower as the other blower was sent off- site for repair on June 11, 2020
 - Performed quarterly groundwater sampling.
 - Submitted SVE performance reported to Maine DEP on July 31,2020
- Plant Area Cell Building CMI Plan Scoping memo and associated plans August 7, 2019. DEP conditional approval September 6, 2019.

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- Continued excavation in Cell Building area:
 - Excavated interior Cells 2, 3, 4, 4A, 5, 6, 7, and 8.
 - Collected confirmation samples.
 - Partially backfilled Cells 1, 9, and 10.
 - H.B. Fleming extracted sheet piles along the western side of Cell-01.
 - H.B. Fleming removed anchors along the northern side of the Cell Bldg.
 - Constructed a new access ramp into the Cell Bldg.
 - Constructed a new decon pad.
 - Loadout soils from TSSA 1 and 2.
 - Dewatering and additional sumps installations
- Plant Area CMI Plan:-Concrete and Utility removal Scope of work and associated Plans.
 - Submitted the Draft Plant Area Concrete and Utility Removal Scope of Work Memo and drawings to Maine DEP on 7/2/20. Received Maine DEP approval on 7/24/20.
- Northern Drainage Ditch (CMI Closure Report Nov 27, 2017, DEP Approval Oct 16, 2018)
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 monitoring according to the Short-Term Comprehensive Monitoring Plan (CMP) during the week of July 13. July monitoring included monthly sampling of groundwater, surface water, and sediment in the vicinity of the Plant Area.
- 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 December 3, 2018.
 - Updated the force-main and electrical/communication conduit alignment and provided updated site plan to Maine DEP on January 16, 2019. Maine DEP provided approval on January 17, 2019.
 - Continued management and maintenance of Final GWES.
- Groundwater at Landfills 3,4,5 (PD WP Jul 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
 - Continued planning for Landfills 3-5 GWES. Activities in July included continued preparation of design drawings, specifications, and design memorandum.

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- 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 through the GWTP was 51,878 gallons with 129,486 gallons total from precipitation and construction related activities.
 - Per the Woodard & Curran Operator , Construction water quality continued to be exceptional throughout July with one TSS test required. Initial treatment flow into the plant was at 4135 mg/L TSS, that soon plummeted to below 200 mg/L. It was the first time we were able to run the new coagulant in higher TSS flows, it performed exceptionally well.
 - Switched the standby Mersorb bed online on July 6th.
 - Finished trial of polyaluminum chloride for use as a coagulant replacement. Results and documentation will be submitted to Mallinckrodt for review.
 - Continue to work on SCADA system upgrades
 - Provided support to Anchor QEA for their work associated with compiling Site data.
 - Submitted the June 2020 NetDMR to MEDEP on July 2, 2020
 - Submitted the June 2020 Toxheets on July 2, 2020
 - Completed all routine maintenance.

- 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 month) 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

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the Maine DEP approved Data Validation Protocol dated Jan 29, 2018 and a summary of the validation results sent to Maine DEP and Mallinckrodt.

- Conducted internal quality control review of data from June monitoring. Submitted EGAD EDDs and laboratory analytical reports to MEDEP on July 2.
- No laboratory analytical data were received in July. Data from July monitoring according to the Short-Term CMP are anticipated in early August. Data will be submitted to MEDEP following completion of internal quality control review

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 Jul 2, 2018)
- Landfills 3, 4 and 5 (CMI Closure Report Jul 25, 2017; DEP Acceptance Oct 3, 2017)
- Scrap Metal Yard (CMI Closure Report Jul 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 the 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.
- 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

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- 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
 - Maintain erosion and sediment controls.
 - Monitor status of repair of SVE blower #1

- Plant Area Cell Building CMI Plan Scoping memo and associated plans August 7, 2019 :DEP conditional approval September 6, 2019
 - Loadout soils from TSSA 1 and 2.
 - Continue Dewatering and additional sump installations as needed.
 - Excavate Test pits , TP-CELL-05, and TP-CELL-06).
 - Complete excavating Cells 6, 7, and 8.
 - Continue backfilling Cells after excavation completion
- Plant Area CMI Plan- Concrete and Utility Removal.
 - No activity

- 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
- Groundwater
 - Final GW Extraction System (GWES) Plan Oct 16, 2017; DEP Approval Jan 9, 2018)
 - Conduct monitoring according to the Short-Term CMP.
- Groundwater at Landfills 3,4,5 (PD WP Jul 19, 2018)
 - Finalize design of Landfills 3-5 area GWES. Prepare design memorandum, including drawings and specifications, for MEDEP review.

- Groundwater Model (Model Feb 22, 2016, DEP Acceptance of Model Sept 15, 2017)
 - No planned activity

- Groundwater Treatment Plant (GWTP) Operation
 - Continue compliance sampling of Outfall 001 and 002 per the MEPDES permit.
 - Complete routine maintenance activities.
 - Submit July 2020 NetDMR to MEDEP.
- Complete and submit to MEDEP the July 2020 Toxscan Report
- Prepare coagulant aluminum study submittal to Maine DEP.
- Continue to support CDM and Sevee & Maher with ongoing remedial site activities, as needed.

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- Continue/ Complete work on SCADA system upgrade
- Other Site Activities
 - Continue routine site maintenance activities.
 - Submit a response to Maine DEP June 24, 2020 response to Mallinckrodt's June 2, 2020 response to Maine DEP April 8, 2020 letter requesting establishment of a trust fund and other Financial assurance

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

As of the end of Q1 2020 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

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- 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: Sediment removal 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.
- **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 Soils excavation and shipments are ongoing**
 - In July 50 rail cars of Plant Area Phase 1 A and Cell Building soils were shipped off site
 - 23 rail cars containing 2,241 tons of non-hazardous soils(site weight)
 - 27 rail cars containing 2,630. tons of Hazardous soils(site weight)
 - A Total of 513 rail cars of Plant Area Phase 1 A and Cell Building soils have been shipped off site to date
 - 179 railcars containing 17,513.90 tons of non- hazardous soils (site weight)
 - 178 railcars to the Republic disposal facility in Niagara Falls, New York
 - 1 railcar to US ecology Stablex disposal facility in Quebec
 - 334 railcars containing 32,538.55 tons of hazardous Soils(site weight)
 - 334 railcars to the US Ecology Stablex disposal facility in Quebec, Canada
- **Landfill 1: Soil excavation and shipments 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
- **Elemental Mercury- see attached log.**
 - 420 Lbs. total recovered since project inception
 - 206 Lbs. recovered in June and July
 - Shipments: NA

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- **General Debris**
 - 07/06/20 – AIM RECYCLE METALS – 26,940 LBS.
 - Total Mercury Sample A=0.43
 - Total Mercury Sample B= 0.210

- **GWTP Sludge**
 - **None.**

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 Q1 2020. The total paid under this program is \$4,427,649.00 (by rail) and \$ 1,800.00 (by Truck)**

- 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.**

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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 March 31, 2020, the total paid under this requirement is **\$47,892.81**

Additional information regarding the progress of the work

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

