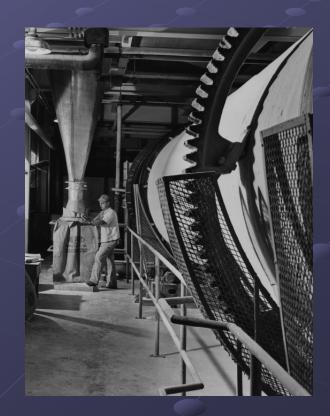


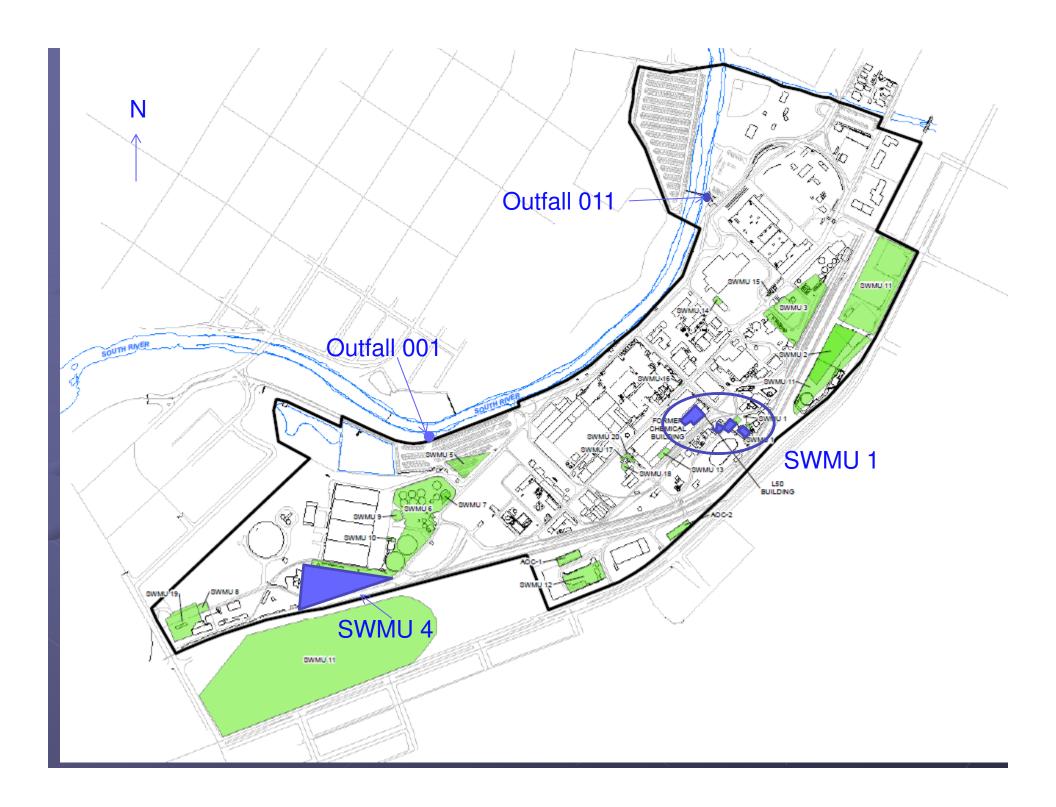
#### Background

- Plant Operations began in 1929 with manufacturing of acetate flake and yarn
- Mercury used from 1929 to 1950
- Orlon, Permasep, Lycra and BCF Nylon



## Background (cont.)

- RCRA Corrective Action Permit issued in 1998
- Assets sold to Koch Industries (Invista) in 2003
- Land will transfer to Invista upon completion of Corrective Actions



# RCRA Corrective Action Programs

- Plant RCRA Facility Investigation (RFI)
- Corrective Measures Study (CMS)
- Groundwater Monitoring Program
- Stormwater (Outfall) Monitoring
- Sewer Investigation
- Hg Inspection and Abatement Program

#### Recent Activities

- Interim Measures
  - Completed in Oct-Nov 2010 to cut off sources of Hg from sewers in former Hg operational area
- Phase III Sewer Investigation
  - Conducted from Sep-Dec 2010
  - Cleanout and video inspection

#### Interim Measures

- Sources of free mercury identified in RFI
- Objective:
  - To expedite the cleanup of mercury sources and eliminate the potential for mercury migration to the sewer



### Interim Measures - Scope

- Re-route roof drains to prevent flushing of source area
- Excavate and remove impacted steam trap that was connected to the sewer
- Vacuum out and abandon impacted solids pit that also was connected to sewer
- Clean out Pumphouse Sewer along Railroad Avenue

#### Interim Measures -Results

- Steam Trap Removed, connection to sewer sealed
- Roof drains re-directed to sewer along
  Middle Avenue via overhead structure
- Solids pits vacuumed, sealed and abandoned
- Pumphouse Sewer cleaned in conjunction with Phase III Sewer Investigation

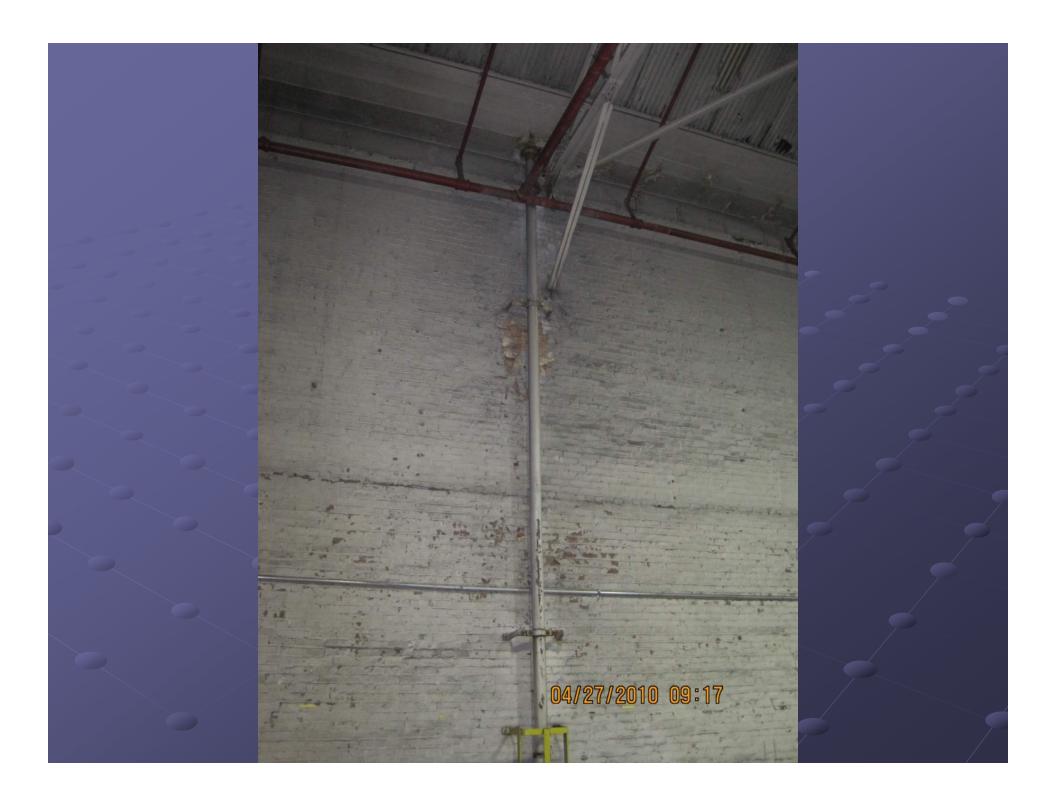


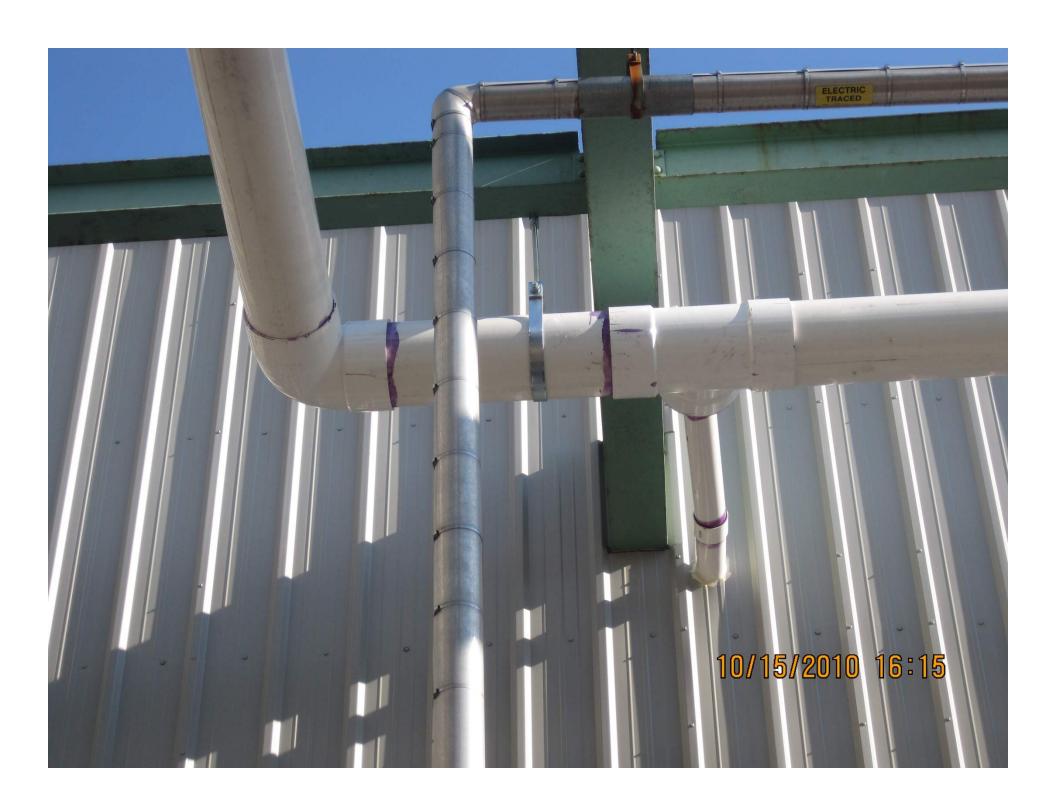
















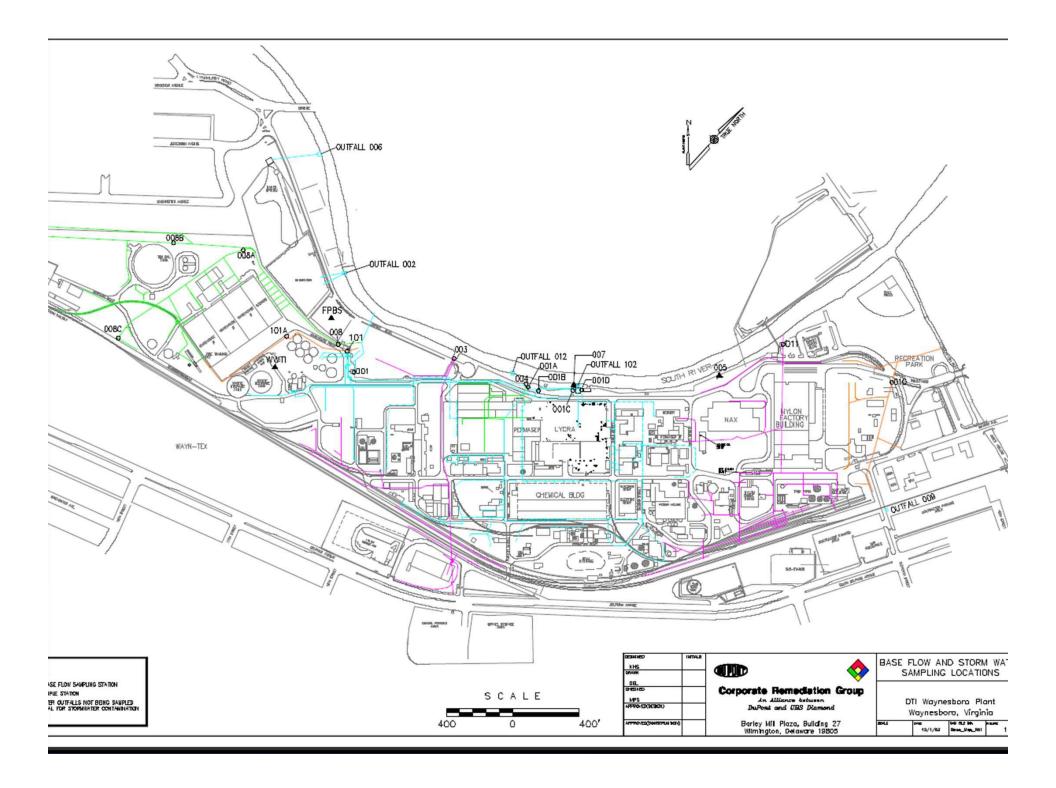


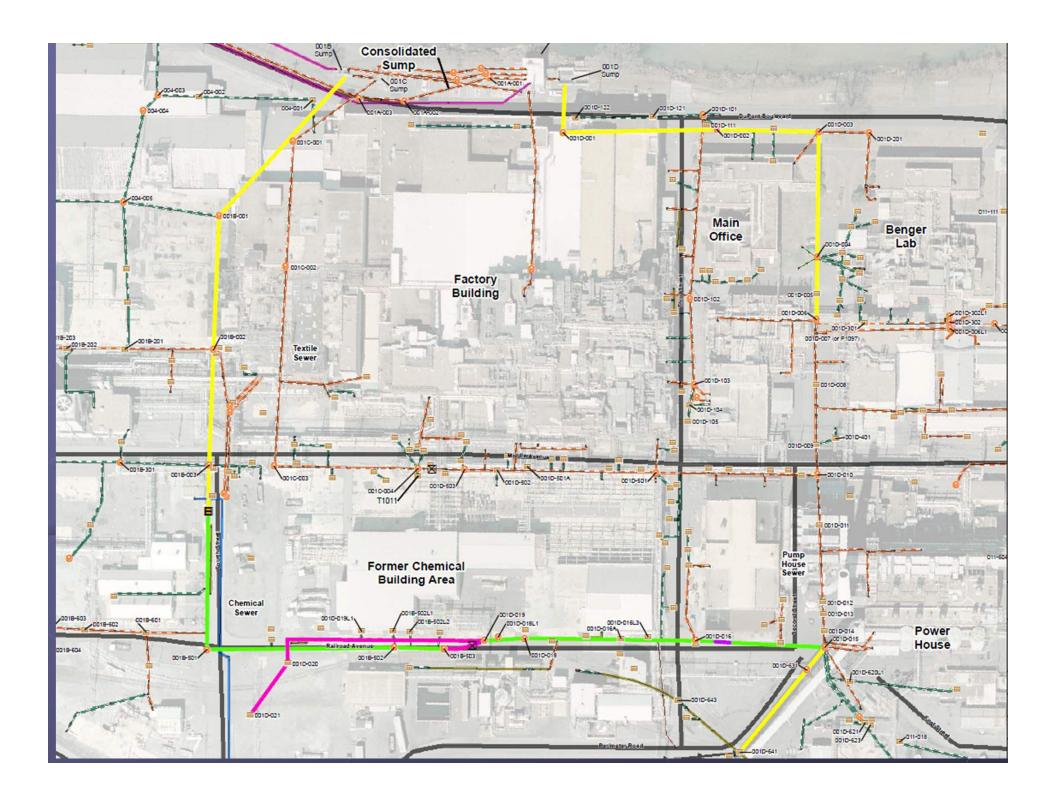


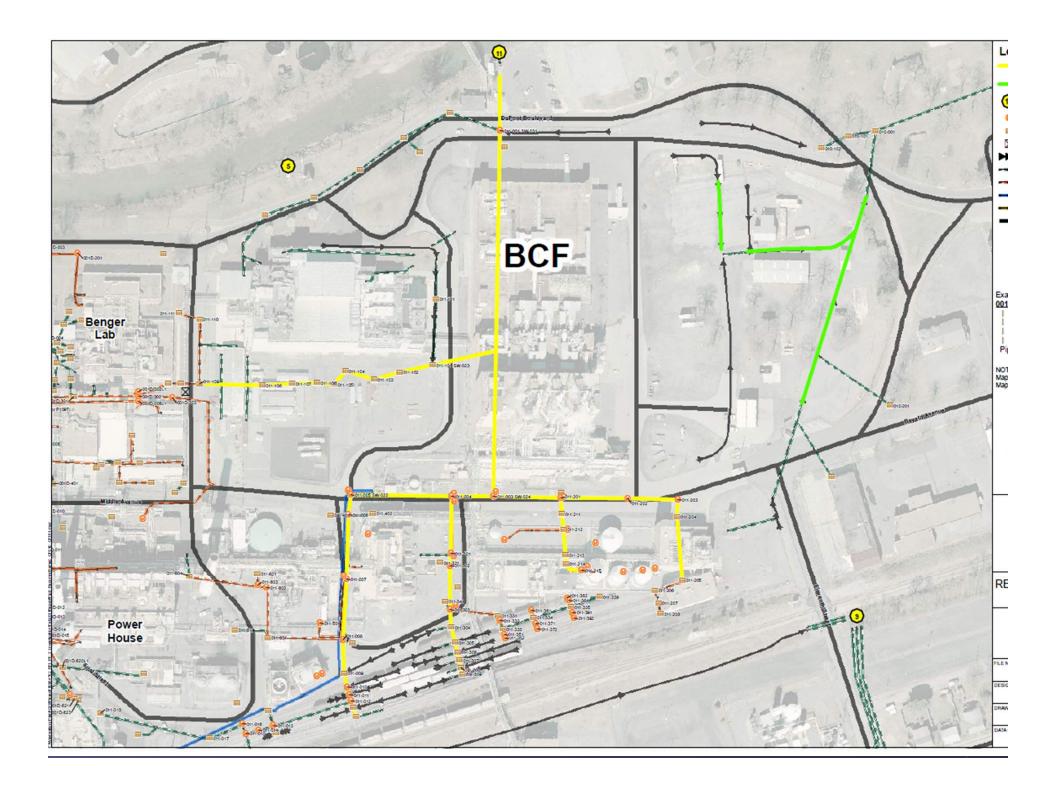


### Phase III Sewer Investigation

- Culmination of three phases of work in former mercury area (SWMU 1)
- Objectives:
  - Remove sediment and debris from sewers impacted by mercury
  - Characterize the sewers in mercury area via video inspection
  - Characterize other sewer systems where mercury has been detected







## Ph III Sewer Investigation - Scope

- Collect sewer water and sediment samples from drainage basins for Outfalls 003, 010 and 011
- Clean sections of Pump House Sewer (PHS) and Chemical Sewers along RR Ave
- Inspect sewers with CCTV

## Ph IIISewer Investigation-Results

- Collected 85 samples from 003, 010 and 011 basins
- Water concentrations up to 286 ug/l
- Sediment concentrations up to 156 mg/kg
- PHS and 011 sumps impacted by Hg
- Free mercury observed in debris jetted out of PHS and Chemical Sewer along Railroad Avenue

## Ph IIISewer Investigation-Results (cont.)

- Removed significant mass of Hg from system
- Jetted out approx. 27 cy of sediment and debris
- Post cleaning monitoring shows improvement in Chemical Sewer, temporary increase in PHS which has decreased









#### Conclusions

- IM and Sewer Work represent first major remediation effort at the plant
  - IM successful in eliminating specific sources of Hg from impacting the sewer
  - Sewer cleaning removed significant Hg mass from system
- No significant sediment sources of Hg were found in upstream reaches of 003, 010 and 011 basins

## Conclusions (cont.)

- PHS and Chemical Sewer most impacted
- Sections of PHS show cracking and deformation
- Numerous unused connections to PHS

#### **Future Activities**

- Recommendations from Sewer Investigation to be incorporated in overall site corrective action program
- Corrective Measures Study (CMS)
- NE Area well drilling
- Continue routine groundwater and outfall monitoring

