

# RCRA Corrective Action Program Update

Former DuPont Waynesboro Plant  
October 24, 2012



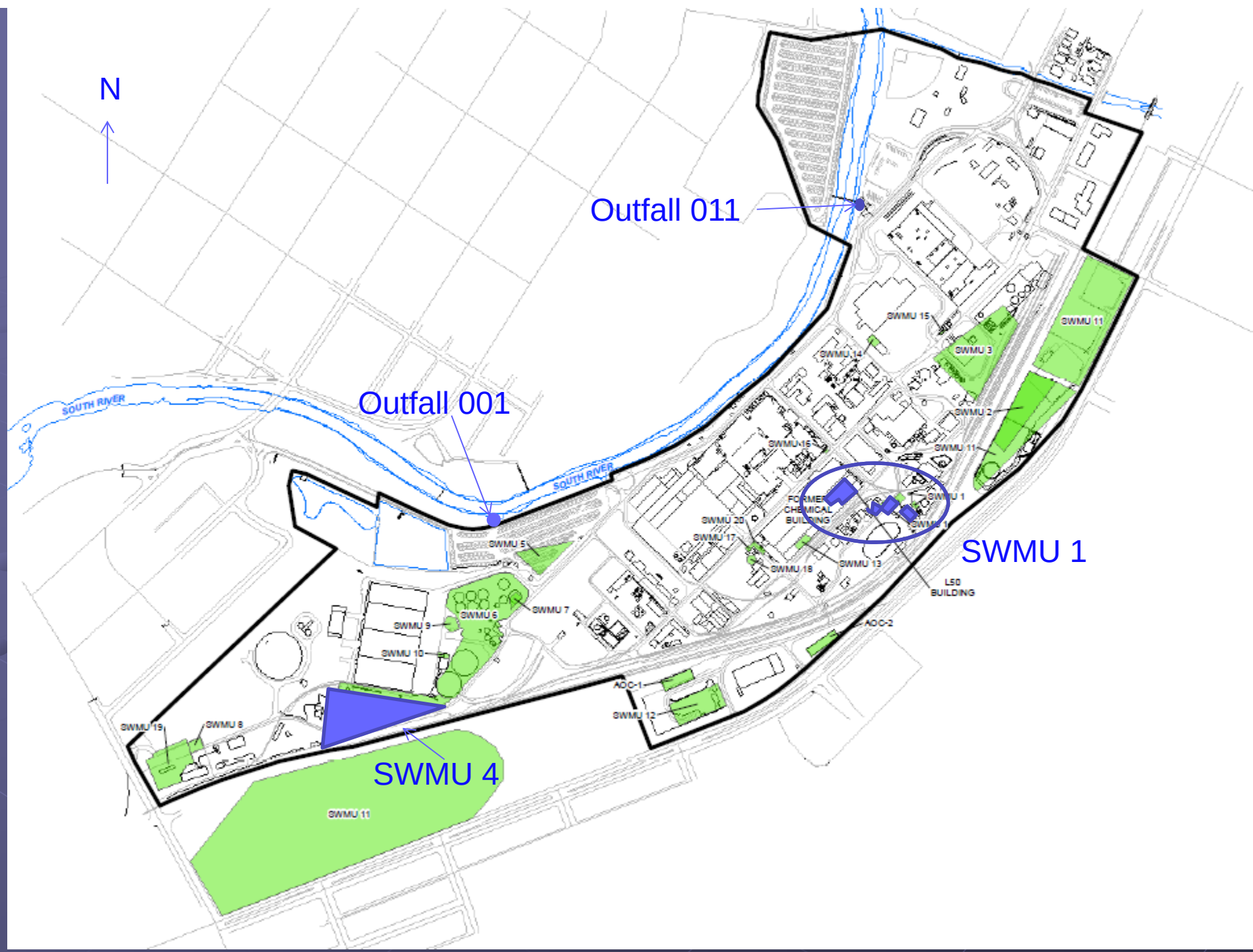
# Background

- 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 2004
- 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
- Interim Measures (IM)
- Hg Inspection and Abatement Program

# Completed Activities

- RFI – 2009
  - Report revised Aug 2012
  - Final Approval pending
- Sewer Investigation - 2010
- Interim Measures – 2010
- NE Area Supplemental Drilling - 2011

# Completed Activities (cont.)

## ● RCRA Facility Investigation

- Investigated 20 SWMUs and 2 AOCs
- Identified 3 SWMUs (1,4, and 7) for Corrective Measures Study
- Recommended continued GW monitoring and sewer remediation



# Completed Activities (cont.)

## ● Sewer Investigation

- Three phase program – mapping, CCTV, sampling and cleanout
- Sampled 85 structures, cleaned 1,967 ft of sewer, removed 27 cu yds of sediment.
- Removed approximately 521 kg (1,148 lb) Hg from sewer system
- Recommended abandonment, cleaning or re-routing impacted sections



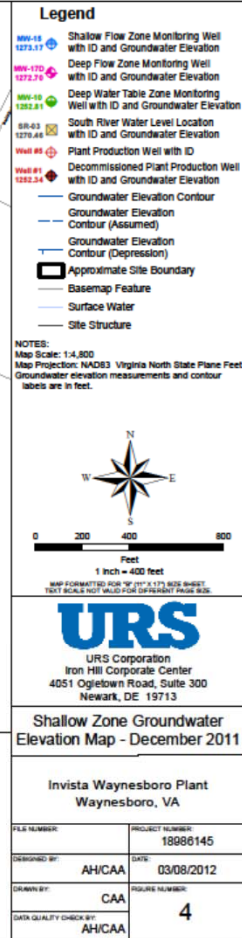
# Completed Activities (cont.)

## ● Interim Measures

- Removed and abandoned Hg sources connected to sewers
- Re-routed roof drainage that flushed through impacted trenches



# ● NE Area Supplemental Drilling - 2011



# ● NE Area Supplemental Drilling - 2011



# Completed Activities (cont.)

## ● NE Area Supplemental Drilling - 2011

- Objective – Determine if Hg was concentrating in bottom of structural depression
- Scope – Replace old wells with new specifically designed wells
- Results and Conclusions
  - Encountered hard quartzite at 51 feet
  - GW is adequately characterized
  - Hg is not accumulating or migrating

# Ongoing Activities

## ● Outfall Monitoring

- Quarterly baseflow sampling
- Semiannual storm events

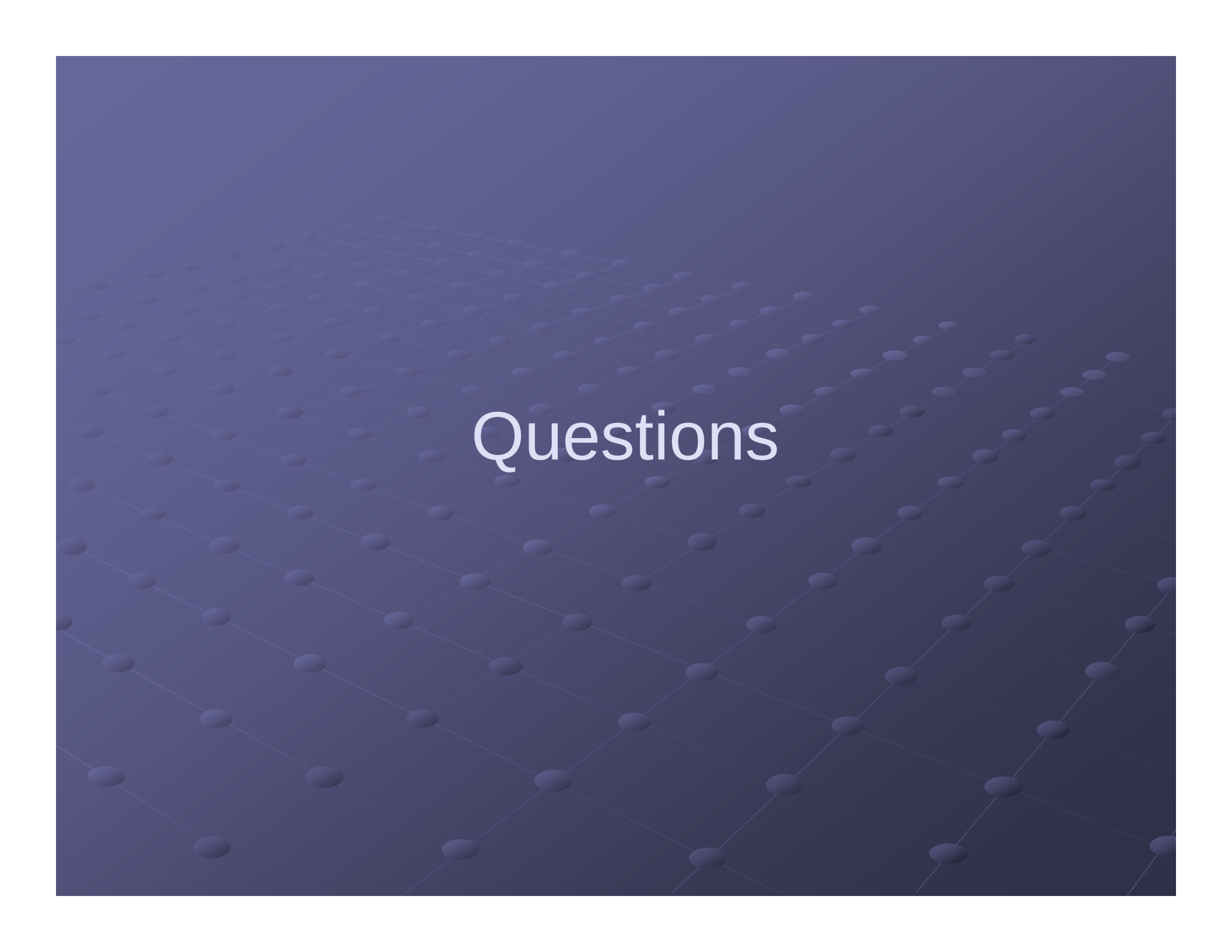
## ● Groundwater Monitoring

- Annual sitewide sampling
- Semiannual sampling in source areas

## ● Hg Inspection and Abatement

# Next Steps

- Proceed with CMS
  - Streamlined Process
  - Potential Remedies
    - Soil – removal, containment, institutional controls
    - Groundwater – institutional controls, diversion, gradient control, monitoring
    - Sewers – Abandonment, cleanout, re-route, monitoring

The background is a dark blue gradient. Overlaid on this is a 3D grid of small, rounded cubes or spheres. The grid is composed of thin, light blue lines that recede into the distance, creating a sense of depth. The cubes themselves are slightly darker than the background and are positioned at the intersections of the grid lines.

# Questions