UNITED STATES SURGICAL CORPORATION and MALLINCKRODT LLC	)	APPEAL OF DESIGNATION OF UNCONTROLLED HAZARDOUS SUBSTANCE SITE AND ORDER
ORRINGTON, PENOBSCOT COUNTY, MAINE PROCEEDING UNDER 38 M.R.S.A. § 1365	)	FINDINGS OF FACT AND ORDER ON APPEAL

Appendix B: Suggested Approach for Implementation of the Remedy

The following is a suggested approach for implementing the remedy required by this Decision in stages. The Department shall determine the appropriate sequence of tasks and modify the sequence as circumstances warrant. The work plans described below for various tasks would be prepared in separate documents with the work plans for the higher priority tasks given higher priority for review and implementation.

A. Stage 1: Highest Priority

Technical

- Develop and implement Site Security Plan.
- Develop a Health and Safety Plan.
- Modify and implement Sediment Prevention Plan.
- Develop and implement revised Comprehensive Site Monitoring Plan including a revised Quality Assurance Project Plan.
- Develop a Work Plan for, and implement the development of, a comprehensive calibrated 3-dimensional groundwater model for the Site to evaluate: (a) the feasibility of a slurry wall in the surficial materials of the western part of the Site, (b) the optimum arrangement of groundwater extraction wells along the western boundary of the Site, (c) the optimum arrangement of groundwater extraction wells around landfills 3-5 to capture residual carbon tetrachloride, (d) possible groundwater dewatering schemes should they be required to excavate contaminated materials from below the water table, and (e) the possible sources of the salt in the Ferry Road wells.
- Develop and begin implementing the Work Plan for the Removal and Disposal of the Southern Cove Contaminated Sediments.
- Develop the Work Plan for the onsite management of contaminated soils and offsite transportation and disposal of contaminated soils.

Administrative

- Develop financial assurance agreements and financial instruments.
- Name Project Management Team and Quality Assurance and Quality Control Team.
- Provide the required insurance coverage.
- Select the Third Party Inspector.

B. Stage 2: Second Priority (This stage should start upon the approval of all required Plans for Stage 1, completion and submission of groundwater modeling study, financial assurance agreement, and implementation of insurance coverage.)

- Implement any improvements to staging areas and transportation infrastructure necessary for temporary storage and offsite transport of contaminated soils and materials.

- Develop Plan and implement Pilot Testing for Extraction Wells.
- Develop and begin implementing Plan for geotechnical investigation and preliminary design for a potential slurry wall.
- Develop and begin implementing a Work Plan for a soils investigation beneath Landfills 1 and 2, followed by laboratory TCLP column tests to determine the capacity of soils under Landfill 1 to leach mercury, chloropicrin, carbon tetrachloride, or trichloroethylene in concentrations that would exceed the MPS.
- Develop and begin implementing a Work Plan for the Water Treatment Plant and related infrastructure upgrades.
- Develop and implement a Work Plan for evaluation of the existing conditions around and in Landfills 3-5 in preparation for the design of new RCRA Subtitle C covers for these landfills.
- Develop a Work Plan for the removal of contaminated soils and materials in the area northwest of Landfills 3-5.
- Develop a Work Plan for the demolition of the remaining above-ground abandoned industrial facilities at the Site.
- Develop a Work Plan for and implement the air monitoring related to Site soil removal activities, beginning with the Northwest Ridge area and Landfill 2.

C. Stage 3: Third Priority (This stage should begin after the approval of all required plans listed under Stage 2, completion of extraction well pilot tests, preliminary design of a slurry wall, and investigation of the current geometry and condition of the covers for Landfills 3-5.)

- Unless the decision has been made that a Slurry Wall is needed first, implement full extraction well array along western boundary of the Site. If a Slurry Wall is needed, do final design and implement construction.
- Implement full extraction well array in the vicinity of Landfills 3-5.
- Implement demolition of the remaining above-ground abandoned plant facilities at the Site.
- Implement the removal of contaminated soils and other materials in Landfill Ridge Area northwest of Landfill 4.
- Develop a Work Plan for and begin implementing the removal of the below-ground sewer lines.
- Begin Excavation and Removal of Landfill 2.
- Develop a Work Plan for and implement the identification of the volume of contaminated soils that must be removed in the plant area.
- Do Preliminary Design of the RCRA C covers of Landfills 3-5 and associated grading.

D. Stage 4: Fourth Priority (This stage should start after approval of all studies and decisions on the limits of excavation under Landfills 1 and 2 have been completed.)

- Begin Excavation and Removal of Landfill 1 and related components such as former lined process lagoon.

- Develop Work Plan for and implement the restoration of the Northerly and Southerly Streams.
- Develop Work Plan for and Implement the Removal of contaminated soils in the plant area and transformer area.

E. Stage 5: Fifth Priority (This stage should start after the characterization of soils in the plant area has been completed to identify those soils that require removal, and preliminary design has been approved of the RCRA Subtitle C covers for Landfills 3-5.)

- Do Final Design of the RCRA C covers for Landfills 3-5 and begin construction of new covers.
- Develop Work Plan for and implement the removal of contaminated soils in the plant area, including the Cell Building.
- Complete all other work contemplated under this Order but not mentioned specifically above.

The following general time frames should be followed in the development of work plans and implementation of remedies, unless otherwise specified.

- Mallinckrodt's time from the start of a Remedy Stage to the submission of a Work Plan or Preliminary Design should be 60 calendar days.
- Implementation time of any field or laboratory study or of any remedy described by a Work Plan would be based on implementation schedules as approved by the Department with each Work Plan.