



P.O. Box 191, U.S. Route 1 • Thomaston, Maine 04861 • 207-593-0100

November 8, 2023

Mr. Eric Hamlin
Department of Environmental Protection
Bureau of Remediation and Waste Management
Division of Solid Waste
17 State House Station
Augusta, Maine 04333

**Re: Dragon Products Company, Inc.
Quarry 5 Wastewater Reroute Project
Supplemental Response**

Dear Mr. Hamlin:

On December 9, 2022, Dragon Products Company, Inc. (Dragon) requested approval from the Maine Department of Environmental Protection (Department) to reroute sanitary wastewater currently flowing to the Quarry 5 Pumphouse, to the southwestern end of the Cement Kiln Dust (CKD) Pile interceptor trench toe drain system which discharges to the Thomaston wastewater treatment facility. Rerouting the wastewater stream directly to the CKD interceptor trench will eliminate the need for the continuous use of the Quarry 5 Pumphouse.

On March 1, 2023, the Department responded via E-mail (Parker to Martunas) requesting additional information on the installation design of the new piping. The following paragraphs address the Department's requests and provide additional details of the installation.

On June 23, 2023, Dragon responded to the Department's questions and provided additional information on the installation design of the proposed system.

Due to operational changes planned to commence by December 2023 at the Dragon facility, Dragon is now providing additional information highlighting the relevancy and importance of the Quarry 5 rerouting project.

On September 6, 2023, Dragon Products Company, Inc. (Dragon) publicly announced plans to gradually idle production operations at the Dragon facility, located in Thomaston, ME, beginning in December 2023. In a press release dated September 6, 2023, Dragon stated, "The phased employee separations are scheduled to commence in December 2023, with the process anticipated to conclude by the beginning of 2025."

The initial phase of process idling will begin with the Quarry, Raw Mill, and Kiln systems. Dragon anticipates these processes to cease operation in December 2023. There is no current expectation these processes will resume operation in 2024. Dragon's cement and Granulated Blast Furnace Slag grinding operations will continue through 2023 into 2024. Cement production through the milling system is anticipated to run through April 2024 and slag production is anticipated to run

through July 2024. Dragon's distribution process, which includes rail car and truck loading, and bagging operations, will continue to operate in 2024 until all cement and slag inventory is consumed.

The Quarry 5 Pumphouse receives a sanitary overflow wastewater stream from Dragon's onsite septic system, fed from four (4) buildings: the Change House, the Core Building, the Engineering Department, and the Main Office. Beginning in July 2024 Dragon will systematically shutdown each of these four (4) locations and move the remaining staff to a single administration building referred to as the Distribution Center (Distribution). The sanitary facilities of Distribution do not utilize the same septic system as the other four (4) locations, but rather has its own dedicated septic tank. This tank is routinely pumped out by a third-party septic disposal company. Under current routing conditions, the volume of sanitary overflow to Quarry 5 will be greatly reduced by the closure of the four (4) buildings, effectively eliminating the sanitary overflow wastewater stream to the Quarry 5 pump station.

Due to the uncertainty of future operations at the Dragon facility, Dragon is seeking approval to bypass the Quarry 5 Pumphouse by rerouting the sanitary conveyance system to combine it with the CKD interceptor toe-drain system as described in previous submittals. With the anticipated reduction of onsite maintenance staff, the rerouting project will eliminate the need for duplicative maintenance and operation of the Quarry 5 Pumphouse station while effectively managing wastewater through continuous operation of the leachate collection system. Rerouting the existing sanitary piping will accommodate current conditions (all sanitary areas) and anticipated future idling conditions. Accordingly, the proposed arrangement will accommodate any future decisions to re-engage areas currently anticipated for shutdown. Regardless of future operating scenarios under existing facility arrangement, the Quarry 5 Reroute project ensures that sanitary overflow will be routed and combined with the CKD leachate collection system and sent offsite to the Thomaston wastewater treatment facility.

Dragon appreciates your attention to this matter and requests confirmation of the Department's approval of this project. If you have any questions or concerns regarding the Quarry 5 wastewater rerouting project please contact me at (207) 593-0144.

Sincerely,



Michael Martunas
Environmental Manager
Dragon Products Company, Inc.

Enclosures

c.c Jason Goins (Dragon)
 Kathy Tarbuck P.E. (MEDEP)
 Brian Pierce, P.E. (SME)