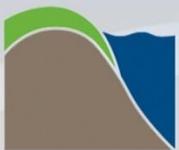


RCRA Closure Permit  
Renewal Application

Chemours Edgemoor Facility  
Edgemoor, Delaware

January 2020

Project No. 11139.EK



**DUFFIELD**  
**ASSOCIATES**  
Soil, Water & the Environment

EXISTING  
3-10-19  
DK 20  
AGD  
*Civil*

Water/Natural Resources

Geotechnical

Environmental

Construction Review

Coastal/Waterfront



## TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION .....	1
2.0 SITE HISTORY .....	1
3.0 SITE DESCRIPTION AND INFRASTRUCTURE .....	1
4.0 INCLUDED DOCUMENTS .....	2
5.0 PROPOSED SITE REDEVELOPMENT .....	3

### FIGURES

Figure 1	Facility Location Map
Figure 2	Monitoring Well Locations
Figure 3	Pre Decommissioning Facility Map
Figure 4	Active Solid Waste Management Units

### APPENDICIES

Appendix A	Post Closure Care Plan
Appendix B	Soils Management Plan
Appendix C	Closure Certification Report
Appendix D	Phase I Remedial Facility Investigation Report
Appendix E	Phase II Remedial Facility Investigation Report
Appendix F	Risk Assessment Report

### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Eugene R. Bailey  
Signature

\_\_\_\_\_  
Signature

EUGENE R. BAILEY  
Printed Name

\_\_\_\_\_  
Printed Name

EXECUTIVE DIRECTOR  
Title

\_\_\_\_\_  
Title

## **1.0 INTRODUCTION**

The purpose of this document is to serve as a Resources Conservation and Recovery Act (RCRA) closure permit renewal application for the former Chemours Edgemoor facility (“the Facility”), located at 4600 Hay Road, in Edgemoor, Delaware. The geographic coordinates of the Facility are 39.749223, -75.499822. The included Figure 1 depicts the Facility’s location.

The Facility currently is owned by Diamond State Port Corporation (DSPC), located at the Carvel State Office Building, 820 N. French Street, Wilmington, Delaware. DSPC acquired the Facility during February 2017. The Facility currently is operated by GT USA Wilmington, LLC, located at 1 Hausel Road, Wilmington, Delaware. GT USA Wilmington, LLC is a private entity. The Facility is not located on Indian lands.

## **2.0 SITE HISTORY**

As a successor to the E.I. du Pont de Nemours and Company (DuPont), the Chemours Company owned and maintained the Edgemoor Facility in accordance with the State of Delaware, Department of Natural Resources and Environmental Control (DNREC) approved Post-Closure Care Plan (PCCP). DSPC requested transfer of the RCRA Closure Permit at the time of the property transfer, assumed responsibility for post-closure care, and has continued to implement the DNREC-approved Post Closure Care Plan (PCCP). The Facility’s PCCP is included as Appendix A.

Impoundments A, B, C, and D were closed in 2004 under the DNREC Corrective Action Permit HW-03A16. The impoundments contain wastes (sludges) from sulfur and chloride processes, which were byproducts of titanium dioxide production at the former Chemours plant. Following closure, DuPont submitted a PCCP. This PCCP dictated requirements for inspection and maintenance of the closed surface impoundments, as well as sampling protocol for groundwater monitoring wells installed at the facility. DNREC has authorized the use of site-specific groundwater screening levels, which is discussed in the PCCP.

## **3.0 SITE DESCRIPTION AND INFRASTRUCTURE**

Ten groundwater monitoring wells were installed to support the PCCP. The wells are identified as MW-01, MW-02, MW-03, MW-04R, MW-05R, MW-06, MW-07, MW-08, MW-09R, and MW-10. Figure 2 shows the locations of the groundwater monitoring wells and the locations of the closed surface impoundments. Monitoring wells MW-01, MW-02, MW-03, MW-04R, MW-05R, MW-06, and MW-07 are located between the closed surface impoundments and the Delaware River. Monitoring wells MW-08, MW-09R, and MW-10 are located upgradient (inland) of the closed surface impoundments.

Production ceased at the Facility in 2015. Following the cessation of production, all production related and waste management equipment and infrastructure were decommissioned. Following decommissioning, these appurtenances were dismantled and

removed (e.g., above ground tanks, above ground piping, wastewater treatment equipment) or abandoned in place (e.g., underground piping). Buildings, potable water and fire water infrastructure were demolished and removed after DSPC acquired the Facility. A map showing the Facility's layout and building locations prior to decommissioning is included as Figure 3. The infrastructure remaining at the Facility is mostly limited to former foundations and underground piping. Few buildings currently remain at the Facility.

There are currently 14 active solid waste management units (SWMU's) at the Facility. See Figure 4 for the location of the active SWMU's. The closed surface impoundments mentioned above account for SWMU 6A, 6B, 6C, and 6D.

#### **4.0 INCLUDED DOCUMENTS**

##### **A. Post Closure Care Plan (PCCP)**

The PCCP for the four closed surface impoundments is included as Appendix A. The PCCP details monitoring and inspection procedures necessary for the closed surface impoundments. Post closure monitoring activities have been performed by Duffield Associates, Inc. (Duffield) from 2017 to present on the behalf of DSPC and GT USA Wilmington, LLC.

##### **B. Soils Management Plan**

The Soils Management Plan (SMP) for the Facility is included as Appendix B. The SMP is used to identify constituents of concern that may be present in the soil and groundwater at the Facility, as well as proper handling techniques if excavation is required. Functionally, the SMP has been, and will continue to be, used as a contaminated materials management plan (CMMP) for the Facility.

##### **C. Closure Certification Report**

The closure report for the four surface impoundments located at the DuPont Edgemoor Facility is included as Appendix C. The 2004 report includes construction and stabilization details relating to the surface impoundments at the Facility.

##### **D. Phase I and Phase II Remedial Facility Investigation Reports**

The Phase I and Phase II Remedial Facility Investigation (RFI) reports are included as Appendix D and Appendix E, respectively. The Phase I and Phase II RFI reports include information regarding hydrogeologic investigations, as well as investigations of specific SWMU's at the Facility.

E. Risk Analysis Report

The Risk Analysis (RA) report evaluates human health and/or ecological impacts from the releases from the regulated SWMU's on the Site. The RA report is included as Appendix F.

**5.0 PROPOSED SITE REDEVELOPMENT**

The Edgemoor Facility is the proposed location of the new Port of Wilmington container port. The proposed work is still in the design development phase. An initial concept of the future container port will be provided when available. The proposed site redevelopment activities will follow the requirements set forth in the PCCP and SMP (a.k.a. CMMP).

11139EK.0120-RCRAPermit.RPT

# FIGURES

# **APPENDIX A**

## **POST CLOSURE CARE PLAN**

# **APPENDIX B**

## **SOILS MANAGEMENT PLAN**

# **APPENDIX C**

## **CLOSURE CERTIFICATION REPORT**

# **APPENDIX D**

## **PHASE I REMEDIAL FACILITY INVESTIGATION REPORT**

# **APPENDIX E**

## **PHASE II REMEDIAL FACILITY INVESTIGATION REPORT**

# **APPENDIX F**

## **RISK ASSESSMENT REPORT**