U.S. Environmental Protection Agency
Fact Sheet #22

Standard Chlorine of Delaware (a.k.a. Metachem) Superfund Site
New Castle County, Delaware

EPA Seeks Public Comment on Proposed ROD Amendment

December 2015

EPA Announces its Proposed Amendment to the 1995 ROD

The U.S. Environmental Protection Agency (EPA) is announcing a proposed Record of Decision (ROD) Amendment for addressing off-site contaminated soils at the Standard Chlorine of Delaware (a.k.a. Metachem) Site located in New Castle County, Delaware. These off-site soils are referred to as Operable Unit-2 (OU-2).

EPA is proposing to modify a small component of the 1995 ROD that addresses the waste pile soils only. The proposed amendment will provide a more efficient permanent remedy for the OU-2 soils. **The modification would involve placing the OU-2 waste pile soils within the OU-3 multilayer cap currently being constructed.** It is not proposing any modifications to the wetlands remedy, which is the primary component of OU-2.

This fact sheet provides a brief summary of the proposed amendment.

If you would like to review the full proposed amendment, the document is titled **U.S. EPA Superfund Program Proposed Plan for Record of Decision Amendment. Standard Chlorine of Delaware Superfund Site.** It is available online at: www.epa.gov/arweb and www.epa.gov/superfund/standardchlorine.

Also, a paper copy of the draft proposed amendment is available at the Delaware City Public Library, located at 250 5th Street, Delaware City, DE.

Public Meeting

EPA will hold a public meeting to discuss the Proposed ROD Amendment

Tuesday, Jan. 12, 2016
6:30 p.m. - 8:30 p.m.
at the
Delaware City Fire Hall
815 5th Street
Delaware City, DE 19706

Your Role in the Process

Community involvement is critical to EPA's decision making process. To make sure the community has a chance to comment on the proposed amendment, there is an official 30-day public comment period.

The Proposed ROD Amendment Public Comment Period is from Jan. 3, 2016 until Feb. 1, 2016

Comments can be submitted:

- ✓ By mail,
- ✓ By e-mail,
- ✓ Or in person, at the upcoming public meeting regarding EPA's Proposed ROD Amendment.

See page 3 for contact information.

Proposed Amendment Summary

EPA's cleanup at the Site is separated into 4 operable units (OUs).

- OU-1 addresses the short-term, or "interim" groundwater remedy;
- OU-2 addresses historic spill soils and sediments specified in the 1995 ROD;
- OU-3 addresses the former facility; and
- OU-4 addresses the future, final groundwater remedy.

The 1995 ROD lists bioremediation and/or **low temperature thermal desorption (LTTD)** as the cleanup remedy for the soils in the former waste piles and wetland sediments. After a pilot study test deemed bioremediation ineffective to meet cleanup goals for the higher contaminated materials, EPA planned to implement the LTTD remedy. (EPA still continues to evaluate bioremediation for the lesser-contaminated sediments).

In 2007, as part of the OU-1 groundwater cleanup remedy, EPA installed a sub-surface barrier wall to help contain the onsite contaminated groundwater plume. Because the waste pile soils were directly in line with the path of the subsurface barrier wall, EPA constructed a protective **temporary soil storage area (TSSA)** where the piles were relocated, to be addressed at a later date. EPA also consolidated contaminated soils encountered during construction of the barrier wall into the TSSA.

In 2010, the OU-3 ROD was signed, outlining EPA's cleanup plans for the former facility area through capping, active soil gas collection and treatment, and institutional controls.

Construction of the OU-3 remedy is currently underway. **EPA is now proposing that the OU-2 waste pile soils in the TSSA be placed within the OU-3 multilayer cap.**

The rationale for the proposed modification incudes:

✓ Feasibility: The contaminants and their concentrations found in the soils within the TSSA are consistent with what is found in the OU-3 soils that are being capped.

✓ Costs: The cost of placing the soils within TSSA under the cap is considerably less than the cost of the LTTD remediation.

LTTD cost estimates for addressing just the TSSA are approximately $5.8 million. Combining the TSSA soils into the materials already being capped would cost approximately $300,000.

EPA has received funding for the OU-3 multilayer cap, which is currently being constructed. EPA has not yet received funding for future OU-2 work.

Photo Below: North side of the TSSA

Summary continued…

✓ Time: The cap project is currently underway; equipment and personnel are already onsite, so the waste pile soils within the TSSA can be addressed in a matter of months.

If the TSSA is addressed later with the remainder of the OU-2 sediment component, timing will depend on completing the OU-2 Remedial Design phase and receiving funding to implement that remedy.

✓ Protectiveness: The shorter amount of time it would take to have a permanent remedy in place for the waste pile soils is more protective of human health and the environment when compared to prolonging the current, temporary remedy in place.

The TSSA was constructed to temporarily store the waste pile soils and contaminated soils from the barrier wall project. It is not meant to serve as a permanent remedy.

The OU-3 cap will provide a permanent barrier between contaminated soil and the environment. Vapors coming off the contaminated soil will be captured and treated.

EPA's Nine Criteria Analysis

Before EPA can adopt an amendment to a ROD, the modification is evaluated using nine criteria to make sure that EPA's selected cleanup plan is still protective. The nine criteria are:

1. Overall Protection of Human Health and the Environment
2. Compliance with Applicable or Relevant and Appropriate Requirements
3. Long-term Effectiveness
4. Reduction of Toxicity, Mobility, or Volume through Treatment
5. Short-term Effectiveness
6. Implementability
7. Cost
8. State Acceptance
9. Community Acceptance

At this point, EPA has fully evaluated the first seven of the nine criteria. Only after considering input from state officials and the community regarding the proposed amendment, will EPA make a final decision. Submit your comments about EPA's proposed amendment by February 1, 2016.

Next Steps

After the public comment period has ended, EPA will publish responses to the comments received in a report called a Responsiveness Summary (RS). The RS will be available for public review as part of the ROD Amendment document.

Mail comments (postmarked no later than February 1, 2016) to:

U.S. Environmental Protection Agency
Region III Office
1650 Arch Street (Mailcode 3HS22)
Philadelphia, PA 19103
Attn: Brad White, RPM

Or, send comments by e-mail to:
white.brad@epa.gov or taylor.trish@epa.gov

Site Background

- The Standard Chlorine of Delaware (a.k.a. Metachem) Superfund Site is a former chemical manufacturing plant located in an industrial area in New Castle County, DE, three miles northwest of Delaware City.

- Chlorinated benzene compounds were made on the 65-acre Site from 1966 to 2002. As a result of those activities, chlorobenzenes from spilled materials have been found in the groundwater, soils, sediments and surface water. Wetlands near the Site are also impacted.

- The Delaware Department of Natural Resources and Environmental Control (DNREC) has provided 10 percent cost share for cleanup actions and will provide long-term monitoring oversight.

For More Information

For more information on the Standard Chlorine of Delaware Superfund Site, visit the websites listed below:

- EPA Standard Chlorine of Delaware Superfund Site webpage: www.epa.gov/superfund/standardchlorine.

- EPA Administrative Records database: www.epa.gov/arweb.

Standard Chlorine of Delaware Superfund Site Proposed ROD Amendment **December 2015**

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