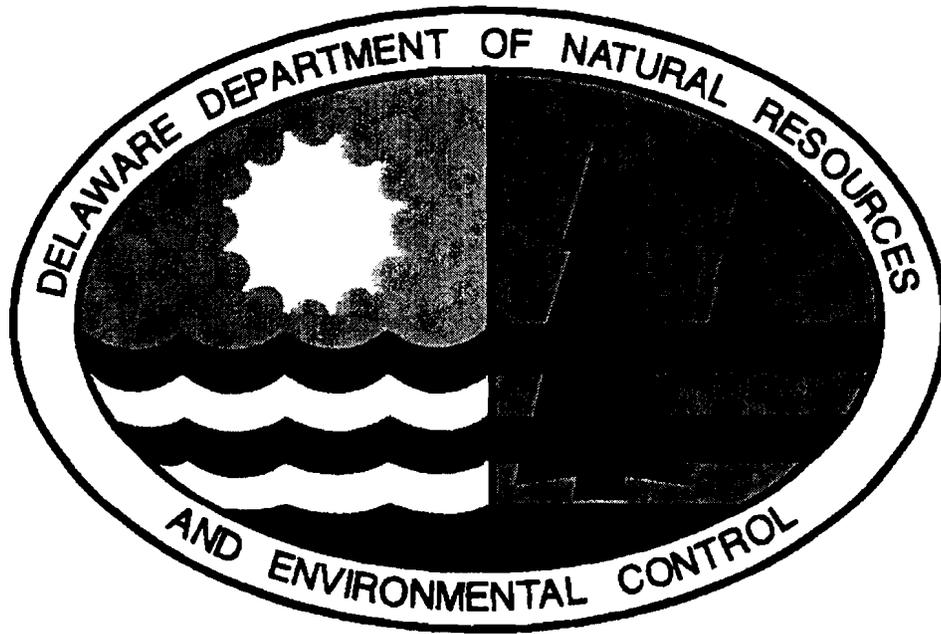


Final Plan of Remedial Action

Budd Metal Company Site



July, 1996

Department of Natural Resources and

Environmental Control

Site Investigation and Restoration

Branch

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Final Plan of Remedial Action Budd Metal Company Site

Introduction

The Department of Natural Resources and Environmental Control (the Department) issues the Final Plan of Remedial Action under the provisions of the Delaware Hazardous Substance Cleanup Act (HSCA) and the Delaware Regulations Governing Hazardous Substance Cleanup (the Regulations). The Final Plan presents to the public the Department's final selection of remedial activities to occur at the Budd Metal Company, Inc. site, Wilmington, Delaware.

Background

In March, 1995, the Department under the authority granted by the Hazardous Substance Cleanup Act (7 Del. C., Chapter 91) reached an agreement with the current owner of the Budd Metal Company, Inc., Mr. Isaac Buddovitch (the Potentially Responsible Party) to perform a Remedial Investigation/Feasibility Study (RI/FS) of the soil and groundwater at the Budd Metal Company site (hereinafter "the site").

The site is located in a low-lying industrial area southeast of the city limits of the City of Wilmington, Delaware. The RI/FS was conducted consistent with the Delaware Regulations Governing Hazardous Substance Cleanup (HSCA), Delaware Standard Operating Procedures (SOP) for Chemical Analytical Programs (CAP), the Guidance Document and other Departmental policies or procedures.

The data generated during the RI confirmed the findings of previous studies of the site. Specifically, the data confirmed that elevated levels of lead are present in the uppermost levels of the fill soils in the western portion of the site. Petroleum hydrocarbons, PCB's and PAH compounds are also present sporadically in areas with elevated lead levels. Elevated levels of petroleum hydrocarbons and PCB's are present in the area of the former transformers, and petroleum hydrocarbons are present at elevated levels in the sediments in the drainage swale. In addition, elevated levels of lead and PAH's were detected in an area of the eastern portion of the site. Based on the results of the RI/FS conducted for the site, the Department has determined that the site does pose a threat to human health and the environment. The Department, therefore, recommends that remedial action is required at the site.

Proposed Remedial Action

Remedial Action is defined in the Regulations as “the containment, contaminant mass or toxicity reduction, isolation, treatment, removal, cleanup, or monitoring of hazardous substances released to the environment, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate harm or risk of harm to the public health, welfare, or the environment which may result from a release or an imminent threat of a release of hazardous substances”.

The proposed remedy for this site consists of the following:

- 1) Excavation, stabilization and removal of PCB bearing soils to a regulated hazardous waste facility.
- 2) Excavation and stabilization of lead bearing site soils and placement back on-site.

Groundwater contamination (TPH) has been documented in the shallow, unconfined (Columbia) aquifer on site, particularly in the north/central portion of the site, near the service garage. Restriction of groundwater use in the unconfined aquifer in the vicinity of the service garage is required to eliminate the potential for adverse exposures to humans from consumption of contaminated groundwater. Therefore, DNREC will establish a groundwater management zone (GMZ) for the site. DNREC has determined that TPH levels in groundwater, in exceedence of 10ppm, shall constitute as free product. Should the elevated levels of TPH in the groundwater, in the vicinity of the service garage, decrease to less than 1ppm following 2 years of successive groundwater monitoring, then DNREC shall eliminate the GMZ from the site. Should the level of TPH in the groundwater in the vicinity of the service garage exceed 10ppm following 2 successive groundwater monitoring years, then DNREC shall require remediation be undertaken for the groundwater.

Proposed Plan and Public Participation

The Department drafted a Proposed Plan of Remedial Action for the site and recommended that above mentioned remedial actions take place at the site. The Department provided public notice in the News Journal and Delaware State News on July 14, 1996. During the comment period, the Department received no objections to the Proposed Plan. Therefore, the Final Plan of Remedial Action was issued designating the selected remedies and stipulations concerning current and future activities.

Declaration

The Final Plan of Remedial Action for the Budd Metal Company, Inc. site is protective of human health, welfare, and the environment and is consistent with the requirements of the Delaware Hazardous Substance Cleanup Act.


Nicholas A. Di Pasquale
Division of Air and Waste Management

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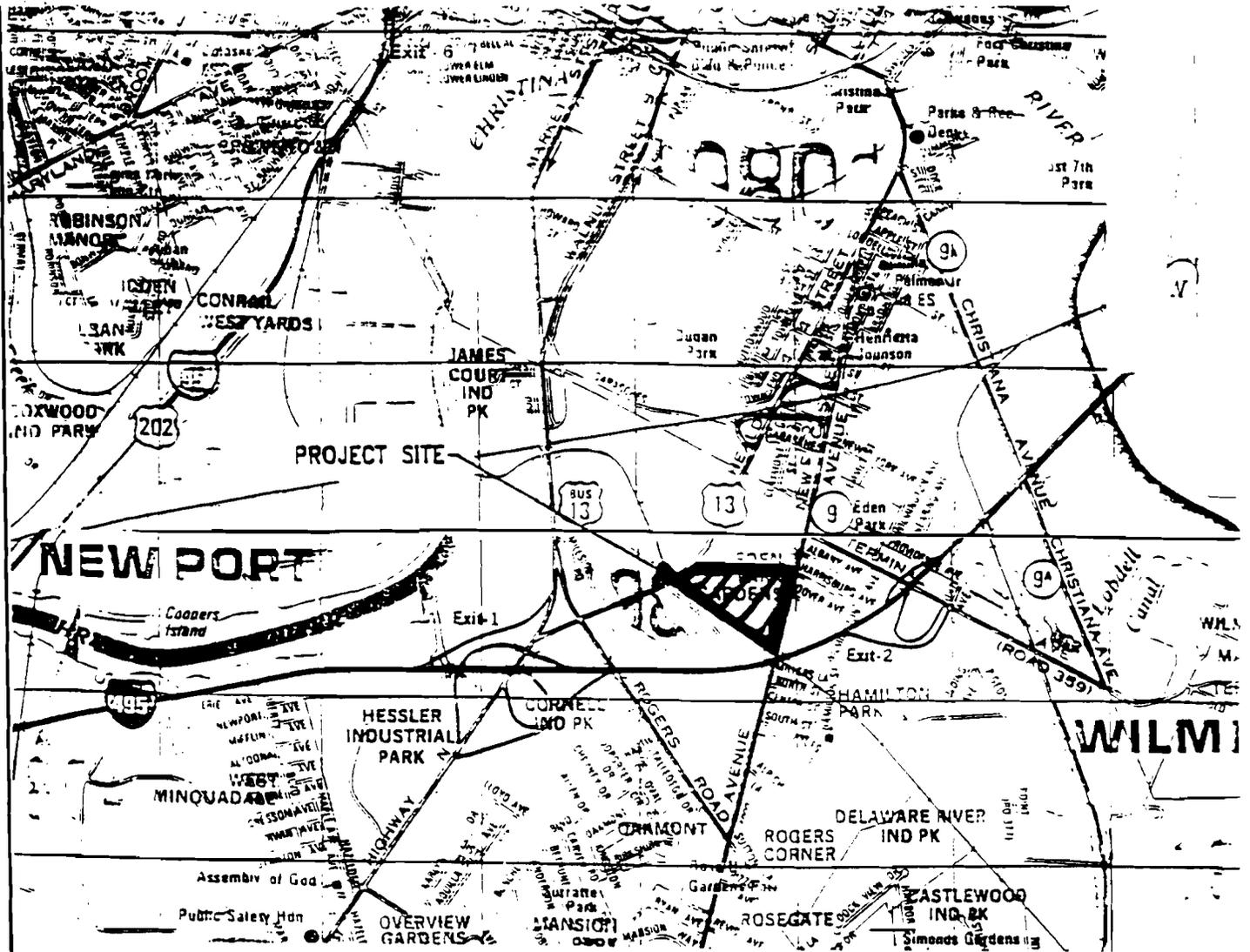
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Figure 1: Site Location Map

Figure 2: Site Map

Figure 3: Groundwater Management Zone Map

Figure 4: News Journal Newspaper Legal Notice



NOTE:

THIS LOCATION SKETCH IS ADAPTED FROM "ADC'S STREET MAP OF NEW CASTLE COUNTY, DELAWARE," PREPARED BY ADC OF ALEXANDRIA, INC., MAPS NO, 8 AND 13, AND DATED 1992.

**SITE LOCATION SKETCH
BUDD METAL COMPANY**

WILMINGTON
NEW CASTLE COUNTY, DELAWARE

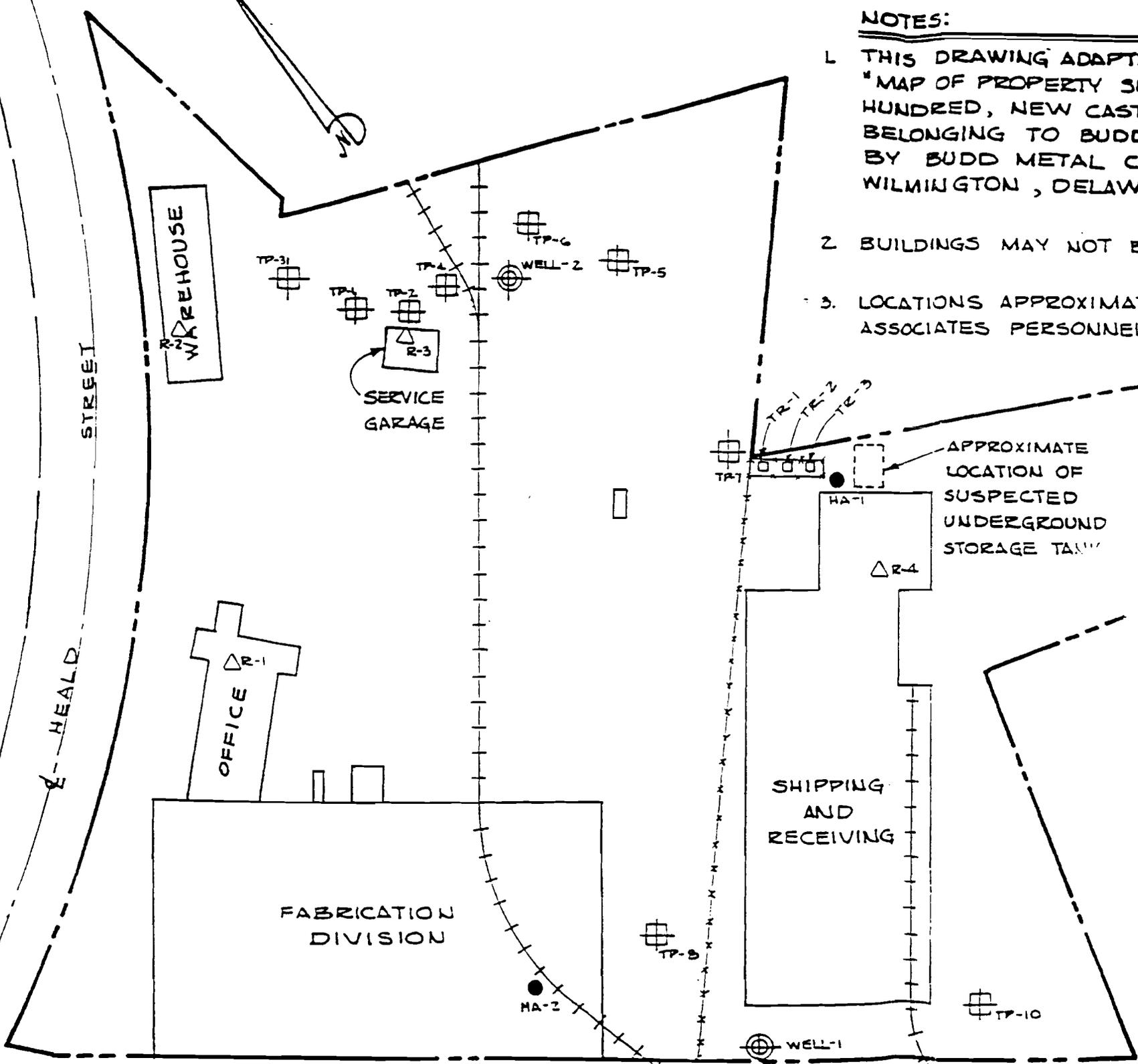


DUFFIELD ASSOCIATES, INC
CONSULTANTS IN THE GEOSCIENCE
WILMINGTON, DELAWARE ELKTON, MARYLAND

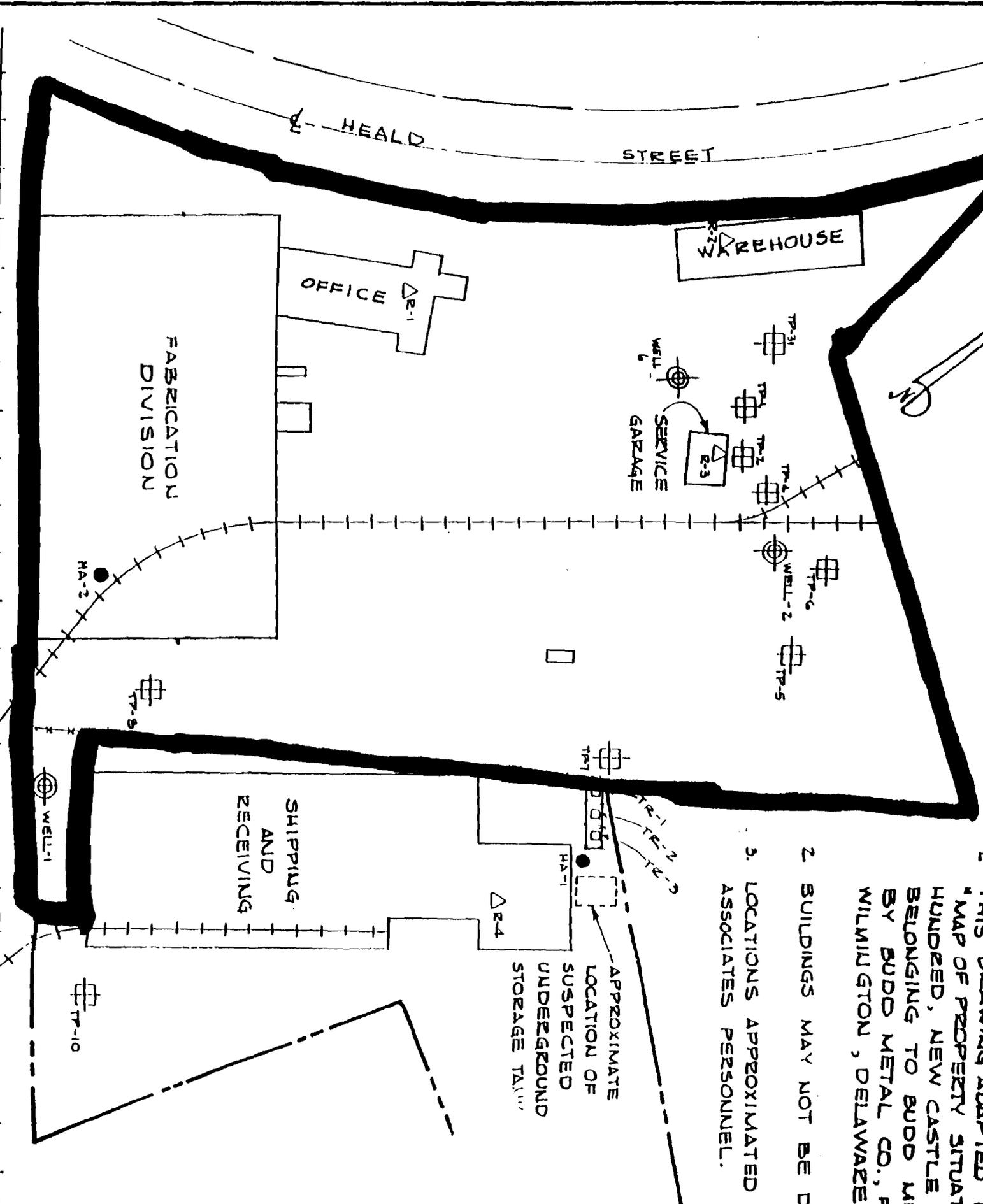
Drawn: DSH	Chk'd:	Date: 28 SEPTEMBER 19
Scale: 1" = 2000'		W.O.: 1451.E
File No: A-1451E-1		FIGURE 1

NOTES:

1. THIS DRAWING ADAPTED FROM "MAP OF PROPERTY SITUATED AT 100 HUNDRED, NEW CASTLE COUNTY, DELAWARE, BELONGING TO BUDD METAL COMPANY, BY BUDD METAL CO., FABRICATORS, WILMINGTON, DELAWARE, 1980."
2. BUILDINGS MAY NOT BE DRAWN TO SCALE.
3. LOCATIONS APPROXIMATED BY BUDD METAL COMPANY ASSOCIATES PERSONNEL.



WILMINGTON & NORTHERN P. R.



1. THIS DRAWING ADAPTED FROM MAP OF PROPERTY SITUATED HUNDRED, NEW CASTLE COUNTY BELONGING TO BUDD METAL CO., FARM WILMINGTON, DELAWARE, 1951.
2. BUILDINGS MAY NOT BE IDENTICAL TO THOSE OF BUDD METAL CO. ASSOCIATES PERSONNEL.
3. LOCATIONS APPROXIMATED BY BUDD METAL CO. ASSOCIATES PERSONNEL.

Figure 4

**PROPOSED PLAN OF
REMEDIAL ACTION
FOR THE
BUDD METAL COM-
PANY SITE**

The Delaware Department of Natural Resources and Environmental Control (the "Department") Announces The Release of the Proposed Plan of Remedial Action for the Budd Metal Company Site located southeast of the city limits of the City of Wilmington, under the authority of the Hazardous Substance Cleanup Act (HSCA).

In March 1995, the Superfund Branch (now known as the Site Investigation and Restoration Branch) of the Delaware Department of Natural Resources and Environmental Control (DNREC) reached an agreement with the current owner of the Budd Metal Company site to perform a Remedial Investigation/Feasibility Study (RI/FS) of the soil and groundwater at the Budd Metal Company site. The purpose of the RI/FS was to determine the nature and extent of surface and subsurface contamination at the site, identify potential sources of contamination, evaluate risks to the public and environment associated with the identified contamination, and to identify, evaluate and recommend a remedial action, if necessary. Based on the results of that RI/FS, the preferred Plan of Remedial Action for the site would include the removal of some of the soils to a secure hazardous waste facility, remediation of the lead bearing soils, (transporting them to an on-site treatment system), removal of debris found in the soil in the form of metal, bricks and miscellaneous materials, as well as the development of a groundwater management zone (GMZ).

A copy of the Proposed Plan of Remedial Action for Budd Metal Company site is available at the following location:

DNREC's
New Castle Office
715 Grantham Lane
New Castle, De 19720
(302) 323-4540

DNREC invites written comments on this Plan. Members of the public may also request a public hearing on the Proposed Plan of Remedial Action pursuant to 7 Del. C. 9112. The comment period begins on July 15, 1996 and ends on August 5, 1996. Comments and/or requests for a public hearing may be submitted in writing to Paul Will by the close of business (4:30 p.m.) on August 5, 1996 at the above address.

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Table 1: Remedial Investigation - Lead, PCB and TPH Results

Table 2: Remedial Investigation - PAH Results

Table 3: Feasibility Study Alternative Screening Matrix

**TABLE 1: SUMMARY OF LABORATORY ANALYSIS OF SOIL SAMPLES
BUDD METALS REMEDIAL INVESTIGATION**

Sample	Lead	PCBs	TPH	Notes
BMS-1	969.0	1.0	290.0	GC Fingerprint indicates the presence of lubricating oils (10W40)
BMS-1	87.0	ND	50.0	GC Fingerprint indicates the presence of coal tar oil.
BMS-2	2,070.0			
BMS-2	58.1			
BMS-3	456.0	ND	200.0	GC Fingerprint indicates a pattern similar to that of 10W40 motor oil.
BMS-3	1,390.0	ND	47.0	GC Fingerprint indicates a pattern similar to that of coal tar oil.
BMS-4	16.0			
BMS-4	20.7			
BMS-5	25.5			
BMS-5	37.3			
BMS-6	315.0			
BMS-6	51.8			
BMS-7	846.0			
BMS-7	450.0			
BMS-8	481.0			
BMS-8	1,150.0			
BMS-9	244.0			
BMS-10	1,020.0			
BMS-10	54.0			
BMS-11	2,120.0			
BMS-11	479.0			
BMS-12	3,960.0			
BMS-12	114.0			
BMS-13	1,030.0			
BMS-13	101.0			
BMS-14	1,350.0			
BMS-14	101.0			
BMS-15	3,150.0			

Blanks in the TPH and PCBs columns indicate that the samples were not analyzed for these parameters

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site", dated Revised March, 1996, and should be viewed in the context of that report.

**TABLE 1: SUMMARY OF LABORATORY ANALYSIS OF SOIL SAMPLES
BUDD METALS REMEDIAL INVESTIGATION**

Sample	Lead	PCBs	TPH	Notes
BMS-15	48.2			
BMS-16	3,890.0			
BMS-16	39.4			
BMS-17	3,760.0			
BMS-17	21.5			
BMS-18	4,570.0			
BMS-18	106.0			
BMS-19	3,410.0			
BMS-19	95.0			
BMS-20	4,170.0			
BMS-20	50.9			
BMS-21	3,230.0			
BMS-21	852.0			
BMS-22	6,570.0			
BMS-22	3,650.0			
BMS-23	3,550.0			
BMS-23	121.0			
BMS-24	119.0			
BMS-24	85.1			
BMS-25	3,080.0			
BMS-25	54.6			
BMS-26	1,860.0			
BMS-26	1,400.0			
BMS-27	3,450.0			
BMS-27	2,850.0			
BMS-28	7,240.0			
BMS-28	1,830.0			
BMS-29	167.0			
BMS-30	150.0			
BMS-31	210.0			

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site", dated Revised March, 1996, and should be viewed in the context of that report.

**TABLE 1: SUMMARY OF LABORATORY ANALYSIS OF SOIL SAMPLES
BUDD METALS REMEDIAL INVESTIGATION**

Sample	Lead	PCBs	TPH	Notes
BMS-32	588.0			
BMS-32	7,250.0			
BMS-33	1,970.0	.8	500.0	GC Fingerprint indicates a mixture of lubricating oils.
BMS-33	1,120.0	.6	400.0	GC Fingerprint indicates a mixture of heavier weight lubricating oils.
BMS-34	1,550.0			
BMS-34	306.0			
BMS-35	174.0	ND	90.0	GC Fingerprint indicates the presence of a mixture of lubricating oils.
BMS-35	18.5	ND	32.0	GC Fingerprint indicates the presence of weathered #2 Fuel Oil.
BMS-36	1,030.0			
BMS-36	30.2			
BMS-37	215.0			
BMS-37	83.8			
BMS-38	1,000.0	0.21 J	120.0	GC Fingerprint indicates the presence of 10W40 motor oil.
BMS-38	21.8	ND	60.0	GC Fingerprint indicates #6 fuel oil.
BMS-39	80.3			
BMS-39	9.2			
BMS-40	207.0			
BMS-41	51.5			
BMS-42	89.1	ND	860.0	GC Fingerprint indicates lubricating oil, heavier weight than 10W40.
BMS-43	195.0			
BMS-44	202.0	ND	170.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-45	220.0			
BMS-45	8.0			
BMS-46	229.0	ND	90.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-46	2,020.0	9.3	1,600.0	GC Fingerprint indicates lubricating oil.
BMS-47	4,840.0			
BMS-47	1,220.0			
BMS-48	910.0	.6	360.0	GC Fingerprint indicates a mixture of lubricating oils and coal tar oil.
BMS-48	1,820.0	.7	700.0	GC Fingerprint indicates lubricating oil.

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site", dated Revised March, 1996, and should be viewed in the context of that report.

**TABLE 1: SUMMARY OF LABORATORY ANALYSIS OF SOIL SAMPLES
BUDD METALS REMEDIAL INVESTIGATION**

Sample	Lead	PCBs	TPH	Notes
BMS-49	188.0	ND	110.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-49	295.0	ND	240.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-50	304.0			
BMS-50	1,860.0			
BMS-51	180.0	ND	190.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-51	688.0	ND	400.0	GC Fingerprint indicates lubricating oil mixed with coal tar oil.
BMS-52	106.0	ND	180.0	GC Fingerprint indicates a mixture of lubricating oils.
BMS-52	130.0	0.24 J	5,000.0	GC Fingerprint indicates mineral oil (transformer / insulator).
BMS-53	68.5	ND	NP	GC Fingerprint indicates non petroleum organic material.
BMS-53	157.0	0.14 J	10,000.0	GC Fingerprint indicates mineral oil (transformer / insulator).
BMSS-1	514.0	ND	360.0	GC Fingerprint indicates lubricating oil heavier than 10W40 mixed with extremely weathered fuel oil.
BMSS-2	375.0	ND	1,100.0	GC Fingerprint indicates lubricating oil heavier than 10W40 mixed with coal tar oil.

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site", dated Revised March, 1996, and should be viewed in the context of that report.

**TABLE 2: SUMMARY OF LABORATORY ANALYSIS FOR BASE-NEUTRAL COMPOUNDS IN SOILS
BUDD METALS REMEDIAL INVESTIGATION**

(all concentrations in mg/kg)

Parameter	Industrial RBC	BMS-1	BMS-1	BMS-3	BMS-3	BMS-33	BMS-33	BMS-35	BMS-35	BMS-38	BMS-38	BMS-42	BMS-44	BMS-46	BMS-46	BMS-48	BMS-48	BMS-49
Phthalene	41000.00	ND	ND	ND	0.69	ND	0.28	ND	ND	ND								
Benaphthylene	NS	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benaphthene	61000.00	ND	ND	ND	9.70	ND	0.22	ND										
Fluorene	41000.00	ND	ND	ND	1.30	ND												
Benanthrene	NS	1.10	0.80	0.39	1.60	0.37	2.00	ND	ND	0.49	ND	ND	ND	0.44	0.85	0.29	210 J	0.22
Anthracene	310000.00	0.31	ND	ND	0.41	ND	0.29	ND										
Fluoranthene	41000.00	1.90	0.81	1.00	2.10	0.48	2.00	ND	ND	0.98	0.22	ND	ND	0.66	1.00	0.57	0.30	0.62
Pyrene	31000.00	2.00	0.81	0.99	2.00	0.67	2.60	ND	ND	0.92	200 J	ND	0.24	0.69	1.30	0.62	0.38	0.61
Benzo[a]anthracene	3.90	1.10	0.39	0.58	0.72	0.33	1.00	ND	ND	0.59	ND	ND	ND	0.37	0.64	0.35	ND	0.36
Fluorene	390.00	0.94	0.37	0.57	0.78	0.36	1.00	ND	ND	0.64	ND	ND	ND	0.32	0.62	0.30	210 J	0.29
Benzo[b]fluoranthene	3.90	1.60	0.40	0.76	0.70	0.49	1.60	ND	ND	0.86	ND	ND	ND	0.44	0.90	0.46	0.29	0.46
Benzo[k]fluoranthene	39.00	0.52	ND	0.28	ND	ND	ND	ND	ND	0.25	ND	ND	ND	ND	0.27	ND	ND	ND
Benzo[a]pyrene	0.39	0.91	0.28	0.53	0.46	0.28	0.90	ND	ND	0.50	ND	ND	ND	0.28	0.56	0.29	0.23	0.28
Benof[1,2,3-cd]pyrene	3.90	0.69	ND	0.38	ND	ND	0.59	ND	ND	0.37	ND	ND	ND	ND	0.39	ND	ND	ND
Benzo[ghi]perylene	0.39	ND	ND	0.43	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo[ghi]perylene	NS	0.63	ND	0.54	0.32	ND	0.56	ND	ND	0.34	ND	ND	ND	ND	0.43	ND	0.37	ND

RBC Industrial - EPA Region III Risk Based Concentration Level for Industrial Sites, March 7, 1995

ND - Not Detected

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site" dated revised March, 1996, and should be viewed in the context of that report.

**TABLE 2: SUMMARY OF LABORATORY ANALYSIS FOR BASE-NEUTRAL COMPOUNDS IN SOILS
BUDD METALS REMEDIAL INVESTIGATION**

(all concentrations in mg/kg)

Parameter	Industrial RBC	BMS-49	BMS-51	BMS-51	BMS-52	BMS-52	BMS-53	BMS-53	SS-1	SS-2
		1.5-2.0	0-0.5	2.0	0-0.5	1.0	0-0.5	1.0-1.5	0-0.5	0-0.5
Phthalene	41000.00	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benaphthylene	NS	0.37	ND	ND	ND	0.53	ND	0.49	ND	ND
Benaphthene	61000.00	ND	ND	ND	ND	ND	ND	ND	ND	ND
Fluorene	41000.00	0.21	ND	ND	ND	ND	ND	ND	ND	ND
Benanthrene	NS	1.20	0.26	1.50	ND	1.60	ND	1.50	0.44	1.10
Fluoranthene	310000.00	0.33	ND	0.33	ND	ND	ND	ND	ND	ND
Benanthrene	41000.00	1.40	0.51	2.00	ND	0.70	ND	1.00	0.63	2.10
Fluorene	31000.00	1.80	0.61	2.80	ND	0.34	ND	0.41	0.64	2.00
Benzo[a]anthracene	3.90	0.97	0.34	1.20	ND	0.22	ND	0.29	ND	1.00
Fluorene	390.00	0.97	0.30	1.20	ND	0.23	ND	0.31	0.57	1.40
Benzo[b]fluoranthene	3.90	1.50	0.48	1.80	ND	0.31	ND	0.52	1.00	2.60
Benzo[k]fluoranthene	39.00	0.39	ND	0.52	ND	ND	ND	ND	ND	0.89
Benzo[a]pyrene	0.39	0.91	0.31	1.10	ND	200 J	ND	0.26	0.46	1.60
Benof[1,2,3-cd]pyrene	3.90	0.52	0.23	0.64	ND	ND	ND	ND	0.63	1.90
Benzo[ah]anthracene	0.39	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo[ghi]perylene	NS	0.48	0.22	1.30	ND	ND	ND	ND	0.84	1.70

RBC Industrial - EPA Region III Risk Based Concentration Level for Industrial Sites, March 7, 1995

ND - Not Detected

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company Site" dated revised March, 1996, and should be viewed in the context of that report.

**TABLE 3:
BUDD METAL COMPANY SITE
FEASIBILITY STUDY ALTERNATIVE SCREENING MATRIX**

Alternatives	Alternative 1 No Action	Alternative 2 Thermal Treatment	Alternative 2a Haul PCB soils off site for disposal	Alternative 2b Bioremediation on site	Alternative 3 Covering	Alternative 4 Stabilization and Removal	Alternative 5 Stabilization in place and covering
Assessment Factors							
Short-term Effectiveness	None	Soils removed	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Soils removed from contact with ecological receptors	Soils taken out of zone of human contact	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Soils taken out of zone of human contact
Long-term Effectiveness	None	Soils removed	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Constituents degraded	Soils taken out of zone of human contact	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Soils taken out of zone of human contact
Reduction of Toxicity, Mobility or Volume	None	Soils removed	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Constituents degraded	Mobility affected as soils not exposed to infiltrating rain water.	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Toxicity and mobility reduced. Volume not affected
Implementability	Easy Implemented	Easy Implemented	Reasonably easy to implement, materials and equipment are readily available	Easy Implemented	Difficult to implement due to site grading	Reasonably easy to implement, materials and equipment are readily available	
Cost-Present Worth	\$0	\$99,000	\$12,500	\$10,000	unknown	\$1,200,000	\$800,000
Compliance with ARARs	Does not meet ARARs, in excess of RBCs	Meets RBCs	Meets RBCs	Meets RBCs	Does not meet RBCs or TCLP	Meets RBCs and TCLP requirements	Meets TCLP requirements, soils no longer considered hazardous
Overall Protection of Human Health and the Environment	Risk of human contact with lead or lead dusts.	Soils removed	Soils removed	Constituents degraded	Soils taken out of zone of human contact	Soils removed from site and turned into non-hazardous material with constructive reuse potential	Soils taken out of zone of human contact
State Acceptance	Not acceptable	Acceptable	Acceptable	Acceptable	Not acceptable, soils do not pass TCLP	Not acceptable to DSWA	Acceptable
Community Acceptance	To be addressed by public comment	To be addressed by public comment	To be addressed by public comment	To be addressed by public comment	To be addressed by public comment	To be addressed by public comment	To be addressed by public comment

Note: This table is part of a report titled "Remedial Investigation/Feasibility Study Results and Proposed Remedial Action for the Budd Metal Company site" dated Revised March, 1996, and should be viewed in the context of that report.

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THE FINAL PLAN

of Remedial Action for the Budd Metal Company Site, Under the Hazardous Substance Cleanup Act, has been issued by the Site Investigation & Restoration Branch (SIRB) of the Delaware Department of Natural Resources and Environmental Control (DNREC).

The proposed remedy for this site consisted of the following: 1) Excavation and stabilization of lead bearing site soils with placement back on the site. In addition, DNREC will establish a Ground-water Management Zone (GMZ) for the site.

The Proposed Plan of Remedial Action for the Budd Metal Company Site was available for public review and noticed in the 7/14/96 issue of the Delaware State News and The News Journal. The public comment period on this Plan closed on 8/5/96. No objections to the Plan or any requests for a public hearing were received.

The Final Plan was signed by DNREC's Director of Air and Waste Management on August 8, 1996.

The Remedial Action Decision Record containing the basis for the Final Plan may be reviewed at the Division of Air and Waste Management, 715 Grantham Lane, New Castle, De. 19720 between the hours of 8:00 a.m. and 4:30 p.m. Monday through Friday. For additional information call Paul Will at (302) 323-4540.

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