

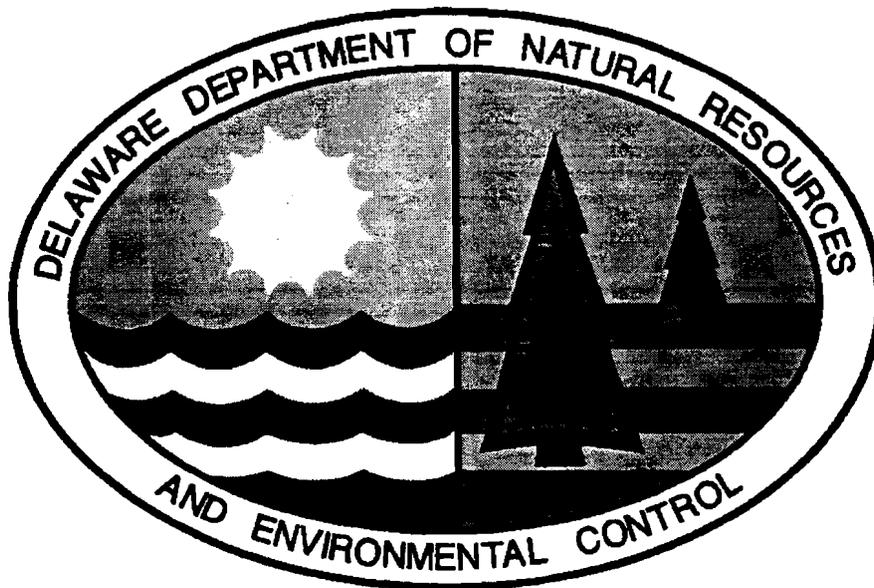
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PURE GREEN INDUSTRIES, Inc.

PROPOSED PLAN OF REMEDIAL ACTION



JULY 1996

**DELAWARE DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
SITE INVESTIGATION AND RESTORATION BRANCH**

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I. INTRODUCTION

Pure Green Industries, Inc. under the authority of 7 Del.C., Chapter 91, the Delaware Hazardous Substance Cleanup Act (HSCA), has performed a Facility Evaluation (FE) of a 2 acre parcel of property located at 1620 Bowers Street in Wilmington, Delaware. Pure Green performed the investigation in order to determine whether or not their proposal to utilize the U.S. Environmental Protection Agency's ("EPA") presumptive remedy for municipal landfills (i.e. low permeability cap) would be appropriate at this site. Based on the FE, the Department of Natural Resources and Environmental Control (Department) determined that remedial action is required to protect public health, welfare, and the environment. It was also determined that the presumptive remedy for municipal landfills is appropriate at this site. Therefore, the Department has issued this Proposed Plan of Remedial Action under the authority of HSCA.

II. PURPOSE OF THE PROPOSED PLAN

The purpose of this proposed plan is to present the public with the Department's planned technical approach to protect public health, welfare, and the environment and to encourage public involvement. To this end, the Department will establish a public comment period that conforms with the requirements of the Regulations Governing Hazardous Substance Cleanup (Regulations). At the conclusion of the comment period, public input will be considered and the Department will issue a Final Plan of Remedial Action.

III. SITE DESCRIPTION AND HISTORY

The site is located at 1620 Bowers Street, north of Gander Hill Prison and east of the Amtrak rail maintenance yards at 12th Street, in an industrial section of southeast Wilmington, Delaware. The site covers approximately two (2) acres and is partially overgrown with bushes, weeds, and low shrubs. The site is poorly graded and uneven in appearance.

The site is shown on the United States Geologic Survey (USGS), Wilmington South Quadrangle Topographic Map (7.5 minute series) at a latitude of N39° 44' 35" and a longitude of W75° 31' 35". See Figure 1.

The site is part of a larger tract of land that is believed to have been used for disposal of municipal refuse and rubble. The larger tract of land is subdivided into four lots (1A, 1B, 1C, and 2). Parcel 1B is the area of interest and is referred to as the site for the purposes of this proposed plan.

Parcels 1A and 1C are owned by Design Contracting, Inc., which is a demolition, dismantling, and site preparation business. Parcel 1A covers approximately 5.55 acres of land, including the right-of-way from Bowers Street, located at the southeastern boundary of the site. This parcel

appears to be used for the disposal of wastes from demolition jobs and contains 15 to 20 feet of fill and large debris piles.

Parcel 1C is a 5.22 acre portion of land which is lower in elevation and is similar in appearance to the site (parcel 1B).

Parcel 2 is an 8.00 acre property located on the western section of the subdivision that contains a large central operations building for Diamond State Recycling Corporation and numerous piles of sorted scrap metal. Approximately three feet of fill has been placed in this area.

In March 1994, a preliminary assessment (PA) was performed on the larger tract of land (all four parcels) under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The PA was performed in response to the discovery of buried municipal waste during preparation activities for the installation of a septic system. The EPA reviewed the PA and planned to take no further action regarding placement of the tract on National Priorities List (NPL). The tract was added to Delaware's HSCA list.

In November 1995, Pure Green Industries entered into a Voluntary Cleanup Agreement with the Department. Pure Green proposed the installation of a cap, however, the Department required an investigation of the site (parcel 1B) to determine whether or not this was an appropriate remedy. A Facility Evaluation (FE) was completed in June 1996. Based on the results of the FE the Department concluded that remedial action is necessary to protect public health, welfare, and the environment. Furthermore, it was determined that a cap is the appropriate remedy for this site.

IV. FEASIBILITY STUDY

Upon completion of the investigation, the Department may require a feasibility study (FS) to evaluate the various options available to remediate a site. For some categories of sites with particular commonalties, the EPA has developed presumptive remedies. Presumptive remedies are based on historical patterns of remedy selection and the preferred technologies typically implemented at sites with similar characteristics.

In the case of landfills, the EPA's Office of Solid Waste and Emergency Response has developed a presumptive remedy policy entitled "EPA's Presumptive Remedy for CERCLA Municipal Landfill Sites." The Department has reviewed this policy and concurs with EPA's approach and philosophy of utilizing established remedies for categories of sites with similar characteristics (e.g., landfills). To this end, the Department herein adopts EPA's presumptive remedy for municipal landfills as the FS for the Pure Green site. The Department has determined that this established FS, and this approach in general, will streamline the remedial process and, provide protectiveness to public health, welfare, and the environment.

The Department has placed on file "EPA's Presumptive Remedy for CERCLA Municipal Landfill Sites" and a supporting document entitled "Conducting Remedial Investigations/Feasibility Studies for CERCLA Landfill Sites."

The proposed remedy is contained in Section V of this plan.

V. PROPOSED REMEDIAL ACTION

The following actions will be required as part of the remedial action for the Pure Green Industries Site:

- Grading to promote positive drainage. During grading activities fill may be added and used as a foundation layer.
- Installation of a low permeability layer. The low permeability layer may be constructed of clay, soil, or other Department approved material as long as it is of such character that it will minimize the percolation of water through it and the landfill, does not crack excessively when dry, and is free of putrescible materials and large objects.
- Installation of a protective layer. This layer will protect the low permeability layer from any unauthorized surface disturbance that damages the final cover.
- Installation of a final cover. The final cover will prevent erosion caused by surface water runoff.
- Development of an operation and maintenance plan to ensure long-term integrity and effectiveness of the cap.
- Placement of a deed restriction. The covenant will be executed by the property owner and recorded with the registrar of deeds for the county in the facility is located.
- No disturbances to the landfill or cap may be done without prior approval from the Department.
- Installation of ground water monitoring wells may be required to comply with the Regulations Governing Solid Waste.

VI. PUBLIC PARTICIPATION

Notice of availability of the Pure Green Industries, Inc. Proposed Plan of Remedial Action will appear in the Wilmington News Journal on July 28, 1996, in accordance with Section 12 of the Regulations. The public comment period begins on the date of publication and runs for 20 days,

concluding on Monday, August 19, 1996. During this time members of the public may request a public hearing.

At the close of the public comment period, the Department will consider all written comments and issue a Final Plan of Remedial Action.

All comments or questions regarding the Proposed Plan should be directed to:

Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation and Restoration Branch
ATTN: Steven Langseder
715 Grantham Lane, New Castle, Delaware 19720
(302) 323-4540

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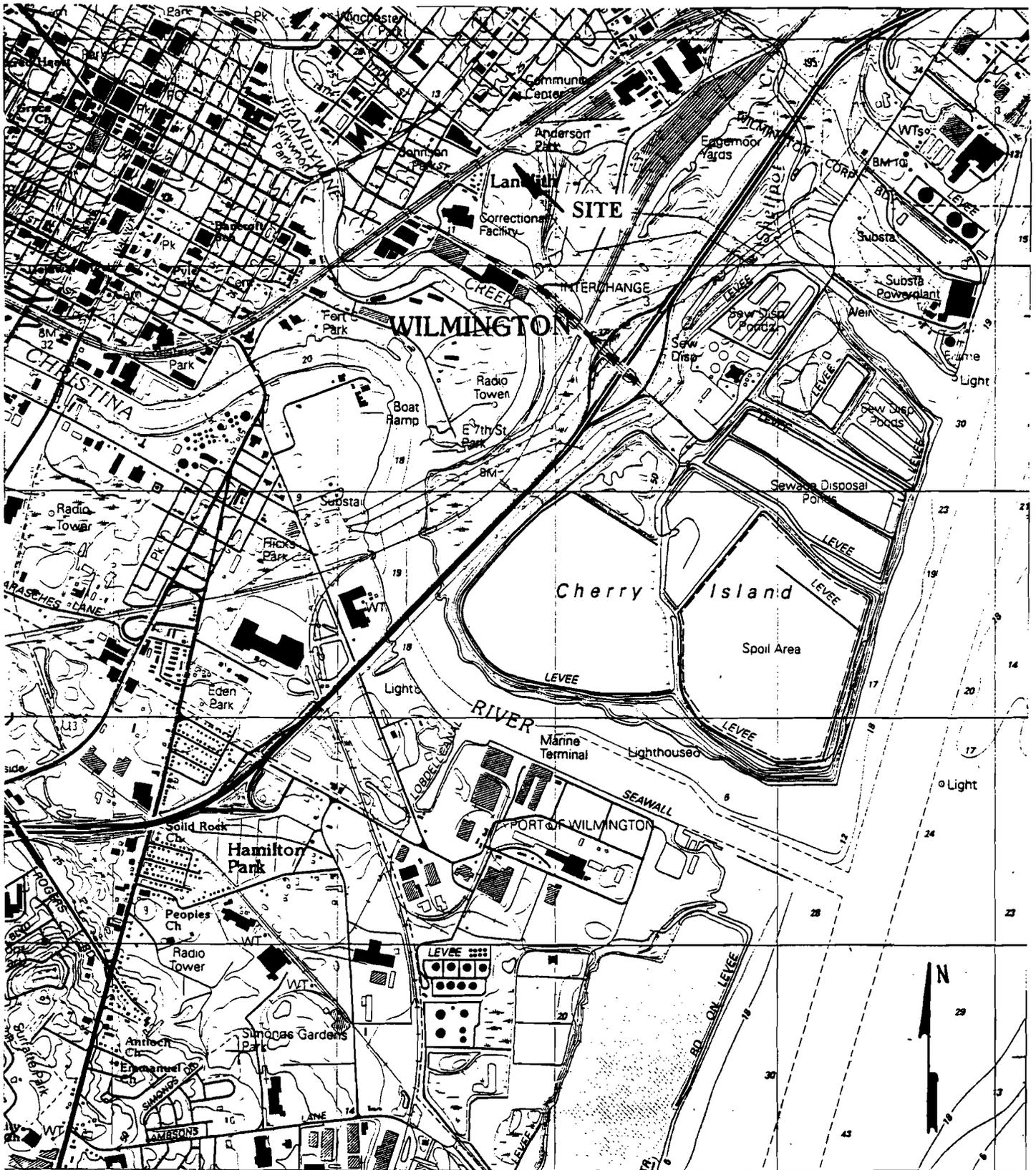


Figure 1

From: Wilmington South Quadrangle
 Delaware - New Jersey
 7.5 Minute Series (Topographic)

Pure Green Industries, Inc. Site
 Wilmington, Delaware