



PROPOSED PLAN OF REMEDIAL ACTION

Harry Wood Landfill Site
Operable Unit 2 (OU-2)
New Castle, DE
DNREC Project No. DE-0016



September 2014

Delaware Department of Natural Resources and Environmental Control
Division of Waste and Hazardous Substances
Site Investigation & Restoration Section
391 Lukens Drive
New Castle, Delaware 19720

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Approval:

This Proposed Plan meets the requirements of the Hazardous Substance Cleanup Act.

Approved by:

Timothy Ratsep, Environmental Program Administrator Site Investigation & Restoration Section
September 2, 2014
Date



What is the Proposed Plan of Remedial Action?

The Proposed Plan of Remedial Action (Proposed Plan) summarizes the clean-up (remedial) actions that are being proposed to address contamination found at a Site. A legal notice is published in the newspaper advertising the Proposed Plan for a 20-day comment period. DNREC considers and address all public comments received and publishes a Final Plan of Remedial Action (Final Plan) for the Site

What is Operable Unit 2 of the Harry Wood Landfill Site?

The Harry Wood Landfill Site “Site” is part of a property located along Frenchtown Road (State Route 273) in New Castle, Delaware. The location of the Site is depicted on Figure 1. The Site has been divided into operable units (OU’s). The OU-1 property was certified as a Brownfield Site by DNREC-SIRS on July 28, 2010 and a Brownfield Development Agreement (BDA) was signed on January 15, 2011 with Seeds of Greatness Church. The remainder of the property (DE-0016 -Harry Wood Landfill-OU-2) is under a Voluntary Cleanup Program Agreement with Bp Amoco, which was signed on July 23, 2010. **This Proposed Plan of Remedial Action applies only to the OU-2 portion of the Site (Figure 2).**

What happened at Opeable Unit 2 of the Harry Wood Landfill Site?

An unpermitted landfill existed on to the Harry Wood OU-2 site between 1960 and 1965. Several investigations related to the unpermitted landfill were conducted between 1979 and 2014 to determine the nature and extent of landfill.

The OU-2 section of the property accepted primarily polypropylene waste from an Amoco plant in New Castle. A survey of the landfill in 1979 stated that 5,000 tons of waste was located in the landfill which included non-polar solvents, polypropylene waste, resins, alcohol, heavy and trace metals and various organic and inorganic compounds.

What is the environmental problem at Operable Unit 2 of the Harry Wood Landfill Site?

The OU-2 portion of the Site was entered into DNRECs Voluntary Cleanup Program based on previous environmental investigations indicating the potential presence of hazardous substances related to the unpermitted land filling operation from the 1960’s. Bp Amoco performed a Remedial Investigation (RI) on OU-2 in April 2011. The RI indicated that a chemical of concern (COC), Mirex, is present at the Site. Mirex was utilized as a flame retardant in polypropylene manufacturing. The majority of the Mirex in the remedial response area is located at approximately 0-3 foot depth. The RI investigation and risk assessment indicated that Mirex requires a remedial action because it could pose an unacceptable risk to indoor air and construction workers at 0-2 foot depth.

What does the owner want to do at Operable Unit 2 of the Harry Wood Landfill Site?

The Site owner currently wants to construct a parking lot on the OU-2 site to support the activities on OU-1. In addition, the owner may want to construct a building on the Site for future use.

What additional cleanup actions are required at the Harry Wood Landfill (OU-2) Site?

DNREC proposes the following remedial actions for the Harry Wood OU-2 Site, which needs to be completed before a Certificate of Completion of Remedy (COCR) can be issued:

1. Remove surface debris, clear-cut (tree and shrub removal) OU-2. Removal and off-site disposal of all identified waste from the remedial response area (2.4 acres-See Figure 2). Response area will be backfilled with clean soil, graded and covered with a minimum of 4 inches of black top over the entire remedial response area (2.4 acres). The remedial response area will be excavated to 0-2 foot depth below ground surface to accommodate the potential future use of the site.
2. An Environmental Covenant, consistent with Delaware’s Uniform Environmental Covenants Act (Title 7, Del. Code Chapter 79, Subtitle II) (UECA), will be recorded in the office of the Recorder of Deeds to include the following:

[a.] [Use Restriction]. Use of the Property shall be restricted solely to those non-residential type uses permitted within Commercial, Manufacturing, or Industrial Districts;]

[b.] [Interference with Remedy]. There shall be no digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities under two feet in the remedial response area without the prior written approval of DNREC-SIRS;]

[c.] [Limitation of Groundwater Withdrawal]. No groundwater wells shall be installed, and no groundwater shall be withdrawn from any well, on the Property without the prior written approval of DNREC-SIRS and DNREC Division of Water;]

[d.] [Compliance with Long Term Stewardship Plan]. Perform all work required by the Long Term Stewardship Plan (“LTS Plan”), as issued, approved, modified or amended by DNREC;]

[e.] [Compliance with Contaminated Material Management Plan] Perform all work required by the Contaminated Material Management Plan (“CMMP”), as issued, approved, modified or amended by DNREC;]

3. Develop a DNREC approved CMMP to allow construction workers to safely handle any potential contaminated soil and groundwater at the Site. The site owner will be required to maintain the CMMP after the remedy is completed to accommodate the future use of the Site.
4. Develop and implement a DNREC-approved Long-Term Stewardship (LTS) Plan. The LTS Plan will detail: the groundwater monitoring network and schedule to be followed in order to monitor the attenuation of the groundwater COCs.

What are the long term plans for Operable Unit 2 of the Harry Wood Landfill Site after the cleanup?

The institutional controls outlined by the environmental covenant will specify the future land use and intrusive action restrictions for the Site. The DNREC approved Long-Term Stewardship Plan will document the requirements.

DNREC plans to issue a Certificate of Completion of Remedy for the Site after the implementation of the remedial action, LTS Plan and the uniform environmental covenant on the Site.

How can I find additional information or comment on the Proposed Plan?

The complete file on the Site including the Brownfield Investigation and the various reports are available at the DNREC office, 391 Lukens Drive in New Castle, 19720. Most documents are also found on:

<http://www.nav.dnrec.delaware.gov/DEN3/>

The 20-day public comment period begins on September 7, 2014 and ends at close of business (4:30 pm) on September 29, 2014. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Robert Schulte, Project Officer, or Robert Newsome, Public Information Officer.

Figure 1: Site Location Map

Figure 2: OU-2 Remedial Response Area

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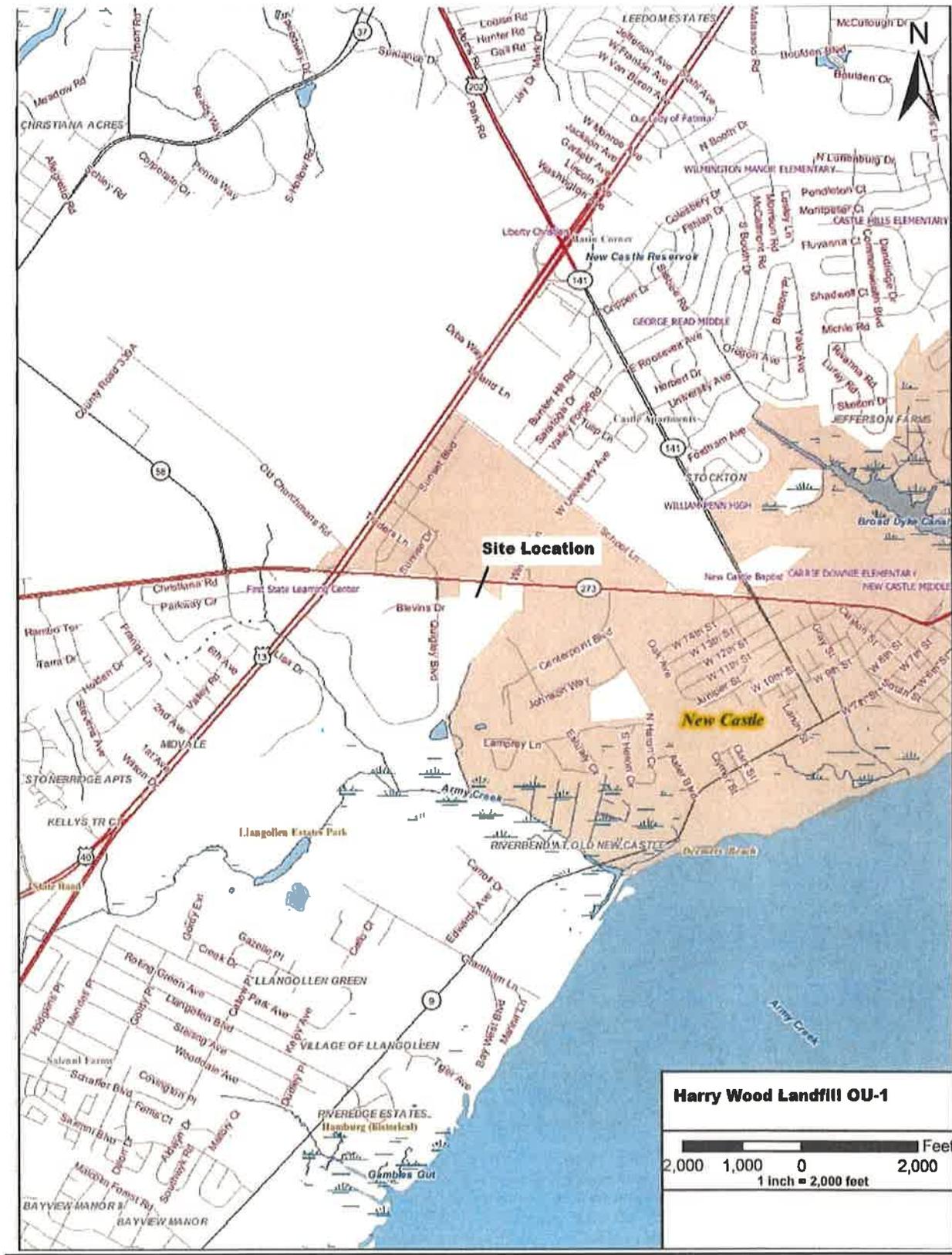
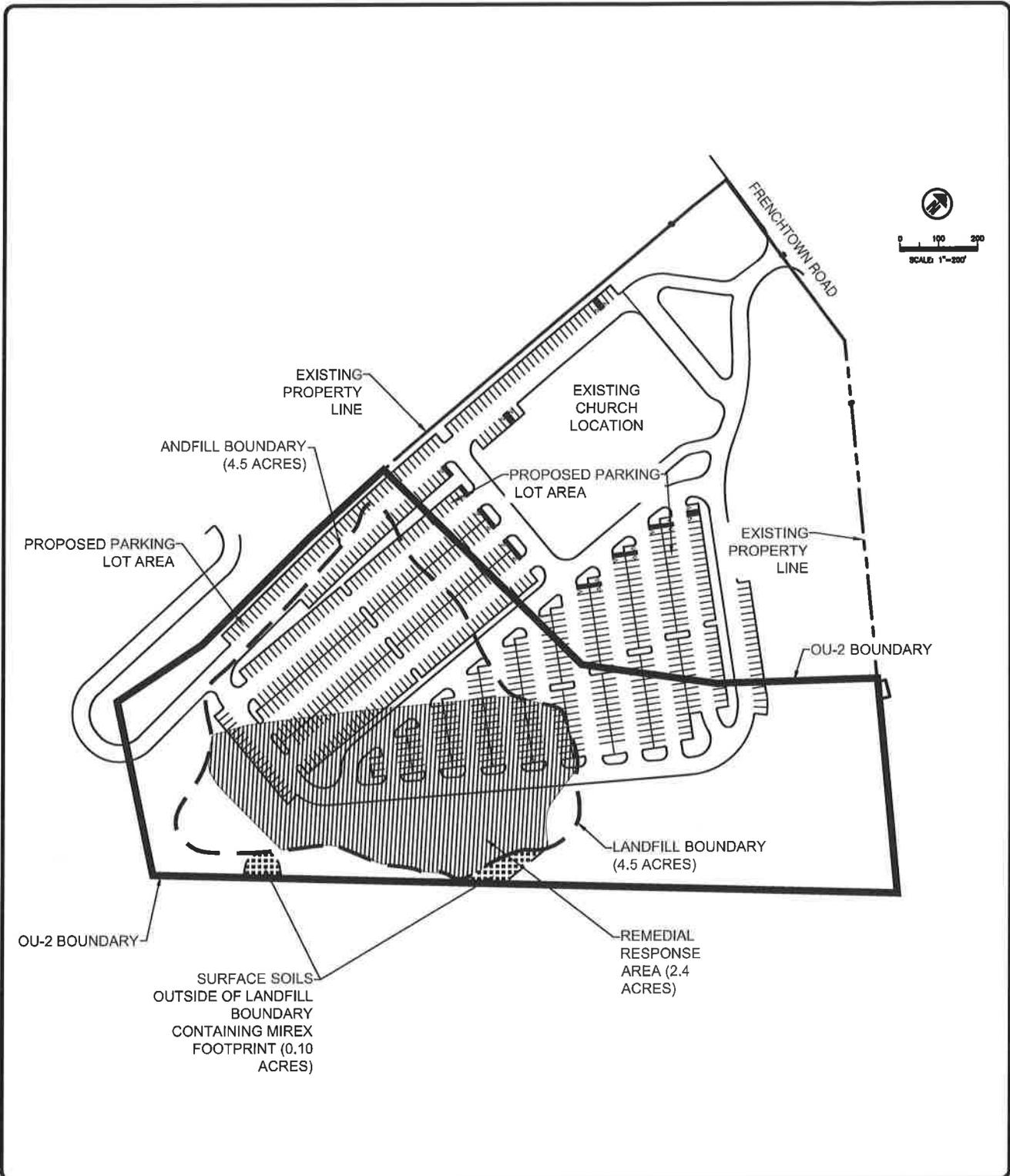


Figure 1 - Site Location



OVERALL SITE LAYOUT AND PROPOSED PLAN OF REMEDIAL ACTION

DRAWN BY: SCD
 REVIEWED BY: CDM
 APPROVED BY: MLS
 DATE: 6/20/14
 SCALE: 1" = 200'

REVISIONS			
NO.	DESCRIPTION	DATE	BY

HARRY WOOD LANDFILL
 VCP SITE DE-0016
 NEW CASTLE, DELAWARE
 FEASIBILITY STUDY REPORT

FIGURE 2

Glossary of Terms Used in this Proposed Plan

Certificate of Completion of Remedy (COCR)	A formal determination by the Secretary of DNREC that remedial activities required by the Final Plan of Remedial Action have been completed.
Contamination	The introduction of harmful or hazardous matter into the environment
Exposure	Coming into contact with a substance through inhalation, ingestion, or direct contact with the skin; may be acute or chronic
Final Plan of Remedial Action	DNREC's plan for cleaning up a hazardous site after it has been reviewed by the public
Remedial Action	A specific cleanup activity at a site
Feasibility Study	A report designed to develop cleanup alternatives for a site.
Risk Assessment	A quantitative evaluation of only the most obvious and likely risks at a site
Proposed Plan of Remedial Action	A plan for cleaning up a hazardous site submitted by DNREC and subject to public comments
Risk	Likelihood or probability of injury, disease, or death
Remedial Investigation	Field sampling and evaluation of a site financed by the responsible party
Soil Management Plan	A written plan specifying how potentially contaminated soil material at a site will be sampled, evaluated, staged, transported and disposed of.
Uniform Environmental Covenant	A standardized form of a land use restriction that is recorded on the property deed of record and transfers with the land if sold to a new owner.