



PROPOSED PLAN OF REMEDIAL ACTION

Cannon Salvage Site
Hartley, Delaware
DNREC Project No. DE-0340



December 2015

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

Date December 10, 2015



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 the Site for public comment. A legal notice is published in the newspaper for a 20-day comment period. DNREC considers and addresses all public comments received and publishes a Final Plan of Remedial Action (Final Plan) for the Site.

What is the Cannon Salvage Site?

Cannon Iron and Metal Inc. is a salvage company located at 3221 Hartly Road, Hartly, Delaware. The site is approximately seven (7) acres in size and is further identified as Tax Parcel (WD00-73-000-02-35.01) (Figure 1). The nearest intersection to the Site is Hartly Road and Forrest Ave. The Site consist of one structure that is used as an office building. Attached to the office building is a covered area where equipment is stored. Directly east of the office building is a commercial scale. Concrete pads cover the active areas of the Site; the remaining areas are made of bare earth and stone grade cover (Figure 2).

What happened at the Cannon Salvage Site?

The Site has been used as a salvage yard since approximately 1970. Automobiles, appliances and various other scrap metals are processed on site. Salvaged vehicles are brought to the Site, drained of fluids, and then dismantled for usable parts. What is not recycled from the vehicle is then crushed and transported off-site.

What is the environmental problem at the Cannon Salvage Site?

A Preliminary Assessment was performed in July 2010 and recommended that a Site Inspection (SI) be conducted. In late 2010 an initial SI was conducted by a private consultant for the Site owner and results were provided to SIRS. MTBE was found in elevated concentrations in the groundwater. An onsite well is present and being treated by a carbon system. The Site was brought into the Voluntary Clean-Up Program (VCP) in November 2010. Monitoring wells and soil boring were installed to further investigate the extent of the contamination. Semi-volatile compounds (SVOCs) and metals were detected in elevated levels in surface soil. Groundwater results showed elevated levels of metals and MTBE. One off-site residential well, north of the Site, was impacted by MTBE and being monitored by the Delaware Division of Public Health.

What clean-up actions have been taken at the Cannon Salvage Site?

Groundwater was monitored from February 2011 until December 2012 to evaluate the MTBE contamination. Also during this time, the Site was sold to another salvage company. The new owners installed concrete slabs in areas of the Site. Much of the debris present on the Site surface has been collected and disposed of. An onsite well is being treated by a carbon system.

What does the owner want to do at the Cannon Salvage Site?

The Site will remain a salvage and recycling facility.

What additional clean-up actions are needed at the Cannon Salvage Site?

DNREC proposes the following remedial actions for the Site, which need to be completed before a Certificate of Completion of Remedy (COCR) can be issued.

1. Maintain the impervious materials (e.g. buildings, asphalt, or concrete) to currently capping the areas of concern for soil and should be maintained.
2. A proposed Environmental Covenant must be submitted to DNREC for approval within 60 days of the issuance of the approved Long Term Stewardship (LTS)
3. An Environmental Covenant, consistent with Delaware's Uniform Environmental Covenants Act (7 Del.C. Chapter 79, Subchapter II) must be recorded in the Office of the Kent County Recorder of Deeds within 60 days of the issuance of the Long Term Stewardship Plan. The Environmental Covenant must include the following activity and/or use restrictions:
 - [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 on the Property without the prior written approval of DNREC;
 - [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 the Long Term Stewardship Plan. All work required by the Long Term Stewardship Plan must be performed to DNREC's satisfaction in accordance with the Plan; and

[e.] Compliance with Contaminated Materials Management Plan. All work required by the Contaminated Materials Management Plan must be performed to DNREC's satisfaction in accordance with the Plan.

4. A Contaminated Materials Management Plan (CMMP) must be submitted to DNREC within 60 days of the issuance of the Final Plan of Remedial Action. The CMMP will provide guidance to enable construction workers to safely handle any potential contaminated soil and groundwater at the Site.
5. The CMMP will be implemented upon its approval by DNREC.
6. A Long-Term Stewardship Plan shall be submitted to DNREC for approval. The LTS plan will detail: 1) the groundwater monitoring requirements and schedule to be followed in order to monitor the attenuation of the groundwater Contaminants of Concern (COC); and 2) the site-inspection schedule to be followed in order to ensure the long-term integrity of the remedy.
7. The LTS Plan must be implemented within 60 days of its approval by DNREC.
8. A request for a Certification of Completion of Remedy (COCR) must be submitted to DNREC within 60 days of approval of the Remedial Action Completion Report.

What are the long term plans for the Site after the cleanup?

The Site use will be restricted to non-residential (commercial/industrial) purposes by recording the Environmental Covenant. The CMMP will be completed and available for the Site.

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

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

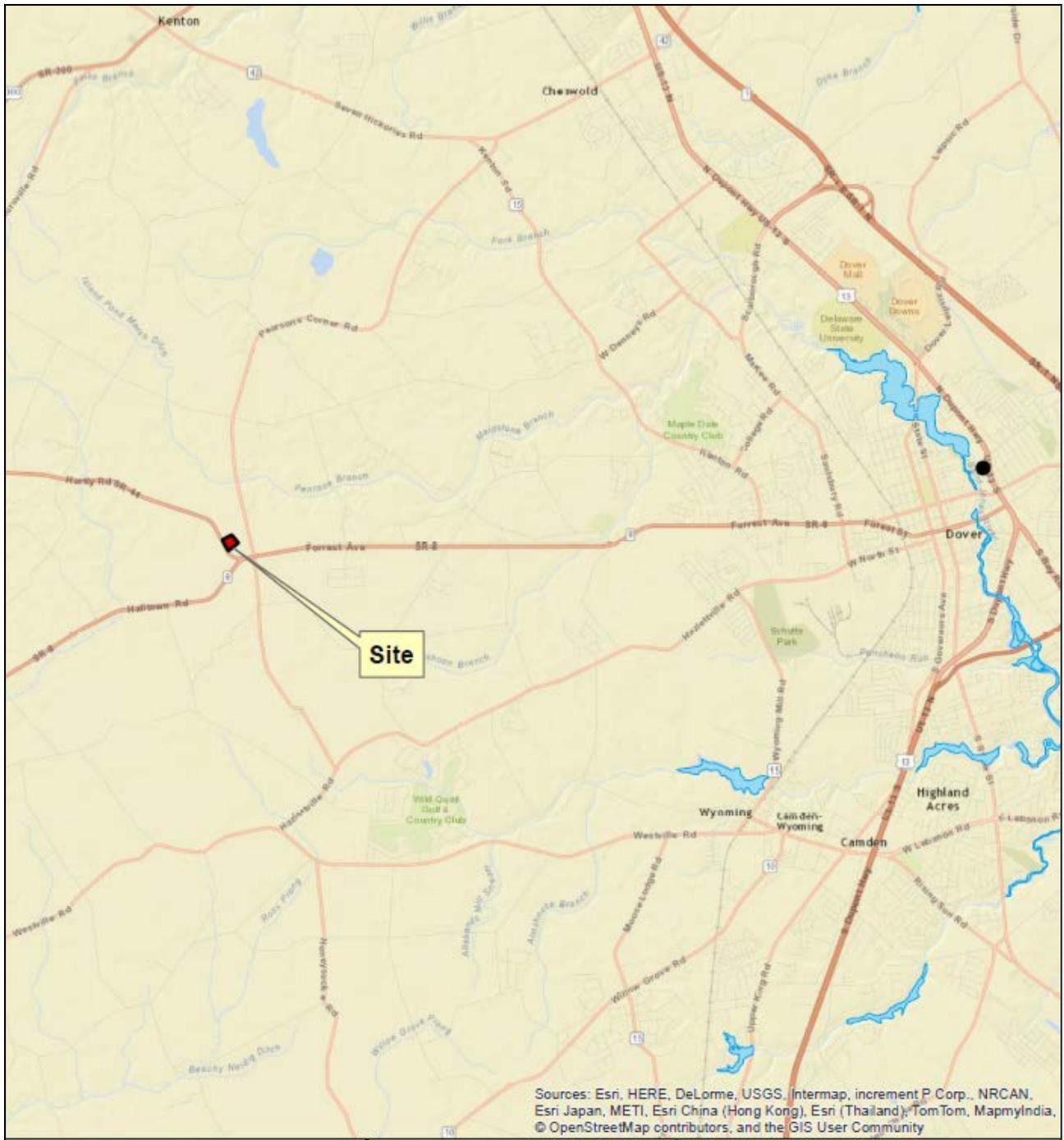
<http://www.nav.dnrec.delaware.gov/DEN3/>

The 20-day public comment period begins on December 13, 2015 and ends at close of business (4:30 pm) on January 4, 2015. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Krystal Stanley, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Location Map

Figure 2: Site Map

KAS:vdh; KAS15033.doc; DE 0340 II B 8



Site

DWHS
Site Investigation & Restoration Section
391 Lukens Dr.,
New Castle, DE 19720
302.395.2600

1:100,000



Figure 1
DE-0340

This map is provided by the DNREC-SIRB solely for display and reference purposes and is subject to change without notice. DNREC-SIRB will not be held responsible for the assumed accuracy contained in the map or for use other than its intended purposes. February 2008



Site

DWHS
Site Investigation &
Restoration Section
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302.395.2600



1:1,790



Figure 2 DE-0340

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Glossary of Terms Used in this Proposed Plan

Area of Concern (AOC)	A discrete section of the Site representing the local bounds of contamination in soil or ground water.
Certification 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.
Contaminant of Concern (COC)	Potentially harmful substances at concentrations above acceptable levels.
Contaminated Materials Management Plan	A written plan specifying how potentially contaminated material at a Site will be sampled, evaluated, staged, transported and disposed of properly.
Exposure	Contact with a substance through inhalation, ingestion, or direct contact with the skin. Exposure may be short term (acute) or long term (chronic).
Final Plan of Remedial Action	DNREC's adopted plan for cleaning up a hazardous site.
Hazardous Substance Cleanup Act (HSCA)	Delaware Code Title 7, Chapter 91. The law that enables DNREC to identify parties responsible for hazardous substances releases and requires cleanup with oversight of the Department.
Preliminary Risk Assessment	A quantitative evaluation of only the most obvious and likely risks at a site
Risk	Likelihood or probability of injury, disease, or death.
Restricted Use	Commercial or Industrial setting
Site Inspection (SI)	Environmental study of a site which includes the sampling of soils, groundwater, surface water, sediment and/or wastes on the property, as appropriate. This evaluation is performed on behalf of the United States Environmental Protection Agency (U.S. EPA).
SIRS	Site Investigation Restoration Section of DNREC, which oversees cleanup of sites that were contaminated as a result of past use, from dry cleaners to chemical companies
US EPA	United States Environmental Protection Agency