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Castle Ford Site:
Proposed Plan of Remedial Action

April 2, 1995

Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Superfund Branch

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Castle Ford Site Proposed Plan of Remedial Action

I. Introduction

In April 1992, the Department of Natural Resources and Environmental Control ("Department") reached an agreement with Quill 800, Inc. (the Potentially Responsible Party, ["PRP"]) to perform a Remedial Investigation ("RI") and Risk Assessment ("RA") of the Castle Ford Site ("Site") under the Delaware Hazardous Substance Cleanup Act ("HSCA"). Based on the comprehensive environmental investigations performed for the Site and for the New Castle Spill Federal Superfund Site located to the north of the Site, the Department concluded that the Castle Ford Site, in its present condition, does not present an unacceptable risk to public health, welfare or the environment.

II. Organization and Contents of the Proposed Plan

The Department issues this proposed plan under the provisions of the Delaware Hazardous Substance Cleanup Act ("HSCA") and the Regulations Governing Hazardous Substance Cleanup, ("Regulations"). The proposed plan presents the Department's assessment of the health and environmental risks posed by the Site and plans for limited further action.

As per the Regulations, the Department will provide notice to the public and an opportunity for the public to comment on the proposed plan in accordance with Section 12 of the Regulations. At the comment period's conclusion, the Department will review and consider all of the comments received and then the Department will issue a final plan of remedial action. The final plan of remedial action shall designate the selected remedy for the site. The proposed plan, the comments received from the public, the Department's responses to those comments, and the final plan of remedial action will constitute the remedial decision record.

The Regulations discuss the contents of the proposed plan of remedial action in Section 8 of the Regulations. The proposed plan contains a description of the following site information:

- A summary of the procedures, analytical results, and conclusions of the remedial investigation,
- A review of certain interim actions already undertaken at the site,
- A discussion of objectives,
- A summary of the risk assessment results, and
- A plan for the site's future.

III. Site Description

The Site consists of an L-shaped parcel with an approximate area of 6.4 acres. The tract is located along the west side of Delaware State Route 9, (Wilmington Road) within the northern portion of the City of New Castle, New Castle County, Delaware (Figure 1 - Site Location.) Wilmington Road bounds the Site to the east, the New Castle Board of Water and Light (“NCBW&L”) bounds the Site to the north and west, a rail line (the Delaware Railroad Company) bounds the Site on the southwest, Knotts Bus Company bounds the Site on the south, and the John Wolf residence bounds the site for approximately 100 feet to the southeast.

The New Castle Spill Federal Superfund Site sits to the north of the NCBW&L and a marsh is located to the west of the NCBW&L.

The Site sits on two (2) topographic levels, with the southern portion of the Site higher in elevation than the northern portion of the Site. While the topographic character across each segment of the Site is relatively flat, the southern portion of the Site lies between five and six feet higher in elevation than the northern portion of the Site.

For convenience, this Proposed Plan of Remedial Action describes the southern portion of the Site as Parcel A, (see Figure 2 - Site Sub Areas) and the northern portion of the Site as Parcel B, (see Figure 2 - Site Sub Areas). Parcel A consists of 4.7 acres with its long axis oriented east-west. Parcel B consists of 1.7 acres with a rectangular shape measuring 320 feet (north-south) by 230 feet (east-west). A chain link fence partially separates the two parcels.

IV. Site History

Review of the aerial photographs of the Site and the surrounding area indicates that the Site was undeveloped and used for agricultural purposes through at least 1954. Subsequent to the development, Parcel A and Parcel B were initially used for different purposes.

A. Site Use History: Parcel A - South Portion

Hoy’s 5 & 10 Cent Store (“Hoy”) owned, developed and the occupied Parcel A. Hoy constructed a office/warehouse structure on the front quarter of the property and left the rear three quarters of the property to revert to its natural state.

Hoy sold the property to Quillen Brothers’ Auto Sales, Inc. (“Quillen Brothers’) in 1965. Quillen Brothers’ leased the building’s office portion to an accounting firm and used the building’s rear portion for automobile body repairs and part storage. During this period Quillen Brothers’ did not use the western portion of Parcel A (which comprises approximately 69% of the Site) and allowed trees and shrubs to continue to grow and take

Figure 1 - Site Location

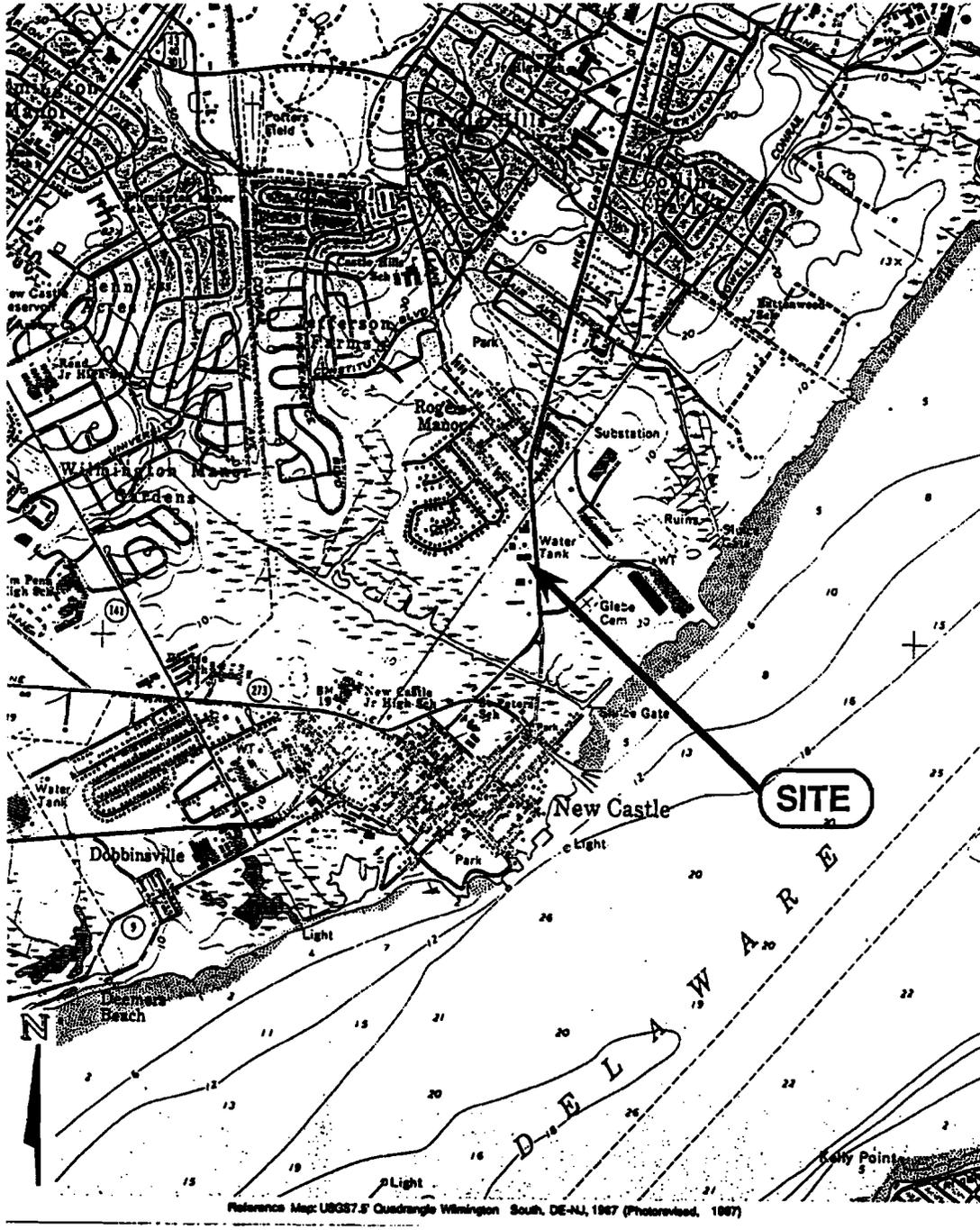
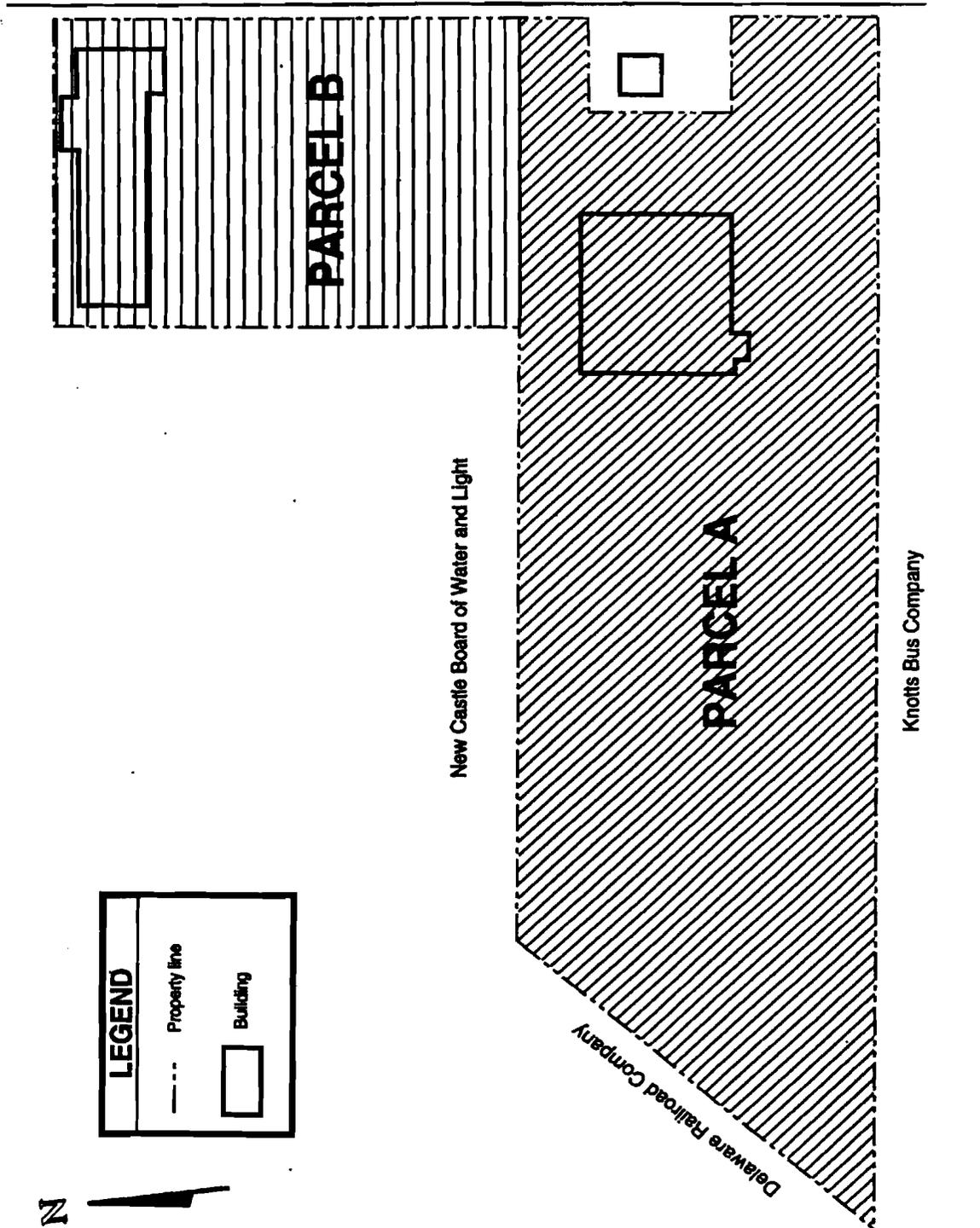


Figure 2 - Site Sub Areas: Parcel A and Parcel B

Wilmington Road (Delaware Route 9)



over this western portion. After several years, the accounting firm vacated the building's front portion and Quillen Brothers' expanded their storage into this area.

Quillen Brothers' transferred the ownership of Parcel A along with Parcel B to Quill 800, Inc. ("Quill 800") in 1982. In 1982, Quill 800 leased Parcel A to Castle Ford, Inc. which utilized the building's front portion as storage space and the rear portion for automobile body repair. Castle Ford, Inc. ceased business operations at Parcel A in 1992.

From 1992 through 1994, Parcel A remained unoccupied. In 1994, Quill 800 subdivided Parcel A from Parcel B, creating two (2) tax parcels, and leased Parcel A to Wik Associates, Inc. ("Wik") a local consulting firm. Wik presently uses the front portion of the building for office space and the rear portion for of the building for storage. Wik presently, does not use the rear wooded portion of Parcel A.

B. Site Use History: Parcel B - North Portion

Quillen Brothers' developed the property in 1958 for use as an automobile dealership. Quillen Brothers' constructed the structure in 1958 on the northern end of Parcel B for use as a showroom, offices, and a vehicle service facility and then graded and paved the remainder of Parcel B for use as a vehicle storage area. During the initial years of the automobile dealership, the dealership operated exclusively on the Parcel B portion of the Site. Quillen Brothers' operated on Parcel B from 1958 to 1982. In 1982, Quillen Brothers' sold the dealership to Castle Ford, Inc. and then Quillen Brothers' transferred the Parcel B property to Quill 800, Inc., the current owner of the site. Castle Ford Inc. ceased operating on the Site in 1992 and since 1992 Parcel B has remained un-occupied. In 1994, Quill 800 subdivided Parcel B from Parcel A, into two (2) separate tax parcels.

C. Facility Processes and Waste Generation History

Quillen Brothers' generated process residuals and wastes at the Site only from the vehicle repair and body shop operations. These wastes typically included the following materials summarized in Table 1 - Quillen Brothers' Wastes.

Table 1 - Quillen Brothers' Wastes

Vehicle Repair Facility	Auto Body Shop
Motor oil and lubricants (new and used)	Paint and lacquer thinners
Antifreeze	Paint and lacquer carrying agents
Degreasers (used for parts cleaning)	Degreasers
	Solvents

Floor drains located in the floor of the vehicle service bays in the Parcel B's showroom building drained to a pass through tank which connected to the municipal sanitary sewer system. The pass through tank was initially constructed as an oil-water separator though

it appears that as long as the Quillen Brothers' operated at the Site the fluids in the tank went directly into the city sewer and were not separated. The floor drains primarily accepted water (rain and melted snow) from the incoming vehicles. The floor drains also accepted water during the periodic washing of the floors in the service area.

The waste oils and generated fluids produced during on-site repair were collected in above ground canisters and emptied into a waste oil drain located in the service area floor. This waste oil drain emptied into the 500 gallon waste oil tank located centrally and immediately south of the showroom building. Quillen Brothers' periodically emptied the 500 gallon waste oil tank throughout its use at the Site. After Quill 800 removed the waste oil tank in May 1990, Castle Ford, Inc. temporarily staged the oils in 55-gallon drums prior to removal by a licensed waste hauler.

Quillen Brothers' disposed of the waste solvents, generated from a self-contained parts washer located in the vehicle service bay areas on Parcel B, through a contract with Boulden, Inc.

Quillen Brothers' moved the body shop operations from Parcel B to Parcel A during the 1960's. Floor drains within the body shop portion of Parcel A's building were directly connected to the municipal sanitary sewer system. Quillen Brothers' former facility personnel indicated that Quillen Brothers' collected the waste solvents in 5 and 55-gallon drums and temporarily stored within an area immediately west of the body shop building prior to disposal. Quillen Brothers' hired Hazco International, Inc. to transport and Spectron, Inc. to dispose of these drummed waste.

D. Regulatory History

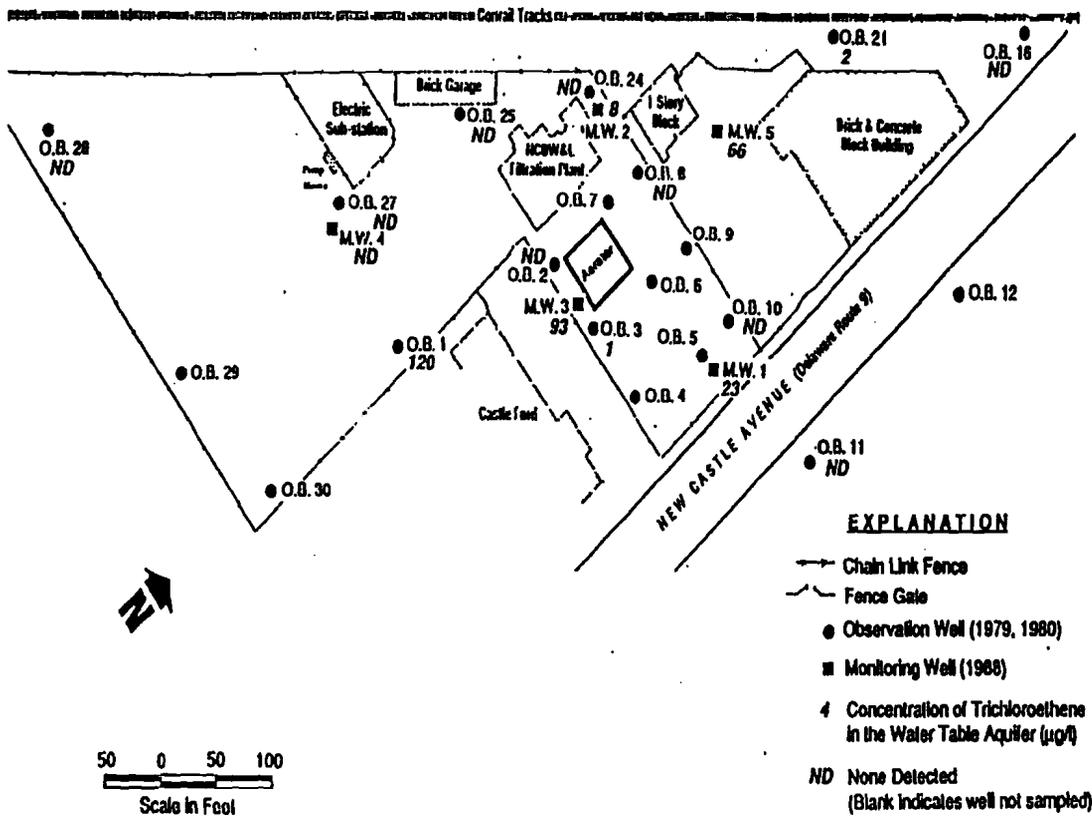
The following is a brief summary of the regulatory history for the Site.

1. Site Identification

The United States Environmental Protection Agency ("EPA") identified the Site as a function of investigations conducted by Environmental Resource Management, Inc. ("ERM") on the behalf of Witco Corporation at the New Castle Spill National Priority List Site. The New Castle Spill investigation found that:

"tris (beta-chlorophyl)-phosphate ('tris') and trichloroethene ("TCE") were the most commonly identified organic compounds in the local groundwater system. Tris concentrations ranged from 17.1 to 1109, 000 micrograms per liter (ug/l). TCE concentrations ranged from 1 (a qualitative estimate) to 120 ug/l (see Figure 3 - Concentrations of Trichloroethene in the Water Table Aquifer, April 18, 1988).....TCE was reportedly never used by Witco."

**Concentration of Trichloroethene in the Water Table
Aquifer ($\mu\text{g/l}$), 18 April 1988
New Castle Spill Site**



Modified from Final Remedial Investigation Report for the New Castle Spill Site, ERM, Inc., Figure 4-8

Figure 3 - Concentrations of Trichloroethene in the Water Table Aquifer, April 18, 1988

Based on the results of the New Castle Spill findings, ERM concluded that the distribution of TCE in the unconfined water table aquifer suggested that the source of TCE was in an upgradient direction from the Witco facility, (e.g. the Quillen Brother's Auto Sales, Inc.).

2. Preliminary Assessment

The Department conducted a preliminary assessment ("PA") of the Site under the Comprehensive Environmental Response Compensation Liability Act (CERCLA) in March 1989 which revealed the presence of apparent waste solvent stains on asphalt in the waste solvent storage area behind the body shop as well as possible paint/waste solvent stains in the grassy area located immediately south of the body shop.

3. Site Investigation

The Department performed a site investigation ("SI") of the Site under CERCLA on May 23 and 24, 1989. The SI consisted of soil sampling in three (3) areas within the Castle Ford property plus a fourth location (off-site background sample) and groundwater samples from five (5) groundwater monitoring wells located adjacent to the Castle Ford property. Results of the SI indicated the present of TCE, in conjunction with other compounds.

4. Underground Storage Tanks (USTs) Waste Oil and Heating Oil Removal/Abandonment

Quill 800 with the Department's oversight and approval, decommissioned two (2) USTs (a 500 gallon waste oil tank and a 2,000 gallon heating oil tank) at the Site in May 1990 as per the Regulations Governing Underground Storage Tanks. Quill 800 excavated and removed the 500 gallon tank from the subsurface. Quill 800 abandoned the 2,000 gallon tank in-place due to its location adjacent to and partially beneath the north side of Parcel B's show room building.

Quill 800 removed the last un-addressed tank at the Site, a 3,000 gallon gasoline tank, in December 1993. During the removal, Quill 800 detected concentrations of Total Petroleum Hydrocarbons ("TPH") slightly above the Department's action levels; consequently, the Department required a limited site investigation in the immediate vicinity of the 3,000 gallon tank. Based on the analytical results from the limited investigation, the Department issued a letter dated June 7, 1994 indicating that the Department did not require any further action at the Site relative to the 3,000 gallon tank.

5. Hazardous Substance Cleanup Act

In April 1992, the Department reached an agreement with Quill 800, the Potentially Responsible Party ("PRP"), to perform a Remedial Investigation of the Castle Ford Site under the Delaware Hazardous Substance Cleanup Act ("HSCA"). The Department approved the Work Plan in January 1993. The Remedial Investigation field work began

in July 1993 and finished in October 1993. Quill 800 submitted a draft Remedial Investigation (“RI”) and Risk Assessment (“RA”) Reports to the Department in November 1994. Quill 800 submitted the final Remedial Investigation and Risk Assessment Reports to the Department in March 1995.

Quill 800, at the direction of the Department, completed an interim action on the Parcel A portion of the Site. The first portion of the interim action involved Quill 800 removing the paint residue located to the ground south of the auto body shop building on Parcel A and stockpiling and covering this paint chip material on Parcel B for proper disposal. The second portion of the interim action involved Quill 800 disposing of drummed drilling residuals and purge fluids from Parcel A’s monitoring wells. Quill 800 completed the interim action in July 1994, as directed by the Department. With the completion of the July 1994 Interim Action, the Department removed Parcel A from the definition of the Site through an amendment to the Consent Decree.

In September 1994, the Department and Quill 800 finalized the First Amendment to the Consent Decree which recognized the separation of Parcel A from Parcel B and removed Parcel A from the Department’s definition of the Site and therefore any obligations under HSCA.

This proposed plan describes the findings of the RI and RA and address the remaining HSCA issues located on Parcel B.

V. Remedial Investigation Procedures

An extensive review of past investigations (Witco’s for the New Castle Spill NPL Site and the Departments PA and SI for the Site) and waste handling practices, identified areas of concern on the Site which had not yet been addressed. However, the Department found that significant portions of the information from the Witco New Castle Spill Site were applicable to the Site and therefore, the Department agreed that duplication of previous investigative efforts unwarranted. With this in mind, Quill 800 developed a Work Plan to:

- Define the source of the TCE found in groundwater and soil samples in and around the Site,
- Evaluate the extent and magnitude of the TCE contamination impacting the soils and groundwater
- Identify existing and potential migration characteristics and pathways (direction, rate, and dispersion) for the TCE contamination as related to activities conducted at the Site, and
- Characterize actual or potential hazards to human health and/or the environment resulting from the TCE in around the Site.

The Work Plan called for:

- The collection and analysis of subsurface and surface soils samples,

- The installation of two (2) monitoring wells on Parcel A (one south and one west of the body shop) and three (3) monitoring wells on Parcel B (one north of showroom building, one west of the showroom building adjacent to the storm drain, and one south of the showroom), see Figure 4 - Project Groundwater Monitoring Network,
- The sampling of the newly installed monitoring wells and selected Witco New Castle Spill monitoring wells, and
- The analysis of collected soil and groundwater samples for selected analytical parameters.

VI. Remedial Investigation Results

The following is a brief summary of the Quill 800 RI results.

A. Geology

The Site RI identified the same lithology under the Site as Witco found under the New Castle Spill Site. Fine grained surface soils sit on top of the sands of the Columbia Aquifer, which consists of medium-grained silty sand with trace to moderate amounts of small to medium quartz gravel. Under the Columbia Aquifer sits the clay of the upper portion of the Potomac Aquifer.

This lowermost lithology encountered during the investigation at the Site was a gray dense, stiff clay layer. Data obtained from the Witco - New Castle Spill RI Investigation reported that this clay ranges in thickness from 25 to 34 feet. Permeability testing performed on this clay by Witco in 1988 indicate an average permeability of 2.87×10^{-8} cm/sec. An undisturbed soil sample of the clay collected from Site well MW-5 reported a vertical permeability of 1.2×10^{-8} cm/sec which corroborates Witco's findings.

B. Site Hydrogeology

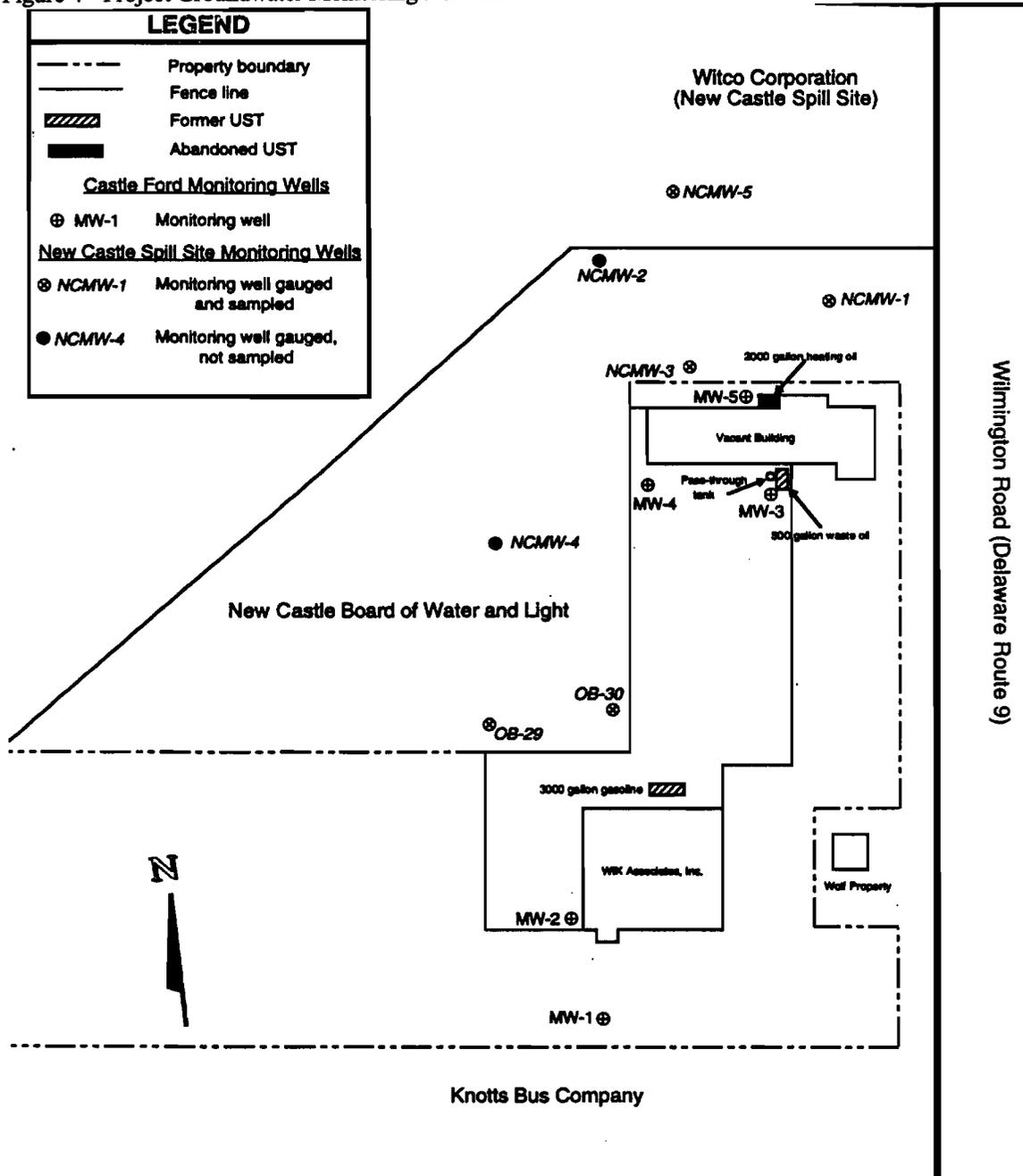
Quill 800 obtained groundwater elevations for the Site on two (2) occasions. These data appear to indicate that from the central portion of the Site, groundwater flow directions descend radially to the north, the northwest, and the west. The Quill 800 flow directions coincide with the Witco New Castle Spill Site flow directions.

From the Site's groundwater information, Quill 800 calculated a hydraulic gradient for the Site of 0.0005 feet per foot and a rate of groundwater flow of 0.64 feet per day.

C. Analytical Results

The following is a brief summary of the RI findings.

Figure 4 - Project Groundwater Monitoring Network



1. Soils

Quill 800 detected no organic vapors with field instrumentation from during monitoring well installation and soil sampling on Parcel A. Quill 800 detected organic vapors from a limited number of soils samples collected on Parcel B at the downslope limit of the Site.

Laboratory analyses of soils collected during monitoring well installation indicate trace levels of benzene and the presence of three base neutral compounds, all of which are phthalates. Significant soil contamination is not considered to exist at the Site.

2. Groundwater

The laboratory detected TCE as the only compound detected at levels of potential concern. Laboratory analysis of groundwater samples indicate TCE concentrations above 5 ug/l in two (2) monitoring wells on the Site (Parcel B portion) and in three (3) monitoring wells situated downgradient of the Site on the New Castle Spill Site. The maximum TCE concentration detected in groundwater was 21 ug/l from an on-site well, See Table 2 - Concentration of Trichloroethene ("TCE") in Site Area Monitoring Wells.

TCE concentrations in the three (3) sampled off-site monitoring wells from 1988 through 1993 decreased between 43 to 87 percent.

D. Conclusions of the Remedial Investigation

The sampling results, when taken in conjunction with the previous field studies and the background investigation, allow some general conclusions about the volume and distribution of contamination at the Site.

The confining layer beneath the Columbia Formation, the water table aquifer, is a dense clay with a vertical permeability of 10-8 cm/sec. In addition, the Witco RI estimated that it would take approximately 160 years for groundwater and/or contamination to migrate, from the Columbia aquifer into the confining clay of the Potomac, to a depth of one-foot into the clay.

Assuming that all the TCE detected in the groundwater emanated from the Site, and a thirty (30) year period from the initial introduction of TCE into the groundwater system, the rate of TCE transport within the local groundwater system calculates to 10.0 feet/year.

While rates of contamination transport are pertinent, the distance to which TCE is expected to migrate away from the Site is of equal if not greater significance. New Castle Spill data indicate low to non-detectable concentrations of TCE in monitoring wells situated between 250 to 300 feet downgradient from the building on Parcel B. Based on the absence of source replenishment since the closure of the automotive facility at the Site and the declining concentrations of TCE detected by groundwater sampling, further

advance of the TCE plume is not expected and an overall reduction in the TCE contamination plume extent can be anticipated.

Table 2 - Concentration of Trichloroethene ("TCE") in Site Area Monitoring Wells

Monitoring Well	Site	Location	April 1988	May 1989	July 1993
NCMW-1	New Castle Spill Site	New Castle Board of Water and Light	23 ug/l	not sampled	13 ug/l
NCMW-2	New Castle Spill Site	New Castle Board of Water and Light	8 ug/l	not sampled	not sampled
NCMW-3	New Castle Spill Site	New Castle Board of Water and Light	93 ug/l	42 ug/l	12 ug/l
NCMW-4	New Castle Spill Site	New Castle Board of Water and Light	ND	not sampled	not sampled
NCMW-5	New Castle Spill Site	Witco	66 ug/l	not sampled	13 ug/l
OB-29	New Castle Spill Site	New Castle Board of Water and Light	not sampled	ND	ND
OB-30	New Castle Spill Site	New Castle Board of Water and Light	not sampled	ND	ND
MW-1	Castle Ford Site	Quillen Brothers'	na	na	ND
MW-2	Castle Ford Site	Quillen Brothers'	na	na	2J ug/l
MW-3	Castle Ford Site	Quillen Brothers'	na	na	5J ug/l
MW-4	Castle Ford Site	Quillen Brothers'	na	na	21 ug/l
MW-5	Castle Ford Site	Quillen Brothers'	na	na	18 ug/l

Note: ND = Not Detected
na = not applicable

VII. Interim Action

The Remedial Investigation Consent Decree with the responsible parties provided that, if during the course of the investigation means became apparent to reduce contamination or prevent its spread, appropriate action would be taken immediately. Since 1992, the following remedial actions have occurred:

- One (1) 3,000 gallon gasoline underground storage tank was removed,
- Approximately 60 tons of paint stained and clean soil was excavated from the paint spill area located south of the body shop on Parcel A. The excavated soils were stockpiled and held on Parcel B for future sampling and then transport for proper disposal,
- Drummed drilling residues from MW1 and MW2 were disposed of as clean fill on the Site, and
- Drummed drilling cuttings from MW3, MW4, and MW5 were disposed of as clean fill on the Site.

VIII. Facility Remedial Action Objectives

The Regulations provide that the Department sets objectives for land use, resource use, and cleanup levels that are protective of human health and the environment. The following two (2) objectives are determined to be appropriate for the Castle Ford Site:

- To continue the use of the property as an industrial/commercial facility with supplied public water for all purposes, and
- To allow routine construction, excavation and maintenance activities without any special chemical hazard protection.

These objectives are consistent with the value of the building structures (e.g. office, warehouse, and vehicle maintenance shop) the surrounding land use, New Castle County zoning policies, state regulations governing water supply, and worker health and safety.

IX. Risk Assessment Summary

Quill 800 performed a health risk assessment to evaluate the possible effects on human health from the use of the Site consistent with the objectives discussed above.

The Risk Assessment (“RA”) evaluated whether there was a possible health risk and/or environmental impacts from the release of hazardous substances from the Site under a No Action Scenario. The RA was performed in a segmented fashion, which evaluated Parcels A and B under separate assessments.

The RA results indicated that there was an absence of any chemicals of concern (“COC”) in the soil and groundwater on Parcel A and no COC in soil on Parcel B. One COC, TCE was determined to exist in groundwater on Parcel B.

The RA determined that the only exposure pathway for groundwater at the Site on Parcel B was through a domestic water supply well and that cancer risk did not exceed a cancer risk value of 10⁻⁵, see Table 3 - Calculated Intakes and Cancer Risk. In addition, since no domestic water supply well currently exists at the Site and or in the environs immediately surrounding the Site, the RA concluded that no hazard exists at the Site. The RA, further concluded, that this absence of hazard will continue as long as groundwater beneath the Site is not used as a potable water supply. However, please note, the TCE concentrations of 21 ug/l and 18 ug/l exceed the federally mandated Maximum Contamination Level (“MCL”) for Drinking Water of 5 ug/l; therefore, the Department shall restrict the withdrawal of groundwater for drinking water purposes in the unconfined aquifer.

X. Proposed Remedial Action Plan

Since the risks associated with the Site are acceptable if the unconfined aquifer is restricted from drinking water use, and the Department will restrict drinking water access, the proposed plan is as follows for Parcel A and Parcel B.

A. Proposed Remedy - Parcel A

The Department recommends that Quill 800 abandon the existing monitoring wells MW-1 and MW-2 under the appropriate regulation.

B. Proposed Remedy - Parcel B

The Department recommends the following.

- Groundwater withdrawal from the unconfined aquifer be restricted.
- Quill 800 shall maintain the monitoring wells (MW4, and MW5) located on Parcel B. However, prior to any property transaction, the seller shall sample the wells, which previously reported TCE, for TCE and report this information to the Department. Each subsequent, seller and buyer is obligated to maintain, sample, and report the levels of TCE until TCE in groundwater reaches the target concentration of 5 ug/l in groundwater, (e.g. the Maximum Contamination Level (MCL) for Drinking Water Supplies as amended by the EPA). When this target concentration is reached, the Owner can petition the Department to grant approval for the Owner to properly abandon the well(s).
- Quill 800 shall abandon properly the existing monitoring well MW3 under the appropriate regulations.

Table 3 - Calculated Intakes and Cancer Risks

Compound Name	Concentration (ug/l)	SF Inhalation (1/mg/k/d)	SF Oral (1/mg/k/d)	Cancer Risk Combined Resident & Child	Cancer Risk Worker
Trichloroethene ("TCE")	21.0	6.00E-03	1.10E-02	1.3533E-06	5.2185E-06

- Quill 800, shall dispose of the approximately sixty (60) tons of mixed paint stained and clean soil removed from Parcel A and stockpile and tarped on Parcel B properly.
- Quill 800 shall dispose of properly the drummed purge fluids from MW-3, MW-4, and MW-5.
- Quill 800 shall clean the floor drain in the vehicle bays to the pass through separator and then empty and clean the pass through separator of any liquid/sludge located in the pass through separator. Quill 800 shall dispose of this liquid/sludge properly and then confirm that the pass through separator and floor drains are functioning properly. Or, Quill 800, shall decommission the floor drains and pass through separator properly. If Quill 800 elects to decommission the pass through separator, Quill 800 shall remove and dispose of properly any and all fluids, sludges, and/or residues contained there in prior to decommissioning the pass through separator.

XI. Public Participation

The Department actively solicits public comments or suggestions on the proposed plan and welcomes opportunities to answer questions. Please direct written comments to:

Department of Natural Resources
Division of Air and Waste Management
Superfund Branch
715 Grantham Lane
New Castle, Delaware 19720

Attn: Jane Biggs Sanger

or call (302)323-4540. The public comment period closes on April 24, 1995. A public meeting will also be held on the Proposed Plan. The meeting will be held on Wednesday, April 12, 1995 at 7:00 p.m. in the Department of Natural Resources and Environmental Control New Castle Office in the Large Conference Room located at 715 Grantham Lane, New Castle, Delaware.

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