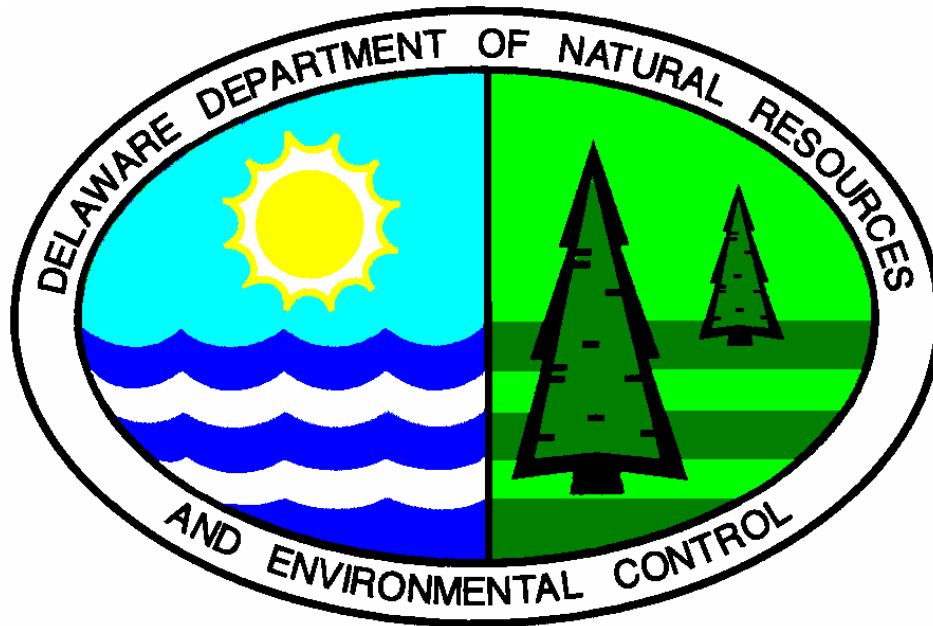


PROPOSED PLAN OF REMEDIAL ACTION

Kenton Landfill OU1
Kenton, DE

DNREC Project No. DE-0108



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Delaware Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation & Restoration Branch
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TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	SITE DESCRIPTION AND HISTORY.....	2
2.1	SITE SETTING.....	2
2.2	SITE AND PROJECT HISTORY	2
3.0	INVESTIGATION RESULTS/FEASIBILITY STUDY	3
4.0	REMEDIAL ACTION OBJECTIVES.....	4
6.0	PUBLIC PARTICIPATION.....	6

LIST OF FIGURES

FIGURE 1: SITE LOCATION MAP.....	9
FIGURE 2: SITE LOCATION MAP SHOWING OU1 AND OU2.....	10
FIGURE 3: SITE PLAN SHOWING MONITORING WELL LOCATIONS	11

LIST OF APPENDICIES

APPENDIX A: Remedial Investigation Laboratory Data Summary Tables

1.0 INTRODUCTION

The Kenton Landfill (site) consists of approximately 98 acres and is located 1.5 miles south of Kenton, Delaware. The site is located 1,300 feet north of the intersection of Delaware Route 11 and Shorts Corner Road or Road 169 (Figure 1). Route 11 immediately borders the site to the south and west, and wooded open space to the north and east. A small trailer park is located to the south, beyond several hundred yards of forested land. The site is divided into two sections by a railroad right-of-way. The western portion is approximately 45 acres, in size and was designated as Operable Unit 1 (OU1) during the initial investigations, with the remaining 53 acres in the eastern portion, designated as OU2.

The site owner, the Delaware Department of Transportation (DelDOT), entered into the Voluntary Cleanup Program (VCP) under the provisions of the Delaware Hazardous Substance Cleanup Act, 7 Del. C. Chapter 91 (HSCA), as administered by the Delaware Department of Natural Resources and Environmental Control-Site Investigation and Restoration Branch (DNREC). Through a VCP Agreement, DelDOT agreed to investigate the potential risks posed to the public health, welfare, and the environment at the site.

A facility evaluation (FE) conducted by DNREC, and completed in 1994, identified low concentrations of metals, pesticides and volatile organic compounds (VOCs) in on-site soils, and elevated concentrations of several metals and organic solvents in shallow groundwater. Based upon the results of the FE, a RI was recommended.

In 1995, an additional environmental investigation was conducted on behalf of DelDOT by EA Engineering, Inc. (EA), the scope of which concentrated on the groundwater medium. Additional wells were installed, and slug tests were performed to better characterize the groundwater flow direction and rate. Based upon the results of these investigations, DelDOT entered into the VCP, and contracted Tetra Tech, Inc. (Tetra Tech) of Christiana, Delaware, to perform a remedial investigation (RI) of the site.

This document is the Department's proposed plan of remedial action (proposed plan) for the site. It is based on the results of the previous investigations performed at the site. This proposed plan is issued under the provisions of the HSCA and the Regulations Governing Hazardous Substance Cleanup (Regulations). It presents the Department's assessment of the potential health and environmental risks posed by the site.

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

Section 2.0 presents a summary of the site description and history. Section 3.0 provides a description of the RI results. Section 4.0 presents a discussion of the remedial action objectives. Section 5.0 presents the proposed plan. Section 6.0 discusses public participation requirements.

2.0 SITE DESCRIPTION AND HISTORY

2.1 Site Setting

The site consists of approximately 98 acres and is located 1.5 miles south of Kenton, Delaware. The site is located 1,300 feet north of the intersection of Delaware Route 11 and Shorts Corner Road (Road 169). Route 11 immediately borders the site to the south and west, and wooded open land to the north and east. A small trailer park is located to the south, beyond several hundred yards of forested land (Figure 2).

The site is divided into two sections, known as operable units, by a railroad right-of-way. The western portion is approximately 45 acres in size, and was designated as OU1 during the initial investigations, with the eastern portion designated as OU2. Access by vehicle is limited in OU1 by a locked cable barrier onto the only dirt path/road into the landfill. Pedestrian access is not restricted. A fence with two gates surrounds a portion of OU2.

2.2 Site and Project History

DelDOT operated the site as a sand and gravel borrow pit from 1951 until 1964, after which DelDOT disposed of road debris and tree clippings on OU1. During that time, it has been confirmed that local residents disposed of various domestic refuse into the pit. It is also suspected that illegal dumping of industrial waste may also have taken place. Dumping activities were curtailed in the late 1960s. In 1969, DelDOT leased OU2 to Kent County, which erected a transfer station in 1979 that was operated by the Delaware Solid Waste Authority.

As part of a FE conducted by DNREC in 1994, soil and groundwater samples were collected from seven test pits and four newly installed monitoring wells (MW-1 through MW-4). A follow-up investigation by EA on behalf of DelDOT was performed in 1995, which involved the collection of soil and groundwater samples from three new wells (MW-5 through MW-7). The results of these investigations confirmed the presence of both domestic and industrial waste in OU1. Soil samples contained low concentrations of VOCs, metals and pesticides. Groundwater samples from a number of the monitoring wells contained elevated concentrations of vinyl chloride, 1,2-dichloroethene (DCE) and trichloroethene (TCE) above their respective EPA Maximum Contaminant Levels (MCLs) for Drinking Water. The EA investigation also conducted slug tests on six wells in order to assess the characteristics of the shallow Columbia Aquifer. A rare-species information search requested by EA, and conducted by DNREC's Division of Fish and Wildlife identified the presence of two rare Delaware plants within the OU1 site boundaries, both located in shallow wetlands near Route 11.

As a consequence of these investigations, DNREC contacted DelDOT who entered into a VCP Agreement to perform a RI at the Kenton Landfill OU1 site. The purpose of the RI was to: 1) assess potential contaminant exposure to nearby residents and potential future construction workers; 2) delineate the extent of the groundwater contaminant plume; 3) identify and assess potential impacts to nearby surface water bodies; 4) assess potential impacts of the site on rare and endangered species; and 5) investigate the potential for the migration of contaminants in surface soils, such that the migration of contaminants does not cause a violation of state and federal water quality standards for surface water bodies.

3.0 INVESTIGATION RESULTS/FEASIBILITY STUDY

Concentrations of dissolved VOCs, in particular DCE (up to 310 micrograms/liter ($\mu\text{g/L}$) in MW-3), TCE (up to 67 $\mu\text{g/L}$, in MW-3) and vinyl chloride (up to 170 $\mu\text{g/L}$ in MW-3), were detected in groundwater samples above their Delaware Uniform Risk-Based Standards (URS) of 5 $\mu\text{g/L}$, 5 $\mu\text{g/L}$ and 2 $\mu\text{g/L}$ respectively. Concentrations of dissolved metals were all below their URS for groundwater except aluminum, iron and manganese. However, standards for these three metals are based upon aesthetic, not health based, concerns.

Analytical and field screening data indicate that low concentrations of VOCs, semivolatile organic compounds (SVOCs), pesticides and PCBs remain in on-site soils, below remediation standards, with no “hot spot” areas identified. Concentrations of several metals, including copper, nickel and thallium were slightly elevated above site-specific background values, but did not exceed any URS values. Complete analytical results from the RI are presented in table format in Appendix A.

No VOCs, semivolatile organic compounds (SVOCs), pesticides or PCBs were detected in surface water samples. Elevated concentrations of eleven metals, particularly iron (up to 94,300 $\mu\text{g/L}$, URS of 1,000 $\mu\text{g/L}$) and manganese (up to 11,300 $\mu\text{g/L}$; URS of 80 $\mu\text{g/L}$), were detected at levels above their respective URS values for the protection of the environment, and above the levels from an upstream, background, sampling location. Concentrations of dissolved metals appeared to increase at locations adjacent and downstream from the landfill, indicating potential site impacts. Subsequently, an ecological assessment of the stream was conducted to evaluate the potential impact that the elevated metals in surface water may have on the benthic macroinvertebrates within the stream. The ecological assessment was conducted in accordance with both DNREC and the U.S. Environmental Protection Agency (EPA) Rapid Bioassessment Protocols. Results of the assessment indicated that there were no deleterious effects on the benthic macrofauna as a result of the elevated metals in surface water.

No formal human health risk assessment was performed. In place of the risk assessment, contaminant concentrations were directly compared to the Delaware’s URS or U.S. EPA’s MCL values. The results of this comparison indicated that potential human health risk existed in the potential use of groundwater, due principally to the presence of vinyl chloride, and to a lesser extent, TCE and DCE.

Upon completion of the RI, and after establishing remedial action objectives, DNREC usually requires a feasibility study (FS) to be performed in order to evaluate the various options available to remediate a site. However, for some categories of sites with similar environmental problems, 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*. It was concluded by EPA that containment technologies generally would be appropriate for municipal landfill waste because the volume and heterogeneity of the waste

generally make treatment impracticable. DNREC has previously reviewed this policy and concurs with EPA's approach, and has adopted EPA's presumptive remedy of containment for municipal landfills. By using this approach, DNREC has determined that this will streamline the remedial process and, at the same time, provide protectiveness to public health, welfare, and the environment.

The Department has placed a copy of *EPA's Presumptive Remedy for CERCLA Municipal Landfill Sites* and a supporting document entitled *Conducting Remedial Investigations/ Feasibility Studies for CERCLA Landfill Sites* at the DNREC office location located in Section 6.0.

4.0 REMEDIAL ACTION OBJECTIVES

According to Section 8.4 (1) of the Regulations, site-specific remedial action objectives must be established for all plans of remedial action. The Regulations provide that DNREC set objectives for land use, resource use and cleanup levels that are protective of human health and the environment.

Qualitative objectives describe in general terms what the ultimate result of the remedial action, if necessary, should be. In view of the presumptive remedy policy developed for landfill sites, and in consideration of the commercial land use scenario and the DNREC *Regulations Governing Solid Waste*, the following qualitative objectives are determined to be appropriate for the site:

1. Prevent human exposure to impacted media.
2. Prevent migration of contaminants off-site.
3. Prevent environmental impacts to surface water bodies due to impacted media at the site.
4. Minimize ecological exposure to impacted media.
5. Protect and preserve threatened or endangered species and maintain habitats that presently support threatened or endangered species.

These objectives are consistent with the current and proposed use of the site as a former landfill in a rural setting, Kent County zoning policies, and state regulations governing water supply.

Based on the qualitative objectives, the quantitative objectives are:

1. Prevent human exposure to landfill waste and associated contaminated soils through maintenance of soil and vegetative cover and through institutional controls.
2. Prevent human exposure to groundwater contaminated by TCE, 1,2-DCE and vinyl chloride above their U.S. EPA MCLs of 5 µg/l, 5 µg/l, and 2 µg/l, respectively, through a combination of institutional controls and monitored natural attenuation.

3. Direct surface water drainage off and away from the landfill and minimize precipitation percolation through the landfill waste that could leach soil contaminants into groundwater through maintenance of soil and vegetative cover, and elimination of areas of standing water on the surface of the landfill.
4. Prevent ecological exposure to soils with concentrations of VOCs, SVOCs, and metals above ecological thresholds through maintenance of soil and vegetative cover.
5. Monitor groundwater and surface water quality so as to assure that no further degradation of these media occur.
6. Protect and preserve threatened or endangered species, and the habitat, which presently supports threatened or endangered species, through institutional controls.

5.0 PROPOSED PLAN OF REMEDIAL ACTION

Based on the presumptive containment remedy, the existing and proposed land use scenario, the *Regulations Governing Solid Waste*, and *Regulations Governing Water Supply*, the following remedial actions are proposed to ensure the long-term protectiveness to public health, welfare, and the environment:

- 1) Maintain the integrity and effectiveness of the existing soil cover, including making repairs as necessary to correct the effects of settling, subsidence and erosion so as to promote the establishment of vegetative cover, minimize infiltration and percolation of water into, and prevent erosion of, landfill waste. Maintenance of the existing soil cover would be conducted in accordance with a DNREC-approved O & M plan and schedule.
 - a. Note that the land has been used as a solid waste disposal site, a description of which shall include a detailed map of the area(s) that were used for solid waste disposal, and
- 2) Placement of a deed restriction which will:
 - a. Prohibit further development of the site, and designate the property as “Open Space.”
 - b. Note that the site is included in a Groundwater Management Zone (GMZ) which prohibits the installation of any water well on, or groundwater use at, the site without the written approval of DNREC;
 - c. Prohibit digging, excavation or any disturbance of the soil cap without the written approval of DNREC; and
- 3) Establishment of a long-term groundwater and surface water monitoring plan. The scope and frequency of monitoring would be conducted in accordance with a DNREC-approved O & M plan and schedule.

In addition, DNREC will place the site within a GMZ, which is an internal document that restricts groundwater withdrawals at the site.

6.0 PUBLIC PARTICIPATION

DNREC actively solicits public comments or suggestions on the proposed plan of remedial action and welcomes opportunities to answer questions. Please direct written comments to:

DNREC Site Investigation and Restoration Branch
391 Lukens Drive
New Castle, Delaware 19720
Attention: Keith Robertson

The comment period begins Wednesday, April 30, 2003, and ends at the close of business (4:30 p.m.) Tuesday, May 20, 2003 and if so requested, a public meeting will be held on the proposed plan. The meeting time and place will be announced if said meeting is requested.

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John Blevins
Director, Division of Air and Waste Management

Date of Review of Proposed Plan

Figures 1 - 3 from the 1998 Tetra Tech Remedial Investigation Report

Figure 1: Site Location Map

Figure 2: Site Location Map Showing OU1 and OU2

Figure 3: Site Plan Showing Monitoring Well Locations

Appendix