

POLREP 201
Standard Chlorine of Delaware Site
(aka Metachem Site)
745 Governor Lea Road
New Castle, DE 19720

Lat.: 39.59886 N, Lon.: 75.64226 W

ATTN:EPA III RRC

cc: DNREC - Crofts

I. SITUATION (as of April 7, 2006):

- A. The EPA On-Scene Coordinator along with the State of Delaware Department of Natural Resources and Environmental Control (DNREC) continue to conduct facility cleanup and implement removal actions. On-site activities focus on the removal of chemical substances from the facility and dismantlement operations.
- B. The wastewater treatment plant (WWTP) has been taken off-line and replaced with a bypass system that uses carbon filtration. Approximately 73,087,490 gallons of wastewater have been treated and discharged from the site to date.
- C. Tetra Tech continued conducting air monitoring throughout the facility. Volatile organic compounds (VOC's) remained at or below 1.0 parts per million (ppm) at the perimeter of the facility.
- D. A total of 11 totes of chlorobenzene mixture and 4 rollofs of chlorobenzene-contaminated piping and debris were shipped offsite for disposal. The following materials have been transported off-site to date.

Material	Amount	Method
Trichlorobenzene	234 ISO containers 7 truck loads 5 drums	Manufacturing
Orthodichlorobenzene	24 drums 1 truck load 3 railcars	Manufacturing
Used PPE	5 Rolloffs	Landfill
Hazardous debris	9 Rolloffs	Landfill
Nonhazardous debris	6 Rolloffs	Landfill
Ethylene glycol	27 truck loads	Incineration

Material	Amount	Method
Solids from former WWTP operations	4 rolloffs	Landfill
Bromochlorobenzene	6 truck loads	Fuel Blending
Paradichlorobenzene	7 truck loads 2 railcars	Manufacturing
Benzene	2 truck loads	Fuel Blending
Organic mud	1 truck load	Incineration
Contaminated solids/sediments, chlorinated benzene mixtures, and benzene	2,084 drums	Landfill and incineration
Sulfur monochloride	7 drums	Incineration
Spent activated carbon containing chlorobenzenes	3 portable tanks 2 roll-offs 3 vac box	Incineration
Monochlorobenzene	1 railcar 3 truck loads	Manufacturing
Non-hazardous debris from warehouse	14 truck loads 3 roll-offs	Landfill
Benzene	38 truck loads	Manufacturing
Hydrochloric acid	3 truck loads	Neutralization
Benzene waste	9 truck loads	Incineration
Diethylbenzene waste	1 truck load	Incineration
Paradichlorobenzene mixture	4 railcars	Manufacturing
Dichlorobenzene mixture*	21 railcars	Manufacturing
Chlorobenzene mixture (CR/SP bottoms)	525 totes	Incineration
Non-hazardous waste oil/water	2 truckloads	Recycling
TSCA debris	2 truckloads	Landfill
Chlorobenzene mixture waste	46 ISO containers 29 truckloads 21 vac boxes	Incineration
Drummed Chlorobenzene wastes	18 truckloads	Incineration
Caustic solution	4 truckloads	Neutralization

*previously listed as chlorobenzene mixture; update provides a more accurate material description

E. Estimated Costs (As of April 7, 2006):

	<u>ESTIMATED COSTS</u>	<u>CEILING</u>
START (old contract)	\$1,785,982	\$2,019,796
START (new contract)	\$175,506	\$295,875
ERRS:		
Earth Tech (old contract)	\$16,208,221	\$16,236,732
Earth Tech (new contract, through February 10, 2006)	\$906,165	\$1,250,000
Guardian (old contract)	\$663,140	\$695,000
Guardian (new contract)	\$1,819,187	\$1,850,000
Guardian (contract 3)	\$4,891,575	\$5,096,217
IT	\$24,447	\$52,000
REAC (as of 3/5/04)	\$607,090	\$875,000
USCG (as of 12/23/04)	\$828,018	\$879,090
Small Services Contract	\$23,887	\$64,691
Subtotal	\$27,933,218	\$29,314,401
Unallocated Funds		\$3,634,199
TOTAL	\$27,933,218	\$32,948,600

*EPA arranged for a zone crossover with Region 2 to keep Earth Tech on site past June 2005 to continue transportation of mixed trichlorobenzenes.

- F. The OSC continues to post POLREPs on the OSC website (<http://www.epaosc.net>) and forward key analytical results to the Region.

II. ACTIONS

- A. Guardian continued to be prepared for any hazardous materials spill control during dismantlement operations and continues on call for after-hours emergencies. There have been no spills.
- B. Guardian continues site maintenance and boiler operations, which continues over the weekend.
- C. Guardian and Tetra Tech continue to inspect drums and totes and Guardian overpacks the drums as necessary.

- D. Guardian continues to move and stage drums and totes in proper areas on the truck loading pad, drum storage pad, and warehouse, respectively.
- E. Guardian continues to maintain the cover over the BLAST tank sludge pile, including maintenance of the condensate and seepage.
- F. As needed, water and steam condensate that collects on the 700 pad is pumped into the 708 tank.
- G. Guardian loaded 11 totes of chlorobenzene mixture for disposal by EPA Remedial contractor Black and Veatch and their subcontractor Clean Harbors.
- H. Guardian loaded four rolloff containers of chlorobenzene-contaminated piping and debris for macroencapsulation in a certified landfill.
- I. Guardian continued investigation of underground piping leading to outfall 003. Sumps and drop boxes were cleared of soil and debris and underground piping was cleared and capped.
- J. Guardian continued to prepare piping for a smaller package boiler that will be brought on site to replace the existing package boiler.
- K. START continued maintenance and review of the vessel inventory status, drum database, disposal logs, and analytical database.
- L. Pioneer continued demolition operations and removing process equipment from the former plant.

III. FUTURE ACTIVITIES

- A. The OSC will continue to coordinate with the Region and DNREC regarding removal of chemicals from the site. The OSC will continue coordinating with off-site facilities.
- B. START will continue to review data and monitor worker health and safety.
- C. EPA and its contractors will continue to prioritize, plan, and implement future removal activities.

Michael Towle, On-Scene Coordinator
EPA Region III
Philadelphia, PA