

**EXPLANATION OF SIGNIFICANT DIFFERENCES  
for the  
TYBOUTS CORNER LANDFILL SUPERFUND SITE  
NEW CASTLE, NEW CASTLE COUNTY, DELAWARE**

**I. INTRODUCTION**

Site Name: Tybouts Corner Landfill Superfund Site

Site Location: New Castle, New Castle County, Delaware

Lead Agency: U.S. Environmental Protection Agency, Region III

Support Agency: Delaware Department of Natural Resources and  
Environmental Control

**Statement of Purpose**

The U.S. Environmental Protection Agency (EPA) hereby issues this Explanation of Significant Differences (ESD) for the Tybouts Corner Landfill Site (Site) in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), 42 U.S.C. § 9617(c); and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.435(c)(2)(i). Section 117(c) of CERCLA and Section 300.435(c)(2)(i) of the NCP require the publication of an ESD when modifications to a remedial action are necessary and such modifications significantly change, but do not fundamentally alter, the remedy selected in a Record of Decision (ROD) with respect to scope, performance, or cost.

In 1986, EPA issued a ROD selecting a remedial action for implementation at the Site. EPA modified the remedy with ESDs in 1992 and 2000 (collectively, the Selected Remedy). Land use restrictions were established under settlements, reached between the United States and potentially responsible parties (PRPs) in 1988, under which PRPs were required to implement the remedial action. In addition, in 2005 the Delaware Department of Natural Resources and Environmental Control (DNREC) established a Groundwater Management Zone (GMZ) to restrict the use of groundwater under, and immediately downgradient of, the Site.<sup>1</sup>

The land use restrictions in the 1988 settlements and the groundwater use restrictions established by the GMZ prohibit activities at the Site and the adjacent parcel which would

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<sup>1</sup> A Delaware GMZ is an area where DNREC has determined that new drinking water wells must be restricted in order to protect public health and safety. A Memorandum of Agreement (MOA) between DNREC's Division of Water and Division of Waste & Hazardous Substances establishes the specific groundwater use restrictions for the selected area. The MOA states that no public or domestic water supply wells will be allowed or permitted in the Columbia Aquifer or within the unconfined portions of the Potomac Aquifer in the selected area. Both of these aquifers underlie the Site. The MOA also states that permits for any wells located in other areas of the GMZ may be issued but will be subject to review and approval by both the Delaware Division of Water and the Delaware Division of Waste & Hazardous Substances.

adversely impact the Selected Remedy or compromise the protection of human health and the environment. Neither the 1986 ROD nor subsequently issued ESDs formally selected the land and groundwater use restrictions in place today.

This ESD formally selects Institutional Controls (ICs) prohibiting activities at the Site and the adjacent parcel which would adversely impact the Selected Remedy or compromise the protection of human health and the environment. This ESD also provides the public with an explanation of the restrictions currently in place, summarizes the information that supports this modification, and confirms that the remedial action complies with the statutory requirements of Section 121 of CERCLA, 42 U.S.C. § 9621. Because EPA finds that the restrictions currently in place are effective in accomplishing the ICs selected in this ESD, EPA does not expect that any additional actions will be taken to implement the ICs selected herein. Should this change in the future EPA will take appropriate action to modify the restrictions in place.

## II. **SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY**

### A. **Site History and Contamination**

The Site is located about 10 miles south of Wilmington near the intersection of U.S. Route 13 and Delaware Route 71 (Red Lion Road) in New Castle, New Castle County, Delaware. The Site consists of a former landfill, at one time a large landfill (Main Landfill) and a smaller landfill nearby (West Landfill) which were consolidated during the cleanup, and contaminated groundwater. The surface of the Site occupies over 47 acres and is surrounded by dense woodlands to the south and residential development to the north. Red Lion Creek runs west to east, south of the Site. Pigeon Run, a tributary to Red Lion Creek, flows along the western boundary of the Main Landfill. The landfill surface is relatively flat and slopes to the south toward Red Lion Creek. The creek enters the Delaware River two miles downstream from the Site.

The Site was a former sand and gravel quarry. Between 1968 and 1971, the New Castle County Department of Public Works disposed of municipal, domestic, and industrial waste at the Site. The Main Landfill area is located near the confluence of Pigeon Run and Red Lion Creek, in a triangular area northeast of Pigeon Run. Before it was consolidated into the Main Landfill, the West Landfill covered 4 acres and was located west of Pigeon Run. Industrial wastes disposed of at the Site contained, among other things, trichloroethylene; vinyl chloride; 1, 2-dichloroethane (1, 2-DCA); benzene; and other organic and inorganic chemicals. New Castle County ceased landfilling activities at the Site in 1971.

In May 1976, DNREC discovered volatile organic compounds (VOCs) in a residential supply well 400 feet east of the Main Landfill. EPA testing in 1983 and 1984 identified contamination in a second residential well located 150 feet north of the Main Landfill. EPA added the Site to the Superfund Program's National Priorities List (NPL) in September 1983. In 1984, EPA selected an initial remedial measure to install a public waterline to 42 residences. Installation of this waterline was completed in 1985. A remedial investigation identified the

Main and West Landfills as the sources of contamination. A risk assessment showed that exposure to the contaminated groundwater presented a significant human health risk, primarily due to VOCs. The risk assessment also identified the potential for contaminated leachate to migrate to the underlying Potomac aquifer. Investigation showed that a plume of contaminated groundwater extended outside the Main Landfill to the southeast.

## **B. Selected Remedy**

In March 1986, EPA issued a ROD for the Site to address Site-wide contamination in soils and groundwater. The remedy included the following components:

- Consolidation of the West Landfill into the Main Landfill. Excavation would include all waste and contaminated soil.
- Construction of a multi-layer cap over the consolidated Main Landfill to significantly reduce or eliminate the vertical infiltration of precipitation.
- Installation of a trench system in the vicinity of the Main Landfill to prohibit lateral groundwater migration through, and to collect existing leachate from, the fill.
- Pumping and treating the plume of contaminated groundwater.

The 1986 ROD listed the following Remedial Action Objectives (RAOs):

- Elimination or appreciable reduction of vertical infiltration of rainfall through the Main and West Landfills;
- Elimination or control of lateral migration of groundwater into the Main and West Landfills; and
- Elimination or control of the contaminated groundwater in the Columbia Aquifer and the Upper Hydrological Zone (UHZ) of the Potomac Aquifer.

In May 1992, EPA modified the ROD with an ESD to replace the upgradient trench with a slurry wall and the down gradient trench with interceptor wells. In July 2000 (after construction of the remedy by PRPs under settlements (see subsection C, below)), EPA issued a second ESD to enhance the remedy with a permanent active landfill gas migration control system (GMCS) along the northern, eastern, and southern border of the capped Main Landfill to address the migration of methane gas.

## **C. Remedy Implementation, Establishment of Institutional Controls, and Current Status**

In 1988, the U.S. District Court for the District of Delaware approved several settlements between the United States and PRPs (Consent Decrees) under which the PRPs were required to

design and implement the remedy selected in the 1986 ROD (the Consent Decrees were amended to incorporate each ESD). The Consent Decrees, as amended, additionally contained language requiring the implementation of land use restrictions to protect the operation and integrity of the Selected Remedy.

### **1. *Remedy Implementation***

Remedial design activities began in April 1989. The PRPs completed the remedial design and initiated remedial action in November 1992. The PRPs consolidated the West Landfill material into the Main Landfill in July 1993. In May 1995, post-excavation sampling from the West Landfill area confirmed that the excavation removed source material that could contaminate groundwater. In accordance with EPA-approved specifications, the West Landfill area was then converted to wetlands.

The PRPs installed the slurry wall in October 1993 to prevent infiltration of clean groundwater into, and lower the water level within, the consolidated Main Landfill. The PRPs completed the multi-layer cap over the consolidated Main Landfill in November 1994. Following cap construction, the PRPs installed 51 passive gas vents in the landfill surface and 15 gas monitoring wells outside and downgradient of the landfill. The PRPs completed construction of a network of eight interceptor wells in April 1995 to prevent off-Site migration of landfill leachate. The interceptor wells pumped groundwater into a storage tank in the on-site pump house and then to the New Castle County sewer system. Remedy construction was completed in September 1995.

In October 1996, methane gas was detected outside the perimeter of the Main Landfill near Red Lion Road. To mitigate threats presented by the migration of the gas, the PRPs installed a temporary active gas extraction system along the northern perimeter of the Main Landfill along Red Lion Road in November 1996. In accordance with the July 2000 ESD, the PRPs constructed a permanent above-ground landfill GMCS to prevent subsurface migration of gas.

### **2. *Implementation of Institutional Controls***

Implementation of the 1988 Consent Decrees by the PRPs resulted in the establishment of restrictions on three parcels of land associated with the Site as described in Table 1.

<b>Table 1</b>	
<b>Parcel</b>	<b>Restriction</b>
1004900062 (Main Landfill)	No action may be taken which obstructs, interferes with, or alters the remedy; this restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land.
1005300030 (Former West Landfill)	No action may be taken which obstructs, interferes with, or alters the remedy; this restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land.
1004900128	No action may be taken which obstructs, interferes with, or alters the remedy; this

(Contiguous Property)	restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land. There shall be no new building erected on the parcel until after completion of the Remedial Construction and Work. <sup>2</sup>
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In addition, the Consent Decrees provided that:

- All conveyances of title, easement, or other interest in the Site shall contain (i) a provision requiring access as required under the Consent Decrees, and (ii) a provision ensuring that there shall be no obstruction of the remedial action (including O&M) or alteration of the remedy constructed.
- All conveyances of title, grants of easements, and all such other conveyances of any interest in the Site shall contain such covenants to permit remedial activities and to protect the remedy and shall comply with the deed notice requirements of New Castle County and the State of Delaware.
- Notices were required to be filed in the land records office to ensure that the restrictions and obligations would run with the land and be binding upon any person who may at any time acquire any interest in the Site.

On August 22, 2001, New Castle County filed, with the New Castle County Recorder's Office, a Notice of Consent Decree which attached the Consent Decrees. This Notice was filed for each of the three parcels.

In August 2005, by Memorandum of Agreement between the DNREC Division of Air and Waste Management (DAWM) and the Division of Water Resources (DWR), DNREC established a GMZ "to provide administrative control aimed at minimizing the risks posed by contaminated groundwater beneath the site." The area covered by the GMZ is shown in Attachment 1. The restrictions established over this area are:

- No public or domestic water supply wells will be allowed or permitted in the Columbia aquifer and any hydraulically interconnected units within the GMZ. Wells in the underlying confined aquifers may be permitted provided that well construction will prevent the vertical movement of contaminants.
- Monitoring wells and contaminant recovery wells may be installed in the GMZ following joint review and approval by DWR and DAWM.
- Permits for any wells in the GMZ may be issued by DWR following joint review and approval by both DWR and DAWM.

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<sup>2</sup> "Remedial Construction and Work" was defined in the settlements to mean "all activities specified in the Workplan exclusive of Remedial Design activities and of Operation and Maintenance." The "Workplan" was included as an attachment to the settlements. "Remedial Construction and Work" activities were completed long ago and this building moratorium is no longer in effect.

### 3. *Current Status*

Current monitoring data reveals that groundwater cleanup goals have been largely achieved and that the Main Landfill cap is functioning as designed. While contaminant concentrations at four monitoring locations exceed cleanup goals, the concentrations at those locations have remained relatively stable over time. The active landfill GMCS effectively prevents off-Site migration of unacceptable levels of landfill gas. The slurry wall prevents infiltration of clean groundwater into the waste and helps prevent elevated water levels within the Main Landfill.

The RAOs have been achieved at the Site via implementation of the remedial action and performance of on-going operation and maintenance of the remedy components. The Fifth Five-Year Review (FYR) Report, dated July 14, 2020, stated that the Selected Remedy is protective of human health and the environment because there are no human or environmental receptors currently exposed to Site contaminants. The remedial action at the Site eliminated direct contaminant exposure pathways.

Parcel No.1004900062 (Main Landfill) is currently owned by Red Lion Open Space LLC. The remaining two parcels are currently owned by Lioncap LLC. A residential development is planned for these two parcels.

### **III. DESCRIPTION OF SIGNIFICANT DIFFERENCES AND THE BASIS FOR SUCH DIFFERENCES**

In the Fifth FYR Report, EPA observed that “[t]he requirement of long-term land and groundwater use controls needed to ensure protectiveness is not documented in a decision document” and recommended documentation of land and groundwater use restrictions for properties affected by Site-related contamination. Regarding protection of human health and the environment, EPA concluded that

“The remedy protects human health and the environment in the short term because the remedy is functioning as intended by the decision documents and prevents exposure to contaminated soil and groundwater. Source contamination was consolidated and covered in the Main Landfill, a slurry wall was installed to prevent migration of groundwater into the Main Landfill, and leachate was collected from the landfill until 2007. Institutional controls are in place to protect the integrity of the remedy and to prevent the installation of wells in areas of impacted groundwater. For the remedy to be protective of human health and the environment over the long term, the following actions need to be taken:

- “Document the selection of land and groundwater use restrictions for properties affected by site-related contamination.”

In this ESD, EPA modifies the Selected Remedy to require implementation of ICs to prohibit certain activities at the Site, to ensure that activities at the Site will not adversely impact the Selected Remedy, and to protect human health and the environment. The ICs selected are identified below.

**1. Institutional Controls for Land**

<b>Parcel No.</b>	<b>Institutional Control</b>	<b>Duration</b>
1004900062 (Main Landfill)	No action may be taken which obstructs, interferes with, or alters the remedy; this restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land.	Until EPA determines that such restrictions are no longer required.
1005300030 (Former West Landfill)	No action may be taken which obstructs, interferes with, or alters the remedy; this restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land.	Until EPA determines that such restrictions are no longer required.
1004900128 (Contiguous Property)	No action may be taken which obstructs, interferes with, or alters the remedy; this restriction shall be included in any conveyance of title, easement, or other interest in the property and shall run with the land.	Until EPA determines that such restrictions are no longer required.

**2. Institutional Controls for Groundwater**

<b>Parcels</b>	<b>Institutional Controls</b>	<b>Duration</b>
All parcels included within the Groundwater Management Zone established by the August 2005 Memorandum of Agreement between the Delaware Division of Air	<ul style="list-style-type: none"> <li>No public or residential water supply wells will be allowed or permitted in the Columbia aquifer and any hydraulically interconnected units within the GMZ. Wells in the underlying confined aquifers may be permitted provided that well construction will prevent the vertical movement of contaminants.</li> <li>Monitoring wells and contaminant recovery wells may be installed in the GMZ following joint review and approval by DNREC Division of Water Resources (DWR) or its successor and DNREC Division of Air and</li> </ul>	For each parcel, these controls shall be in effect until EPA determines that the cleanup standards in the 1986 ROD have been met on such parcel for eight rounds of quarterly sampling. <sup>3</sup>

<sup>3</sup> The 1986 ROD was issued before the Superfund Amendments and Reauthorization Act of 1986 introduced the requirement that remedial actions meet, or waive, applicable or relevant and appropriate standards and criteria (ARARs). The cleanup goals set in the 1986 ROD—1 part per billion (ppb) vinyl chloride; 5 ppb for 1,2-DCA; 5 ppb for benzene; and 100 ppb total volatile organics—were set to achieve a  $1 \times 10^{-4}$  cancer risk. The Maximum Contaminant Level (MCL) for vinyl chloride is now 2 ppb; the MCLs for benzene and 1,2-DCA have not changed. In order to meet the acceptable risk range under the NCP, EPA requires that the 1986 ROD-mandated levels be attained before groundwater controls may be removed.

and Waste Management and Division of Water Resources (Attachment 2)	Waste Management or its successor (DAWM). <ul style="list-style-type: none"> <li>• Permits for any wells in the GMZ may be issued by DWR following joint review and approval by both DWR and DAWM.</li> </ul>	
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These land and groundwater restrictions are already in place under the 1988 Consent Decrees and the 2005 GMZ, respectively. This ESD changes, but does not fundamentally alter, the Selected Remedy, with respect to scope, performance, or cost.

**IV. SUPPORT AGENCY COMMENTS**

The changes to the Selected Remedy as described in this ESD have been coordinated with DNREC pursuant to 40 C.F.R. § 300.435(c)(2). DNREC supports the changes set forth herein. DNREC has submitted its concurrence on this ESD in a letter dated November 10, 2020.

**V. STATUTORY DETERMINATIONS**

EPA has determined that the modification to the Selected Remedy as described in this ESD complies with the statutory requirements of Section 121 of CERCLA, 42 U.S.C. § 9621. EPA believes that the Selected Remedy, as revised by this ESD, will remain protective of human health and the environment and will meet the Federal and State requirements that are applicable or relevant and appropriate to the remedial action as described in the ROD and 2000 ESD. Since there are no ARARs associated with the implementation of institutional controls, the Federal and State requirements established at the time of the ROD remain in place in accordance with 40 C.F.R. § 300.430(f)(1)(ii)(B).

**VI. COMMUNITY INVOLVEMENT**

The ESD and the information upon which it is based will be included in the Administrative Record (AR) which is available for public review at the locations listed below:

EPA Public Reading Room: 1650 Arch Street Philadelphia, PA 19103 (215) 814-3157	DNREC: 391 Lukens Drive New Castle, DE (302) 395-2600
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Or online at <https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0300035>

Questions concerning EPA’s action and requests to review the Administrative Record at EPA’s office should be directed to:

Chris Vallone  
Remedial Project Manager (3SD23)  
U. S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
(215) 814-3306



**VII. SIGNATURE**

This Explanation of Significant Differences modifies the Selected Remedy for the Tybouts Corner Landfill Superfund Site to include institutional controls.

Approved By:

**PAUL LEONARD**



Digitally signed by PAUL LEONARD

Date: 2020.12.16 09:22:57 -05'00'

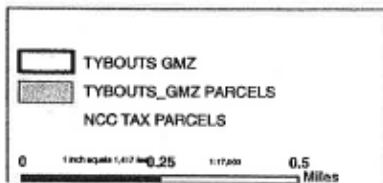
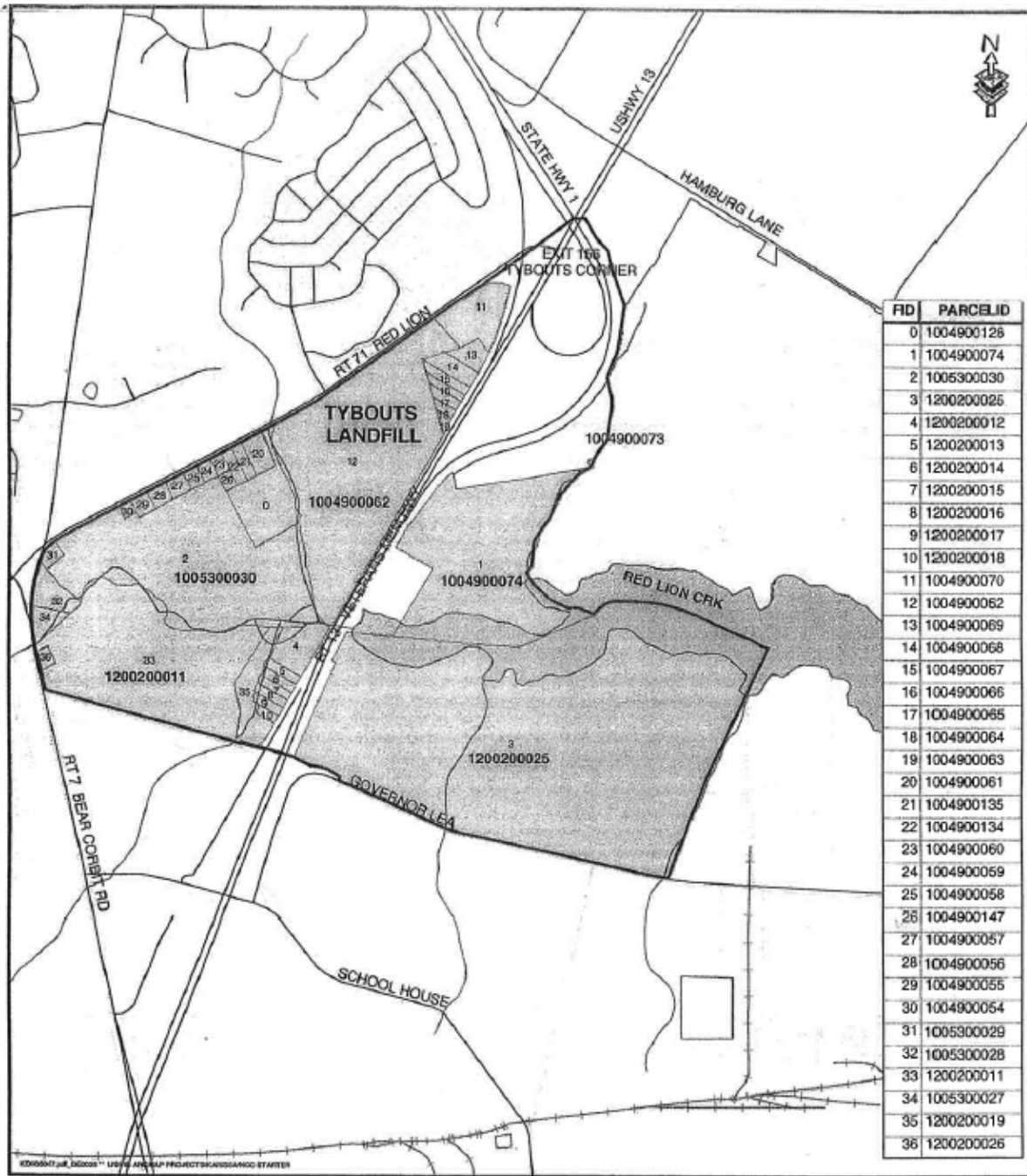
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Paul Leonard, Director  
Superfund and Emergency Management Division  
EPA Region III

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Date

# Tybouts Corner Site 2020 ESD Attachment 1



**DNREC**  
**SITE INVESTIGATION & RESTORATION BRANCH**  
**391 LUKENS DR**  
**NEW CASTLE, DE 19720-2774**  
**302.395.2600**

**TYBOUTS CORNER**  
**LANDFILL GMZ**

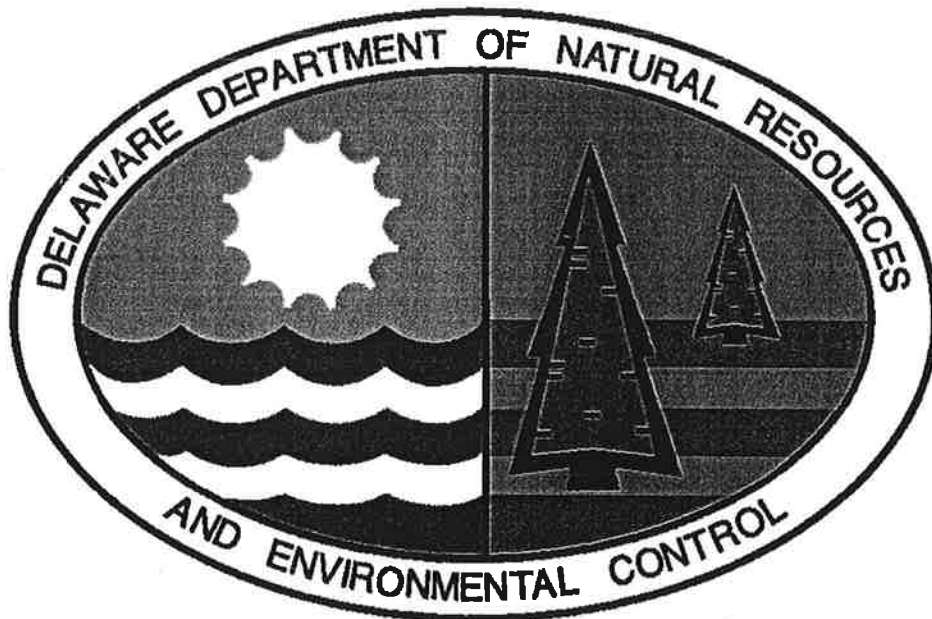
**Tybouts Corner Site 2020 ESD  
Attachment 2**

**[2005 DE MOA]**

# Memorandum of Agreement

## Department of Natural Resources and Environmental Control

Between:  
Division of Air and Waste Management  
and  
Division of Water Resources



For:

Red Lion Road and Route 13 Site (DE-0154)  
&  
Tybouts Corner Landfill Site (DE-0028)  
New Castle, Delaware

August 2005

**WHEREAS**, the Red Lion Road and Route 13 site and the Tybouts Corner Landfill site ("sites") shown in Attachment 1 have been investigated by the Delaware Department of Natural Resources and Environmental Control, Site Investigation & Restoration Branch ("DNREC") under the provisions of the Delaware Hazardous Substance Cleanup Act ("HSCA") Del. C. Chapter 91 and the Delaware Regulations Governing Hazardous Substance Cleanup ("Regulations"); and

**WHEREAS**, the findings are available in the remedial investigation ("RI") report, which is contained within each site's administrative records; and the RI documents the extent of groundwater contamination within the sites property boundaries; and

**WHEREAS**, the final remedy for the Red Lion Road and Route 13 site is outlined in the October 2001 final plan of remedial action and the final remedy of the Tybouts Corner Landfill site is outlined in the June 1995 final plan of remedial action; and

**WHEREAS**, the DNREC Division of Air and Waste Management ("DAWM") is responsible for the investigation and cleanup of release of hazardous substance in the State of Delaware; and

**WHEREAS**, the DNREC Division of Water Resources ("DWR") is responsible for management of the withdrawal of waters in the State of Delaware; and

**WHEREAS**, DNREC's intent is to formally establish a groundwater management zone ("GMZ") for the sites that are consistent with Subsections 2.2, 3.2, 3.6, 4.2, and 4.4 of Delaware's Comprehensive State Ground Water Protection Program ("CSGWPP"); and

**WHEREAS**, significant water bearing units in the vicinity of the sites include the Columbia and Potomac aquifers; and

**WHEREAS**, the Columbia aquifer and any hydraulically interconnected Potomac aquifer units have the potential for being impacted by the sites; and

**WHEREAS**, DNREC has determined that a Groundwater Management Zone (GMZ) for the Columbia aquifer and any hydraulically interconnected Potomac aquifer units underlying the site is appropriate to protect exposure of the public by way of potential groundwater contamination and for management of potential releases at the site; and

**WHEREAS**, the Red Lion Road and Route 13 site and Tybouts Corner Landfill site are partially bounded by Red Lion Road from the west and Route 13 from the east. The Red Lion site comprises of an area of 7.05 acres and the Tybouts Corner Landfill site comprises of an area of 63.60 acres. The two sites are located in New Castle County, Delaware, as shown on Attachment 2; and

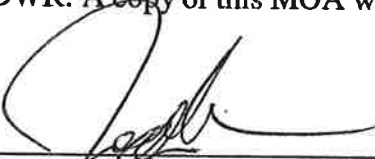
**WHEREAS**, the intent of this GMZ agreement is to provide administrative control aimed at minimizing the risks posed by contaminated groundwater beneath the site and is only part of the approved final remedial action; and

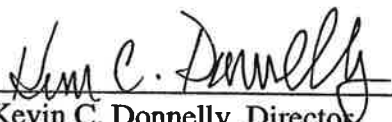
**WHEREAS**, Attachment 2 defines the areal extent of the GMZ and lists the Tax Parcel numbers of the properties affected,

**NOW, THEREFORE, IT IS AGREED BY DAWM AND DWR AS FOLLOWS:**

1. A GMZ shall be established to include the sites as defined both in the text and on the attached maps, Attachment 2.
2. No public or domestic water supply wells will be allowed or permitted in the Columbia aquifer and any hydraulically interconnected units within the GMZ. Wells in the underlying confined aquifers may be permitted provided that well construction will prevent the vertical movement of contaminants.
3. Monitoring wells and contaminant recovery wells may be installed in the GMZ following joint review and approval by DWR and DAWM.
4. Permits for any wells in the GMZ may be issued by DWR following joint review and approval by both DWR and DAWM.

This MOA may be modified or terminated only upon the agreement of both parties. Any modifications must be made in writing and signed by the Director of DAWM and the Director of DWR. A copy of this MOA will be placed within the administrative record for the site.

  
\_\_\_\_\_  
James D. Werner, Director  
Division of Air and Waste Management  
Date: 8/23/05

  
\_\_\_\_\_  
Kevin C. Donnelly, Director  
Division of Water Resources  
Date: 8/23/05

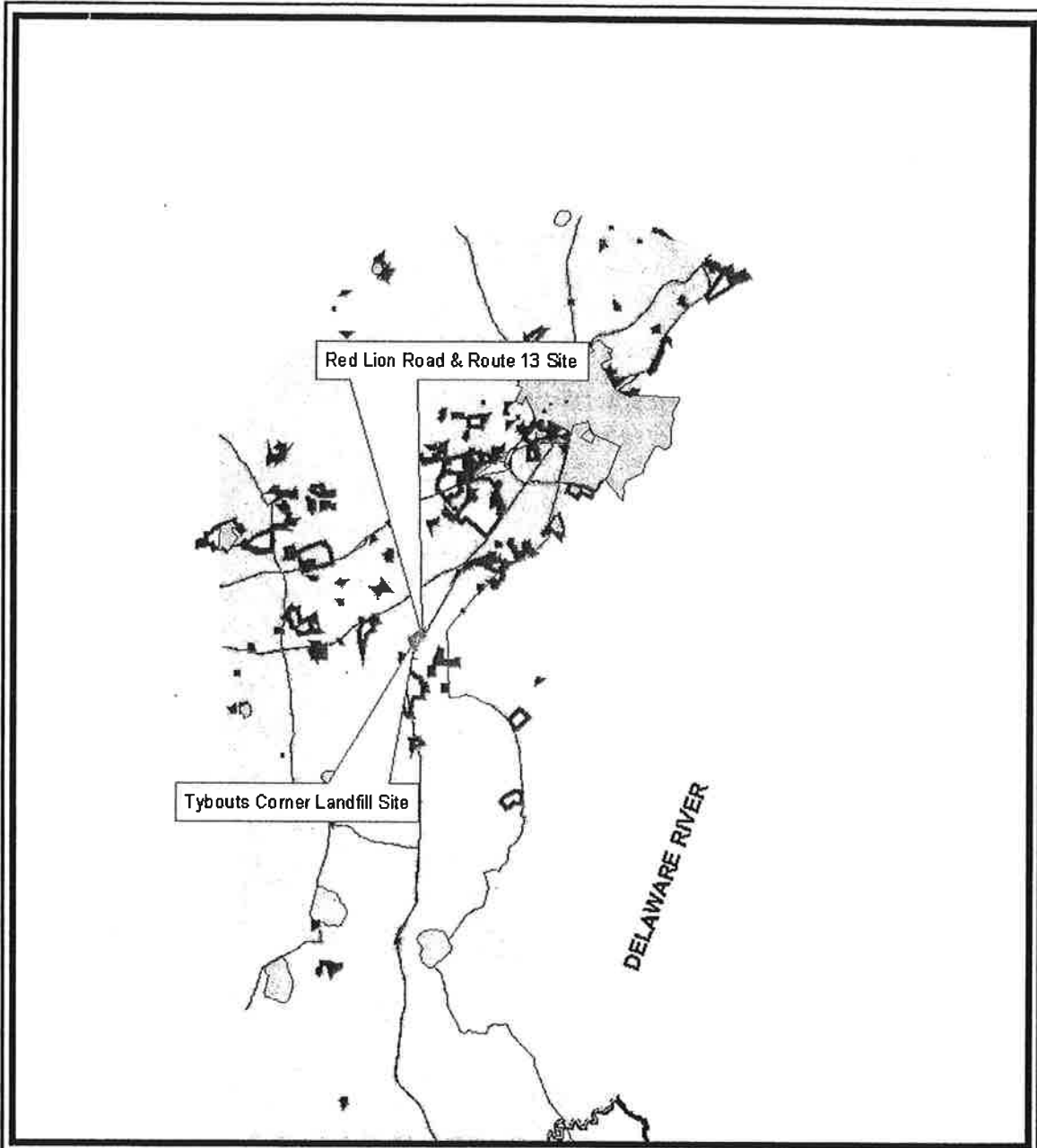
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DE 0154 II H3

Attachment 1: Site location – Red Lion Road and Route 13 Site (DE-0154) and Tybouts Corner Landfill Site (DE-0028)

Attachment 2: Extent of the Tybouts Corner/Red Lion GMZ and Tax Parcel Numbers

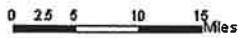
pc: Kathy Stiller Banning, DNREC DAWM with Attachments  
John Barndt, DNREC DWR with Attachments

**Attachment 1**  
**Site Location**  
**Red Lion Road and Route 13 Site (DE-0154)**  
**&**  
**Tybouts Corner Landfill Site (DE-0028)**



STATE OF DELAWARE

December 4, 2003



Red Lion Road and Route 13 Site  
&  
Tybouts Corner Landfill Site  
Groundwater Management Zones



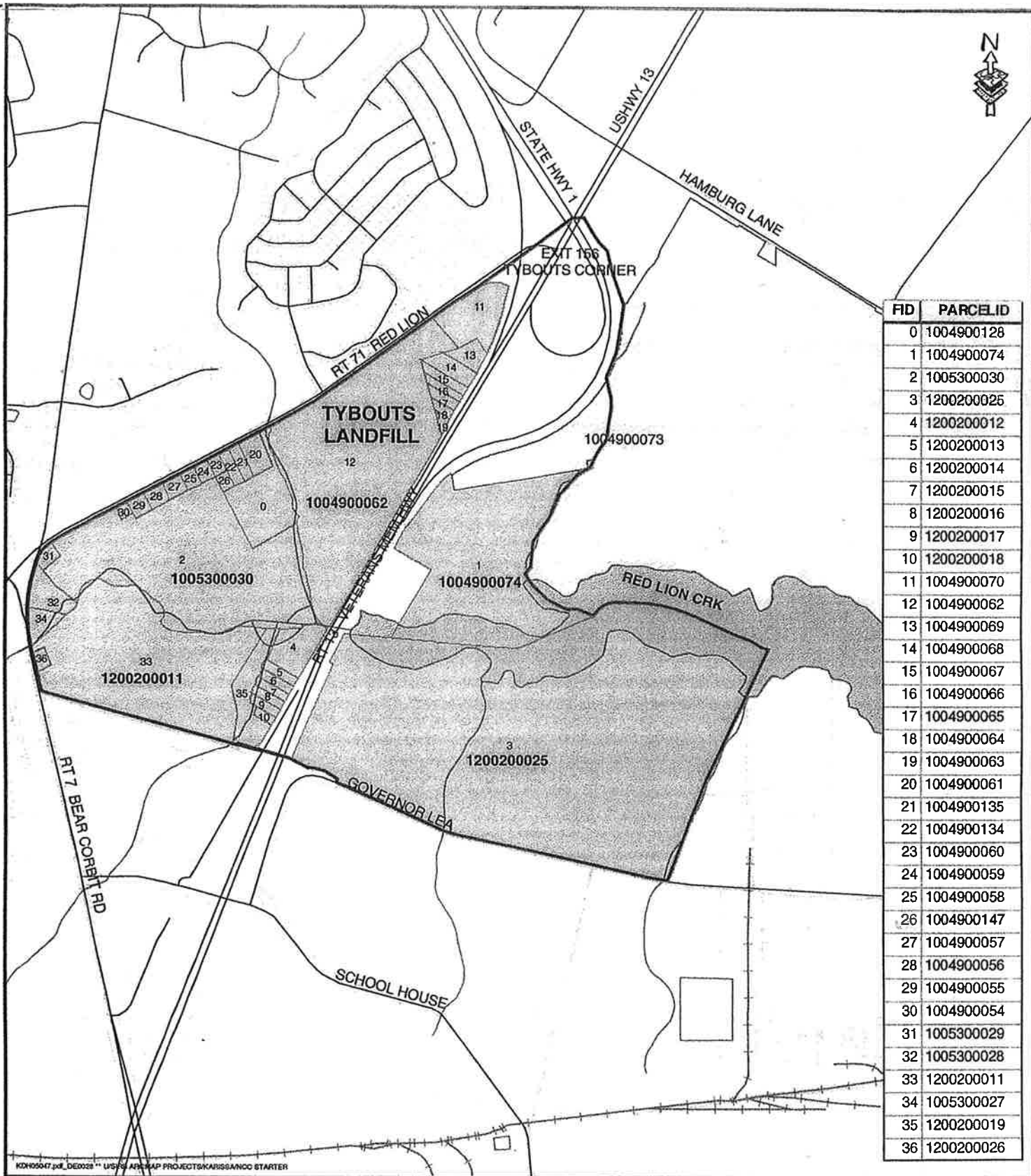
**Attachment 2**

**Extent of Tybouts Corner/Red Lion Road GMZ  
and Tax Parcel Numbers**



**NOW, THEREFORE, IT IS AGREED BY DAWM AND DWR AS FOLLOWS:**

1. A GMZ shall be established to include the site as defined both in the text and on the attached map, Attachment 3.
2. No public or domestic water supply wells will be allowed or permitted in the Columbia aquifer and any hydraulically interconnected unit within the GMZ. Wells in the underlying confined aquifers may be permitted provided that (1) confinement is demonstrated by a Professional Geologist and (2) well construction will prevent the vertical movement of contaminants.
3. Non-potable industrial use wells, monitoring wells, and contaminant recovery wells may be installed in the GMZ following joint review and approval by both DWR and DAWM.
4. Permits for any wells in the GMZ may be issued by DWR following joint review and approval by both DWR and DAWM.

This MOA may be modified or terminated only upon the agreement of both parties. Any modifications must be made in writing and signed by the Director of DAWM and the Director of DWR. A copy of this MOA will be placed within the administrative record for the site.



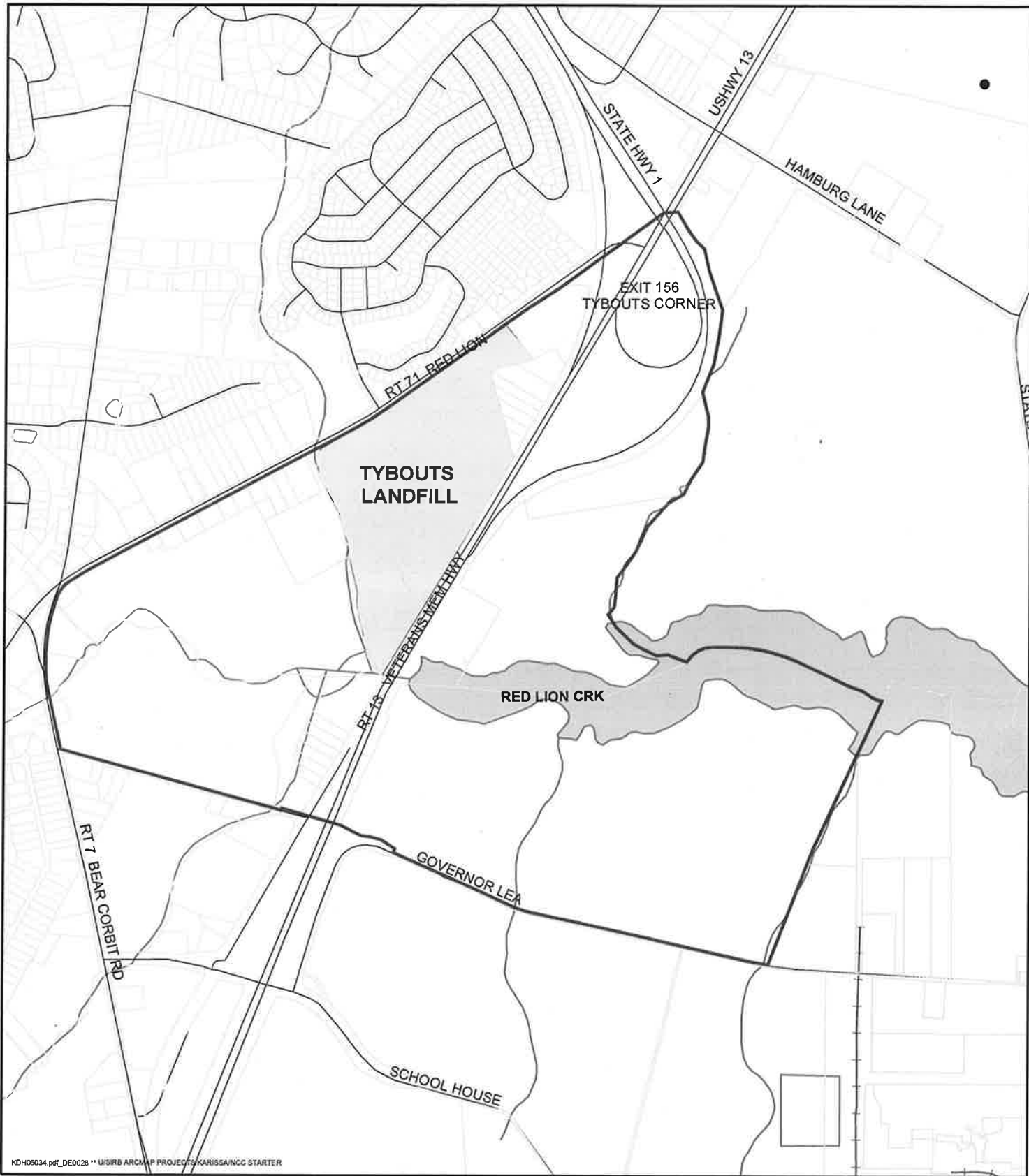
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33	1200200011
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35	1200200019
36	1200200026

 TYBOUTS GMZ  
 TYBOUTS\_GMZ PARCELS  
 NCC TAX PARCELS




0 1 inch equals 1,417 feet 0.25 1:17,000 0.5 Miles

**DNREC**  
**SITE INVESTIGATION & RESTORATION BRANCH**  
 391 LUKENS DR  
 NEW CASTLE, DE 19720-2774  
 302.395.2600

**TYBOUTS CORNER**  
**LANDFILL GMZ**



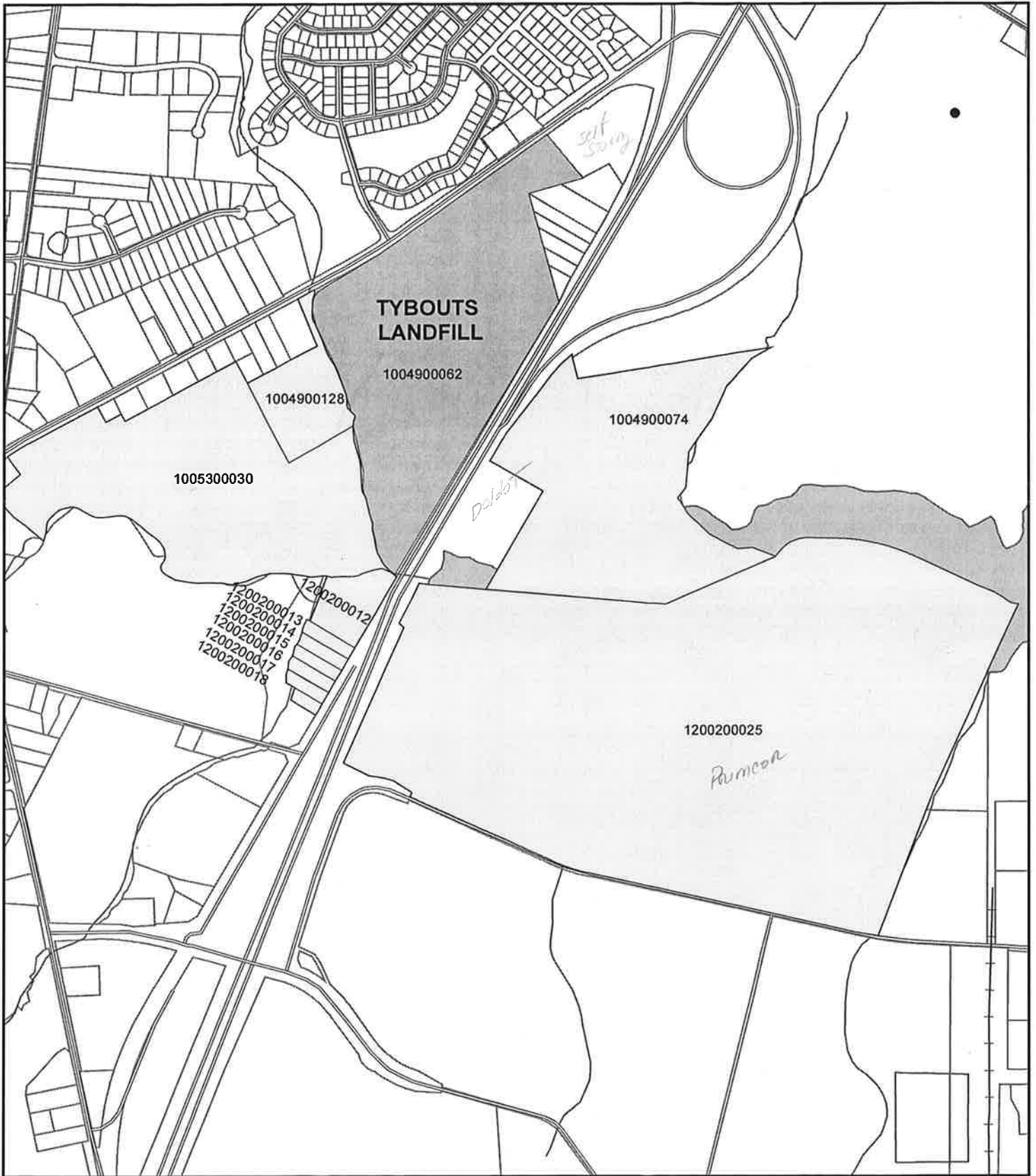
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	TYBOUTS
	TYBOUTS GMZ
	NCC TAX PARCELS

0 1 inch equals 1,250 feet 0.25 1:15,000 0.5 Miles

**DNREC**  
**SITE INVESTIGATION &**  
**RESTORATION BRANCH**  
**391 LUKENS DR**  
**NEW CASTLE, DE 19720-2774**  
**302.395.2600**

**TYBOUTS CORNER**  
**LANDFILL GMZ**



TYBOUTS  
 SELECTED PARCELS  
 NCC TAX PARCELS

0 0.25 1:12,000  
 Miles 1 inch equals 1,000 feet

KDH05001.pdf\_DE0028 11 13 \*\* USIRB ARCMAP PROJECTS/TEMPLATES/NCC STARTER

**DNREC**  
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**PROPOSED**  
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