

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES
391 LUKENS DRIVE
NEW CASTLE, DELAWARE 19720-2774

SITE INVESTIGATION &
RESTORATION SECTION

TELEPHONE: (302) 395 - 2600
FAX No.: (302) 395 - 2601

June 25, 2012

Mr. Christian W. Matta
Remedial Project Manager
DE, VA, WV Remedial Branch
1650 Arch Street - (3HS23)
Philadelphia, PA 19103-2029

**RE: Conditional Approval
ARCADIS Revised Reinjection Test Workplan,
Millsboro TCE Groundwater Contamination Site Millsboro, Delaware**

Dear Mr. Matta:

The Delaware Department of Natural Resources and Environmental Control Site Investigation and Restoration Section (DNREC-SIRS) has reviewed the "ARCADIS Revised Reinjection Test Workplan, Millsboro TCE Groundwater Contamination Site, Millsboro, Delaware", dated June 7, 2012, which was prepared by ARCADIS U.S., Inc..

This document can be conditionally approved, as long as the following comments, particularly with regards to Section 3.2 Investigation Derived Waste (IDW), are addressed in the appropriate section of the Final Version of the document:

Comment 1: ARCADIS states that "...soil cuttings will be continuously screened with a PID during well installation. If any PID readings are detected above background concentrations, the soil cuttings will be analyzed for Chlorinated Volatile Organic Compounds (CVOCs) using the AQR Color-Tec® Field-Based Analysis kit."

DNREC suggests that the soil cuttings as well as the groundwater samples from each of the wells be screened for TPH and BTEX in addition to CVOCs.

Comment 2: In addition, ARCADIS has stated that "If the field analysis indicates the presence of CVOCs the soils will be drummed, secured with bolted lids and labeled pending further characterization. Impacted soils will be disposed offsite according to applicable regulations. If field screening indicates the absence of any soil impacts, the clean soil cuttings will be stockpiled near the drilling location."

Delaware's good nature depends on you!

Printed on
Recycled Paper

AR002617

Mr. Christian W. Matta
June 25, 2012
Page 2 of 2

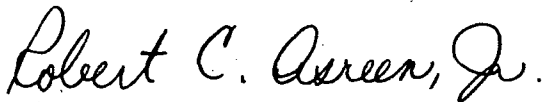
DNREC requests that if the cuttings are to be stockpiled at the Q by the C site, the stockpiles should be placed on plastic, bermed, covered and the site should be secured so that access to the property is restricted.

Comment 3: ARCADIS states that "If there is no evidence of CVOCs the development water from the shallow wells will be discharged to ground surface." However, ARCADIS has not specifically discussed the plans to handle the disposition of the development water from the 10-inch injection well.

Since DNREC believes that the volume of water from the development of the 10-inch injection well will be quite large, DNREC has concerns about discharging it to the ground surface at that Q by the C property if that is ARCADIS plan. ARCADIS should evaluate alternative means of disposal of the development water from this well.

If you have any questions regarding the information contained in this letter, please do not hesitate to contact me at (302) 395-2600.

Sincerely,



Robert C. Asreen, Jr.
Project Manager

RCA:tlw
RCA12062.doc
DE 1361 II C 3

pc: Timothy Ratsep, DNREC-SIRS, Program Administrator
Paul Will, DNREC-SIRS, Program Manager I