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STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
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WASTE MANAGEMENT SECTION
SUPERFUND BRANCH

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April 6, 1993

Ms. Kate Lose (3HW42)
U.S. EPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

RE: State ARARs for the Standard Chlorine of Delaware, Inc. Superfund Site
Delaware City, New Castle County, Delaware

Dear Ms. Lose:

Attached is a copy of a modified ARARs table for the above referenced site. Please note that this table provides a preliminary, but fairly comprehensive, listing of State of Delaware ARARs for this site.

I believe that this table can form the basis of both the Federal and State ARARs table for the draft Record of Decision. I have not incorporated into the table the Federal ARARs information you sent me previously. Work on finalizing this table can be done cooperatively between our two agencies.

If you have any questions, please contact me at (302) 323-4540.

Sincerely,

Anne V. Hiller

Anne V. Hiller
Environmental Scientist III
Superfund Branch

AVH:dw
AVH93027:wp

Attachment

pc: N.V. Raman
Karl Kalbacher

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TABLE 11

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)
AND TO BE CONSIDERED MATERIAL (TBCs)
~~DU PONT NEWPORT SITE~~
Standard Chlorine Site

| ARAR or TBC | Legal Citation | ARAR Class | Requirement Synopsis | Applicability to Selected Remedy | Area of Concern |
|---|---|---|---|---|---|
| I. CHEMICAL SPECIFIC | | | | | |
| A. Water | | | | | |
| 1. Safe Drinking Water Act | 42 U.S.C. § 300f et seq. | | | | |
| a. Maximum Contaminant Level Goals (MCLGs) | 40 C.F.R § 141.50-51 | Relevant and Appropriate | Non-enforceable health goals for public water supplies. The NCP requires that MCLGs shall be attained by remedial actions for ground water that is a current or potential source of drinking water, where the MCLGs are relevant and appropriate under the circumstances of the release. | Remedial action must meet non-zero MCLGs for contaminants of concern for which they exist. The NCP requires that where the MCLG for a contaminant has been set at a level of zero, the MCL promulgated for that contaminant shall be attained by remedial actions for ground water that is a current or potential source of drinking water, where the MCL is relevant and appropriate under the circumstances of the release.<br><br>~~The "greater harm to human health and the environment" ARAR waiver has been invoked.~~ | GW |
| ~~b. Maximum Contaminant Level (MCLs)~~ | ~~40 C.F.R § 141.11-12~~ | ~~Relevant and Appropriate~~ | ~~Enforceable standards for public drinking water supply systems (with at least fifteen service connections or used by at least 25 persons). MCLs apply to public water systems that provide piped water for human consumption.~~<br><br>Keep | ~~For remediation of the contaminant plume, these requirements are not directly applicable since groundwater at the Site is used as a private drinking water supply. However, MCLs are, under the circumstances of this site, relevant and appropriate requirements. Therefore, the remedial action must meet MCLs for contaminants of concern for which they exist and for which the MCLG is set at a level of zero.~~<br><br>The "greater harm to human health and the environment" ARAR waiver has been invoked. | GW |

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| ARAR or TBC | Legal Citation | ARAR Class | Requirement Synopsis | Applicability to Selected Remedy | Area of Concern |
|---|---|---|---|---|---|
| c. Maximum Contaminant Levels (MCLs) | 40 C.F.R § 141.11-12 | Applicable | Enforceable standards for public drinking water supply systems (with at least fifteen service connections of used by at least 25 persons). MCLs apply to public water systems that provide piped water for human consumption. | Installation of public water supply line shall be done such a way as to provide drinking water in compliance with these standards. | GW |
| 2. EPA Health Advisories | EPA Office of Drinking Water | To be Considered | Non-enforceable guidelines for public water supply systems. | To be considered for remedial actions involving ground-water monitoring, recovery and treatment. | GW |
| 3. Health Effects Assessment | | To be Considered | Non-enforceable toxicity data for specific chemicals for use in public health assessments. Also to be considered are Carcinogenic Potency Factors and Reference Doses provided in the Superfund Public Health Evaluation Manual. | To be considered where remedial action addresses risk-based criteria or when setting clean-up standards for the protection of human health. | NI, SI, CG/AIR, GW, All |
| 4. Interim Guidance on Establishing Soil Lead Cleanup Levels at Superfund Sites | EPA OSWER Directive #9355.4-02, dated 12/8/89 | To Be Considered | To be considered when remedial action addresses soils that cause a threat to human health through direct contact, ingestion, or inhalation of lead. | To be considered when lead is present and remedial action addresses soils that cause a threat to human health through direct contact, ingestion, or inhalation. | BR, NI, SI, CG/AIR |
| 5. State of Delaware Regulations Governing Public Drinking Water, Revised March 11, 1991 | Title 16, § 122 | Relevant and Appropriate | Sets criteria for public drinking water supply. These requirements are not directly applicable since groundwater at the site is used as a private drinking water supply. However, under the circumstances of this site, these requirements are relevant and appropriate. | Remedial action must meet levels which are more stringent then Federal MCLs and non-zero MCLGs | GW |
| 6. Delaware Comprehensive Water Resources Management Committee Reports, December 13, 1983 | | To Be Considered | The reports were adopted as policy by the DNREC Secretary. Among these reports is the Groundwater Quality Management Report, July 1983, which provided Delaware with a number of tools for dealing with groundwater contamination. | DNREC: PLEASE FILL IN THIS BOX. | GW |
| Delaware Surface Water Quality Standard of Feb. 1990 1993 | §§ 9.3 (a)(i) and 9.3 (b)(i) | Applicable | Criteria are provided to maintain surface water for streams, lakes, rivers, and standing water in wetlands of satisfactory quality consistent with public health and recreational purposes, the propagation and protection of fish and aquatic life, and other beneficial uses of water. | 1. Any surface water discharge must meet these levels if more stringent than federal regulations.<br><br>2. Surface water in the north wetlands, south wetlands, and the Christina River Red Lion Creek must attain these standards OR HAVE THEM WAIVED!!!!!!!????? | NI, SW, CR, CG/AIR, SW, GW |
| D. Air | | | | | |
| 1. Clean Air Act | 42 U.S.C § 7401 | | | | |



AR308535

| ARAR or TBC | Legal Citation | ARAR Class | Requirement Synopsis | Applicability to Selected Remedy | Area of Concern |
|---|---|---|---|---|---|
| a. National-Ambient Air Quality Standards | 40 C.F.R. Part 50 | Relevant and Appropriate | National limitations on ambient concentrations of pollutants intended to protect public health and welfare. | Applies to for potential releases resulting from ground-water treatment. | ~~NL~~, CG/HR |
| b. National Emissions Standards for Hazardous Air Pollutants | 40 C.F.R Part 61 | Relevant and Appropriate | Standards promulgated for air emissions from specific source categories. Not applicable but may be relevant and appropriate for emissions from air strippers at Superfund sites. | Applies to for potential releases resulting from ground water treatment. | ~~NL~~, CG/HR |
| 2. Delaware Ambient Air Quality Standards | Title 7, Delaware Code, Ch 60, Regulation 3, Section 6003 | Applicable | Establishes ambient air quality standards. | Applicable for potential releases from air stripping of ground water, excavation work, or other remedial actions. | ALL |
| C. Miscellaneous | | | | | |
| 1. ~~Standards for Protection Against Radiation~~ | ~~10 C.F.R. Part 20~~ | ~~Applicable since licensed site or Relevant and Appropriate b/c site now closed~~ | ~~These standards are designed to limit radiation hazards caused by Nuclear Regulatory Commission-licensed activities. The general requirement is that every reasonable effort to maintain radiation exposures "as low as is reasonably achievable" be made. In addition several specific radiation dose limits for the protection of workers and memebers of the public have been set.~~ | ~~Remediation must take place in such a way as to prevent over-exposure of radiation to workers or public. Discharges to air or water must meet specific concentration limits for radionucleides. Waste disposal must also meet any pertinent requirements.~~ | ~~NL~~, ~~CG/HR~~ |
| 2. ~~Delaware Radiation Control Regulations~~ | ~~Title 16, Delaware Code, 7405~~ | ~~Applicable~~ | ~~Establishes regulations for registration of facilities, licensing of materials, standards of protection, safety requirements, and notification requirements.~~ | ~~May be applicable for work at the north landfill and the ground water pump and treat system at this area.~~ | ~~NL~~, ~~CG/HR~~ |
| II. LOCATION SPECIFIC | | | | | |
| 1. Coastal Zone Management Act of 1972 | 16 U.S.C. 1451 et seq. 15 C.F.R. Part 930 | Relevant and Appropriate | Requires that Federal agencies conducting or supporting activities directly affecting the coastal zone conduct or support those activities in a manner that is consistent with the approved appropriate State coastal zone management program. | ~~On-site remedial actions are required to be consistent, to the maximum extent practicable, with Delaware's coastal zone management program. EPA must notify Delaware of its determination that the actions are consistent to the maximum extent practicable.~~ | ALL |

| ARAR or TBC | Legal Citation | ARAR Class | Requirement Synopsis | Applicability to Selected Remedy | Area of Concern |
|---|---|---|---|---|---|
| 2. The Archaeological and Historical Preservation Act of 1974 | 16 U.S.C § 469 | Applicable | Requirements relating to potential loss or destruction of significant scientific, historical, or archaeological data | Archeological and historical resources have not been identified to date. However, the installation of the hydraulic barrier wall along the Christina River has the potential for disturbing archeology resources. Further action will be taken to identify resources and, if identified, action will be taken to mitigate any adverse effects on those resources that would result from construction. If resources happen to be identified in other areas, action will be taken to mitigate any adverse effects on those resources that would result from implementation of the remedial action. | NE, CG/HR |
| 3. National Historic Preservation Act of 1986 | 16 U.S.C. §§470 et seq. 36 C.F.R. Part 800 | Relevant and Appropriate | Requires remedial action to take into account effects on properties included in or eligible for the National Register of Historic Places and to minimize harm to National Historic Landmarks. | If the property is eligible for the National Register of Historic Places, actions will be taken to mitigate any adverse effects that would result from implementation of the remedial action. | NE, CG/HR |
| 4. Protection of Floodplains | 40 C.F.R. Part 6, Appendix A | Applicable | Sets forth EPA policy for carrying out provisions of Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands). These require actions to avoid adverse effects, minimize potential harm, and restore and preserve natural and beneficial values. | Applicable since much of the remedial action will take place within the 100-year floodplain. | ALL |
| 5. Delaware Coastal Zone Act, amended 7/92 | Title 7 Delaware Code, Ch 7 | Relevant and Appropriate | Controls the location, extent, and type of industrial development in Delaware's coastal areas. | Will be considered for consistency since the remedial action is located in Delaware's coastal area. | ALL |
| 6. Delaware Wetlands Act of 1973, Revised June 29, 1984 | Title 7, Delaware Code, Ch 66, § 6607 | Relevant and Appropriate | Requires activities that may adversely affect wetlands in Delaware to be permitted. Permits must be approved by the county or municipality having jurisdiction. | Any substative requirements shall be met since wetlands will be ~~destroyed and replaced in the north~~ drainage ~~way and~~ dredged (or excavated) and restored ~~in the north and south wetlands~~. Since all of the wetland or river remediation is considered "on-site", no permit will be necessary. | ~~NE, ST,~~ SW |
| 7. Delaware Regulations Governing the Use of Subaqueous Lands, amended 9/92 | Title 7, Delaware Code, Ch 72 | Relevant and Appropriate | Requires activities that affect public or private subaqueous lands in the State be permitted. | Any substantive requirements shall be met since the remediation involves dredging of the ~~Christina River~~ along the unnamed tributary. | ~~NE~~, CG/HR, SL/CR |

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O = pms. applicable

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| 8. Delaware Executive Order 56 on Freshwater Wetlands (1988) | | Applicable | General policy to minimize the adverse effects to freshwater wetlands. | Applicable to wetland remediation and restoration. | ~~NL,SL, SW~~ |
| 9. Governor's Roundtable Report on Freshwater Wetlands (1989) | | To Be Considered | General policy to minimize the adverse effects to freshwater wetlands. | To be considered for wetland remediation and restoration. | NL,SL, SW |
| 10. Procedures for Implementing the Requirements of the Council on Environmental Quality on the National Environmental Policy Act | 40 C.F.R Part 6 Appendix A | Applicable | EPA's policy for carrying out the provisions of Executive Order 11990 (Protection of Wetlands). No activity that adversely affects a wetland shall be permitted if a practicable alternative that has less effect is available. If there is no other practical alternative, impacts must be mitigated. | Applicable since wetlands will be destroyed in the north drainageway and dredged in the north and south wetlands. | NL,SL, SW |
| 11. Ground Water Protection Strategy of 1984 | EPA 440/6-84-002 | To be Considered | Identifies ground water quality to be achieved during remedial actions based on aquifer characteristics and use. | The EPA aquifer classification will be taken into consideration during design and implementation of the treatment remedy. | GW |
| **III. ACTION SPECIFIC** | | | | | |
| **A. Miscellaneous** | | | | | |
| 1. Delaware Environmental Protection Act | Title 7, Delaware Code, Ch 60 | Applicable | Policy for the development, utilization, and control of all water, underwater, land, and air resources of the State. | Applicable for proposed remedial actions. | ALL |
| 2. Occupational Health and Safety Act | 29 C.F.R Parts 1904, 1910, and 1926 | Applicable | Provides occupational safety and health requirements for workers engaged in on-site field activities | Applicable to on-site work performed during implementation of remedial activities. | ALL |
| **B. Water** | | | | | |
| 1. Clean Water Act (CWA); National Pollutant Discharge Elimination System Requirements | 33 U.S.C § 1251; 40 C.F.R. Part 122 | Relevant and Appropriate | Enforceable standards for all discharges to waters of the United States. | Discharge limits shall be met for all on-site discharges to surface water. Only substantive requirements shall be met. | ~~NL,~~ ~~SC/HR~~ GW |

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| 2. General Pretreatment Regulations | 40 C.F.R Part 403 | Applicable | Standards for discharge to POTW. | Applicable should the extracted ground water or treated ground water be discharged to a POTW. | Nbr GW COMR |
| 3. Section 10 of the River and Harbors Act | 33 U.S.C. Section 403<br>33 C.F.R. Part 320-330 | Applicable | | Applicable for the dredging ~~of the Christina River~~. | ~~GR~~ |
| 4. Fish and Wildlife Coordination Act<br><br>HELP: THIS MAY NOT BE RELEVANT TO THIS SITE. SEE 4-20,pART II | 16 U.S.C. 661 et seq.<br>40 C.F.R. 6.302(e) | Relevant and Appropriate | Requires action to protect fish or wildlife. | Applicable for the dredging of the ~~Christina River~~. | ~~GR~~ |
| 5. State of Delaware Regulations Governing the Construction of Water Wells | Title 7, Delaware Code, Ch 60 | Relevant and Appropriate ~~for on-site~~ activities and Applicable for off-site activities | Contain requirements govering the location, desigh, installation, use, disinfection, modification, repair, and abandonment of all wells and associated pumping equipment. | Installation of any monitoring and recovery wells and the abandonment of wells shall meet all substantive requirements and all off-site activities shall be permitted. | ALL |
| 6. State of Delaware Regulations for Licensing Water Well Contractors, Pump Installers, Contractors, Well Drillers, and Well Drivers | Title 7, Delaware Code, Ch 60 | Applicable | Regulations for examining and licensing those persons engaged in the contracting for the drillign boring, coring, driving, digging, construction, installation, removal, or repair of water wells or water test wells or the installation or removal pf pumping equipment in and for a water well or water test well. | Applicable for the installation, removal, or repair of monitoring wells, recovery wells and recovery pumps. | ALL |
| 7. Delaware Water Quality Standards | Stream Quality Standard Section 10 | Applicable | Standards are established in order to regulate the discharge into state waters in order to maintain the integrity of the water. | Applicable should the ground-water treatment system involve discharge to surface water. | ~~Nbr GOMR~~ |
| 8. EPA Policy for Ground Water Remediation at Superfund Sites | OSWER Directive 9355.4-03 | To be Considered | This policy recommends approaches to ground water remediation using a pump and treat system. | This policy will be considered if, during the future, active ground-water restoration is necessary. | GW |

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| 9. Delaware River Basin Commission Water Quality | Memorandum of Agreement between the Delaware River Basin Commission and the U.S. Environmental Protection Agency Region 3 (§ III.5 and V.8) | Applicable | Regulate restoration, enhancement and preservation of waters in the Delaware River basin. | Applicable if remedial action involves discharge of >50,000 gallons/day average over any month or a withdrawal of ground water of 100,000 gallons/day or more average over any month. | ~~NL~~ ~~CG/HR~~ GW |
| 10. Delaware Regulations Governing the Allocation of Water | Title 7, Delaware Code, Ch 60 | Relevant and Appropriate | Contain information pertaining to water allocation permits and criteria for their approval. | May be applicable for the ground-water recovery system ~~or the public water supply line~~ | ~~NL~~, ~~CG/HR~~, GW |
| 11. State of Delaware Groundwater Management Plan | Title 7, Delaware Code | To Be Considered | Policy for ground water management. | To be considered in setting the ground water management zone. | GW |
| 12. Delaware Regulations Governing Control of Water Pollution | Title 7, Delaware Code, Ch 60 | Applicable | Contain water quality regulations for the discharge into surface and ground water. | Applicable for potential discharge of treated ground water into surface water. Also applicable for stormwater runoff into the ~~Christina River~~. UNNAMED TRIBUTARY INTO KILLCOHOOK CREEK | ~~NL~~ ~~SL~~ ~~CG/HR~~, All |
| 13. State of Delaware Regulations Governing Public Drinking Water Systems | Title 16, Delaware Code, Section 122 | Applicable | Establishes requirements for public drinking water supplies. | May affect the establishment of public drinking water service to residents along Old Airport Road. | GW |
| 14. Regulations for Licensing Operators of Wastewater Facilities | Title 7, Delaware Code, Section 6023(f) | Applicable | Establishes requirements for th licensing and qualifications of operators of wastewater treatment facilities. | Applicable for the ground-water treatment facility. | ~~NL~~ ~~CG/HR~~ GW |
| Air | | | | | |
| 15. Control of Air Emissions from Air Strippers at Superfund Ground Water Sites, June 15, 1989 | EPA OSWER Directive 9355.0-28 | To be Considered | Policy to guide the selection of controls for air strippers at groundwater sites according to the air quality status of the site's location (i.e., attainment or non-attainment area). | To be considered in determining if air emissions controls are necessary for an air stripper because New Castle is in an ozone non-attainment area. Sources most in need of controls are those with emissions rates in excess of 3 lbs./hour or 15 lbs./day or a potential rate of 10 tons/year of total VOCs. | ~~NL~~ ~~CG/HR~~ All |

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| 2. Delaware Regulations Governing the Control of Air Pollution | 7 Delaware Code, Chapter 60, Section 6003, Regulation 2, Section 2.4 | Relevant and Appropriate | Sets forth the requirement that a permit is necessary to operate an air stripper if emissions will exceed 2.5 lbs./day. | If emissions exceed 2.5 lbs./day then the substantive requirements of the regulation must be met. In addition, the emissions from the air stripper must meet the Ambient Air Quality Standards set forth in Regulation 3 of 7 Delaware Code, Chapter 60, Section 6003. | NL CG/IR GW |
| E. Sediments/Solids | | | | | |
| 1. Delaware Sediment and Stormwater Regulations | Title 7, Delaware Code, Ch 40 | Relevant and Appropriate | Establishes a statewide sediment and stormwater management program. | A stormwater and sediment management plan consistent with Delaware requirements must be approved by EPA before construction disturbing over 5,000 square feet of land can begin. | ALL |
| F. Hazardous Waste | | | | | |
| 1. United States Department of Transportation Rules for Transportation of Hazardous Materials | 49 C.F.R Parts 107, and 171.1-172.604 | Applicable | Regulations for transport of hazardous materials | Applicable to offsite shipment of process wastes. | ALL |
| 2. Delaware Regulations Governing Solid Waste | Title 7, Delaware Code, Chapter 60 | Applicable | Establishes regulations to implement an improved solid waste management program. | Applicable for any off-site transport and/or disposal of non-hazardous material during the remedial activities. | ALL |
| 3. Delaware Regulations Governing Hazardous Waste (The Solid Waste Disposal Act (RCRA)) | Delaware Regulations Governing Hazardous Waste (42 U.S.C. § 6901 et seq.) | Applicable in some cases and Relevant and Appropriate in others | Delaware Regulations Governing Hazardous Waste Part 261 (40 C.F.R. Part 261) define "hazardous waste". The regulations listed below apply to the handling of such hazardous waste. | The collected ground water, treatment systems, and hazardous wastes generated by the treatment systems shall be handled in accordance with regulations listed below | ALL |
| 4. Standards Applicable to Generators of Hazardous Waste | Delaware Regulations Governing Hazardous Waste, Part 262.10-58 (40 C.F.R Part 262.10-58) | Applicable | Establishes standards for generators of hazardous wastes including waste determination manifests and pre-transport requirements. | Applicable to operator(s) of the wastewater treatment plant if the wastes generated by the ~~groundwater~~ treatment system(s) is a RCRA-hazardous waste. | NL CG/IR A/ |

| ARAR or TBC | Legal Citation | ARAR Class | Requirement Synopsis | Applicability to Selected Remedy | Area of Concern |
|---|---|---|---|---|---|
| 5. Standards Applicable to Transporters of Hazardous Waste | Delaware Regulations Governing Hazardous Waste, Part 263 (40 C.F.R Part 263) | Applicable | Sets forth regulations for off-site transporters of hazardous waste in the handling, transportation, and management of the waste. | Apply to any company contracted to transport hazardous material from the site. | ALL |
| 6. Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) | Delaware Regulations Governing Hazardous Waste, Part 264 (40 C.F.R Part 264) | Applicable | Regulations for owners and operators of TSDF's which define acceptable management of hazardous wastes. | Applies to onsite recovery and treatment systems which handle hazardous waste and any facilities to which hazardous wastes generated at the Site may be taken. | ALL |
| 7. RCRA Requirements for Use and Management of Containers | Delaware Regulations Governing Hazardous Waste, Part 264.170-178 (40 C.F.R Part 264.170-178) | Applicable | Requirements for storage of hazardous waste in storage containers. | Applicable for temporary storage containers and on-site treatment systems. | ALL |
| 8. RCRA Requirements for Tanks Systems | Delaware Regulations Governing Hazardous Waste, Part 264.190-199 (40 C.F.R Part 264.190-199) | Applicable | Requirements for storage or treatment of hazardous waste in tank systems. | Applicable for onsite treatment systems and temporary storage tanks. | ALL |
| 9. RCRA Manifest System, Record-keeping, and Reporting | Delaware Regulations Governing Hazardous Waste, Part 264.70, 264.73-75, and 264.77 (40 C.F.R Part 264.70, 264.73-75, and 264.77) | Applicable | Requirements for manifesting for offsite disposal of hazardous wastes. | Applicable for offsite disposal of hazardous waste generated by treatment systems. | ALL |
| 10. The Hazardous Waste Permit Program | Delaware Regulations Governing Hazardous Waste, Part 122 | Relevant and Appropriate | Requires a permit for the treatment, storage, or disposal of any hazardous waste as identified or listed in Part 261. | Any substative requirements will be met. | ALL |

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|---|---|---|---|---|---|
| 11. Identification and Listing of Hazardous Wastes | Delaware Regulations Governing Hazardous Wastes, Part 261 | Applicable in some cases and Relevant and Appropriate in other | Identifies solid wastes which are regulated as hazardous wastes. | Use to determine which materials to be disposed of are hazardous wastes. | ALL |
| 12. RCRA Land Disposal Restrictions | Delaware Regulation Governing Hazardous Waste, Part 268 (40 C.F.R. Part 268) | Applicable | Restrictions on land disposal of hazardous wastes. | Applicable for off-site land disposal of hazardous waste. [illegible] | ~~ALL~~ GW, OFS, SED |
| ~~13. RCRA Land Disposal Restrictions~~ | ~~Delaware Regulation Governing Hazardous Waste, Part 268 (40 C.F.R. Part 268)~~ | ~~Relevant and Appropriate~~ | ~~Restrictions on land disposal of hazardous wastes.~~ | ~~Applies to remedial actions in the south landfill, the south wetlands, and the Christina River (unless the sediments are disposed of in the the north landfill).~~ | ~~SL, SW, CR~~ |

Others to think about: NRC: 10CFR61
RCRA: landfill regs

GW - Ground water
OS - on-site soils
OFS - off site soils
Sed. sediments
SW - Surface water [illegible]
All - All of the above

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