SOLID AND HAZARDOUS WASTE MANAGEMENT SECTION LONG TERM STEWARDSHIP INSPECTION

FACILITY:

INVISTA Seaford formerly DuPont Seaford Nylon Plant

25876 DuPont Road Seaford, DE 19973

EPA ID:

DED002348845

DATE:

September 19, 2017

SHWMS STAFF:

Francis Gavas - Hydrologist

SITE STAFF:

Michael Terry – Environmental, Health and Safety Manager

THRU:

Jason Sunde – SHWMS Program Manager

FILE CODE:

70

BACKGROUND:

The INVISTA Seaford Nylon Plant is located in Sussex County, Delaware on 650 acres bordered by the Nanticoke River to the east, the Norfolk Southern Railroad to the north and branches of the Nanticoke to the east and south. The plant was previously operated by DuPont. The property was transferred in title to IVISTA on March 30, 2013 and is regulated under an Administrative Order on Consent. The plant has manufactured nylon since 1939.

Following a Facility Investigation, review, public hearing and comment period, the Delaware Department of Natural Resources and Environmental Control (DNREC) Solid and Hazardous Waste Management Section (SHWMS) issued a RCRA Record of Decision (ROD) on May 25, 2006 which specified corrective measures necessary to remedy environmental issues identified at the facility.

REMEDIES AND CONTROLS:

The ROD specified the following remedies and controls at three solid waste management units (SWMU) identified during the facility investigation:

SMWU 1: Sampling of monitoring wells with monitored natural attenuation of carbon tetrachloride with an associated groundwater management zone (GMZ). The SHWMS approved DuPont's request to discontinue groundwater monitoring on October 5, 2010 based upon recurring below MCL detections of CCI4.

SWMU 7/12/13: Sampling for arsenic in 12 wells and at 2 surface water locations with monitored natural attenuation with an associated GMZ.

SWMU 13/17: Soil capping of exposed solid waste completed on October 30, 2006 with a construction complete report submitted and approved in May of 2007.

An environmental covenant was established for the site between DuPont and DNREC on April 3, 2008 and later transferred to INVISTA and filed with Sussex County which prohibited the withdrawal of groundwater from the GMZs, protected the remedies in place, and prohibited the disturbance or removal of soil in specified areas across the site. The real property was transferred to INVISTA on March 10, 2016.

OBSERVATIONS: All monitoring wells were properly secured. No intrusions or disturbances of the remedies or controls were observed.

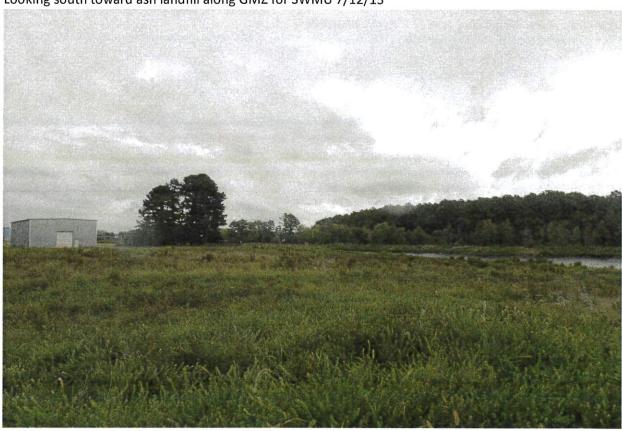
CONCLUSIONS AND RECCOMENDATIONS: INVISTA is in compliance with the ROD and all associated controls at the site. A letter of compliance in recommended.



Looking east across SWMU 7/12/13, well in foreground



Looking south toward ash landfill along GMZ for SWMU 7/12/13



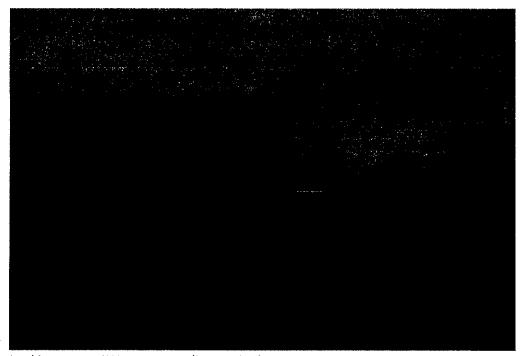
Looking north toward former fly ash ponds along GMZ for SWMU 7/12/13

A view into woods east of landfill of covered exposed waste from SWMU 13/17





Looking east across SWMU 1



Looking across SWMU 6, a no dig area in the UECA covenant



Looking across the golf course, a no dig area in the UECA covenant