



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

E.I. DU PONT DE NEMOURS AND COMPANY

TOWANDA, PENNSYLVANIA

EPA ID NO. PAD 003 038 056

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Figure 1 - Map of the Plant Layout

ACRONYMS

AOC	Area of Concern
AR	Administrative Record
CFR	Code of Federal Regulations
CMP	Corrective Measures Plan
CMS	Corrective Measures Study
DNAPL	Dense Non-Aqueous Phase Liquids
EPA	Environmental Protection Agency
IC	Institutional Control
IM	Interim Measure
MCL	Maximum Contaminant Level
MeCl	Methylene Chloride
OHM	O.H. Materials Co.
PADEP/R	the Pennsylvania Department of Environmental Protection/Resources
RBC	Risk Based Concentration
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SAP	Sampling and Analysis Plan
SB	Statement of Basis
SWMU	Solid Waste Management Unit
TCE	Trichloroethylene
U.S.C.	United States Code
VOC	Volatile Organic Compound

I. Introduction

A. Facility Name and Location

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the E.I. du Pont de Nemours and Company facility (hereinafter referred to as the Facility or DuPont) located in Towanda, Pennsylvania. The Facility is located on Patterson Boulevard in North Towanda, Towanda Township, Bradford County, Pennsylvania and is bordered by Route 6 on the east, Patterson Boulevard on the south, and Sugar Creek on the west-northwest. Topographically, the Facility is located on a glacial terrace approximately 70 feet above Sugar Creek. The Facility covers 51 acres. See Figure 1 for a map of the plant layout.

B. Purpose of Document/Proposed Remedy

The purpose of this SB is to summarize investigation results and remedial actions performed at the Facility and to describe and solicit comments on EPA's proposed final remedy. Based on a review of past and present environmental practices, soil and groundwater sampling activities, historical investigations and remedial activities performed at the Facility, EPA is proposing Monitored Natural Attenuation with Institutional Controls as the Final Remedy. Natural attenuation refers to a system where a variety of physical, chemical, or biological processes act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater. As decomposition of the contaminants takes place, compounds called "breakdown products" are produced. Ultimately, the breakdown products are also decomposed resulting in compounds which are not a threat to human health or the environment. Monitored Natural Attenuation simply refers to the act of collecting samples to "monitor" the natural attenuation process.

Because contamination will remain in the groundwater at the Facility, EPA's proposed final remedy includes Institutional Controls (ICs). ICs are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination by limiting land or resource use. The proposed ICs are:

- an environmental covenant prohibiting the use of groundwater beneath the Facility for potable purposes or any other use that could result in human exposure, unless such use is required by the Final Remedy,
- an environmental covenant restricting well drilling without prior EPA approval shall be placed on the Facility to prevent inadvertent exposure to the contaminated groundwater and adverse affects to the final remedy, and
- in the event DuPont intends to sell part or all of the Facility, DuPont will notify EPA and demonstrate that the prospective purchaser is aware of the restrictions placed on groundwater use.

The Facility is subject to the Corrective Action program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

The Corrective Action program is designed to ensure that facilities have investigated and cleaned up, if necessary, any releases of hazardous waste and constituents from any solid waste management unit.

In the Commonwealth of Pennsylvania, EPA has delegated most of the RCRA permitting program to the Pennsylvania Department of Environmental Protection (PADEP) based upon promulgated State regulations which are equivalent to, or more stringent than, the federal requirements. EPA has not yet delegated the RCRA Corrective Action requirements, under which this SB has been prepared, to PADEP. In Pennsylvania, EPA administers the RCRA Corrective Action program with authority to require environmental investigations and remedial actions at any facility that applies for a hazardous waste operating permit or otherwise operated under RCRA interim status.

PADEP issued the Facility a RCRA hazardous waste operating permit on July 31, 1990 for the storage of hazardous waste. On July 31, 1990, EPA issued a HSWA Corrective Action Permit (I.D. #PAD 003038056) (HSWA Permit) to the Facility which required the Permittee to investigate the extent of environmental contamination at the Facility and evaluate remedy options. The HSWA Permit expired on July 30, 2000 and its conditions have been continued under 40 C.F.R. Section 270.51. EPA intends to modify the Facility's HSWA Permit to include the components of EPA's Final Remedy.

C. Importance of Public Input

The public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility and/or submitting written comments to EPA during the public comment period. The information presented in this SB can be found in greater detail in the work plans and reports submitted by DuPont to EPA, site inspections, EPA policies, and EPA guidelines which can be found in the AR. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages anyone interested to review the AR. The AR and index are available for public review at the EPA Region III Office in Philadelphia as described in Section VI of this document.

As discussed in further detail in Section VI, below, EPA will address all significant comments submitted in response to the proposed remedy described in this SB. EPA will make a Final Remedy Decision and issue a Final Decision and Response to Comments (FDRTC) after it considers information submitted during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed remedy, EPA may modify the proposed remedy or select other alternatives based on such new information and/or public comments.

II. Facility Background

A. Site History

The Facility has been in operation since the early 1940's when DuPont began manufacturing X-ray screens. In the 1960's, DuPont began manufacturing coated films and wet-

processing solutions at the Facility. Television phosphors (black and white) were manufactured at the Facility from 1954 to 1958 and photosensitive polymer coatings were produced from 1967 to 1974. Currently, the Facility manufactures fuel cell components, coated films, and flexible circuit materials.

B. Summary of Environmental Investigations

On October 7, 1983, DuPont submitted to the Pennsylvania Department of Environmental Resources (PADER), which was subsequently renamed PADEP, a report describing a methylene chloride (MeCl) spill which occurred on the northeast side of the Facility. DuPont subsequently determined that the spill resulted from a leaking MeCl supply line.

On March 8, 1985, EPA requested information from DuPont regarding the Solid Waste Management Units (SWMU's) at the Facility. Subsequently, DuPont conducted and submitted a RCRA Facility Assessment (RFA) to EPA in which it described and recommended remedial actions all SWMUs identified at the Facility.

As required by the HSWA Permit, DuPont conducted the following four investigations at the Facility: a verification investigation (VI), a supplemental verification investigation (SVI), a RCRA Facility Investigation (RFI), and a supplemental RFI.

In 1991 DuPont performed the VI to investigate potential releases of hazardous waste at the Facility. EPA approved the final VI Report on September 6, 1991. The EPA-approved VI Report recommended that an RFI be conducted and that groundwater be further investigated in five areas where volatile organic compounds (VOCs) were detected above applicable screening levels developed by DuPont and approved by EPA. The VOCs detected above the screening criteria were benzene; 1,2-dichloroethane, MeCl and trichloroethylene (TCE).

DuPont conducted the SVI simultaneously with the VI to investigate high levels of VOCs detected in one HydroPunch sample taken in the area of Tanks A through F and the Solvent Reclamation Still. The results of the SVI were included in DuPont's RFI work plan submitted to EPA on February 28, 1992. EPA approved the RFI work plan on May 18, 1992. Based on the SVI, DuPont concluded that benzene, MeCl, and TCE were present in some wells above the respective screening levels for those contaminants. DuPont used the results of the VI and SVI to select locations for the installation of additional monitoring wells during the RFI.

In February 1992, DuPont detected MeCl in groundwater seeps from the bluff rising above Sugar Creek. DuPont submitted a Groundwater Seep Corrective Measures Plan (CMP) to EPA on May 13, 1992 proposing the installation of groundwater collection sumps to remediate the groundwater seeps. EPA approved DuPont's CMP on May 26, 1992.

DuPont performed the RFI to determine the type and extent of contamination at the Facility. As part of the RFI, DuPont presented a hydrogeologic conceptual model of the Facility developed with the aid of a computer program. The conceptual model was prepared to show the three dimensional flow system of groundwater under natural conditions as well as pumping conditions. The model portrayed a system where nearly all the groundwater originating from the

Facility discharges to Sugar Creek or seeps near the base of the bluff rising above Sugar Creek. The model also conceptualizes downward vertical hydraulic gradients between the glacial till (upper aquifer) and the silt and sand unit (lower aquifer). The flow in the silt and sand unit then becomes more horizontal due to its higher conductivity. Ultimately, Sugar Creek comprises the primary discharge of both the shallow and deep groundwater beneath the Facility with apparent influence by the nearly continuous plant production well. During the RFI, DuPont detected VOCs at concentrations of MeCl, TCE, and 1,2-dichloroethylene exceeding their respective MCLs in shallow groundwater in three areas at the Facility. The RFI recommended that additional data be obtained near Monitoring Well (MW)-8 to define the extent of VOC contamination in the shallow groundwater. DuPont submitted the final RFI Report to EPA in September 1993 and a Supplemental RFI Report in 1994. As part of the supplemental RFI, DuPont investigated the extent of VOC contamination near MW-8 and defined a boundary on the downgradient extent of the VOC contamination.

Based on the investigatory reports mentioned above and a July 27, 1994 meeting between DuPont and EPA, DuPont agreed to commence clean up of some of the releases of hazardous constituents before EPA selected a Final Remedy. These activities in which a facility performs short-term actions to control ongoing risks before a final remedy is selected are called Interim Measures (IM). The IMs are discussed in the next section.

DuPont submitted a study entitled Corrective Measures Study (CMS) to EPA on August 29, 1994. The CMS provided recommendations for Corrective Action at the Facility. The recommendations included reclaiming MeCl from MW-6A, instituting groundwater monitoring, evaluating the occurrence of MeCl in MW-6C, and monitoring the seep collection system. While EPA did not consider this document to be a corrective measures study since it described an interim remediation measure, EPA approved the remediation plans contained in the CMS on October 17, 1994.

DuPont submitted an *Evaluation of Intrinsic Bioremediation* report to EPA on July 23, 1997. This report detailed laboratory experiments through microcosm studies using soil and groundwater from the Facility. Along with groundwater monitoring and analysis, the laboratory experiments provided direct evidence that indigenous microbes are degrading MeCl in groundwater. Based upon the presented lines of evidence, intrinsic bioremediation is causing the degradation of MeCl and chloroethenes at the Facility and preventing their migration.

On August 13, 1998, DuPont provided EPA with a report evaluating the feasibility of using air sparging to remediate the source areas at the Facility. The report concluded that air sparging, which introduces oxygen into the subsurface, would likely suppress the ongoing anaerobic biological degradation resulting in the possible migration of site contaminants. More importantly, however, the low hydraulic conductivity would prevent effective implementation of this technology.

Also, in late 2006 to early 2007, DuPont conducted an investigation of the glacial silt and sand aquifer to determine whether contaminated groundwater was migrating beyond the immediate area where natural attenuation was occurring. Results from this investigation were presented to EPA in the *1st Half 2007 Interim Remedial Measure Status Report* which was

approved by EPA on October 11, 2007. Laboratory analytical results indicate that no contamination is migrating vertically beyond the capture zone of pumping well SW-04.

C. Summary of Interim Measures

Based on the investigatory reports detailed above, DuPont instituted IMs to remediate the contaminated groundwater beneath the Facility.

Activities taken on the northeast side of the Facility to remediate the MeCl spill were performed under PADER direction prior to EPA involvement at the Facility. In 1983, DuPont installed a groundwater recovery system consisting of 72 wells to remediate the groundwater. A combined approach utilizing air-stripping and associated soil flushing was employed. Biological remedial methods were then employed to achieve an even more stringent cleanup level. With the approval of PADER, DuPont discontinued groundwater remediation in June 1988. Based on results from the RFI, it appeared that some residual MeCl was still present in the shallow groundwater. A sharp decrease in MECl by four orders of magnitude was observed following a pump test performed in May, 1993. This decrease was confirmed by two additional rounds of sampling in July and August, 1993. It was determined that this residual area was small and that the pumping eliminated the bulk of this contamination. Overall, remedial efforts were successful in reducing contaminant levels from 1400 milligrams per liter (mg/L) to 0.004 mg/L.

In 1992 in accordance with the EPA-approved CMP, DuPont installed a groundwater collection pump to remediate contaminated groundwater found seeping from old drainage pipes on the western side of the Facility near the base of the bluff rising above Sugar Creek.

During the Facility investigations, two major areas of groundwater contamination were discovered. One area is centered around MW-6A in the upper aquifer and, to a lesser extent, MW-6C in the lower aquifer. The contamination in this area consisted primarily of MeCl. DuPont agreed to pump the MeCl contaminated water from MW-6A and transport it to the on-site MeCl recycling area which was part of DuPont's established operating procedures. DuPont agreed to continue this activity until MeCl use at the Facility ceased.

The MeCl recovery system operated from April 1995 to November 1996 and removed about 190 pounds of MeCl. Since November 1996, DuPont has monitored the presence of MeCl in the groundwater. The area of contaminated groundwater has remained small and there is no evidence that contamination has moved off-site. Furthermore, monitoring data have also shown that as of November 2001 and November 2003, MeCl has been nondetect in MW-6C and MW-6A, respectively.

Since MeCl no longer seeps from the pipes and has been non-detect since November 2003 in MW-6A and November 2001 in MW-6C, and the Facility no longer uses MeCl, EPA allowed DuPont to remove the pipes and the collection system of the MeCl recovery system.

The second area of groundwater contamination is in the upper aquifer centered around MW-8 and primarily consists of chlorinated degreasing solvents such as TCE and the compounds that form when chlorinated solvents decompose in the environment, namely cis-1,2-

dichloroethene, vinyl chloride, and ethene. This area of contamination is also small, is not moving off-site, and appears to be responding positively to natural attenuation.

III. Summary of Environmental Issues

A. Contaminated Media

The only medium contaminated at the Facility is the groundwater. The principal contaminants identified in the groundwater are MeCl, TCE, and the usual breakdown products of TCE: cis-1,2-dichloroethene, vinyl chloride, and ethene. The areas of contamination at the Facility are small, localized, and not migrating off-Site from the Facility.

B. Summary of Facility Risks

1. Potential Receptors in Contact with Groundwater – Environmental investigations performed by DuPont at the Facility show that groundwater contamination is not migrating off-site. Therefore, since there are no drinking water wells at the Facility, the only possible groundwater receptors would be workers who would be exposed to groundwater during installation of wells within the defined areas of on-site contamination. The ICs proposed will prohibit the installation of drinking water wells within these defined areas and, thus, eliminate this pathway. In addition, a Health and Safety Plan will be required which will alert any worker to the contamination and ensure appropriate Personal Protective Equipment will be worn and preventive exposure measures will be taken. Furthermore, EPA proposes to require DuPont to file deed notices to notify prospective purchasers that the groundwater underlying the Facility is contaminated.

2. Drinking Water Wells in the Vicinity of the Facility – In November 2006, EPA conducted a visual drinking water well survey in the vicinity of the Facility. No private wells were observed directly adjacent to the Facility. One private well was observed on the Susquehanna River side of Towanda in the vicinity of the public drinking water wells. The Towanda Public Drinking Water Wells are located in this same area and draw water from the aquifer beneath the aquifer where the highest contamination is located on the DuPont property. EPA has determined that Facility-related contamination is not migrating from the Facility, and, therefore, is not a threat to either of these receptors. This survey was supplemental to the well survey already performed during the RFI which noted that the closest groundwater users in the area are public water supply and industrial wells located approximately 3000 feet from the Facility along the Susquehanna River.

The Towanda Borough is aware of the groundwater contamination at the Facility. Towanda Borough routinely tests the water and has not detected the presence of any Facility-related contaminants further supporting EPA's finding that groundwater contamination is not migrating off-site or affecting the public drinking water supply.

IV. Proposed Remedy Performance Standards

EPA is proposing Monitored Natural Attenuation with Institutional Controls as the Final

Remedy for the Facility. For groundwater, the groundwater cleanup standards consist of the respective Maximum Contaminant Levels (MCLs) promulgated at 40 C.F.R. Part 141 pursuant to Section 1412 of the Safe Drinking Water Act, 42 U.S.C. Section 300g-1, for the constituents methylene chloride; trichloroethylene; cis-1,2-dichloroethene; and vinyl chloride. DuPont will be required to sample the monitoring well network in accordance with the Sampling and Analysis Plan (SAP) presented in the November 1, 1995 Interim Remedial Measures Status report. Any modification to the sampling plan will have to be approved by EPA prior to implementation.

Additionally, part of DuPont's conceptual model is that any groundwater, along with any contaminants, that migrates will be captured within the radius of influence of SW-04, the currently operational production pumping well. Therefore, if in the future this well were to stop pumping before the groundwater constituents meet their respective cleanup levels, DuPont will need to submit a plan to assure that human health and the environment are not being adversely impacted.

If DuPont determines, on the basis of analytical results, that the concentration of each constituent has not exceeded its respective cleanup level for three continuous years, DuPont may request in writing, for EPA approval, that corrective action for groundwater contamination at the Facility be terminated.

V. Evaluation of EPA's Proposed Remedy Selection

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three remedy threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria to determine which proposed remedy alternative provides the best relative combination of attributes.

A. Threshold Criteria

EPA's evaluation of the threshold criteria is as follows:

1. Protect Human Health and the Environment - EPA is satisfied with the determination that Monitored Natural Attenuation with ICs is and will be protective of human health and the environment. There are no human health threats associated with domestic uses of the contaminated groundwater originating from the Facility because groundwater is not used for drinking water purposes. In addition, due to biological activity, the contaminants in the groundwater at the Facility are decomposing rapidly enough to prevent the contaminants and the breakdown products from migrating from the Facility.

Even though there are no current consumptive uses of Facility-contaminated groundwater, it is EPA's goal that groundwater be restored to drinking water standards to be

protective of potential future use. Until groundwater is restored to drinking water standards, EPA is proposing to require ICs, as necessary, to prevent consumptive use of the groundwater.

2. Attainment of Media Cleanup Standards - The proposed Monitored Natural Attenuation with ICs will attain the media cleanup criterion by restoring groundwater to drinking water standards. Under EPA's proposed remedy, DuPont will be required to monitor groundwater until the concentration of each constituent does not exceed the constituent's respective Maximum Contaminant Level (MCL) promulgated at 40 C.F.R. Part 141 pursuant to Section 1412 of the Safe Drinking Water Act, 42 U.S.C. Section 300g-1, for three continuous years.

DuPont will be required to sample the monitoring well network in accordance with the SAP presented in the November 1, 1995 Interim Remedial Measures Status report. Any modification to the SAP will have to be approved by the EPA prior to implementation.

3. Controlling Source of Releases - Since DuPont ceased using MeCl in its operations in 1996, the source for MeCl has been eliminated. The re-routing of the drainage pipes to the sump for collection and transfer to the on-site treatment area addressed the issue of MeCl seeping into Sugar Creek. Moreover, the area where the highest concentrations of MeCl were found has responded to natural attenuation as well as other technologies. Monitoring data have shown that as of November 2003 and November 2001, MeCl has been non-detect in MW-6A and 6C, respectively.

With respect to the second area of groundwater contamination in the upper aquifer centered around MW-8, chlorinated solvents and compounds that form when chlorinated solvents decompose in the environment are found in the shallow and deep aquifers with the former evaporation pond as the most likely source. The evaporation pond was closed in 1974; soil was excavated and the area was filled with gravel effectively eliminating the source. Natural Attenuation will complete remediation of the residual compounds.

B. Balancing/Evaluation Criteria

1. Long-Term Reliability and Effectiveness - The long-term reliability and effectiveness standard is intended to address protection of human health and the environment over the long term. DuPont has demonstrated that, due to biological activity, the contaminants in the groundwater are decomposing rapidly enough to prevent the contaminants or the breakdown products from migrating beyond the Facility boundary. EPA expects this natural attenuation process to continue. DuPont will continue to monitor the groundwater to demonstrate that this attenuation process continues until the groundwater cleanup standards are met.

2. Reduction of Toxicity, Mobility or Volume of Waste - For this criterion, remedies that employ treatment and/or source removal and containment that are capable of permanently reducing the overall risk posed by the remediation wastes are preferred. Natural attenuation, by definition, refers to a system where a variety of physical, chemical, or biological processes act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater. EPA's proposed remedy will, therefore, accomplish this

criterion.

3. **Short-Term Effectiveness** - The proposed remedy is expected to meet the short-term effectiveness criterion. The short-term effectiveness criterion is intended to address hazards posed during the implementation of the remedy. Short-term effectiveness is designed to take into consideration the impact on site workers and nearby residents during construction before the final cleanup levels are met. The only possible exposures to groundwater at the Facility is to workers taking environmental samples or to workers excavating soil in the vicinity of the contaminated plume. DuPont will be required to submit a Health and Safety Plan to EPA that provides for proper worker training and the wearing of protective clothing if exposure to contaminated groundwater is expected.

4. **Implementability** -. The proposed remedy is fully implementable. The implementability criterion addresses the regulatory constraints in employing the cleanup approach. Natural attenuation has been proven to be occurring at the Facility due to naturally occurring microbes. All necessary components of the monitoring network are in place and are currently operational; therefore, no new regulatory constraints are anticipated.

5. **Cost** - EPA's overriding mandate under RCRA is protection of human health and the environment. However, EPA believes that cost is an appropriate consideration when selecting among alternatives that achieve the cleanup requirements. EPA's experience in the Superfund program has shown that in many cases several different approaches will offer equivalent protection of human health and the environment, but may vary widely in cost. All necessary components of the monitoring network at the Facility are in place and are currently operational. The only recurring costs are operational and maintenance (O&M) and reporting costs of the monitoring network.

DuPont has submitted a cost estimate for the proposed remedy of Monitored Natural Attenuation with ICs of \$21,750 per year.

6. **Community Acceptance** - The Community acceptance of EPA's proposed remedy will be evaluated based on comments received during the public comment period and will be described in the FDRTC.

7. **State Acceptance** - State acceptance will be evaluated based on comments received from PADEP during the public comment period and will be described in the FDRTC.

PADEP has been involved with the actions of the Facility jointly with the EPA since 1990. PADEP's Environmental Cleanup Program previously raised concerns that the conceptual model utilized for this Facility has not been documented to be accurate and, therefore, has allowed some unknown contaminant mass to escape into the bedrock aquifer. PADEP requests that to remedy this, bedrock wells need to be installed to determine the quality of the water. During the RFI, EPA decided to forego installing bedrock wells. Furthermore, there are no data to suggest that the conceptual model included as part of the RFI is inaccurate. Refer to Section

IIB for a description of the conceptual model.

EPA continues to disagree that bedrock wells are necessary considering the analytical data available since monitoring began. EPA did, however, agree that further investigation into the silt and sand aquifer was necessary. In response, DuPont agreed to install two additional wells that monitored the groundwater zone immediately above bedrock. EPA has concluded that the analytical results from these wells are below any level that would represent a threat to human health or the environment, or otherwise impair the use of this aquifer for off-site groundwater users.

VI. Public Participation

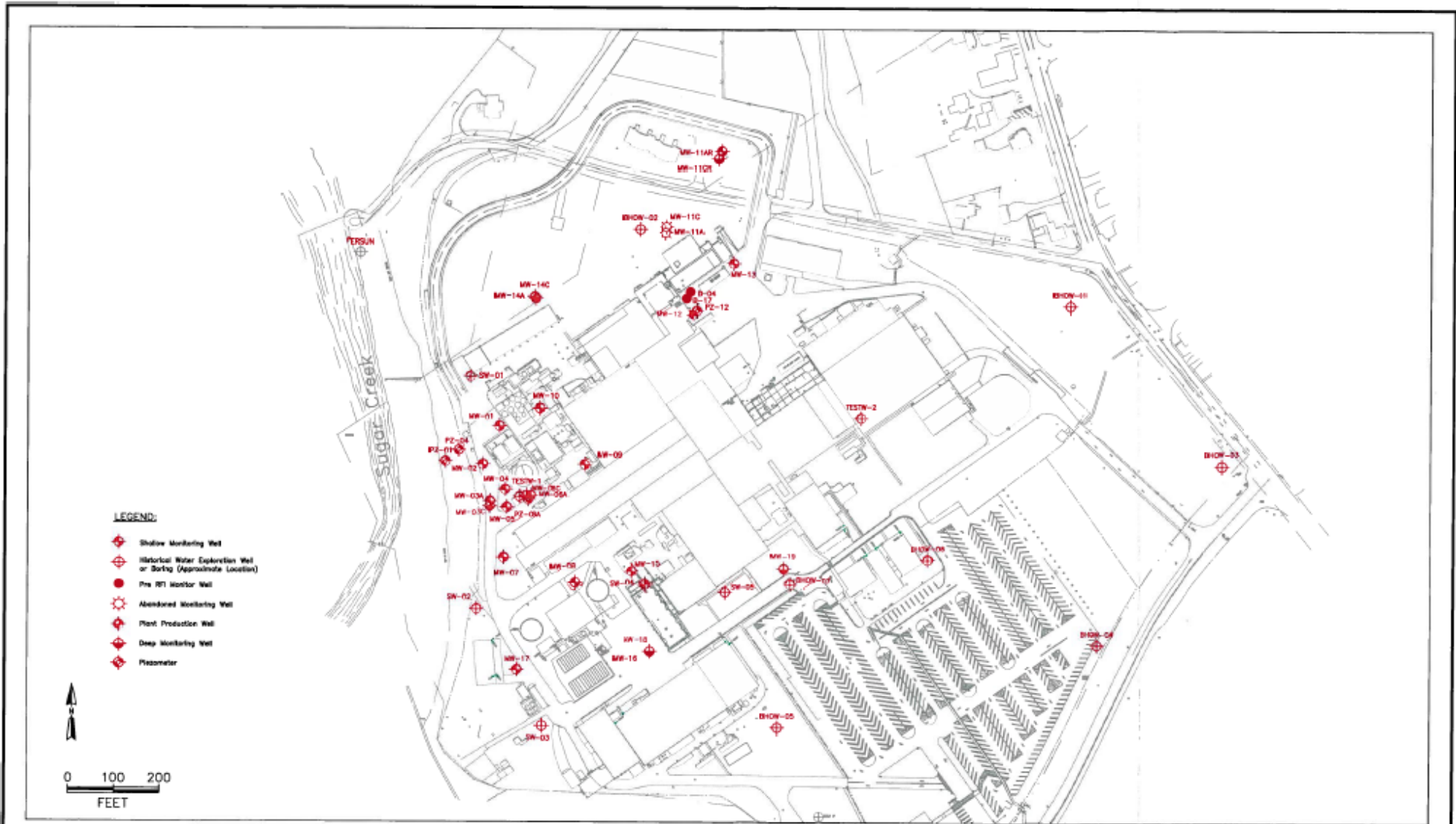
EPA is requesting comments from the public on its proposal that Monitored Natural Attenuation with Institutional Controls become the Final Remedy at the DuPont Facility in Towanda, Pennsylvania. The public comment period will last forty-five (45) calendar days from the date that this SB is published in a local newspaper. Comments should be submitted by mail, fax, e-mail, or phone to the addresses listed below.

A public hearing will be held upon request. Requests for a public hearing should be made to Mr. Kevin Bilash of the EPA Regional Office (215-814-2796). A hearing will not be scheduled unless requested.

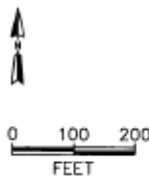
The Administrative Record contains all information considered by EPA when making this proposal to require Monitored Natural Attenuation and Institutional Controls at the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Kevin Bilash (3LC30)
Phone: (215) 814-2796
Fax: (215) 814 - 3113
Email: bilash.kevin@epa.gov

After evaluation of the public's comments, EPA will prepare a Final Decision and Response to Comments that identifies the final selected remedy. The Response to Comments will address all significant written comments and any significant oral comments generated at the public meeting, if requested. This Final Decision and Response to Comments will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the corrective measures identified by EPA in this SB, EPA may seek additional public comments.



- LEGEND:**
- ◆ Shallow Monitoring Well
 - ◆ Historical Water Excretion Well or Boring (Approximate Location)
 - Pre RI1 Monitor Well
 - ◆ Abandoned Monitoring Well
 - ◆ Plant Production Well
 - ◆ Deep Monitoring Well
 - ◆ Piezometer



DUPONT
Corporate Remediation Group
 An Alliance between
 DuPont and ORF Diamond
 Borley Mill Plaza, Building 27
 Wilmington, Delaware 19825

TITLE:
**DuPont Towanda
 Site Base Map**

DATE:	DES.:	FILE NUMBER:
1/6/03	DEL	71288010
DATE:	APPD.:	FIGURE NO.:
1/6/03	EAH TAE	0 1
DATE:	REV.:	
	0	