

**SOLID AND HAZARDOUS WASTE MANAGEMENT SECTION
LONG-TERM STEWARDSHIP INSPECTION**

FACILITY: W.L. Gore & Associates, Inc.
555 Paper Mill Rd.
Newark, DE 19714

EPA ID: DED002331536

DATE OF ASSESSMENT: September 1, 2015

SHWMS REPRESENTATIVES: Benjamin Mack - Environmental Scientist (SHWMS) *Bmm 9/9/15*

EPA REPRESENTATIVES: Joel Hennessy - Region 3, Land and Chemicals Division
Cassie McGoldrick - Region 3, Land and Chemicals Division

SITE REPRESENTATIVES: Lora Gans – Environmental Associate
Mary Lieberman – Product Steward
Peggy Horst – Environmental Associate
Scott Howard – Environmental Health and Safety Associate
Larry Henigan – Plant Leader

REPORT SUBMITTED TO: Jason Sunde, Program Manager *JS 9/9/15*

REFERENCE: W.L. Gore, File Code: 70
15 0901 70 W.L. Gore LTS Report

BACKGROUND:

W.L. Gore & Associates, Inc. (Gore) is currently a manufacturer of Teflon® gaskets and seals. Their 50-acre campus is located in Newark, DE. Benjamin Mack has been the project officer for the facility since November 2014.

A Statement of Basis (SB) was approved in 2012, in which two “Restricted Areas” were delineated. The SB also required land use restrictions to be placed on the “Restricted Areas,” which include the SWMU 7/Shed Area and the Surface Impoundment Area. Implementation of these land use restrictions occurred in the form of an Environmental Covenant, which was enacted on February 7, 2014. SHWMS and EPA representatives conducted a Long-Term Stewardship (LTS) inspection on September 1, 2015 to determine the efficacy of all Institutional Controls (ICs), as well as compliance with all other conditions of the SB and Environmental Covenant.

For the purpose of this inspection, steel-toed shoes and safety glasses were deemed appropriate personal protection equipment for the areas in which the inspection took place.

On September 1, the weather was sunny with the temperature in the high 80’s. An aerial photograph with outlined Restricted Areas is **Attachment #1**. Photographs of the Restricted Areas (as determined by the Environmental Covenant) are in **Attachment #2**.

CONDITIONS OF RESTRICTED AREAS:

Surface Impoundment Area: The Surface Impoundment Area is located southeast of the Paper Mill West building. It is the site of a former impoundment that was identified during the Resource Recovery and Conservation Act (RCRA) Facility Assessment (RFA) as an area of historic waste disposal. It is marked by a manmade rock pile which has a ring of rocks placed around it in a five ft. radius. The ring of rocks marks the border of the Restricted Area (Picture 1). The Surface Impoundment is surrounded by trees on the southern side and a grass meadow on the other three sides. Remedial goals for the Surface Impoundment were based on soil screening values from samples taken before removal of the impoundment. The Surface Impoundment was removed in 2007.

Observations: No residential development or other ground disturbance was observed. The Surface Impoundment area is on a steep hillside, which means it is unlikely that any future development will occur. Mr. Henigan (the plant manager) also said that Gore had no long-term plans to conduct any construction or other earth-moving activities in this area. No violations of the Environmental Covenant or SB were observed.

SWMU 7/Shed Area: The SWMU 7/Shed Area (Shed) is a two-story building located south-southeast of the Paper Mill West building (Picture 2). It is the site of several underground storage tanks that were removed in 1987. Impacts to the soil were found during the tank removals. The proposed remedy for the Shed was an Environmental Covenant that allowed for non-residential use only, as well as a restriction for limited indoor occupancy. The basement of the Shed is currently used as a file storage room (Pictures 3 and 4) and the top floor is unused. The Shed is surrounded on three sides by a steep downslope and on the fourth side by a paved parking lot.

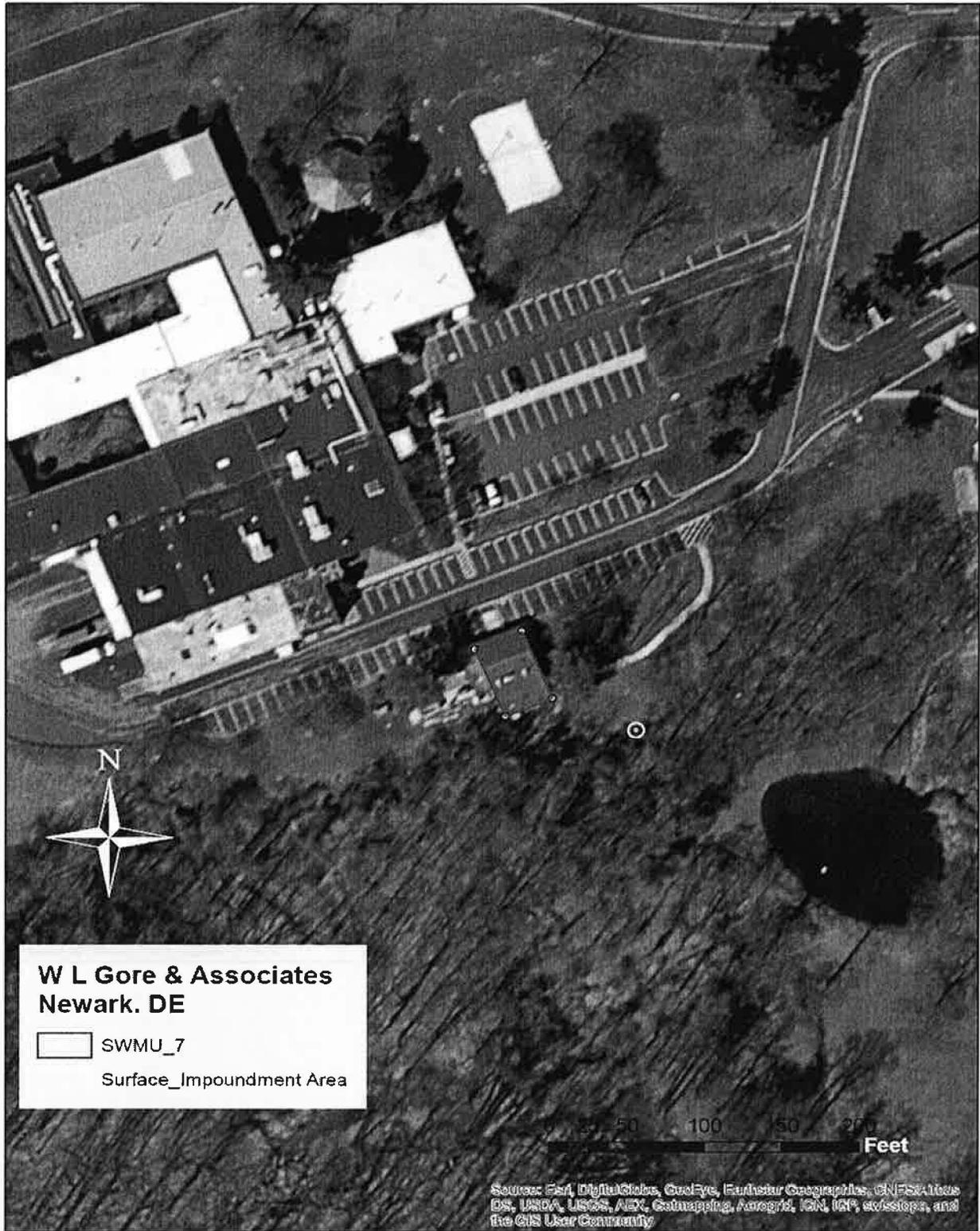
Observations: No residential development or other ground disturbance was observed. A warning sign explaining the use restriction for the Shed was visible upon entering the file room (Picture 5). There were no indications of daily onsite worker occupancy at the time of the inspection. Mr. Henigan (the plant manager) said that Gore had no long-term plans to change the use of the building or to conduct any construction or other earth-moving activities in this area. No violations of the Environmental Covenant or SB were observed.

CONCLUSIONS/RECOMMENDATIONS:

A letter of compliance is recommended for the Environmental Covenant and SB conditions inspected on September 1, 2015.

JWS:BM:drb
BM15006

Attachment 1: Map of Gore Restricted Areas



Attachment 2: Photographs



Picture 1. Surface Impoundment area looking southeast.



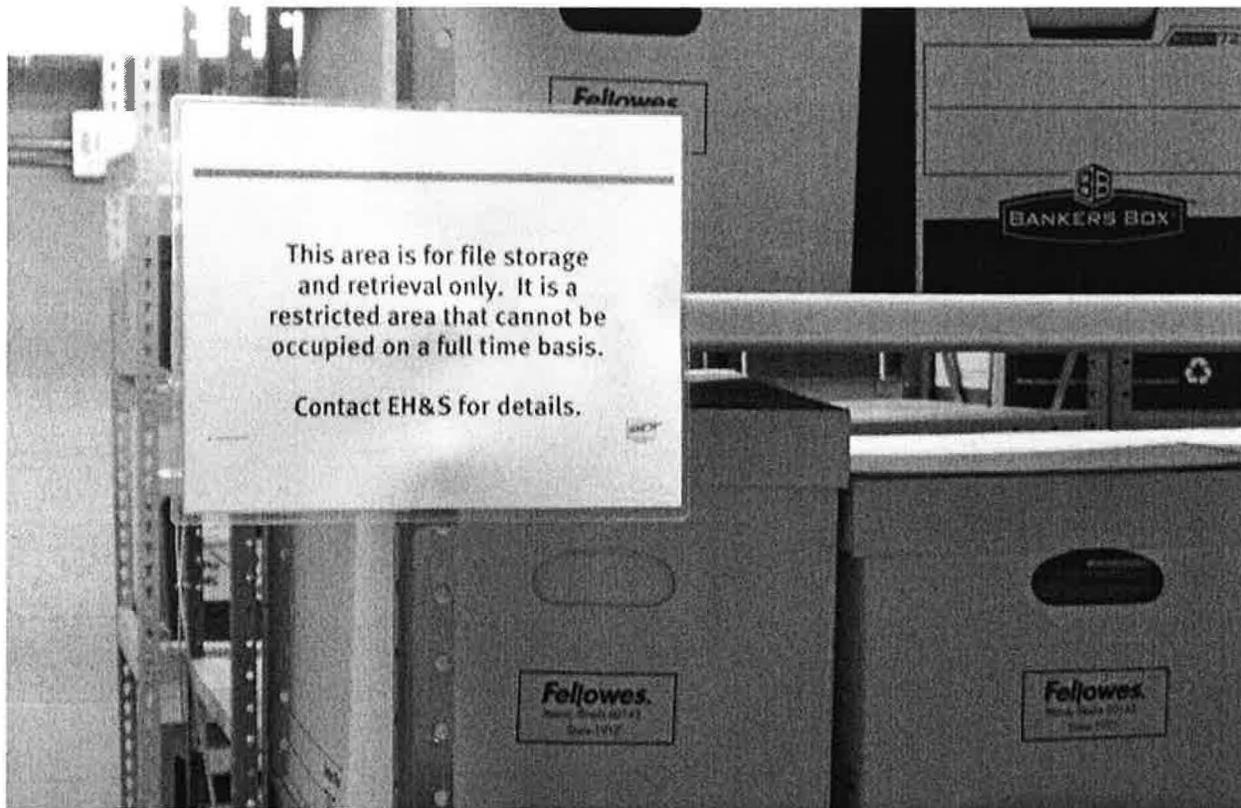
Picture 2. Exterior of SWMU 7/Shed looking northwest.



Picture 3. Interior of Shed file room looking north-northwest.



Picture 4. Interior of Shed file room looking north-northwest.



Picture 5. Warning sign found in interior of file room in Shed.

