

# **STATEMENT OF BASIS**

## **Atlantic Aviation Corporation New Castle, Delaware**

EPA ID No. DED 011 028 438

### **I. Introduction**

This Statement of Basis is for the Atlantic Aviation Corporation (AAC) facility in New Castle, Delaware (hereafter called the “facility”). After a thorough site inspection of the facility and an evaluation of past environmental practices, the Environmental Protection Agency (EPA) believes that no further corrective action is necessary at the AAC facility at this time. The purpose of this document is to solicit public comment on the proposal that no further corrective action is required at the facility at this time.

The Atlantic Aviation Corporation has been designated a high priority facility in the Resource Conservation and Recovery Act (RCRA) corrective action program. (For more information on the RCRA Corrective Action Program, visit the Region III web site at [www.epa.gov/reg3wcmd/correctiveaction.htm](http://www.epa.gov/reg3wcmd/correctiveaction.htm)) The corrective action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for AAC.

### **II. Facility Background**

The AAC facility is located along the east corner of the New Castle County Airport in New Castle, Delaware. AAC had operated at the airport for more than 30 years and offered flight support, flight services and aircraft services. AAC leased the property from the Delaware River and Bay Authority. The facility consisted of four hangars and an underground storage tank (UST) farm.

In December of 1999, the Atlantic Aviation administration offices moved from the New Castle County Airport to the Christiana Executive Campus located in Newark, Delaware. More recently, the entire facility was sold by AAC to Dassault Falcon Jet - Wilmington Corporation, effective October 23, 2000. This was an asset purchase and AAC retains the environmental liability for the site.

### **III. Summary of Facility Areas**

There are three areas of interest that were identified by AAC in a letter to EPA dated February 3, 2000. These three areas include: 1) Fuel Tank Farm, 2) Paint Shop, and 3) Hazardous Waste Pad. Each of these areas is described in more detail below. (See attachment 1 for locations)

- 1.) **Fuel Tank Farm** - The Fuel Tank Farm is a 50 X 75 feet fenced area located in the northwest corner of the facility. AAC stores aviation jet fuel (Avjet) in two 30,000-gallon underground storage tanks (USTs). Aviation gasoline is stored in two 15,000-gallon tanks to supply aviation refueling equipment and is also used for onsite operations. Also located in the main containment area of the fuel farm are two 275-gallon, double walled, steel, above ground tanks (ASTs). These tanks are used to store off-specification fuel until it is removed about once a month and recycled by a contractor. A summary of releases from the Fuel Tank Farm is discussed in more detail in Section IV below.

Three waste streams are handled in the Fuel Tank Farm area: filters, pads, and off-specification fuel.

- Filters are used to support fuel farm operations and are changed every two years. The used filters are currently changed and removed by a contractor at the time of replacement.
- Pads and other absorbent material used to cleanup occasional spills are stored in designated areas of the fuel farm and removed in the same fashion as the filters described above. In the past, the material was stored in sealed containers under a roof at the fuel farm. They are then placed in sealed fifty-five gallon drums and moved to the Hazardous Waste Pad described in Item #3 below.
- Off-specification fuel is stored in two 275-gallon ASTs located at the fuel farm in the containment area. This fuel is obtained by either draining from the sumps of the aircraft refueling vehicles or removing fuel from an aircraft. The fuel obtained from the latter source is first placed in a 300-gallon mobile bowser tank in the hangar where the aircraft is being serviced. The fuel in the bowser is then removed directly or transferred to the ASTs described above. The off-specification fuel is removed from the AAC facility at least once a month, depending on the amount generated, by a contractor. In the past, off-specification fuel was stored in two 2000-gallon ASTs located just south of Hangar 1. These ASTs, which were previously located in a below-grade concrete vault, were taken out of service and removed 1999.

- 2.) **Paint Shop Storage** - In the paint shop, numerous waste streams are generated, collected and stored in two hazardous waste storage locations: one located in the paint hangar and the other located adjacent to Hanger 1A (described in number 3 below). During the paint stripping process, rinse water, used paint stripping solvent, unused paint and containers,

and paint chips are collected in drums and properly labeled. Also, air filters used to filter air in the paint shop in Hangar 3B are removed periodically. These wastes are placed in steel drums and removed within ninety days of when it was generated. The paint hangar storage area can accommodate twelve fifty-five-gallon drums. According to facility records, no releases have occurred in this area.

- 3.) **Hazardous Waste Pad** - As described in item number 2 above, hazardous waste mainly generated by the paint operations at this facility is also stored in a designated hazardous waste storage area located adjacent to Hangar 1A (see Attachment 1 for location). This area is an outdoor, concrete paved storage area which is bermed, roofed and surrounded by a locked fence. There is storage for up to seventy fifty-five-gallon drums of waste. According to facility records, no releases have occurred in this area.

As part of the routine maintenance activities, used oil and aircraft fluids are collected in steel drums located in designated areas of the facility. Wastes are removed periodically to the hazardous waste pad. Shop rags used in the day-to-day operations of the shop areas are dispensed and collected through the central stockroom, where they are returned to a commercial laundry service. Four cold solvent cleaner machines at the facility are leased and serviced by a contractor and have been used since 1978. The spent mineral spirits-based solvent is routinely disposed of off-site by a contractor. Materials used in the cleanup of jet fuel and other fluids are properly collected in containers in the Paint Shop and Fuel Tank Farm areas. These wastes are removed periodically with the other hazardous waste stored in the areas discussed above.

AAC has used numerous underground storage tanks (USTs) at this facility to store aviation jet fuel and heating oil. AAC performed a search of the Delaware's Department of Natural Resources and Environmental Control's (DNREC) Underground Storage Tank Branch files and discovered that nineteen (19) USTs were present at the site at various times (see Attachment 2 for list). Of these 19 tanks, five are still in service and are located at the Fuel Tank Farm. These tanks are discussed under Item #1 above. AAC stores aviation jet fuel (Avjet) in two 30,000-gallon USTs and Aviation gasoline in two 15,000-gallon tanks to supply aviation refueling equipment. A 280-gallon UST is also located in the Fuel Tank Farm area that is used as pressure relief tank as a safety measure for the system. AAC upgraded these active tanks in March of 1989. The remaining 14 tanks were either closed in ground or removed under the direction of DNREC's UST Branch.

One additional UST was used at the facility for storage of hazardous waste. The closure of the 2000-gallon UST was in accordance with the DNREC approved July 1991 closure plan submitted by AAC. The completed closure was approved by DNREC on October 30, 1991. The location of this tank is designated on Attachment 1.

#### **IV. Release History**

EPA, in coordination with the DNREC, has evaluated this facility by performing a file

review, sending two information requests and conducting a site visit to identify possible releases to the environment. As a result, the following releases at the Fuel Tank Farm were identified at the AAC facility.

- Between January 1975 and December 1981, five spill incidents of Aviation Jet fuel had occurred at the Fuel Tank Farm area. These spills released a total of 7,800 gallons of fuel, largely as a result of operator error during product transfer or mechanical failure of equipment. In all instances, DNREC was notified and activities were undertaken to contain and cleanup the spills.
- **November 25, 1983 Spill:**  
**Description of Incident:** 1,000 gallons of Avjet fuel was released when one of the 30,000-gallon USTs was overfilled and fuel escaped to the surface through the tank vent. The released fuel flowed around a small earth berm on the north side of the tank farm and spread toward the north. Figure 3 shows the approximate spill area dimensions. Soon after the spill, approximately 500 gallons of the product was recovered and it was estimated that about 400 gallons of the unrecoverable product remained within the bermed area. Approximately 100 gallons spread to the north beyond the tank farm.

**Follow-up Activities:** Immediately after the spill, AAC began a sampling program to determine the extent of soil contamination. In December 1983, AAC submitted a report describing results that indicated the presence of Avjet, gasoline, toluene, and other volatile organic compounds in the soil. Between 1983 and 1993, AAC completed additional soil and groundwater sampling and the results indicated the presence of Total Petroleum Hydrocarbons (TPH), total xylenes, and ethylbenzene in the spill area.

In 1996, under the direction of US EPA and DNREC, AAC conducted an additional Site Investigation to address data gaps from the previous sampling events. Groundwater and soil samples were collected and analyzed for compounds detected during past investigations. The data collected in 1996 indicated that no volatile organic compounds (VOCs) were detected in soil or groundwater above appropriate screening levels, in this case Maximum Contaminant Levels (MCLs) or Risk Based Concentrations (RBCs). However, elevated levels of TPHs remain in both groundwater and soil locally in the spill area. The concentrations have decreased significantly since the 1983 release, however, the levels present are above DNREC UST Branch's screening values. The remaining TPH issue at the Fuel Tank Farm area is being deferred to DNREC's UST Branch and any additional investigation and/or remediation or cleanup will be handled through that office.

For more information about the investigations performed in this area, please see

the “Site Investigation - Atlantic Aviation Fuel Farm, New Castle County Airport, New Castle, Delaware” dated July 1996 located in the Administrative Record.

- **August 11, 1998 Spill:**

**Description of Incident:** Approximately 100 gallons of Aviation Gasoline was discharged to the paved parking lot at the Fuel Tank Farm when a driver pulled away from the fill stand with the nozzle still attached to the tanker truck. Some of the gasoline escaped to a grassy area adjacent to the fill stand. Absorbent materials were immediately placed at the source and DNREC’s spill hotline was contacted.

**Follow-up Activities:** On August 12, 1998, using a Photo Ionization Detector (PID) and field visual observations, AAC excavated soil impacted by the spilled gasoline. The total excavated area was 30 feet X 13 feet, to a depth of 1-3 feet below the ground surface. At this depth, a siltier material was encountered that appeared to have limited the vertical migration of the product.

All excavated material was transported off-site and properly disposed of by thermal treatment by Clean Earth of New Castle, Delaware on October 13, 1998. These activities were in accordance with DNREC’s Emergency Response Branch and no further work is planned.

To prevent future releases in the Fuel Tank Farm area like the ones described above, AAC has instituted a number of improvements to the loading/unloading area procedures and equipment. In the spring of 1999, curbing was installed to better contain any future spills. New probes, a computer inventory volume control, and leak detection systems have now been installed on all the USTs and the tanks are recertified annually. An alarm now sounds to prevent the accidental overfilling of the tanks. Also, AAC has instituted an improved training program for line operators responsible for filling or unloading the tanks. AAC plans to repave the entire loading area to eliminate ponding and patch any cracks in the asphalt. These measures significantly reduce the potential of future spills or releases to the environment from the Fuel Tank Farm operations.

Based on the information provided above on the activities AAC has completed to address the releases to the environment and a review of all available resources and a thorough site inspection, EPA is proposing that no further corrective action be required at this time at the Atlantic Aviation Corporation facility in New Castle, Delaware. Any remaining investigation or cleanup activities regarding the elevated levels of TPH at the Fuel Tank Farm are deferred to the authority of DNREC’s UST Branch.

## **V. Public Participation**

EPA is requesting comments from the public on its proposal that no corrective action will be required at this facility at this time. The public comment period will last forty-five (45)

calendar days from the date that this matter is publicly noticed in a local newspaper (January 11, 2001 to February 26, 2001). Comments may be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Jennifer Shoemaker of the EPA Regional Office at the address below or at (215) 814-2772.

The Administrative Record contains all information considered by EPA when making this proposal to not require corrective action at this facility at this time. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency  
Region III  
1650 Arch Street - 3WC23  
Philadelphia, PA 19103-2029  
Contact: Ms. Jennifer Shoemaker  
Voice: (215) 814-2772  
Fax: (215) 814-3113  
Hours: Mon-Fri, 9:00 A.M - 5:00 P.M.  
E-mail: shoemaker.jennifer@epa.gov (ASCII text only)

New Castle Public Library  
424 Delaware Street  
New Castle, DE 19720  
(302) 328-1995  
Contact: Ms. Sally Hatton - Reference Department  
Hours: Mon.& Tues., 10:00 A.M. - 9:00 P.M.  
Wed. & Thurs., 2:00 P.M. - 9:00 P.M.  
Fri.& Sat., 10:00 A.M. - 5:00 P.M.

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that no further action is needed at this time at this facility, EPA will seek public comments on the revised proposal.