

From: Sarah B [REDACTED]
To: CZA_Program (MailBox Resources)
Subject: Project Washington/Starwood Digital Ventures Request for Status Decision (Project CZA-448SD)
Date: Sunday, January 11, 2026 9:13:45 PM

Department of Natural Resources and Environmental Control
Coastal Zone Act Program
100 W. Water St., Suite 7B
Dover, DE 19904
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Subject: Project Washington Data Center Status Decision (Project CZA-448SD)

Dear Secretary Patterson,

My name is Sarah B [REDACTED]. I am a long time environmental health advocate in Delaware and a [REDACTED]

I greatly appreciate the opportunity to comment on the Project Washington Data Center Status Decision as I believe that it has the potential to cause significant health harms to humans and should not be permitted.

Project Washington's parcel is directly adjacent to the [Metachem Products](#) (1) Superfund site which was once ranked as the world's [leading source of toxic compounds](#) (2).

Metachem operated from 1966 until 2002 when it declared bankruptcy. Metachem purchased its 65 acre manufacturing plant from the Standard Chlorine of Delaware in 1998 and escaped full liability of the site's past spills because it is operated as a LLC (limited liability company). A series of spills occurred at the site including a 569,000 gallon spill after a tank collapse in 1986. The site was added to the Federal National Priority Superfund cleanup list in 1987.

Regulators have been aware of the groundwater threats Metachem posed for decades and Metachem products LLC sits directly above the Potomac and Columbia aquifers. The Potomac Aquifer is a drinking water source for much of New Castle County. Metachem is not just affecting groundwater and drinking water for Delaware City, the site slopes downward into Red Lion Creek where [fish are unsafe to eat](#) (3). While EPA's Removal Action was essentially completed in September 2006 with the off-site transportation of the last of the liquid chlorinated benzene materials into the stream of commerce, remedial activities at the site continue to include off-site disposal of wastes and the installation of a ground water remedy. Since 2007, the EPA has been operating an Interim Groundwater Remedy to treat contaminated groundwater at the site. This interim remedy was enhanced in 2010. In 2025, DNREC took over the operation and maintenance of the extraction wells, treatment system, and subsurface barrier wall installed for the Interim Groundwater Remedy, ensuring long-term sustainability and local oversight over the project.

Metachem Products was a chlorinated benzene chemical manufacturing facility that produced chemical compounds such as benzene, paradichlorobenzene and chlorobenzene. The chemical compound benzene released by Metachem can cause cancer and is associated with an increased risk of leukemia. Pesticide vapors and contaminated dust released by Metachem creates conditions within the fenced site that would increase the cancer risk from lifetime exposure to as much as 900 times normal.

The proposed [Project Washington directly abuts the Metachem site](#) (4). Why Project Washington would be proposed directly adjacent to this tax-payer funded Superfund site is unconscionable. What assurances do we have that Project Washington will not disrupt the adjacent site and who will be responsible for oversight?

Project Washington should be considered heavy industry.

Heavy industry is prohibited under Delaware's Coastal Zone Act (CZA) and the CZA is defined by characteristics including:

1. A use involving more than 20 acres
2. The employingment of equipment such as smokestacks, tanks, distillation or reaction columns, etc
3. The potential to pollute when equipment malfunctions or human error occurs

Project Washington is heavy industry because of the following:

1. It is 29 times the allowable size
2. It will have 516 emergency generators, each with a 5,020-gallon diesel fuel tank.
3. In addition, Project Washington's application does not explore the possibility of a leak or spill of the 2,590,320 gallons of diesel fuel in the Coastal Zone due to equipment malfunction or human error, as required by the CZA. Simply because of its proximity to Metachem it has a huge potential to pollute. On the [EPA's website for Metachem](#) (1) "Any future onsite construction must not interfere with the integrity of the cleanup

remedies in place." Project Washington has not addressed this in their application.

Project Washington noted on their application that it will discharge 2,737,500 gallons of water per year to a permitted wastewater treatment facility. How this will not interfere with the DNREC's extraction wells, treatment systems, and subsurface barrier wall for Metachem installed for the Interim Groundwater Remedy is not remotely addressed in this application yet the application describes 4 phase 1 data center buildings, 4 generator yards and electrical infrastructure construction ([figure 3](#)) (5) directly adjacent to Metachem and also notion that construction debris will be generated from development of the site ([p.22](#)) (5).

I urge you to not allow this project in Delaware's coastal zone.

Sincerely,

Sarah B [REDACTED]
[REDACTED]

References:

1. Environmental Protection Agency (2025). Standard Chlorine of Delaware, Inc. New Castle, DE.: Cleanup Activities.
<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.cleanup&id=0300058>
2. Montgomery, J., & Billington, M. (July 23, 2006). Reports link the chemical byproduct to cancer and other ailments — and Delaware leads the United States in production of it and PCBs. *The News Journal*. Reposted Vietnam Agent Orange Relief & Responsibility Campaign (VAORRC) <https://vn-agentorange.org/dioxins-all-around-us/>
3. State of Delaware, Delaware Department of Natural Resources and Environmental Control. Delaware Fish Consumption Advisories.
<https://dnrec.delaware.gov/fish-wildlife/fishing/consumption-advisories/#current>
4. State of Delaware, Delaware Department of Natural Resources and Environmental Control (DNREC). URS. Figure 1, Site Map, DCR Property Boundary, Phase II SWMU RFI.
<https://documents.dnrec.delaware.gov/dwhs/remediation/motiva/Attachment->

1-Site-Map.pdf

5. State of Delaware, Department of Natural Resources and Environmental Control: Application for a Coastal Zone Status Decision. Division of Climate, Coastal, and Energy. (October 30, 2025). Project Washington, Starwood Digital Ventures. <https://documents.dnrec.delaware.gov/Admin/Public-Notices/CCE20250425/status-decision-application.pdf>