

In The Matter Of:
DNREC Public Hearing
General Motors - Unit 4

Docket 2020-R-WH-0008
April 9, 2020

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Proposed Plan of Remedial Action)
for the General Motors Corp. Wilmington)
Assembly Plant Operable Unit 4)
Docket #2020-R-WH-0008, Public Hearing)

..

Virtual Public Hearing
Dial-In Number 1-408-418-9388
Access Code: 350 462 960

Thursday, April 9, 2020
6:00 p.m.

..

BEFORE: Lisa Vest, Hearing Officer

ALSO PRESENT: Rick Galloway, DNREC

-- Transcript of Proceedings --

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1 MS. VEST: Thank you for taking
2 the time out of your busy day to join us
3 tonight.

4 The date is Thursday, April 9,
5 2020, and we are here this evening to
6 provide a virtual platform for the State of
7 Delaware's Department of Natural Resources
8 and Environmental Control to conduct a
9 hearing on the proposed plan of remedial
10 action for GM OU-4 located in Wilmington,
11 Delaware.

12 For those of you that may not
13 recognize me, my name is Lisa Vest, and
14 Secretary Garvin has designated me to be the
15 hearing officer for tonight's proceedings.

16 Very briefly, there have been
17 changes made to DNREC's standard meeting
18 protocols necessitated, of course, by the
19 ongoing state of emergency due to the
20 COVID-19 pandemic.

21 First and foremost, this hearing
22 is being conducted virtually. Staff is not
23 together gathered in the same room.
24 Everybody is participating independently at



1 their respective locations.

2 While there are no sign-in sheets
3 to document physical attendance tonight,
4 WebEx does generate a list of those that are
5 virtually present for this hearing so that
6 the Department can still maintain an
7 accurate record of those who have joined
8 tonight. And I would like to thank everyone
9 for their interest in this matter.

10 At the conclusion of these
11 remarks, I will be turning the hearing over
12 to Department staff, who will be making a
13 brief Power Point presentation regarding the
14 proposed plan of remedial action for GM OU-4
15 for the benefit of comments being generated
16 tonight.

17 There is still a court reporter
18 virtually present. There will be a verbatim
19 transcript of the hearing tonight, which it
20 is our statutory requirement to have the
21 same prepared. And, as always, that
22 transcript will be posted on the hearing
23 website that's dedicated to this matter as
24 soon as the Department receives it.



1 Please note that the Department
2 will not be accepting any comments in
3 realtime during this hearing. DNREC wishes
4 to ensure, however, that everyone is able to
5 offer their comments for inclusion into the
6 record.

7 Therefore, until further notice,
8 the record will remain open for a minimum of
9 15 days following this hearing event
10 tonight.

11 In more complex cases and in the
12 event that a request for an extension is
13 received, an extension of time for comment
14 will be considered.

15 I would encourage those that have
16 logged in tonight to check out DNREC's web
17 page for public hearings under the
18 administrative hearing section of the
19 website for more detail.

20 Of course, all mechanisms
21 previously available by which the public can
22 offer comment remain in effect. There is an
23 electronic link on the hearing page. There
24 is e-mail. And, of course, there is the



1 U.S. Postal Service.

2 Also, briefly, all protocols
3 remain in place for our hearing tonight.
4 All comment received must be limited
5 exclusively to the subject matter of
6 tonight's hearing. All comments pertinent
7 to this matter will be incorporated into the
8 hearing record being generated.

9 In order to ensure that everyone
10 who chooses to offer comment is able to do
11 so, the record shall remain open through
12 Friday, April 24, 2020.

13 There is only one authentic record
14 of this proceeding tonight, and it is the
15 official court reporter's transcript.

16 The statutory purpose of the
17 hearing tonight is to help build a record
18 with regard to the Department's proposed
19 actions.

20 A record consisting of the
21 transcript of the hearing tonight, all the
22 written comments that have been entered, all
23 exhibits, and the Hearing Officer's report,
24 will be reviewed by the Secretary.



1 Secretary Garvin will ultimately
2 issue an order following his review with his
3 decision on this matter and the reasons
4 therefore.

5 As is customary in DNREC hearings,
6 no Q and A session will be permitted during
7 the hearing, nor will there be any realtime
8 comments accepted.

9 Lastly, it is important to note
10 that no decision has already been made
11 tonight by the Department, nor will any
12 decision be made tonight with regard to the
13 proposed plan of action.

14 The record will remain open 15
15 days following the hearing tonight so that
16 all members of the public may have ample
17 opportunity to offer comment for the
18 Secretary's deliberation.

19 Written comment again may be
20 received to the Department through Friday,
21 April 24, 2020. Comments can be submitted
22 through a comment forum on the hearing page,
23 via e-mail to
24 DNRECHearingComments@delaware.gov, or via



1 the U.S. Postal Service at the physical
2 address for DNREC in Dover, as indicated on
3 our website.

4 Written comments to DNREC may not
5 be submitted using any social media platform
6 such as Twitter, Facebook, YouTube or basic
7 text messaging.

8 Lastly, it is important to note
9 that all comment, whether it's received
10 through the mail or through the electronic
11 mechanisms that I have just described, as
12 long as it's received on or before
13 April 24th, all bears the same weight, and
14 it will all be taken into consideration by
15 Secretary Garvin prior to his making a
16 decision in this matter.

17 This hearing tonight merely acts
18 as one of the many mechanisms that the
19 record includes to enable the Department to
20 fully vet its proposed plan of action to the
21 public and to let the public know the
22 various ways by which they can communicate
23 their concerns or comments to the
24 Department.



1 That being said, I am going to
2 turn it over now to Rick Galloway. He is
3 the Department's expert with regard to this
4 matter. If I can just get this to -- Rick,
5 are you there?

6 MR. GALLOWAY: Yes. I'm here.

7 MS. VEST: Okay. Give me one
8 second. And we will get you going. It is
9 now switching over to you. I believe that
10 you have control.

11 MR. GALLOWAY: Yes. Thank you
12 very much, Lisa, for that.

13 And as you can see, this
14 information is up here about the plan. I am
15 going to, before we get started, I'm going
16 to just say that we should please enter the
17 exhibit list into the record.

18 MS. VEST: Proceed. Okay.

19 MR. GALLOWAY: Hello. My name is
20 Rick Galloway. I'm the project officer for
21 the GM Wilmington Assembly Plant Operable
22 Unit 4. We will refer to it or throughout
23 as OU-4.

24 And everyone is aware that this is



1 the location of the property we are talking
2 about, the former GM plant. Here is Boxwood
3 Road, just to give people a reference.

4 Okay. So the site was divided
5 into a number of different operable units,
6 OU-1 through OU-6. We are talking about
7 Operable Unit 4 which, as you can see, is
8 this black box area located here.

9 So this is just an overhead shot
10 of a map of the site. And I will go through
11 a couple of points that I think people need
12 to take note of.

13 North is to the top of the page
14 here. Here is the fence line right here at
15 GM. And everything on this side of the
16 fence line is GM property.

17 Everything on this, in this
18 direction at the right side of the page is
19 off of the GM property.

20 This is the Anchor Motor Freight
21 building, which we are going to be talking
22 about, and the tanks that we are going to
23 call them USTs are located in approximately
24 this area.



1 And then you will note here this
2 small purple box is called an SVE, a soil
3 vapor extraction system. I am going to talk
4 a little bit about that tonight.

5 And then the red line is the
6 benzene contamination that was in the
7 groundwater above the action level, the
8 drinking water level.

9 And the dashed blue line is the
10 screening level, which is lower, but not the
11 standard that we will talk about tonight.

12 And then townhouses are located
13 here to the right of Dodson Avenue, which is
14 right here.

15 So this image is showing a lot of
16 different things. It's a side view.
17 Obviously, the blue is the air and above
18 ground. The brown is below ground.

19 The blue line going across here is
20 the groundwater. And this is meant to kind
21 of show a lot of different information here
22 about the samples that were taken.

23 So I will point to the former UST
24 is former underground storage tanks which



1 were next to the Anchor Building that leaked
2 into the soil and into the groundwater. And
3 then the groundwater traveled off site.

4 And then the orange lines that are
5 depicted here, they are vapors that, you
6 know, under certain conditions can travel up
7 through the soil, and then they can travel
8 up underneath a building slab or a concrete
9 slab -- here we call them sub-slab -- and
10 then into indoor air. And that's where they
11 end up.

12 And then you will see that there
13 are SGs, soil gas sampling locations,
14 sampling of an actual soil gas that was in
15 the ground.

16 You will see the SVE system I
17 talked about, soil vapor extraction.

18 You will also see groundwater
19 monitoring wells, and also soil gas, indoor
20 air. And then we also have OA is outdoor
21 air or ambient air.

22 So I'm not going to go through a
23 lot of this. I won't read this. But just
24 suffice to say that there were a number of



1 samples taken from the soil groundwater and
2 the air.

3 You will note that some of them
4 say on-site and some of them say off-site
5 that I was referring to. If it says
6 on-site, that's on the GM property. And if
7 it says off-site, it was taken off-site of
8 the property in the townhouses, around the
9 townhouses in the area.

10 So this is going to be a breakdown
11 of the environmental history timeline. You
12 can see a copy of that, and the exhibit list
13 will have these documents on it.

14 So we will start off with the new
15 further action letter in 1990 and work our
16 way through the different investigations
17 that were done on the site.

18 So the site history really began
19 in 1990 when 12 underground storage tanks,
20 or we call them USTs, were removed which
21 were adjacent to the Anchor Motor Freight
22 Building that I showed you.

23 The USTs contained the gasoline,
24 diesel, waste oil, heating oil, and engine



1 oil. And the contaminated soil was land
2 farmed and then disposed off site.

3 Our tank management section issued
4 a no further action under the tank
5 regulations on November 1990.

6 And then in 2012 after the closure
7 and the bankruptcy at GM, RACER began to do
8 remedial investigation of all the different
9 areas on the site.

10 And that, what happened there is
11 that, you know, we found some groundwater
12 contaminant. The groundwater had been
13 previously determined to be flowing to the
14 west. Then when these additional -- initial
15 investigations for the RI found that it was
16 traveling to the northeast.

17 We also found contamination around
18 this OU-4 around these former storage tanks.
19 And that began some more intensive
20 investigations around that area.

21 So first I'm going to talk about
22 the investigation. I'm going to talk about
23 the groundwater contamination. And then I'm
24 going to talk about the vapors that I



1 mentioned before.

2 So the groundwater contamination
3 consisted of Volatile Organic Compounds,
4 including 1,2,4-trimethylbenzene, which you
5 will see as 1,2,4-TMB, ethylbenzene,
6 benzene, and xylene.

7 And then semi-volatile, not quite
8 as volatile compounds, such as the
9 naphthalene.

10 We also found non-aqueous phase
11 liquid (NAPL) on site. That's just
12 basically oil on top of the water.

13 So if you do a boring, you will
14 find, if you drill a hole on this when it
15 has NAPL, it will have some oil floating on
16 top of the water.

17 And, as I mentioned before, the
18 dissolved contaminants over drinking water
19 standards has migrated a few hundred feet
20 offsite along the northeast groundwater flow
21 direction.

22 So those contaminants are pretty
23 similar in how they were flowing off site.

24 However, there are no drinking



1 water wells within 1 mile of the former GM
2 facility.

3 And the fact that it was done a
4 few hundred feet after this time period
5 indicated that it was probably degrading due
6 to bacteria in the groundwater and soil that
7 was naturally there.

8 However, it did present a risk to
9 on-site commercial and residential users
10 above the cancer risk of one times ten to
11 the minus five, which is one person getting
12 cancer in 100,000 and/or a non-cancer risk
13 of one.

14 These are just sort of
15 calculations, but this is what we mean when
16 we refer to a Hazardous Site Cleanup Act
17 risk standards. When I talk about risk
18 standards, this is what I am talking about
19 for cleanup. Sorry. Apologize.

20 So Vapor Intrusion. I'm going to
21 talk real briefly about vapor intrusion.
22 And it's important that you have a pathway.
23 In order to have a risk, you need to have
24 coming from the groundwater into the soil



1 gas migrating, and in the sub-slab
2 underneath the slab, and then in the indoor
3 air.

4 If you don't have a clear pathway,
5 then you don't really have vapor intrusion
6 occurring.

7 And so at this site we did see
8 some things in the indoor air, including
9 1,2,4 trimethylbenzene, benzene, and
10 ethylbenzene in the indoor air.

11 Results from the four monitoring
12 events at the townhouse show one of the
13 following conditions. So the majority of
14 them, we had no indoor air exceedances. In
15 some of them, we had no paired sub-slab
16 indoor air exceedances. So if they had it
17 in the sub-slab, they didn't have it in the
18 indoor air. If they had it in the indoor
19 air, they didn't have it in the sub-slab
20 air.

21 And also we had a condition where
22 it had some indoor air exceedances but also
23 ambient air exceedances, which is the
24 outside air of the same chemicals about the



1 same concentration.

2 So, you know, we are having
3 situations where we don't have complete
4 pathway and there was either an indoor air
5 source or there was an ambient outdoor air
6 source.

7 So as a result, there was no risk
8 to the townhouses from the vapor intrusion.

9 However, vapors were migrating
10 toward the townhouses, and that was a
11 concern, and I will touch on that in just a
12 minute.

13 There was some additional
14 supplemental vapor intrusion risk evaluation
15 that was performed, including looking at the
16 data, talking about multiple lines of
17 evidence, which is looking at different ways
18 of calculating what the risk might be
19 inside, seeing how they all line up, looking
20 at vertical separation to see, you know, it
21 should be if you have a certain amount of
22 separation between the groundwater and the
23 indoor air, it will degrade as it migrates
24 up to the soil.



1 And, in fact, after doing all
2 those things, that's what we saw is there is
3 still no risk to the townhouses from vapor
4 intrusion.

5 All right. So I talked a little
6 bit about where this could be coming from if
7 it's not coming from the GM property.

8 We talked about outdoor air from,
9 you know, cars go by, and they break down
10 petroleum, and benzene is formed, and that
11 can show up, and also indoor air sources, so
12 things that are used in the house that I
13 show on this list, paint and all those
14 different compounds there, air fresheners
15 and candles.

16 And this is a handy reference for
17 people to look at in different sources for
18 indoor air pollution at the bottom of the
19 page there.

20 So as I mentioned, there was some
21 concern -- excuse me. Sorry. We skipped a
22 page. I apologize.

23 And so because of these potential
24 migration of vapors, it was decided that



1 there was going to be an interim action
2 before the proposed plan, before this
3 proposed plan.

4 So even before all the
5 investigations were done, it was decided
6 that there would be some sort of interim
7 action.

8 In one of the townhouses, the
9 groundwater was heading in the direction of
10 Units 44 and 46. They were in the process
11 of being built. And so it was decided to
12 put in some sub-slab venting as a protective
13 measure so that if there were vapors, they
14 could be safely vented.

15 The other townhouses were already
16 constructed, so that wasn't seriously
17 considered.

18 So there was a focused feasibility
19 study to select a remedy, and the remedy was
20 the soil vapor extraction that I mentioned
21 before. And that started March 2015. And
22 they did weekly monitoring and maintenance
23 of the SVE system during its operation.

24 The SVE system basically is a



1 vacuum system where they pull the vapors out
2 of these wells, and they pull those vapors
3 out and treat it, and then after it's
4 treated, it's vented to the outside air.

5 The SVE system operated from
6 March 30, 2015 to June 15, 2018
7 continuously, and then it was periodically
8 pulsed, turned off and on, different wells
9 were opened, closed, to try to tweak out and
10 get as much as possible contamination out of
11 the ground.

12 The system, itself, removed about
13 8,000 pounds of hydrocarbons, which is the
14 petroleum from the ground.

15 And it was pretty effective. They
16 decreased the NAPL floating on the water
17 from about 4 inches to not being able to be
18 observed in any of the wells that they had
19 on the site.

20 The product recovery stalled over
21 time. It started off, as you can imagine,
22 doing a really good job and pulling a lot
23 out. And then over time it became more and
24 more difficult to get more and more out.



1 And even with the pulsing where they would
2 shut it off and try to shock the system, if
3 they got a little bit more out, they were
4 not able to get much.

5 And it was judged that the SVE
6 system had recovered as much product as was
7 possible.

8 The details of the SVE system can
9 be found in the August 5, 2019 soil vapor
10 extraction system report.

11 Then it came time to come up with
12 the final remedy for OU-4, operable unit
13 four. The feasibility study included
14 resampling of off-site sub-slab, indoor air,
15 ambient, which is outdoor, and soil gas for
16 VOCs to try to see if there was a complete
17 pathway there where they could see that
18 there was maybe something coming in after
19 the system had been shut down.

20 So the resampling showed benzene,
21 only benzene indoor in two of the
22 townhouses.

23 However, benzene was not in the
24 sub-slab. And also it was in the background



1 range for the US of about 4 micrograms per
2 meter cubed.

3 As a result, there was no risk
4 above standards from vapor intrusion for the
5 offsite residents, so it was not a complete
6 pathway.

7 The FS evaluated five different
8 remedial actions, including
9 excavation/disposal, SVE system, chemical
10 treatment, thermal treatment, and a passive
11 wall to prevent contamination from
12 migrating.

13 The SVE was still determined to be
14 the most likely and most effective remedy.
15 However, since the SVE removal was judged to
16 be complete, no vapor intrusion was present
17 in the townhouses, and the groundwater is
18 not impacting any drinking water wells and
19 is degrading offsite within several hundred
20 feet, no active remedy was judged to be
21 required.

22 The remedy selected for the site
23 was restricting on-site groundwater use and
24 future use of the site of the GM property to



1 non-residential, implementing a Contaminated
2 Material Management Plan to protect workers
3 handling the soil and the groundwater during
4 redevelopment, and also long-term
5 stewardship to monitor groundwater.

6 It's important to note that the
7 SVE system is going to remain in place in
8 the event that the monitoring of the
9 groundwater conditions identifies a
10 potential risk for on-site workers or people
11 basically off site.

12 So this is the proposed plan
13 action for the site, which is basically with
14 a longer version of what I just discussed.

15 Environmental covenant is like a
16 deed restriction that restricts the
17 property, the environmental use of the
18 property.

19 So it's the GM property, itself,
20 is restricted to non-residential use
21 permitted within the commercial,
22 manufacturing, and industrial districts.

23 Limitations on groundwater
24 withdrawal: So the groundwater can't be



1 used at the site without DNREC written
2 approval.

3 Again, compliance with the
4 Contaminated Materials Management Plan.

5 And then compliance with the
6 long-term stewardship plan.

7 So the long-term stewardship plan,
8 as I mentioned, has to be submitted within
9 60 days of the final plan of remedial action
10 appeal period. And it's going to detail the
11 monitoring that's going to have to take
12 place to make sure that the groundwater is
13 not presenting a risk to any off-site
14 receptors.

15 The Contaminated Material
16 Management Plan is going to be for making
17 sure that the workers on site are able to
18 handle the soil safely, and it will include
19 making sure that the soil does not migrate
20 and airborne dust does not migrate off the
21 site and that groundwater is not posing a
22 risk to offsite receptors.

23 And then remedial action
24 completion report is just a document that



1 summarizes everything that was done on the
2 site.

3 And COCR, which is a certificate
4 of completion of remedy must be completed.

5 That doesn't mean that everything
6 stops. It would be in this case the
7 proposed plan is to keep monitoring the
8 groundwater to make sure that it continues
9 to be safe.

10 With that, this is my contact
11 information. It will be available in the
12 presentation for your view.

13 And then, as Lisa was mentioning,
14 the comment period will go through
15 April 24th, and people can submit their
16 comments or questions as dictated on the
17 website.

18 So, with that, that's the end of
19 my presentation, and I will turn it back
20 over to Lisa.

21 MS. VEST: Thank you very much,
22 Rick.

23 As Rick said, the Power Point that
24 was just presented is available. It's been



1 posted on the hearing web page, and folks
2 can go check that out at their leisure.

3 Again, the record does remain open
4 through Friday, April 24, 2020. And we
5 would encourage anybody that wishes to offer
6 their comments for the Secretary's review to
7 do so.

8 Rick, just as one final thing for
9 housekeeping, your exhibits on behalf of the
10 Department, are they as posted on the DNREC
11 website for this hearing?

12 MR. GALLOWAY: Yes.

13 MS. VEST: Yes. Okay. Well, let
14 the record reflect exhibits as posted on the
15 hearing web page are hereby entered into the
16 record in this matter.

17 Additionally, as soon as we get
18 the court reporter's transcript, that will
19 be posted, as well.

20 That being said, we will conclude
21 this portion of the record with regard to
22 the virtual hearing tonight.

23 For those that attended virtually,
24 I want to thank you for your time. Again,



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just check back on the website. We will get that posted as soon as we have it.

Thank you for attending. This meeting is hereby adjourned.

(Concluded at 6:27 p.m.)

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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 14th day of April 2020.



Lorena J. Hartnett
Registered Professional Reporter

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