

FINAL PLAN OF REMEDIAL ACTION



2925 Northeast Boulevard

2925 Northeast Boulevard
Wilmington, Delaware

August 25, 2010
DNREC Project No. DE-1413

This Final Plan of Remedial Action (Final Plan) presents the Department of Natural Resources and Environmental Control's (DNREC's) determination that: investigations showed the presence of PCE and its degradation products in the shallow soil and ground water at the site.

DNREC issued public notice of the Proposed Plan for the Site on August 4, 2010 and opened a 20-day public comment period, which ended on August 24, 2010. The Proposed Plan requires:

- The design, installation, and operation of a Multi Phase Extraction (MPE) system to remediate the PCE in the groundwater beneath the building located on the property. MPE involves the extraction of soil vapor, groundwater, and free product simultaneously through the use of high-vacuum pump or blower systems.
- As part of the remedial action for the Site, an operation and maintenance (O&M) period is required. The O&M activities include the operation and maintenance of the treatment system, as well as monitoring of Site-wide groundwater.
- The site owner will record an environmental covenant consistent with Delaware's Uniform Environmental Covenants Act (UECA) that will prohibit land disturbing activities without DNREC's prior written approval, prohibit the installation of wells and use of any groundwater at the site

The Proposed Plan also includes the location of additional information found on the DNREC web page and in the DNREC office at Lukens Drive in New Castle.

There were no comments or questions from the public regarding the Proposed Plan. Therefore, the Proposed Plan was adopted as the Final Plan (see attached).

Approval:

This Final Plan meets the requirements of the Hazardous Substance Cleanup Act.

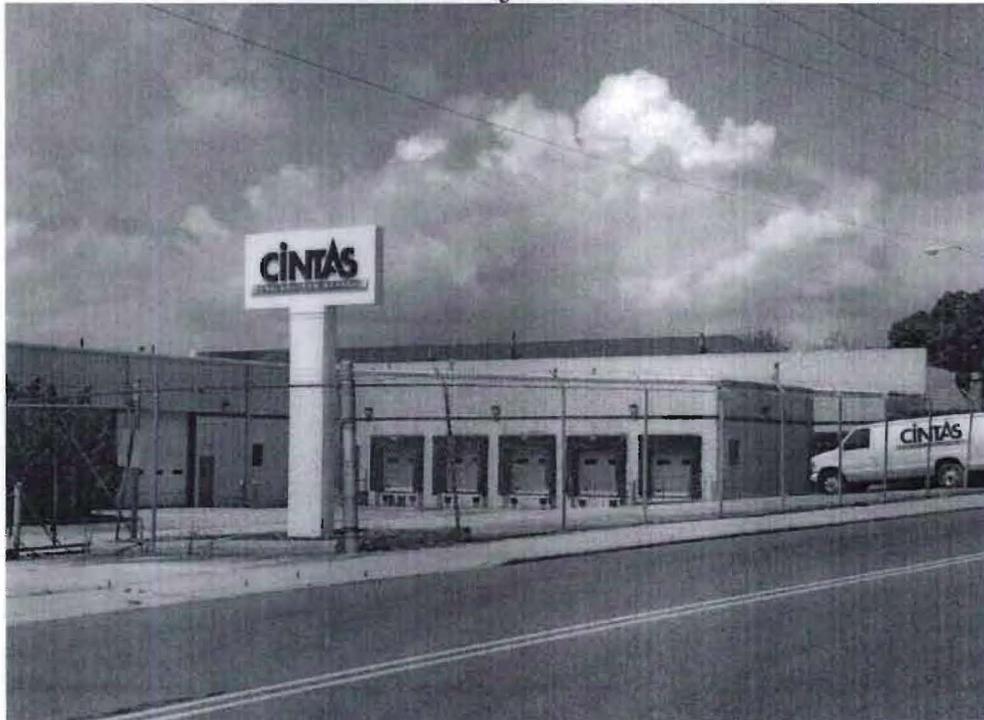


Kathleen Stiller, Program Manager II
Division of Waste Management



PROPOSED PLAN OF REMEDIAL ACTION

2925 Northeast Boulevard Site
Wilmington, Delaware
DNREC Project No. DE-1413



August 2010

Delaware Department of Natural Resources and Environmental Control
Division of Waste Management
Site Investigation & Restoration Branch
391 Lukens Drive
New Castle, Delaware 19720

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PROPOSED PLAN OF REMEDIAL ACTION

2925 Northeast Boulevard Site
Wilmington, Delaware
DNREC Project No. DE-1413



Approval:

This Proposed Plan meets the requirements of the Hazardous Substance Cleanup Act.

Approved by:

Marjorie A. Crofts, Director Division of Waste Management
8.2.10
Date

What is the 2925 Northeast Boulevard Site?

The Site is currently vacant and consists of an approximately 65,000 square foot building centrally located on the property that was most recently utilized as an industrial laundering facility and warehouse space for uniforms and commercial clothing. The majority of the property surrounding the building is paved. The Site is being addressed under Delaware's Voluntary Cleanup Program (VCP).

The Site address is 2925 Northeast Boulevard, Wilmington, Delaware; however, the Site is actually located 700 feet northwest of Northeast Boulevard, on East 30th Street at the corner of East 30th Street and North Church Street.

Tax Parcel Number: 26-023-00-028

Address: 2925 Northeast Boulevard, Wilmington, New Castle County, Delaware

Nearest major intersection: East 30th Street and North Church Street

Area: 4.08 acres

Surrounding Property: Surrounding land use is a mix of commercial, residential, and city parkland

Zoning: 26C-5 Heavy Commercial

Site Utilities: Water and sewer service is supplied by City of Wilmington

Surface water: The nearest surface water bodies are the Shellpot Creek, located approximately one-half mile to the east of the Site and the Brandywine Creek, located approximately one-half mile to the west of the Site.

Topography: The Site is generally flat and is approximately 50 feet above mean sea level.

Groundwater: Shallow groundwater beneath the Site is found in the form of perched water within thin saturated lenses of sand and gravel ranging from approximately 16 to 36 feet below grade surface.

What happened at the 2925 Northeast Boulevard Site?

The Site was first developed as a drive-in movie theater in the 1950s and subsequently redeveloped in the late 1950s and early 1960s as a grocery store and strip shopping center. The Site was occupied by the grocery store and retail tenants until 1978, when it was purchased by Nixon Properties. The Site was then operated by Nixon Uniform Service, Inc. (Nixon) as an industrial laundering facility until April 2007. Nixon performed dry cleaning operations at the Site from 1978 until approximately 1990. The dry cleaning unit utilized perchloroethylene (PCE) as its cleaning agent. Cintas purchased the property in 2007 and continued to operate the industrial laundering facility and uniform warehouse until late 2009 when the operation was shuttered.

What is the environmental issue at the 2925 Northeast Boulevard Site?

Environmental investigations performed prior to the purchase of the property by Cintas showed the presence of PCE and its degradation products in the shallow soil and ground water beneath the building at the site

Environmental investigations were conducted in January and March 2007 in conjunction with the property transaction. A Remedial Investigation (RI) was conducted in December 2008 with Focused Feasibility Study (FFS) following in November 2009.

- Phase II Environmental Site Assessment (ESA) –1/2007: Collection of soil, groundwater and sub-slab soil gas samples. Presence of PCE and TCE in groundwater at the site.
- Supplemental Investigation –3/2007: Supplemental soil, groundwater, and indoor air sampling investigation. PCE was found in groundwater in the immediate vicinity of the former dry cleaner and wash line beneath the building.
- Remedial Investigation (RI) -12/2008: Included the collection of soil, sub-slab soil gas, indoor air, and groundwater samples, as well as performance of a baseline risk assessment. This investigation confirmed the results of the previous investigations.
- Focused Feasibility Study (FFS) – 11/2009: A FFS was performed to establish site-specific Remedial Action Objectives (RAO) and identify and evaluate remedial alternatives to clean up the Site. The FFS identified In-Situ Multi Phase Extraction as the preferred remedial alternative for the Site.

What does the owner want to do at the 2925 Northeast Boulevard Site?

The property is currently for sale and future plans for the property have not been identified. Cintas intends to clean up the Site through the VCP and sell the property. Beyond that, future plans have not been identified.

What clean-up actions have been taken at the 2925 Northeast Boulevard Site?

In 2008, free product PCE was observed in one of the investigation borings installed in the vicinity of the former dry cleaner. The boring was converted to a small diameter monitoring well and an Interim Response Activities Plan (IRAP) was submitted to and approved by DNREC. Cintas implemented the IRAP which involved the performance of pumping tests and an evaluation of the potential recoverability of the PCE, as well as the removal of free product PCE from the well.

Recoverable free product was removed from the well during the initial pump-down test in the small diameter monitoring well. A larger diameter recovery well was subsequently installed near the well where free product was found; however, no free product has been recovered from that recovery well.

What additional clean-up actions are needed at the 2925 Northeast Boulevard Site?

The Proposed Plan of Remedial Action for the 2925 Northeast Boulevard Site involves the design, installation, and operation of a Multi Phase Extraction (MPE) system to remediate the PCE in the groundwater beneath the building located on the property.

MPE involves the extraction of soil vapor, groundwater, and free product simultaneously through the use of high-vacuum pump or blower systems. This technique is utilized to maximize extraction rates of both vapor and liquid, in soils of low permeability (e.g. silt, clay), such as those found at the Site.

MPE is a proven effective remediation technique for the treatment of relatively volatile constituents, such as PCE, in soils of relatively low permeability and has been identified as a presumptive remedy for sites similar to the 2925 Northeast Boulevard Site by the US EPA.

What are the long term plans for the Site after the cleanup?

As part of the remedial action for the Site, an operation and maintenance (O&M) period is required. The O&M activities include the operation and maintenance of the treatment system, as well as monitoring of Site-wide groundwater. Upon completion of the remedial action at the Site, a Remedial Action summary report will be submitted to DNREC. The site owner will record an environmental covenant consistent with Delaware's Uniform Environmental Covenants Act (UECA) that will prohibit land disturbing activities without DNREC's prior written approval, prohibit the installation of wells and use of any groundwater at the site

DNREC plans to issue a Certificate of Completion of Remedy (COCR) for the Site upon satisfactory completion of the remedy at the site.

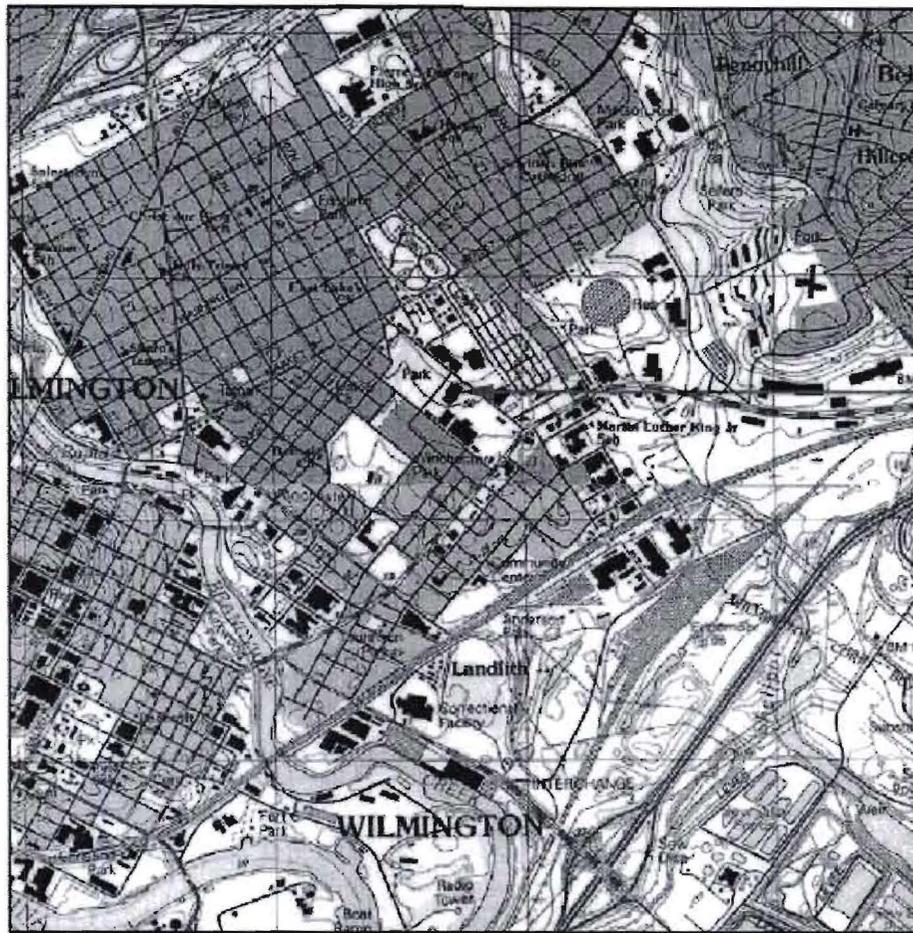
How can I find additional information or comment on the Proposed Plan?

The complete file on the site including the Remedial Investigation and the Focused Feasibility Study are available at the DNREC office, 391 Lukens Drive in New Castle. Most documents are also found on:

<http://www.nav.dnrec.delaware.gov/DEN3/Search/FacilitySearch.aspx>

The 20-day public comment period begins on August 4, 2010 and ends at close of business (4:30 pm) on August 24, 2010. Please send written comments to the DNREC office or call Todd Keyser, Project Manager, at: 302-395-2600.

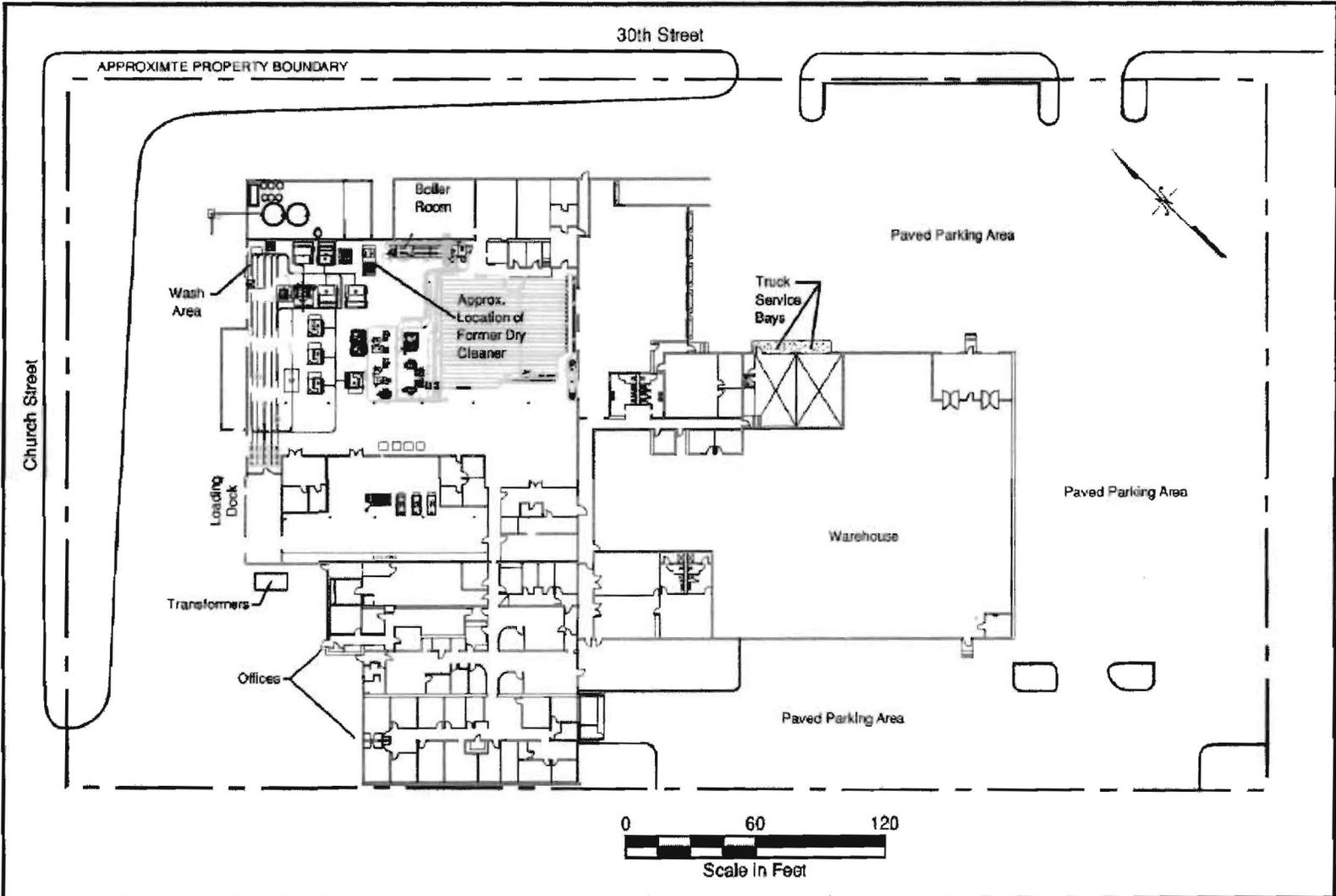
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SOURCE: TOPO MAP PRINTED ON 01/31/07 FROM "Mid-Atlantic.TPO" USGS 7.5 MINUTE Wilmington South, DE NJ, IN TOPOGRAPHIC QUADRANGLE. MAP VERSION 1993. MAP CURRENT AS OF 1991.

SITE LOCATION MAP
 CINTAS FACILITY
 2925 NORTHEAST BOULEVARD
 WILMINGTON, DELAWARE

FIGURE
 1



SITE LAYOUT MAP
CINTAS FACILITY
2925 NORTHEAST BOULEVARD
WILMINGTON, DELAWARE

FIGURE
2

**Glossary of Terms
Used in this Proposed Plan**

Brownfield	Property that is vacant or underutilized because of the perception or presence of an environmental problem.
Certified Brownfield	A brownfield that DNREC has determined is eligible for partial funding through the Delaware Brownfields Program.
Contaminant of Concern (COC)	These are potentially harmful substances at concentrations above acceptable levels (eg metals and PAH).
Certificate of Completion of Remedy (COCR)	A formal determination by the Secretary of DNREC that remedial activities required by the Final Plan of Remedial Action have been completed.
*Exposure	Contact with a substance through inhalation, ingestion, or direct contact with the skin. Exposure may be short term (acute) or long term (chronic).
Final Plan of Remedial Action	DNREC's proposal for cleaning up a hazardous site after it has been reviewed by the public and finalized.
Hazardous Substance Cleanup Act (HSCA)	Delaware Code Title 7, Chapter 91. The law that enables DNREC to identify parties responsible for hazardous substances releases and requires cleanup with oversight of the Department.
Baseline Human Health Risk Assessment	An assessment done to characterize the potential human health risk associated with exposure* to site related chemicals.
Proposed Plan of Remedial Action	A plan for cleaning up a hazardous site submitted by DNREC and subject to public comments.
Risk	Likelihood or probability of injury, disease, or death.

What is a *Proposed Plan*?

A Proposed Plan of Remedial Action (Proposed Plan) is a summary of how DNREC plans to clean up a contaminated site. A Final Plan of Remedial Action (Final Plan) is the adoption of the Proposed Plan, after all comments made by the public within the comment period of twenty days have been considered and addressed by DNREC.

The Delaware State Legislature passed the Hazardous Substance Cleanup Act (HSCA) in 1990. The Legislature made sure that members of the public would be informed about environmental problems in their own neighborhoods and have a chance to express their opinion concerning the clean up of those environmental problems before DNREC takes action.

After DNREC studies a site, it summarizes the problems there and proposes one or more possible solutions in a Proposed Plan. The Proposed Plan contains enough information to allow lay persons to understand the site. More detailed information can be found in the reports and documents approved by DNREC. All of the documents and reports created by DNREC or consultants during the course of the investigation of the site are available to the public at the offices of DNREC-SIRB or at DNREC's website:

<http://www.dnrec.state.de.us/dnrec2000/Divisions/AWM/sirb/sitefiles.asp> .

DNREC issues the Proposed Plan by advertising it in at least one newspaper in the county where the site is located. The legal notices for the Proposed Plans and the Final Plans usually run on Wednesdays or Sundays in the legal classified section of the News Journal and/or the Delaware State News. The public comment period begins on the day (Wednesday), or the day after (Sunday) the newspaper publishes the legal notice for the Proposed Plan.

DNREC frequently holds public meetings during the comment period. Those meetings are usually held near the site in the evening. Citizens can request a public meeting if DNREC did not already schedule one.

Comments are collected at the public meetings, by phone or in writing. DNREC considers all comments and questions from the public before the Proposed Plan is finalized and adopted as a Final Plan.
