



PROPOSED PLAN OF REMEDIAL ACTION

Former James Julian Construction Site
Wilmington, Delaware
DE-1497



September 2011

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

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Wilmington, Delaware
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Approval:

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

Approved by:

Marjorie A. Crofts, Director Division of Waste and Hazardous Substances
9.16.11
Date

Former James Julian Construction Site



What is the Former James Julian Construction Site? The Site is located at 209 and 405 S. DuPont Road in Wilmington, DE and is a certified Brownfield Site. The Site is currently used as the offices and facilities of Paoli Services, Inc. who recently moved into the property. The future plan for the Site is to remain the home of Paoli Services, a construction company.

Tax Parcel Numbers: 1900500378 and 1900500171
Address: 209 and 405 S. DuPont Road, Wilmington, DE 19804
Nearest major intersection: DuPont Road and Route 100 (S. DuPont Road)
Area: 1.31 acres and 5.01 acres, respectively
Surrounding Property: Surrounding land use is industrial, commercial and residential
Zoning: 19HD – Highway Development and 19GI – General Industry
Site Utilities: Water, sewer and electric are provided to the Site
Surface water: Little Mill Creek runs approximately 100 feet south and 500 feet east of the Site
Topography: The Site is relatively flat and is approximately 75 feet above mean sea level
Groundwater: Depth to groundwater ranged from 2.16 – 11.60 feet below ground surface and groundwater flows southeast toward Little Mill Creek.

What happened at the Former James Julian Construction Site? The Site was formerly occupied by the former James Julian, Inc, a Highway and Street Paving Company that was established in 1939. The day to day business operations of James Julian ceased 13 years ago in 1997. Underground Storage Tanks (USTs) containing petroleum were previously used on the property and resulted in impacts to soil and groundwater.

What is the environmental problem at the Former James Julian Construction Site? The soils in portions of the Site contain metals and organic compounds. Residual petroleum contamination is present in select areas.

A Brownfield Investigation was conducted at the Site during October and November of 2010. The results of the investigation are summarized below.

Concentrations of metals (e.g. arsenic and lead) and polyaromatic hydrocarbons (PAHs) were identified in surface soils that in select locations exceeded the DNREC's Uniform Remediation Standards. However, evaluation of the potential risks indicated that the soil concentrations were acceptable for the intended restricted use.

Concentrations of metals including; Aluminum, Iron, and Manganese were found to be present in groundwater. Aluminum, Iron and Manganese are naturally occurring elements in Delaware's

groundwater. Additionally, Aluminum, Iron and Manganese URS values found in DNREC's remediation standards guidance documents are based on National Secondary Drinking Water Regulations ("NSDWR"). NSDWRs are non-enforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water, and do not pose a human health risk. Therefore, the groundwater at the Site does not pose a risk to human health.

Petroleum USTs were previously present on the property. Based on documentation regarding the UST removals and contaminated soil excavation and removal, the remaining petroleum impacts are limited in extent. Therefore, any residual contamination related the USTs removed at the Site should not pose a threat to human health and safety, or the environment. The DNREC Tank Management Section (TMS) determined that no further action (NFA) is required regarding the above-referenced UST removals, as long as the residual contamination onsite remains undisturbed or the use of the Site does not change. Concentrations of petroleum hydrocarbons were identified in select groundwater samples, but the concentrations did not exceed URS values.

What does the owner want to do at the Former James Julian Construction

Site? The Site is currently used as the home of the Paoli Services, who recently moved into the property. The future plan for the Site is to remain the home of the Paoli Services, a construction company.

A formal development plan has not been completed; however, the owner reported that one or more buildings may be expanded.

What clean-up actions have been taken at the Former James Julian

Construction Site? Concurrent with the Brownfield Investigation, the former owner removed six USTs and over-excavated the impacted soil where necessary and practicable.

What additional clean-up actions are needed at the Former James Julian

Construction Site? The proposed remedy includes establishment of an Environmental Covenant for the Site and development and implementation of a DNREC approved Contaminated Materials Management Plan (CMMP) and Long Term Stewardship (LTS) Plan.

The following cleanup actions are proposed for the Site:

1. Environmental Covenant – An environmental covenant shall be established for the Site restricting site land use to non-residential uses and prohibit soil disturbing activities in the area of the former USTs without prior notification of DNREC.
2. Contaminated Materials Management Plan - A DNREC approved CMMP will be developed for soil disturbing activities in the areas of the former USTs.
3. Long Term Stewardship Plan – A DNREC approved LTS Plan will be developed which will include an Environmental Covenant to restrict the use of the Site, and development and implementation of a DNREC approved Contaminated Materials Management Plan (CMMP) to ensure that contaminated materials encountered during intrusive activities in the areas of the former USTs are handled properly.

What are the long term plans for the Site after the cleanup? The future plan for the Site is to remain the home of the Paoli Services, a construction company. The LTS Plan will ensure that the cleanup actions completed at the Site will remain protective of human health and the environment. The current and future owners of the Site shall be responsible for the implementation of the Environmental Covenant including the actions and procedures incorporated into the LTS Plan.

DNREC plans to issue a Certificate of Completion of Remedy for the Site after the completion of the proposed clean-up actions.

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

The complete file on the Site including the Brownfields Investigation is available at the DNREC office, 391 Lukens Drive in New Castle. Most documents are also found on:

<http://www.dnrec.delaware.gov/whs/awm/SIRB/Pages/SIRBPlans.aspx>

The 20-day public comment period begins on September 21, 2011 and ends at close of business (4:30 pm) on October 10, 2011. Please send written comments to the DNREC office or call Kristen Thornton, Project Manager, at 302-395-2600.

Figures:

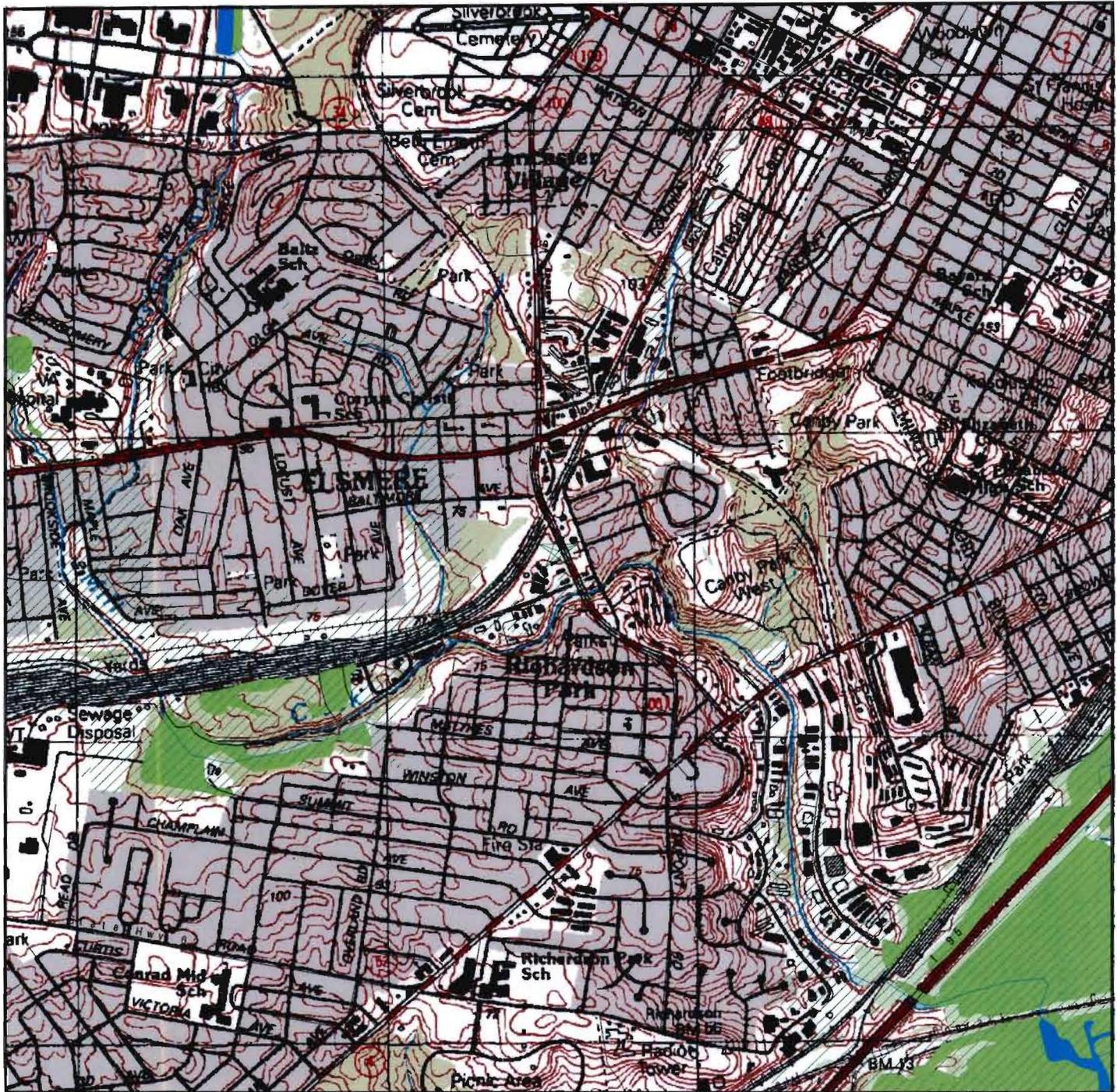
Figure 1: Location Map

Figure 2: Site Photos; current, previous and others as appropriate

Figure 3: Development Plan lay out (if available)

KLT:tlw
KLT11011.doc
DE 1497 II B 8

OVERVIEW MAP - 02805792.2r



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- State Wetlands

Figure 1
Topographic Map

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p>SITE NAME: James Julian Construction ADDRESS: 405 S. Dupont Road Wilmington DE 19804 LAT/LONG: 39.7360 / 75.5886</p>	<p>CLIENT: Environmental Alliance, Inc. CONTACT: Julie Turner INQUIRY #: 02805792.2r DATE: June 30, 2010 8:55 am</p>
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Tuesday, July 6, 2010 3:17:55 PM • G:\EAI Projects\Non-PCG Projects\3052-DE Dupont Road\3052_Map\3052-Base_Map.mxd

Legend

- Site Property
 - New Castle County Parcel
- 0 100 200
Feet

Source: Aerial Photograph obtained from Delaware DataMil, 2007



Environmental Alliance, Inc.
 660 Yorklyn Road, Hockessin, DE 19707
 Phone: (302) 234-4400 - Fax: (302) 234-1535

209 and 405 S. DuPont Road
 Wilmington, DE 19804

SITE BASE MAP

DESIGNED BY: JT	DRAWN BY: AGG	UPDATED BY: --	FIGURE NO.: 2
APPROVED BY:	PROJECT NO. 3052	DATE: 07/06/2010	

**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.
Human Health Risk Assessment (HHRA)	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.
Risk Assessment Guidance for Superfund (RAGS)	An EPA guidance document for superfund sites

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.nav.dnrec.delaware.gov/DEN3/>

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.
