



PROPOSED PLAN OF REMEDIAL ACTION

Franklin Fibre Parking Site
(909 E. 14th Street)
Wilmington, Delaware
DNREC Project No. DE-1511



April 2012

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

CONTENTS

- Proposed Plan: Questions and Answers
- Figures 1, 2, & 3
- Glossary of Terms
- Attachment: *What is a Proposed Plan?*

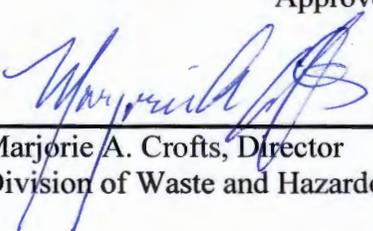
PROPOSED PLAN OF REMEDIAL ACTION

Franklin Fibre Parking Site
(909 E. 14th Street)
Wilmington, Delaware
DNREC Project No. DE-1511



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
4.12.12
Date



What is the Franklin Fibre Parking Site?

The Franklin Fibre Parking Site (Site) is a Delaware Certified Brownfield, located at 909 East 14th Street to the south of the intersection of East 14th Street and North Locust Street in Wilmington, Delaware (Figure 1). The Site is currently a vacant lot. The 0.08 acre property is currently owned by the City of Wilmington UDAG Corporation and is comprised of one tax parcel (tax parcel number 26-036.20-205, lot #8). Franklin Fibre-Lamitex Corporation plans to purchase this property and develop it into a parking area for its adjacent manufacturing plant.

Tax Parcel Number: 26-036.20-205, lot #8

Address: 909 East 14th Street; Wilmington, Delaware

Nearest major intersection: E. 14th Street and N. Locust Street

Area: 0.08 acres

Surrounding Property: The Site is bordered by a vegetated lot to the northeast, 14th Street to the north, Franklin Fibre Lamitex Corp. to the south, and the City of Wilmington combined sewer overflow (CSO) to the northwest (Figure 2).

Zoning: 26M-1 – Light Manufacturing

Site Utilities: Electric, water, sewer.

Surface water: Brandywine Creek is located approximately 570 feet southwest of the Site.

Topography: The Site has elevations which range from 8 to 10 feet and is predominantly covered by vegetation.

Groundwater: Groundwater was encountered at depths ranging from 3 to 4 feet below ground surface. The groundwater flows southwest, towards the Brandywine Creek.

What happened at the Franklin Fibre Parking Site?

The Site is located in an area of Wilmington that has been in continuous industrial use since the late 1800's. The Site appears to have been first developed sometime between 1868 and 1927 when one or more railroad tracks were laid on the Site. The tracks appear to have been removed sometime between 1968 and 1989. Currently there are no structures on the property. Site investigations indicate that portions of the Site are filled with industrial fill (7 - 12 feet deep).

What is the environmental problem at the Franklin Fibre Parking Site?

Environmental investigations determined the following constituents to be potential contaminants of concern (PCOCs) for unrestricted use in soil: Aluminum, antimony, arsenic, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cd)pyrene, iron and manganese. Aluminum, iron, methyl tert-butyl ether (MTBE) and manganese were the only PCOC's detected in Site groundwater. Arsenic and benzo(a)pyrene, benzo(b)fluoranthene, and dibenz(a,h)anthracene are Site specific POCs under a restricted use scenario in the surface and subsurface soil.

The following environmental investigations were performed on the Franklin Fibre Site:

Phase I Environmental Site Assessment Report (BrightFields, June 2011)

BrightFields performed a Phase I Environmental Assessment on the 909 E. 14th Street property in June 2011. This report was prepared for Mr., James Vachris, Jr. of Franklin Fibre-Lamitex Corp. The objective of this report was to evaluate the Site for indications of recognized environmental conditions (RECs).

Site Specific Assessment Report (BrightFields, January 2012, Revised March 2012)

BrightFields performed a Site Specific Assessment on the 909 E. 14th Street property in November 2011. This report was prepared for DNREC-SIRS. The purpose of the investigation was as follows:

- Characterize existing environmental conditions at the Site to assess the nature and extent of contamination. This was accomplished by collecting soil and groundwater samples to investigate the impact historic uses of the Site and surrounding lands may have had on the Site.
- Identify source(s) of contaminants, if they are present.
- Evaluate whether remedial actions may be required at the Site.

What does the owner want to do at the Franklin Fibre Parking Site?

Franklin Fibre-Lamitex Corporation plans to purchase this property and develop it into a parking area for its adjacent manufacturing plant.

What remedial actions are proposed at the Franklin Fibre Parking Site?

DNREC's Proposed Plan includes capping the Site with asphalt, concrete or a minimum of one foot of DNREC approved fill over a marker barrier. Capping is proposed at the Site to prevent exposure to surface and subsurface soils. The City of Wilmington Groundwater Management Zone (GMZ) will be maintained through institutional controls.

DNREC requires the following remedial actions be performed on the Franklin Fibre Site:

1. Capping the Site with asphalt, concrete or a minimum of one foot of DNREC approved fill over a marker barrier.
2. Recording of an Environmental Covenant consistent with Delaware's Uniform Environmental Covenants Act (Title 7, Del. Code Chapter 79, Subtitle II) (UECA) on the property deed. The Covenant will a) restrict the installation and use of groundwater wells for drinking water supply, b) identify the Site as located within a Groundwater Management Zone and c) restrict property to non-residential use.
3. Development and implementation of a DNREC-approved Long Term Stewardship (LTS) Plan to ensure that the enacted protective measures are properly maintained including maintenance of the cap and landscaped areas.
4. Development and implementation of a Site Specific Contaminated Materials Management Plan

(CMMP) and Health and Safety Plan (HASP) to address ensure that contaminated materials are properly managed and/or disposed off-site and worker health and safety is protected.

What long-term stewardship requirements are proposed for the Franklin Fibre Parking Site?

The long-term stewardship requirements proposed for the Franklin Fibre Site require continued adherence to the DNREC-approved LTS Plan and the Environmental Covenant recorded on the property deed.

DNREC will issue a Certification of Completion of Remedy (COCR) for the Franklin Fibre Site following the completion of the aforementioned remedial actions.

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

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

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

The 20-day public comment period begins on Sunday, April 15, 2012, and ends at close of business (4:30 pm) on Monday, May 07, 2012. Please send written comments to the DNREC office or call Robert C. Asreen, Jr., Project Manager, at: 302-395-2600.

RCA:tlw; RCA12046.doc; DE 1511 II B8

Glossary of Terms Used in this Proposed Plan

Contaminants of Concern (COC)	These are potentially harmful substances at concentrations above acceptable levels (e.g. metals and PAHs).
Certification 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.
Final Plan of Remedial Action	DNREC's adopted plan for cleaning up a hazardous site.
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.
Proposed Plan of Remedial Action	DNREC's initial plan for cleaning up a hazardous site, which is subject to public comment before being adopted as final.
Site Inspection (SI)	Environmental study of a site which includes the sampling of soils, groundwater, surface water, sediment and/or wastes on the property, as appropriate. This evaluation is performed on behalf of the United States Environmental Protection Agency (U.S. EPA).
Brownfield Investigation (BFI)	Thorough environmental study of a site which includes 1) sampling of site environmental media and/or wastes on the property and 2) conducting a preliminary risk assessment using the data collected to determine the risk posed to human health and the environment.
Risk	Likelihood or probability of injury, disease, or death.
Brownfield Development Agreement (BDA)	This legal agreement is between a potential developer of a Delaware-certified Brownfields Site and the DNREC. The developer agrees to investigate and cleanup a Brownfields property under the oversight of the Department in exchange for liability protection.
Uniform Environmental Covenant Act (UECA)	Deed restrictions on the site. These can include restrictions on soil intrusion, groundwater usage or usage of the site based on the extent of the cleanup.
Uniform Risk-Based Remediation Standards (URS)	A set of concentration criteria for various contaminants potentially present in site media that are developed for protection of human health and the environment

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 cleanup 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-SIRS or at DNREC's Delaware Environmental Navigator 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 during a weekday evening, at a location near the site. Citizens can request a public meeting if DNREC did not already schedule one.

The public may comment on the Proposed Plan by letter or email, or at the public meeting. DNREC considers all comments and questions from the public before the Proposed Plan is finalized and adopted as a Final Plan.



Figure 1: Site Location Map



Figure 3: View (looking west) of Proposed Parking Lot