PROPOSED PLAN OF REMEDIAL ACTION

Former InSteel Wire Site – Operable Unit 1 (Site Soil)
Wilmington, Delaware
DNREC Project No. DE-1507

April 2013

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

Approved by:

Timothy Ratsep, Environmental Program Administrator
Site Investigation & Restoration Section

04/26/2013
Date

PROPOSED PLAN
Questions & Answers

Former InSteel Wire Site – Operable Unit 1 (Site Soil)

What is the Proposed Plan of Remedial Action?

The Proposed Plan of Remedial Action (Proposed Plan) summarizes the clean-up (remedial) actions that are being proposed to address contamination found at the Site for public comment. A legal notice is published in the newspaper for a 20-day comment period. DNREC considers and addresses all public comments received and publish a Final Plan of Remedial Action (Final Plan) for the Site.

What is the Former InSteel Wire Site, OU-1?

The Site is located at 700 New Castle Avenue in Wilmington, Delaware (Figure 1). It was the former Insteel Wire Products facility. It is bordered by Norfolk Southern Railroad to the north and east, New York Avenue to the south, and New Castle Avenue to the west. Current operations at the site include the storage of bulk materials. The site is covered with the slab of a former warehouse building, several smaller buildings, vegetation, and broken asphalt. The site was certified as a Brownfield on May 11, 2011. In order to allow for redevelopment activities to begin, the site was divided into two Operable Units (OUs). OU-1 includes site soil on the main facility, and OU-2 will include Site groundwater and the remote parcel 2. This Proposed Plan is for OU-1.

What happened at the Former InSteel Wire Site?

The site was previously used to manufacture terra cotta piping materials, galvanize wires and mesh fabrication as well as other wire products. Many storage tanks (both above and below ground) were once present on the property which contained acids, caustics, gasoline, diesel, hydrogen sulfide, and other chemicals. These storage tanks and associated piping were used to store and carry chemicals for site operations. Transformers and transformer pads were also located on the property. In addition to the tanks and transformers, the railroad tracks and historical filling, and the landfill located on the property may have been a source of contamination.

What is the environmental problem at the Former InSteel Wire Site?

The shallow soil (0-2 feet below ground surface) contains lead, arsenic, manganese and polynuclear aromatic hydrocarbons (PAHs) above the DNREC screening level criteria. The subsurface soil (more than 2 feet below ground surface) contains arsenic and PAHs above the screening criteria. Groundwater sampling results showed elevated concentrations of dieldrin, trichloroethene, iron and manganese. Sediment sample results showed elevated concentrations of cyanide and metals. Surface water sample results showed elevated concentrations of metals.

Groundwater, sediment and surface water will be addressed in a separate Proposed Plan of Remedial Action.

What clean-up actions have been taken at the Former InSteel Wire Site?

In September 2000, a diesel fuel release was noticed at the site. It was estimated to be approximately 50 to 150 gallons. Approximately one foot of soil was excavated and disposed of properly.

In addition, the former Estate of Lester Nolan Landfill (DE-0165) exists on the property and has been closed through its own series of investigations and remedial actions.

What does the owner want to do at the Former InSteel Wire Site?

The developer of this site, Port Properties, LLC, plans to redevelop the main portion of the property to support its commercial bulk storage facility. Plans may include demolition of some structures and enhancement/renovations to others. The first enhancement of the Former InSteel Wire property will include the construction of a 1,200 linear feet of railroad track. The railroad track will be installed west of the former Galvanize building and proceed north through a small portion of the north western corner of the landfill and will connect to the existing Norfolk Southern railroad line.

What additional clean-up actions are needed at the Former InSteel Wire Site?

DNREC proposes the following remedial actions for the Site, which needs to be completed before a Certificate of Completion of Remedy (COCR) can be issued:

1. All redevelopment work will be performed in accordance with a DNREC-approved Contaminated Materials and Water Management Work Plan and the Site Specific Health and Safety Plan.

2. Place a barrier cap across the surface of the property. The cap will consist of a minimum of one foot of clean imported fill. If the design of the railroad line requires a minimum of one foot of imported fill, then this will be included as part of the barrier cap. In areas where impermeable surfaces (including building slabs, paving and hardscaping) will be installed as part of the redevelopment process, DNREC may, in its sole discretion, deem these surfaces equivalent to 1 foot of imported earthen fill for the purpose of providing a barrier between site soil and future workers.

3. An Environmental Covenant, consistent with Delaware's Uniform Environmental Covenants Act (Title 7, Del. Code Chapter 79, Subtitle II) (UECA), will be recorded in the office of the Recorder of Deeds to include the following:

    [a.] Use Restriction. Use of the Property shall be restricted solely to those non-residential type uses permitted within Commercial, Manufacturing, or Industrial Districts;

[b.] Interference with Remedy. There shall be no digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities on the Property including any repair, renovation or demolition of the existing structures on the on the Property without the prior written approval of DNREC-SIRS;

[c.] Compliance with Long Term Stewardship Plan. Perform all work required by the Long Term Stewardship Plan ("LTS Plan"), as issued, approved, modified or amended by DNREC. The LTS Plan will detail: 1) the groundwater monitoring network and schedule to be followed in order to monitor the attenuation of the groundwater COCs, and 2) the inspection schedule to be followed in order to ensure the long-term integrity of the remedy

[d.] Compliance with the DNREC-approved Contaminated Materials and Water Management Work Plan, the Site Specific Health and Safety Plan and Operations and Maintenance Plan, as issued, approved, modified or amended by DNREC

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

The Site is planned to be used as a commercial bulk storage facility. DNREC plans to issue a Certification of Completion of Remedy for the site after the completion of clean-up, the redevelopment of the property, and the implementation of the uniform environmental covenants at the site.

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

The complete file on the Site including the Site Specific Assessment Report and the various reports are available at the DNREC office, 391 Lukens Drive in New Castle, 19720. Most documents are also found on: http://www.nav.dnrec.delaware.gov/DEN3/

The 20-day public comment period begins on May 1, 2013 and ends at close of business (4:30 pm) on May 21, 2013. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Larry Jones, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Site Location / Topographic Map
Figure 2: Site Layout and Surrounding Landuses

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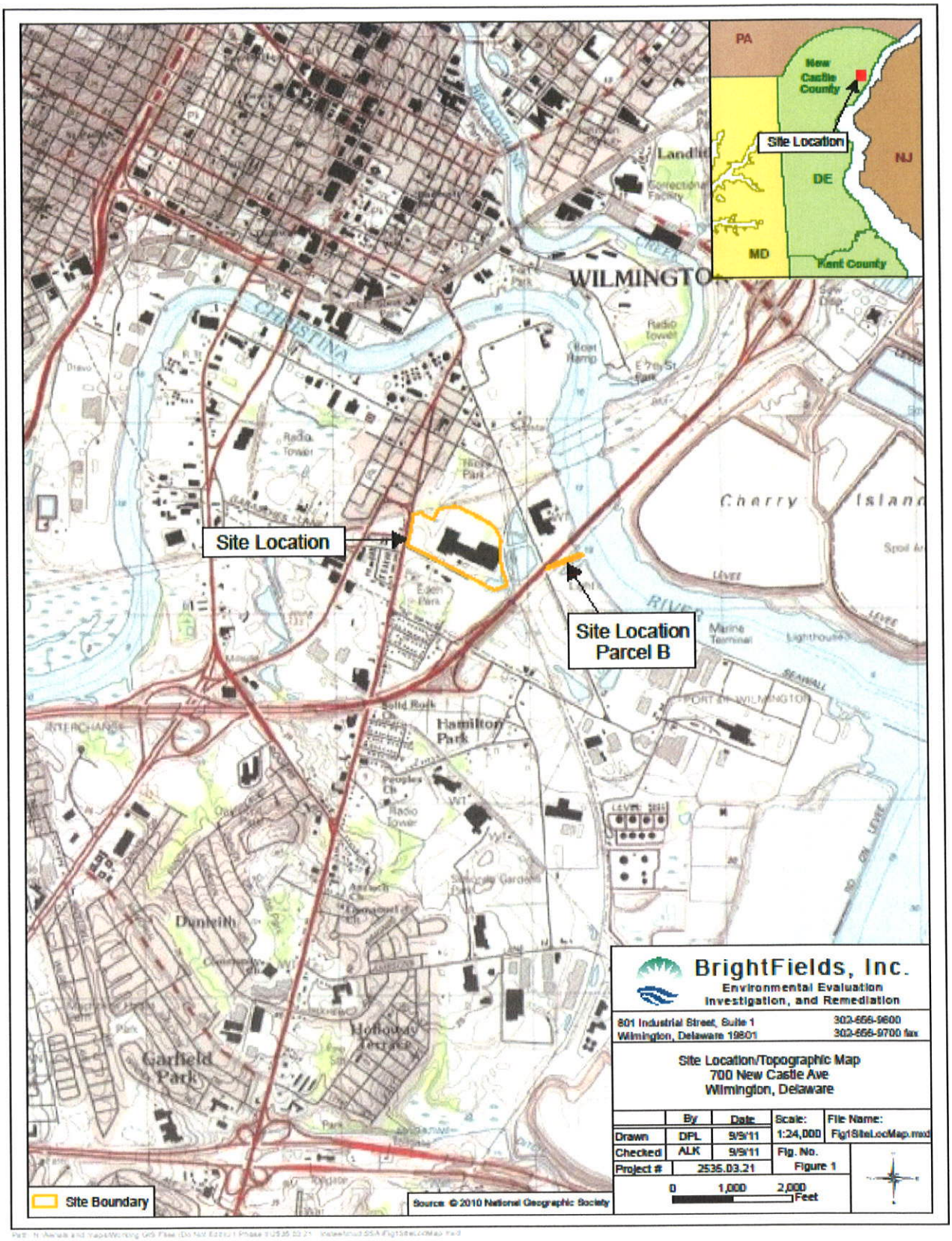

Figure 1 - Site Location / Topographic Map

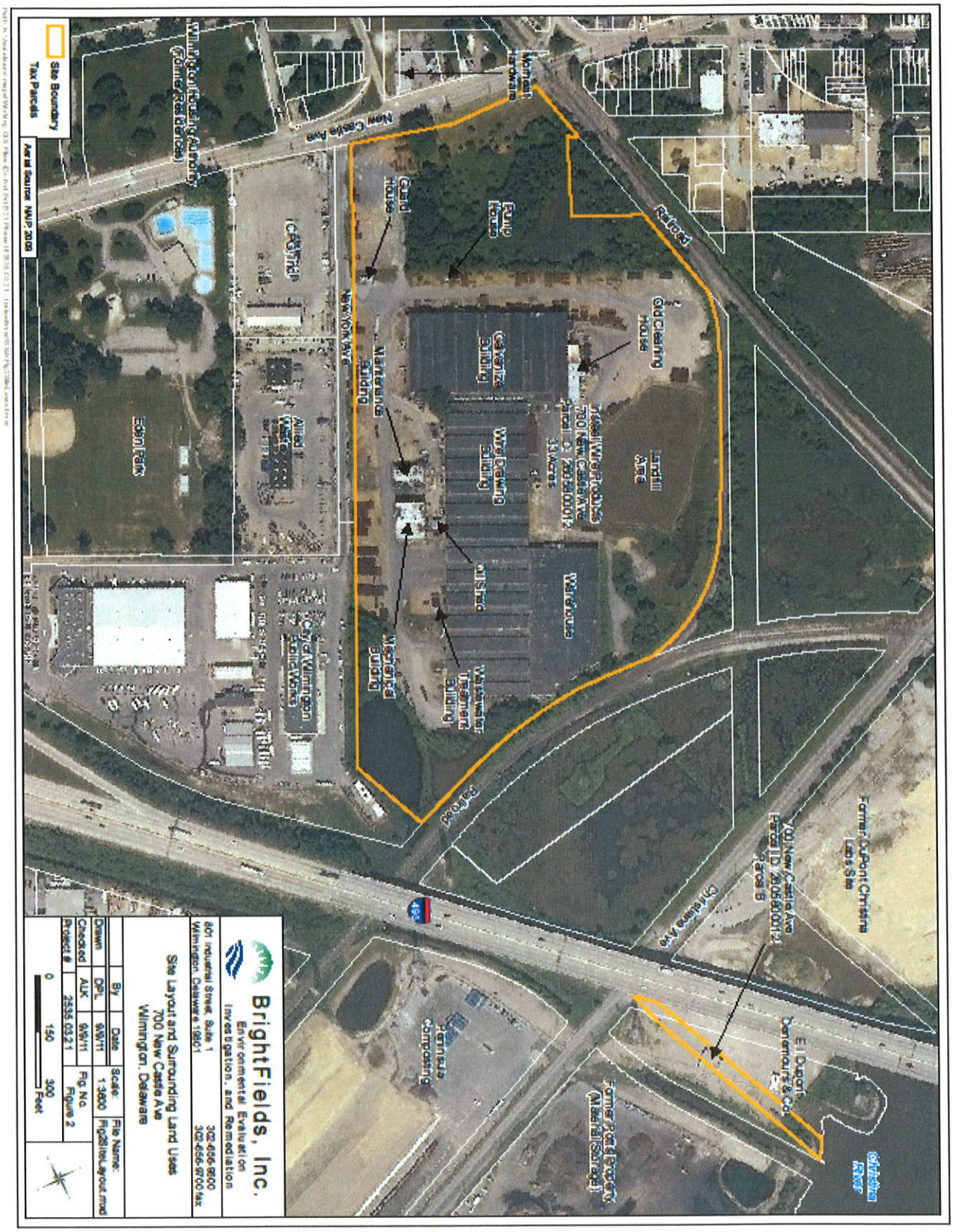

Figure 2 - Site Layout and Surrounding Landuses

Glossary of Terms Used in this Proposed Plan

Area of Concern (AOC)	A discrete section of the Site representing the local bounds of contamination in soil or ground water.
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.
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.
Certified Brownfield	A Brownfield that DNREC has determined is eligible for partial funding through the Delaware Brownfields Program
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.
Contaminant of Concern (COC)	Potentially harmful substances at concentrations above acceptable levels.
Contaminated Materials Management Plan	A written plan specifying how potentially contaminated material at a Site will be sampled, evaluated, staged, transported and disposed of properly.
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 adopted plan for cleaning up a hazardous site.
Groundwater Management Zone	A geographical area where DNREC restricts drilling for ground water because it is contaminated
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.
Poly chlorinated biphenyls (PCBs)	A synthetic, carcinogenic chemical formerly used in a wide variety of industrial applications but banned from most uses by the US EPA in 1979.
Preliminary Risk Assessment	A quantitative evaluation of only the most obvious and likely risks at a site
Risk	Likelihood or probability of injury, disease, or death.
Risk Assessment Guidance for Superfund (RAGS)	An EPA guidance document for superfund sites
Restricted Use	Commercial or Industrial setting
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).
SIRS	Site Investigation Restoration Section of DNREC, which oversees cleanup of sites that were contaminated as a result of past use, from dry cleaners to chemical companies
Toxic Substance Cleanup Act (TSCA)	The federal statute requiring and regulating the cleanup of PCBs.
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
US EPA	United States Environmental Protection Agency