

FINAL PLAN OF REMEDIAL ACTION



PURINA TOWER A SITE

*1409 Eastlawn Avenue
3410 Bellevue Avenue
Wilmington, Delaware*

*June 2013
DNREC Project No. DE-1263*

This Final Plan of Remedial Action (Final Plan) presents clean-up actions required by the Department of Natural Resources and Environmental Control (DNREC) to address environmental contamination at the Purina Tower A Site.

DNREC issued public notice of the Proposed Plan of Remedial Action (Proposed Plan) for the Site on June 2, 2013 and opened a 20-day public comment period. The Proposed Plan is attached. There were no comments from the public; therefore, the Proposed Plan is adopted as the Final Plan.

Approval:

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

Timothy T. Ratsep, Program Administrator
Site Investigation and Restoration Section

06/25/2013

Date



PROPOSED PLAN OF REMEDIAL ACTION

Purina Tower A Site
Wilmington, Delaware
DNREC Project No. DE-1263



June 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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PROPOSED PLAN OF REMEDIAL ACTION

Purina Tower A Site
Wilmington, Delaware
DNREC Project No. DE-1263



Approval:

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

Approved by:

Timothy Ratsep, Environmental Program Administrator Site Investigation & Restoration Section
5/30/2013
Date



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 publishes a Final Plan of Remedial Action (Final Plan) for the Site.

What is the Purina Tower A Site ?

At the time of the Brownfield Investigation in 2010, the Site consisted of five tax parcels located at 1409 Eastlawn Avenue, 3410 Bellevue Avenue; 3113 and 3400 Edgemoor Avenue; and 3101 Edgemoor Avenue/1501 E. 35th Street in Wilmington, Delaware (Figure 1). The five tax parcel numbers are 26-030.00-060, 26-030.00-061, 06-152.00-001, 26-030.00-062, and 26-031.00-001, respectively (Figure 2). With the exception of parcel number 26-030.00-060, the remaining parcels were previous Delaware Department of Natural Resources and Environmental Control (DNREC) Sites known as the Purina Tower “A” and “B” Sites (DE-1263 and DE-1264, respectively).

Since the investigation, some of the tax parcels have been reassigned new DNREC identification numbers based on their current ownership and prior use. Parcels 26-030.00-060, and 26-030.00-061, currently owned by the Brandywine School District, are now identified as DNREC site DE-1263. Parcels 06-152.00-001, 26-030.00-062, and 26-031.00-001, also owned by the Brandywine School District, are now identified as DNREC site DE-1264 Operable Unit-1 (OU-1) (Figure 3). One of the properties (1501 E. 35th Street) was divided into two parcels (26-031.00-002 and 06-152.00-010) and is owned by other entities. These properties will be addressed separately as DE-1264 Operable Unit-2 (OU-2) (Figure 3).

This proposed plan addresses the tax parcel numbers are 26-030.00-060, and 26-030.00-061 (Figure 3), which includes 1409 Eastlawn Avenue, 3410 Bellevue Avenue; and segments of Downing Drive, E 35th Street, and Bellevue Ave (Easements surrounding the 1409 Eastlawn Avenue parcel). These parcels have been designated by DNREC as **DE-1263 – Purina Tower A Site (the Site)**. The nearest intersection to the Site is Eastlawn Avenue and Edgemoor Avenue. The properties contain one mixed use office/vehicle maintenance facility and are surfaced with pavement or stone for vehicle parking. The Site is currently zoned 26M-1 Light Manufacturing.

What happened at the Purina Tower A Site ?

The 1409 Eastlawn Avenue parcel was a vegetated lot before the current building was constructed in 1960. The parcel was used by Tyson's Transfer, Inc., Morris & Son, Bekins Van Lines, Omega Plastics and Liberty Plastics. Before the Brandywine School District purchased the parcel, it was last owned by BMH Properties LLC, and was used by American Sign and Graphics as their sign manufacturing facility from 2006 until 2010.

The 3410 Bellevue Avenue parcel appears to have always been used as a vegetated/gravel lot. No building structures have been erected on the property. Before the Brandywine School District purchased the parcel, it was owned by Frank Byers and used by Byers Electric to store equipment from 2007 until 2010.

What is the environmental problem at the Purina Tower A Site?

The Purina Tower A Site consists of two of the combined five parcels (26-030.00-060 and 26-030.00-061) that were investigated during the 2010 Brandywine School District Transportation Property Brownfield Investigation.

The Brownfield Investigation (BFI) found that surface and subsurface soil at the Site contains metals and polycyclic aromatic hydrocarbons (PAHs) over DNREC soil standards for commercial use of the property. Aluminum, iron, manganese, 1,1-dichloroethene, tetrachloroethene (PCE), and dieldrin were detected above the DNREC criteria in the groundwater. Based on the data, groundwater impacts appear to be migrating from an offsite source. A Human Health Risk Assessment indicated that there is a potential risk to outdoor workers and construction workers exposed to surface soil, subsurface soil, and groundwater beneath the site. A vapor intrusion risk assessment for the Purina Tower A Site indicated that the risk for vapor intrusion from the contaminants detected in soil and groundwater is within DNREC's acceptable range.

What does the owner want to do at the Purina Tower A Site?

In the short term, the existing facility located on parcel number 26-030.00-060 will be renovated to increase the size of the maintenance garage to accommodate two bus bays. Other improvements may also be made to the Site in the future.

What additional clean-up actions are needed at the Purina Tower A Site?

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

1. Maintain the existing asphalt, concrete, and/or crushed stone caps that exist on the Site to eliminate direct contact with contaminants in surface soils.
2. Comply with DNREC's City of Wilmington Groundwater Exclusion Zone (GEZ) – Amended 2011 and applicable City of Wilmington ordinance for groundwater usage.

3. Develop a site specific Health and Safety Plan (HASP) and Contaminated Materials Management Plan (CMMP) to allow construction workers to properly and safely manage contaminated soil and groundwater at the Site during construction activities.
4. Develop and implement a DNREC-approved Long-Term Stewardship (LTS) Plan. The LTS Plan will detail the inspection and reporting schedule to be followed in order to ensure the long-term integrity of the remedy.
5. 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. Limitation of Groundwater Withdrawal. No public or domestic water supply wells will be permitted in Holocene, Columbia, or Wilmington Complex Aquifers or in unconfined portions of the Potomac Aquifer. Wells in confined portions of the Potomac aquifer(s) may be permitted under certain conditions. Non-potable, industrial use wells, monitoring wells and contaminant recovery wells may be permitted following joint review and approval of DNREC-SIRS and DNREC Division of Water;
 - d. 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;
 - e. Compliance with Contaminated Materials Management Plan. Perform all work required by the Contaminated Materials Management Plan (“CMMP Plan”), as issued, approved, modified or amended by DNREC;

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

The Site will contain a school bus maintenance garage for the Brandywine School District. In the long term, the Site use will be restricted to non-residential (commercial/industrial) purposes as recorded in the environmental covenant. A CMMP will also be completed and available to ensure that any future development is conducted in a safe manner.

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

The complete file on the Site including the Brownfield Investigation Report is 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/>

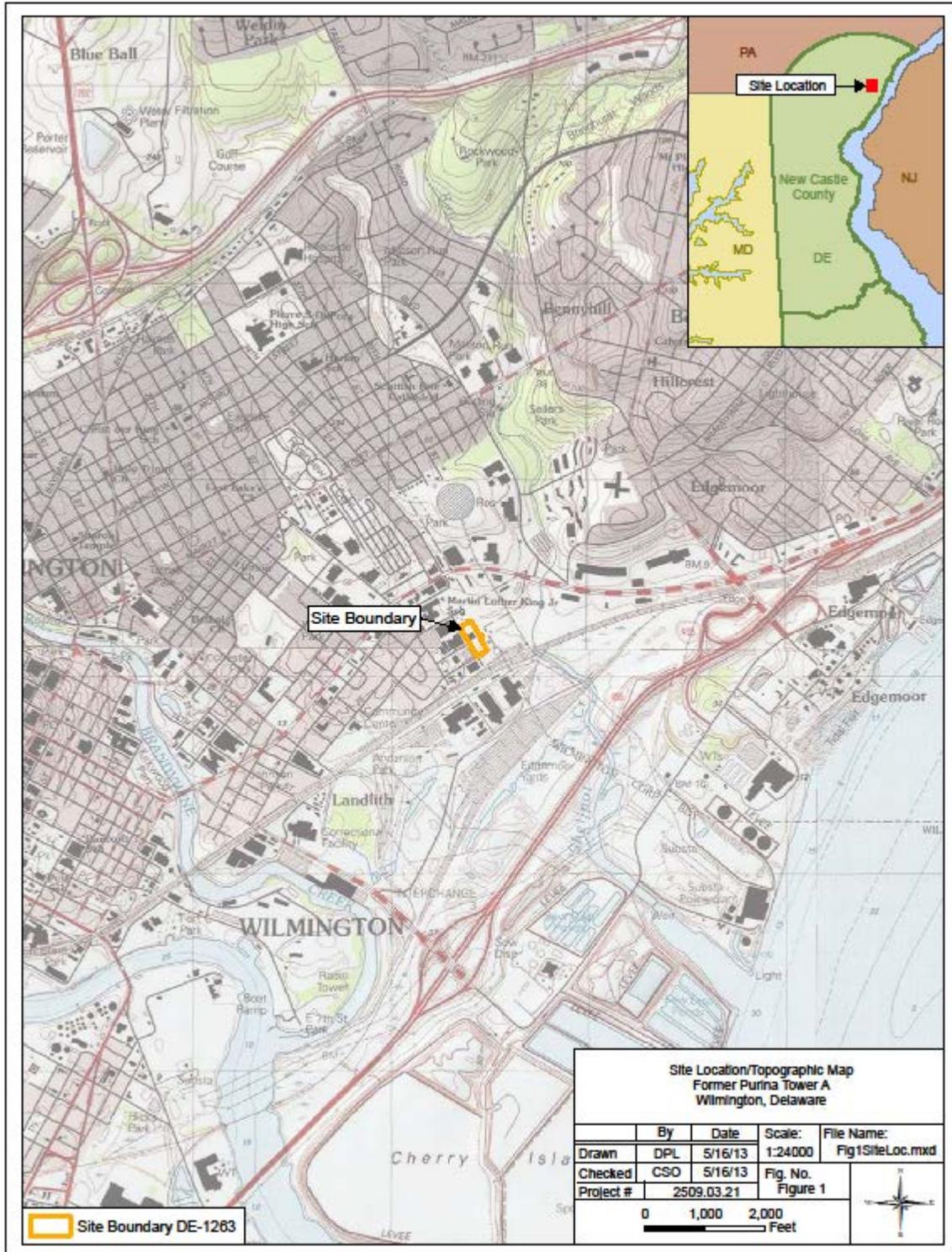
The 20-day public comment period begins on June 2, 2013 and ends at close of business (4:30 pm) on June 22, 2013. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to John Cargill, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Site Location/Topographic Map

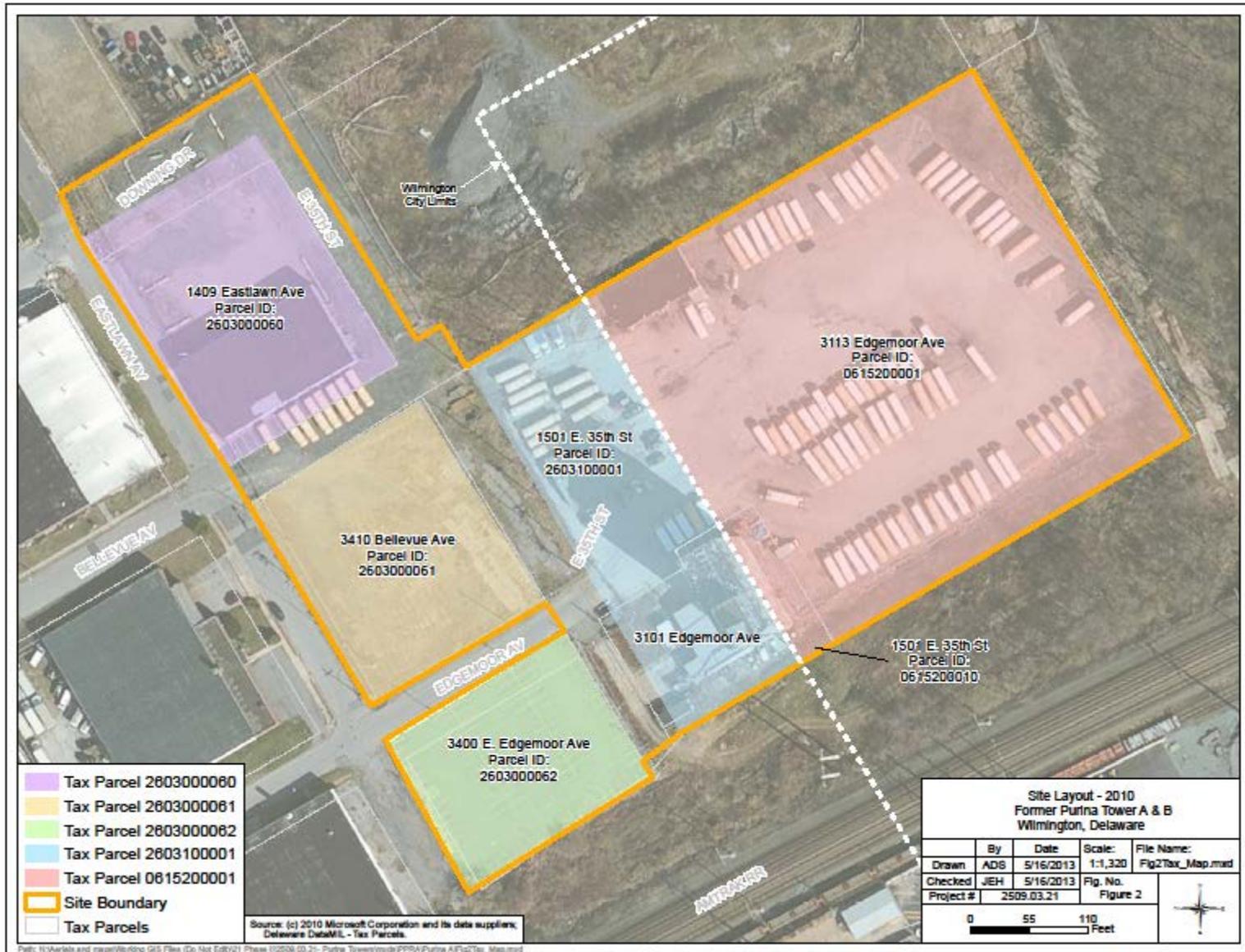
Figure 2: Tax Parcel Map – 2010

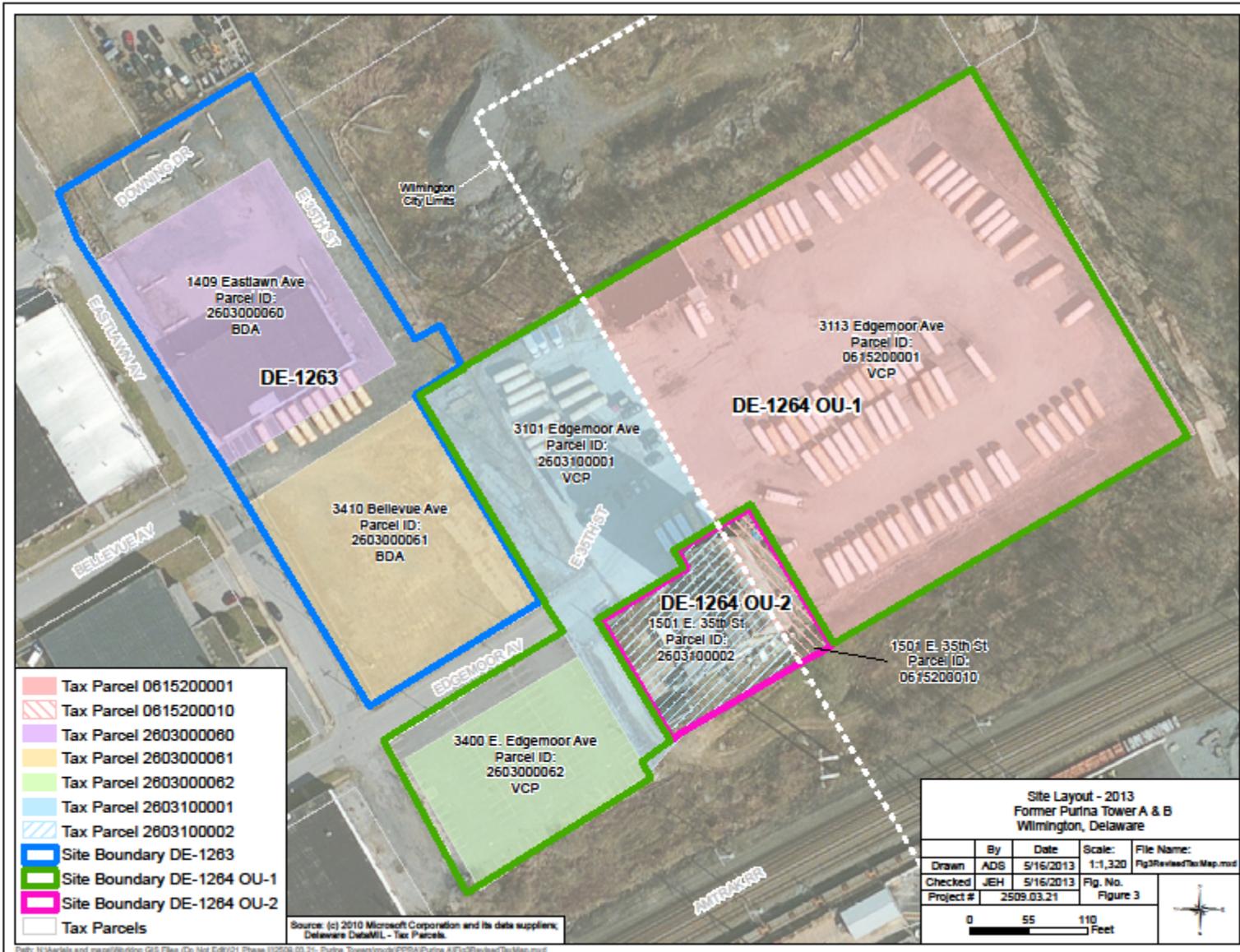
Figure 3: Tax Parcel Map – 2013

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Glossary of Terms Used in this Proposed Plan

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.
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.
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
Human Health Risk Assessment (HHRA)	An assessment done to characterize the potential human health risk associated with exposure* to site related chemicals.
Risk	Likelihood or probability of injury, disease, or death.
Restricted Use	Commercial or Industrial setting
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
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