



## PROPOSED PLAN OF REMEDIAL ACTION

Habitat for Humanity--  
14<sup>th</sup> & Walnut Streets Site  
Wilmington, DE  
DNREC Project No. DE-1534



September 2014

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

Date

## Habitat for Humanity-- 14<sup>th</sup> & Walnut Streets Site



### **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 Habitat for Humanity Site?**

The Habitat for Humanity Site (DE-1534) is a certified Brownfields Site located at the intersection of East 14<sup>th</sup> and Walnut Streets in Wilmington as shown on Figure 1. The Site, totaling approximately 0.55 acres in area, consists of eight tax parcels with separate addresses as shown on the table below and on Figure 2. The surrounding neighborhood includes residential and commercial properties. The Site is presently vacant. The properties located at 209 and 211 E. 14<sup>th</sup> Street are currently a parking lot and the other six properties are covered with grass and surrounded by a chain-link fence.

Table 1. Parcel information for the Habitat for Humanity Site

Address	Acreage	Tax Parcel Number
1401 Walnut St.	0.03	26-029.30-054
1403 Walnut St.	0.01	26-029.30-055
1405 Walnut St.	0.01	26-029.30-056
1411 Walnut St.	0.34	26-029.30-057
209 E. 14 <sup>th</sup> St.	0.06	26-029.30-050
211 E. 14 <sup>th</sup> St.	0.06	26-029.30-051
213 E. 14 <sup>th</sup> St.	0.02	26-029.30-052
215 E. 14 <sup>th</sup> St.	0.02	26-029.30-053

The Site is divided into two operable units (OUs) based on the proposed development plans. OU 1 on E. 15<sup>th</sup> Street will be a paved parking lot. The area of OU 2 will be used for the construction of residences. The extent of the Operable Units is shown on Figure 2.

## **What happened at the Habitat for Humanity Site?**

Based on an examination of historical maps and documents, various manufacturing facilities operated on the property until the 1990s. By 2000, all industrial buildings had been removed from the Site.

## **What is the environmental problem at the Habitat for Humanity Site?**

Investigations by BrightFields, Inc., contractor to DNREC, were concluded in 2013 to 2014 and found residual contamination in surface and subsurface soils resulting from past activities and a previously removed leaking fuel oil tank. The investigation included a Human Health Risk Assessment quantifying cancer and non-cancer risks to future residents and construction workers.

On Operable Unit 2 (residences), the presence of polycyclic aromatic compounds (PAHs) in surface soil present an unacceptable cancer risk to long term residents through incidental ingestion and contact with contaminated soil. Benzo(a)pyrene (a PAH) in surface soil is the most significant contaminant in this respect.

Shallow groundwater on the Site contains concentrations of iron, lead, and manganese which would make it unsuitable as a domestic water supply. There are no groundwater or soil contaminants which would create a risk to future residents through the intrusion of vapors into finished dwelling spaces or to workers engaged in construction activities.

Construction activities on Operable Unit 2 would not present unacceptable risks to workers.

Construction and operation of the parking lot on the area of Operable Unit 1 do not present unacceptable risks to present or future workers, parking lot users or residents.

## **What does the owner want to do at the Habitat for Humanity Site?**

The property will be developed by Habitat for Humanity of New Castle County as affordable housing with on-site parking.

## **What additional clean-up actions are needed at the Habitat for Humanity Site?**

To make the Site suitable for its intended uses, DNREC proposes the following remedial actions:

1. Operable Unit 1
  - a. 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:
    - i. Limitation of Groundwater Withdrawal. No groundwater wells shall be installed, and no groundwater shall be withdrawn from any well, on the Property without the prior written approval of

DNREC-SIRS and DNREC Division of Water;

- b. Develop a DNREC approved Contaminated Materials Management Plan to allow construction workers to safely handle and dispose of any potentially contaminated soil and groundwater at the Site;
  - c. Develop a Long Term Stewardship Plan which will provide for periodic future reviews of the Site to ensure that deed restrictions are observed and the cap/cover on OU 2 remains protective.
2. Operable Unit 2 (Residential Lots only)
- a. Provide a protective cap consisting of building foundations, hardscaping or 2 feet of clean soil cover to prevent future human contact with contaminated soils;
  - b. 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:
    - i. Limitation of Groundwater Withdrawal. No groundwater wells shall be installed, and no groundwater shall be withdrawn from any well, on the Property without the prior written approval of DNREC-SIRS and DNREC Division of Water;
    - ii. Interference with Remedy. There shall be no digging, drilling, excavating, grading, constructing, earth moving, or any other land disturbing activities at depths greater than 2 feet below the ground surface on the Property without the prior written approval of DNREC-SIRS.
  - c. Develop a DNREC approved Contaminated Materials Management Plan to allow construction workers to safely handle and dispose of any potentially contaminated soil and groundwater at the Site;
  - d. Develop a Long Term Stewardship Plan which will provide for periodic future reviews of the Site to ensure that deed restrictions are observed and the cap/cover on OU 2 remains protective.

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

The Site will be used for residences and will be subject to Long Term Stewardship Plan as described above.

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

The complete file on the Site including the Brownfield Investigation 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 September 7, 2014 and ends at close of business (4:30 pm) on September 29, 2014. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Stephen F. Johnson, PE, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Site Location Map

Figure 2: Site Layout

SFJ:tlw; SFJ14024.doc; DE 1534 II B 8

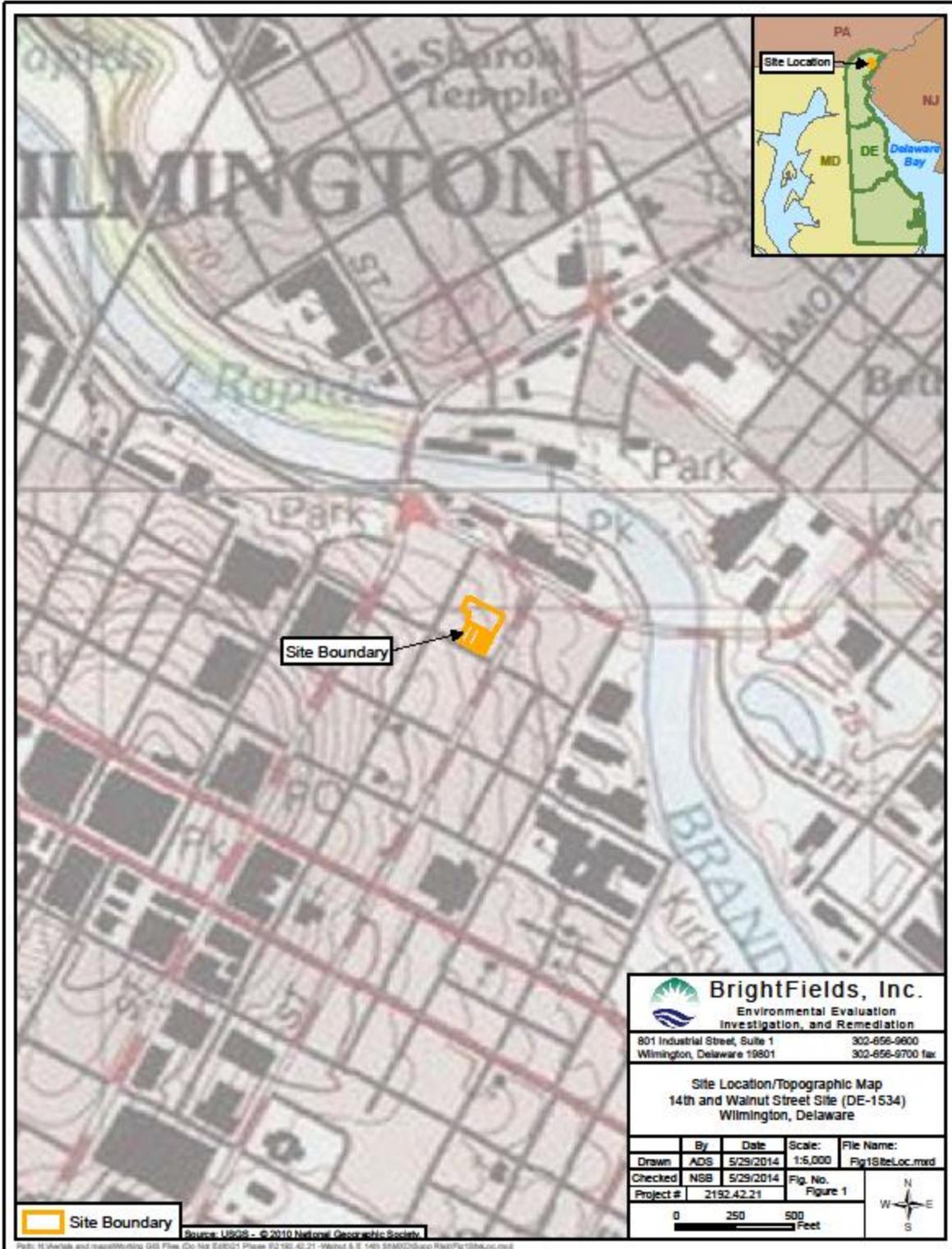


Figure 1

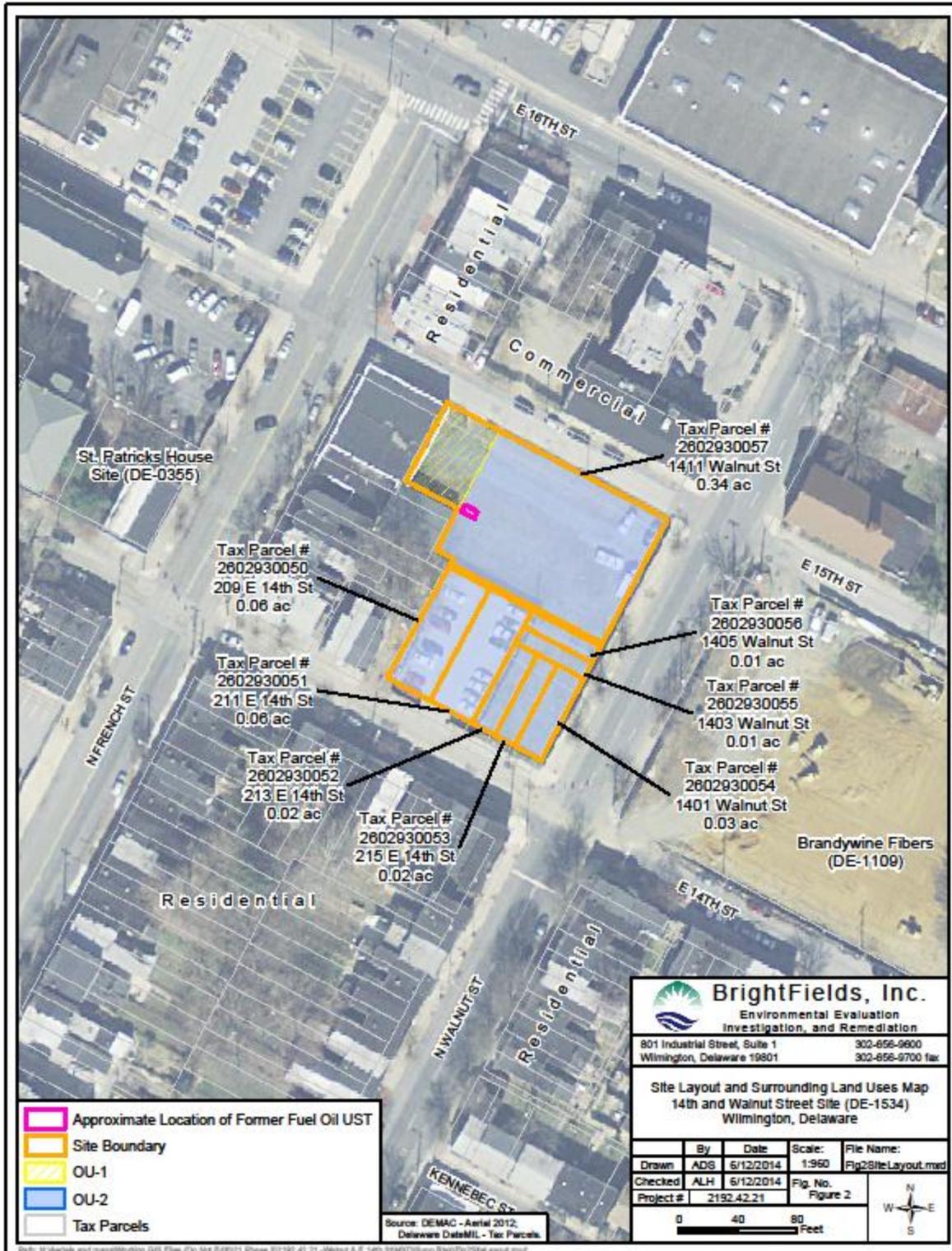


Figure 2

## Glossary of Terms Used in this Proposed Plan

<b>Operable Unit</b>	A discrete section of the Site representing the local bounds of contamination in soil or ground water or distinct remedial actions.
<b>Brownfield Development Agreement (BDA)</b>	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.
<b>Brownfield Investigation (BFI)</b>	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.
<b>Certified Brownfield</b>	A Brownfield that DNREC has determined is eligible for partial funding through the Delaware Brownfields Program
<b>Certification of Completion of Remedy (COCR)</b>	A formal determination by the Secretary of DNREC that remedial activities required by the Final Plan of Remedial Action have been completed.
<b>Contaminant of Concern (COC)</b>	Potentially harmful substances at concentrations above acceptable levels.
<b>Contaminated Materials Management Plan</b>	A written plan specifying how potentially contaminated material at a Site will be sampled, evaluated, staged, transported and disposed of properly.
<b>Exposure</b>	Contact with a substance through inhalation, ingestion, or direct contact with the skin. Exposure may be short term (acute) or long term (chronic).
<b>Final Plan of Remedial Action</b>	DNREC's adopted plan for cleaning up a hazardous site.
<b>Groundwater Management Zone</b>	A geographical area where DNREC restricts drilling for ground water because it is contaminated
<b>Hazardous Substance Cleanup Act (HSCA)</b>	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.
<b>Human Health Risk Assessment (HHRA)</b>	An assessment done to characterize the potential human health risk associated with exposure* to site related chemicals.
<b>Preliminary Risk Assessment</b>	A quantitative evaluation of only the most obvious and likely risks at a site
<b>Risk</b>	Likelihood or probability of injury, disease, or death.
<b>Restricted Use</b>	Commercial or Industrial setting
<b>SIRS</b>	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