FINAL PLAN OF REMEDIAL ACTION

1320 Clifford Brown Walk

1320 Clifford Brown Walk *October 2014*
Wilmington, Delaware *DNREC Project No. DE-1540*

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 1320 Clifford Brown Walk.

DNREC issued public notice of the Proposed Plan of Remedial Action (Proposed Plan) for the Site on September 11, 2014 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

October 9, 2014
Date

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PROPOSED PLAN OF REMEDIAL ACTION

1320 Clifford Brown Walk Site
Wilmington, Delaware
DNREC Project No. DE-1540

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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PROPOSED PLAN OF REMEDIAL ACTION

1320 Clifford Brown Walk Site
Wilmington, Delaware
DNREC Project No. DE-1540

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

Approved by:

Timothy Ratsep, Environmental Program Administrator
Site Investigation & Restoration Section

September 11, 2014
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 1320 Clifford Brown Walk Site?

The 1320 Clifford Brown Walk site is located at 1320 Clifford Brown Walk in Wilmington, Delaware, and consists of two tax parcels (26-029.30-254 and 26-029.30-261), totaling approximately 2.05 acres (Figure 1). The nearest intersection to the Site is Clifford Brown Walk and E 14th Street. The Site consists of a vacant office/warehouse building and open paved parking area with minimal grass around the building in a mixed residential/commercial area (Figure 2).

What happened at the 1320 Clifford Brown Walk Site?

The building on the Site was built in 1917 as a warehouse to store goat skins for the New Castle Leather Company. It was also used as an industrial lithographic printing operation for at least fifty years. There were two Underground Storage Tanks (USTs) that contained toluene and methyl ethyl ketone on the site, which were removed in 1987. Three additional heating oil USTs were removed in 1997. The Site was historically filled when the Brandywine Creek was re-channeled during the late 1800s.

What is the environmental problem at the 1320 Clifford Brown Walk Site?

A Brownfield Investigation performed in 2013 at the Site found that the surface soil contained contamination over DNREC soil standards for residential use of the property. The contaminants of concern that were detected onsite are volatile organic compounds (VOCs) including trichloroethene, semi-volatile compounds (SVOCs) including benzo(a)pyrene, and metals including arsenic. A Human Health Risk Assessment showed that there is a potential risk to residential users, indoor commercial workers, outdoor commercial workers, and recreational users due to the arsenic and trichloroethene in the shallow soil. In addition, calculations indicated that there is a risk from intrusion of trichloroethene vapor for indoor construction workers if the building slab is removed or damaged during construction activities.

What clean-up actions have been taken at the 1320 Clifford Brown Walk Site?

None

What does the owner want to do at the 1320 Clifford Brown Walk Site?

The Site will be developed by 1320 CBW, LLC into a historic adaptive-reuse, residential rental development that will contain 80 loft-style apartments for families and young professionals earning no greater than 60% of the Area Median Income.

What additional clean-up actions are needed at the 1320 Clifford Brown Walk 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. Cap the Site with at least two feet of DNREC-approved fill or impervious material such as buildings, asphalt, or concrete to limit exposure to surface soils.

2. 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.] 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;

   [b.] 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;

   [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; and

   [d.] Compliance with Contaminated Material Management Plan. Perform all work required by the Contaminated Material Management Plan ("Plan"), as issued, approved, modified or amended by DNREC.

3. Develop a DNREC approved CMMP to allow construction workers to safely handle any potential contaminated soil, soil vapor and groundwater at the Site.

4. Develop and implement a DNREC-approved Long-Term Stewardship (LTS) Plan. The LTS Plan will detail the inspection schedule to be followed in order to maintain the long-term integrity of the remedy.

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

The Site is planned to be developed into apartments for families and young professionals.

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 14, 2014 and ends at close of business (4:30 pm) on October 6, 2014. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Kathryn Durant, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Site Location Map
Figure 2: 2012 Aerial Photo of Site

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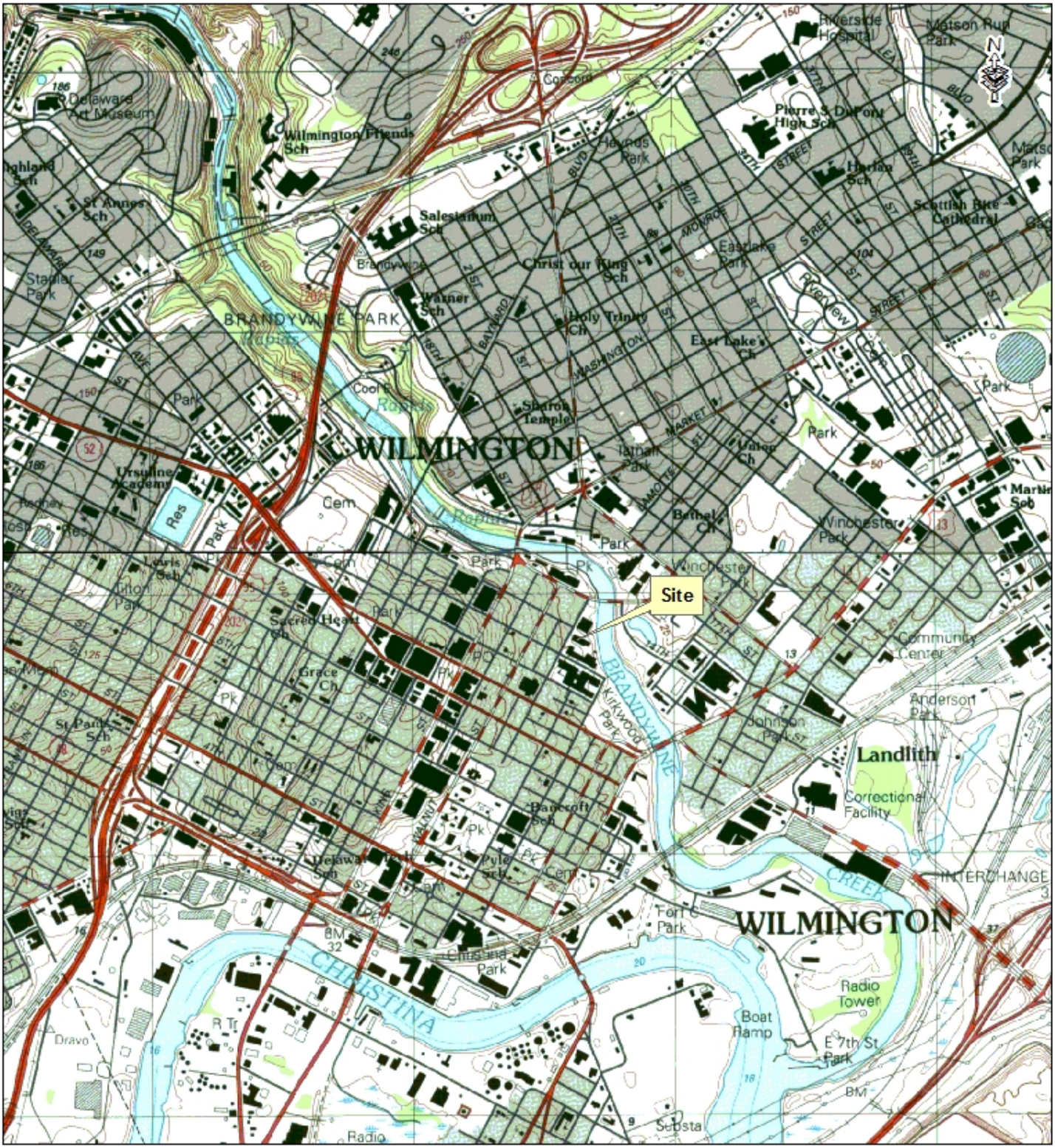

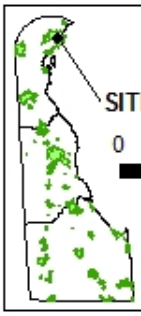

DELAWARE DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL

WHS
Site Investigation & Restoration Section
391 Lukens Dr.,
New Castle, DE 19720
302.395.2600

FIGURE 1
1320 CLIFFORD BROWN WALK (DE-1540)
SITE LOCATION MAP
NEWARK, DE

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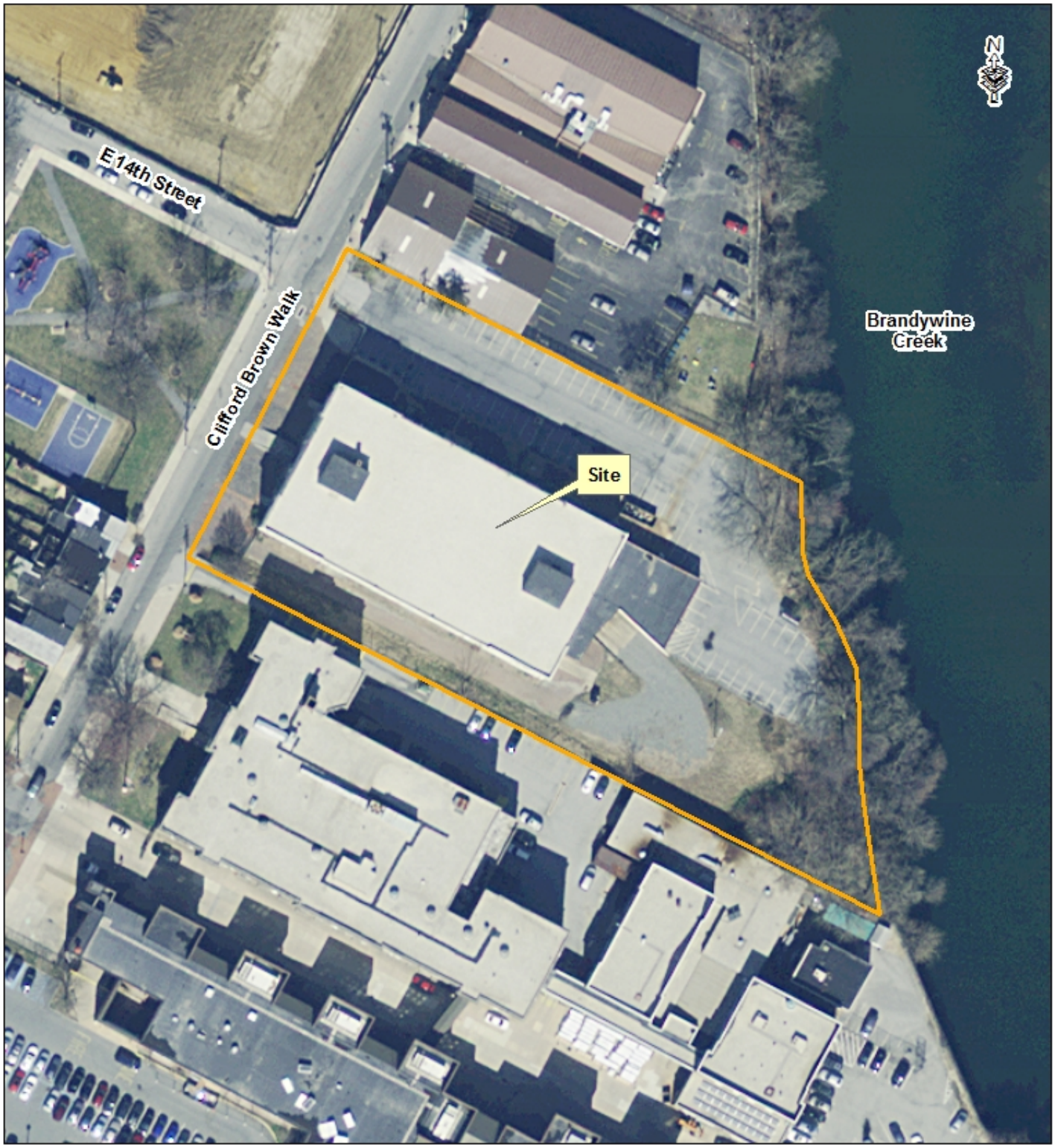
September 2014



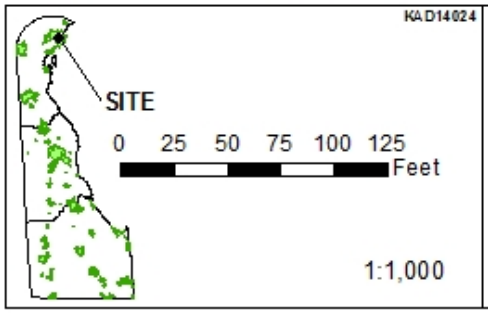


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FIGURE 2
1320 CLIFFORD BROWN WALK (DE-1540)
2012 AERIAL PHOTO
NEWARK, DE

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September 2014

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.
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.
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.
Risk	Likelihood or probability of injury, disease, or death.
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