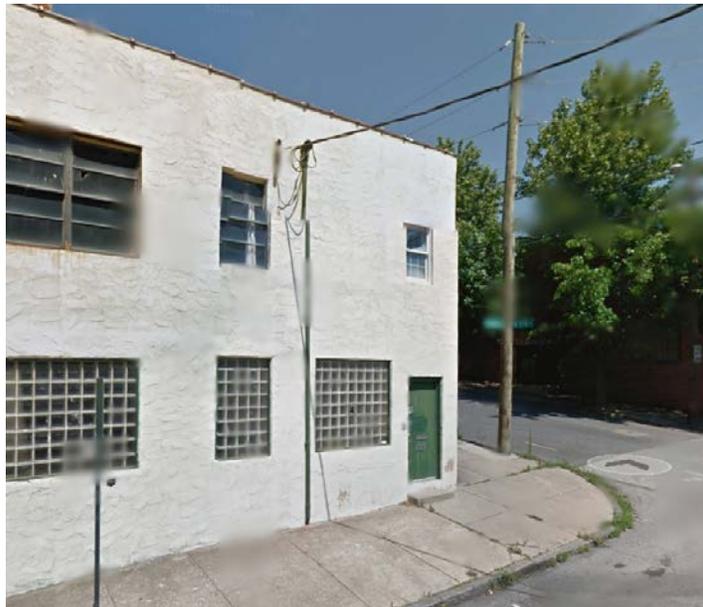




## **PROPOSED PLAN OF REMEDIAL ACTION**

427 North Tatnall Street Site  
Wilmington, Delaware  
DNREC Project No. DE-1248



March 2016

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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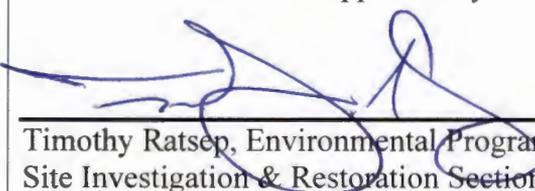
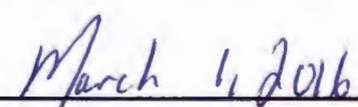
# PROPOSED PLAN OF REMEDIAL ACTION

427 NORTH TATNALL STREET SITE  
Wilmington, Delaware  
DNREC Project No. DE-1248



**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



### **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 427 North Tatnall Street Site?**

The 427 North Tatnall Street Site consists of six parcels totaling approximately 0.11 acres, located at 415 through 427 North Tatnall Street in Wilmington, Delaware (Figure 1). The property consists of a 2-story commercial office building and associated parking area. The Site is located at the intersection of West 5<sup>th</sup> Street and North Tatnall Street. The area has been used for commercial operations as well as residential homes in the past.

### **What happened at the 427 North Tatnall Street Site?**

The property formerly operated as a printing business from at least the 1920s until the 1990s. Prior to the printing business, the property consisted of residential homes, dating back to 1884. The Site currently is vacant and has been since at least 2003.

### **What is the environmental problem at the 427 North Tatnall Street Site?**

The Site is environmentally impacted due to approximately 70-year historical use as a printing business. Additional environmental conditions that were identified was the historical demolition of former site buildings and likely presence of associated on-site backfill, including the parking lot area. Based on the results of Phase I and Phase II Environmental Site Assessments (ESAs) indicating the presence of elevated concentrations of arsenic and lead in site soils, The Flynn Company entered the Site into the Delaware Voluntary Cleanup Program (VCP) in November 2001, in cooperation with the former owner, Brand Design Company, Inc. The current owner, Flynn Realty Services, Inc., purchased the property in November 2003, applied for Brownfields certification in 2005 and entered into a Brownfields/ VCP Agreement in 2009.

Three groundwater samples analyzed for volatile organic compounds (VOCs) during the November 2001 Remedial Investigation (RI) contained concentrations of tetrachloroethylene (PCE) and trichloroethylene (TCE) exceeding the DNREC Uniform Risk-Based Remediation Standards (URS) screening values of 2 micrograms per liter (ug/L) for TCE and 1 ug/L for PCE. A March 2003 addendum to the RI included additional soil and groundwater sampling beneath the building basement and Johnson and Ettinger (J&E) modeling for indoor air intrusion potential. Test results indicated relatively low levels of PCE in soils and elevated concentrations of PCE and TCE in groundwater beneath the building. All three groundwater samples collected from beneath the building contained PCE at concentrations exceeding the groundwater URS of 5 ug/L, with results

ranging from 10 to 170 ug/L. MW-1 and MW-3 contained TCE exceeding the Groundwater URS; no detectable TCE was reported for MW-2, located on the upgradient end of the Site. Although the J&E model indicated acceptable risk levels for Vapor Intrusion using both soil and groundwater sample results, the model may not adequately account for site conditions with groundwater table in contact with the basement.

These findings, along with subsequent indoor air sample results exceeding action levels for TCE and PCE, led to several interim actions taking place in the building. These interim actions consisted of building material removal and sampling, along with installation of a sub-slab ventilation system. After construction of a sub-slab ventilation system in the basement indicated that it did not adequately reduce vapor levels, additional interim actions removed and replaced the wooden floor covering on the first floor, along with a concrete slab that was beneath that flooring. Also, the owner placed plastic sheeting over openings between the basement and 1<sup>st</sup> floor, sealed off one basement stairwell, and reconstructed a 2nd stairwell to the basement for access from outside the building only. The latest interim action by the owner, removal of floor joists apparently containing oil in the room formerly used for printing equipment, resulted in indoor air sample results showing acceptable TCE and PCE concentrations.

### **What does the owner want to do at the 427 North Tatnall Street Site?**

The owner intends to sell the property for commercial office uses.

### **What clean-up actions are needed at the 427 North Tatnall Street 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. Containment with asphalt paving of the parking lot as a cover remedy to prevent direct exposures to contaminants in the soil under the parking lot area.
2. An Environmental Covenant, consistent with Delaware's Uniform Environmental Covenants Act (7 Del.C. Chapter 79, Subchapter II) must be recorded in the Office of the New Castle Recorder of Deeds within 90 days of the issuance of the LTS Plan. The Environmental Covenant must include the following activity and/or use restrictions:
  - [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 at depths greater than 1 foot ,including any repair, renovation or demolition of the existing structures on the on the Property without the prior written approval of DNREC;
  - [c.] 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;

- [d.] Compliance with the Long Term Stewardship Plan. All work required by the Long Term Stewardship Plan must be performed to DNREC's satisfaction in accordance with the Plan; and
- [e.] Compliance with Contaminated Materials Management Plan. All work required by the Contaminated Materials Management Plan must be performed to DNREC's satisfaction in accordance with the Plan.

3. A Remedial Action Completion Report must be submitted to DNREC within 60 days of the completion of the remedial actions required in this Proposed Plan.
4. A request for a Certification of Completion of Remedy (COCR) must be submitted to DNREC within 60 days of approval of the Remedial Action Completion Report.

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

A commercial office use at the Site.

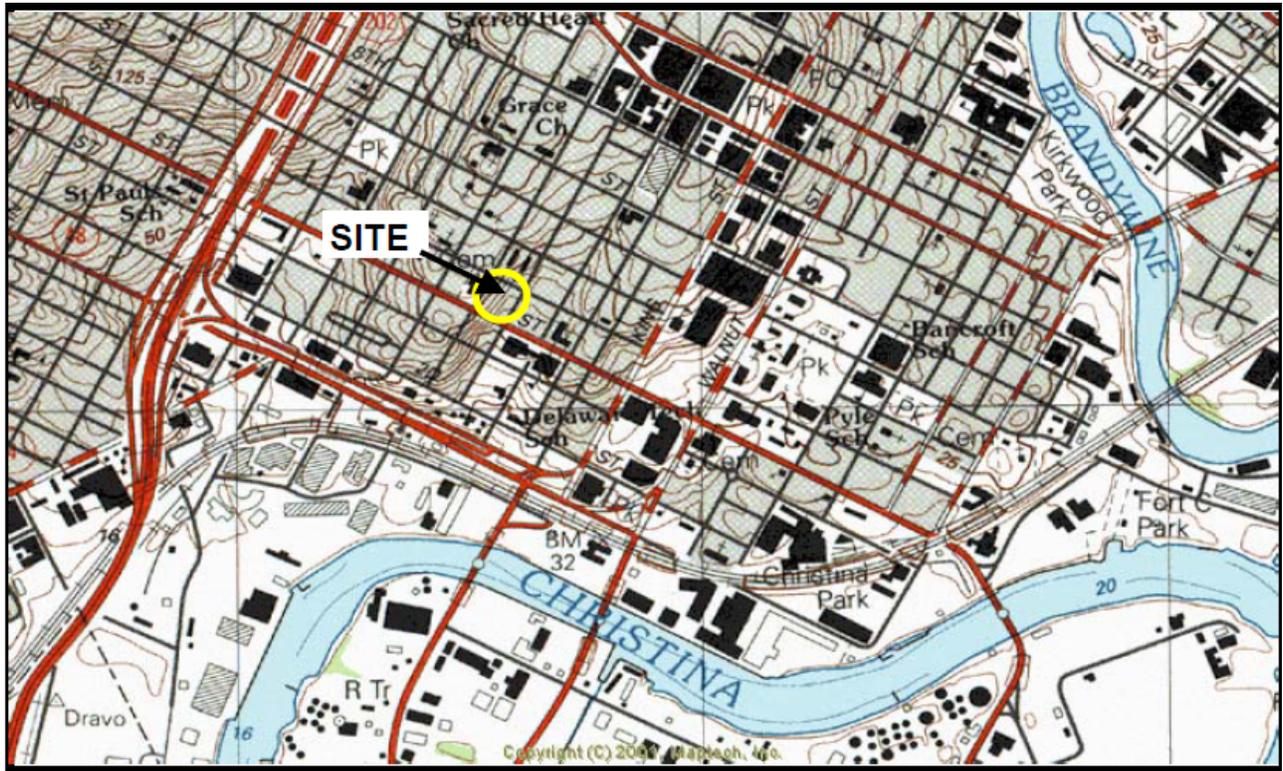
### **How can I find additional information or comment on the Proposed Plan?**

The complete file on the Site including the Brownfield Investigation 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 March 2, 2016 and ends at close of business (4:30 pm) on March 21, 2016. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Lawrence Jones, Project Officer or Robert Newsome, Public Information Officer.

Figure 1: Site Location Sketch

LJJ:tlw : LJJ16003.doc ; DE 1533 II B 8



NOTE:  
 THIS LOCATION SKETCH WAS ADOPTED FROM THE USGS TOPOGRAPHIC MAP,  
 7.5 -MINUTE SERIES, WILMINGTON, DELAWARE - NEW CASTLE CO.(1992)

 <p>Ten Bears Environmental, L.L.C.          41 C Blue Hen Drive          Newark, DE 19713          Phone: (302) 731-8633 Fax: (302) 731-8655</p>	<b>FIGURE 1 - SITE LOCATION SKETCH</b> <b>427 TATNALL STREET</b> <b>WILMINGTON, NEW CASTLE COUNTY, DELAWARE</b> 427 TATNALL STREET CITY OF WILMINGTON, NEW CASTLE COUNTY, DELAWARE	
	DATE: 01-13-03 DRAWN BY: JPG CHECKED BY: FILE NO: 02-51.B	JOB NUMBER: 02-51.B SCALE: NOT TO SCALE FIGURE NO: 1 SHEET 1 OF 1

Figure 1

## Glossary of Terms Used in this Proposed Plan

<b>Voluntary Cleanup Program Agreement (VCP Agreement)</b>	This legal agreement is between a current of a Delaware-certified Brownfields Site and the DNREC. The owner agrees to investigate and cleanup a property under the oversight of the Department in exchange for liability protection.
<b>Remedial Investigation (RI)</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>Final Plan of Remedial Action</b>	DNREC's adopted plan for cleaning up a hazardous site.
<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>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
<b>US EPA</b>	United States Environmental Protection Agency