



## PROPOSED PLAN OF REMEDIAL ACTION

Casper's Auto Parts  
Wilmington, Delaware  
DNREC Project No. DE-1185



October 2016

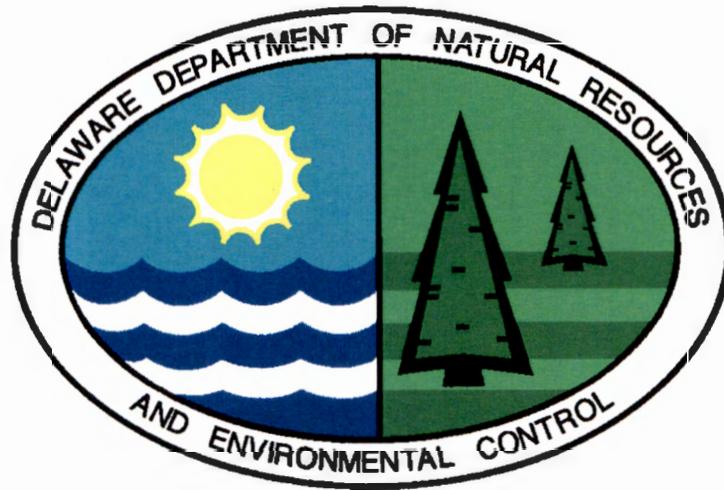
Delaware Department of Natural Resources and Environmental Control  
Division of Waste and Hazardous Substances  
Site Investigation & Restoration Section  
391 Lukens Drive  
New Castle, Delaware 19720

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**Approval:**

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

Approved by:

Timothy Ratsep, Environmental Program Administrator Site Investigation & Restoration Section
<i>October 12, 2016</i>
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 Casper's Auto Parts Site?**

The Casper's Auto Parts site is located at 741 South Market Street in Wilmington, Delaware, and consists of one tax parcel (1000100009), totaling approximately 3.70 acres (Figure 1). The Site currently is operated as an automotive salvage and storage yard and consists primarily of a mixture of concrete, pavement, and compacted soil and gravel with minimal areas of vegetation along the Site perimeter (Figure 2). An office building, used for customer service, is located along the eastern property boundary. A small garage is located in the northeastern portion of the Site. The Site is zoned as heavy industrial (HI). The perimeter of the Site is surrounded with chain-link fencing with a gate providing access to South Market Street along the eastern Site boundary.

## **What happened at Casper's Auto Parts Site?**

Historically, the South Wilmington area had been primarily undeveloped wetlands or agricultural properties that were filled to create more buildable area in the early-1900s. According to historical documentation, the Site itself has been used for an automotive salvage and parts yard since the early-1950s. Contamination typical of the auto salvage operation (e.g. gasoline, oils, antifreeze, etc.) as well as historical filling activities (e.g. slag, brick, concrete, etc.) was expected to be encountered across the Site during the remedial investigation (RI) sampling event.

The Site entered into the State of Delaware Voluntary Cleanup Program (VCP) in November 2000. DNREC-SIRS terminated the VCP in June 2009 in violation of Section IV. *Reservation of Rights*, paragraph 15 wherein unsatisfactory progress was made in the execution of the VCP. A Consent Decree was negotiated and signed in June 2011 wherein a Remedial Investigation (RI) would be designed and implemented to determine the nature and extent of contamination. RI sampling activities were performed at the Site in January 2013. A notice of violation of the Consent Decree was issued in June 2016 whereinafter the RI was completed and provided to DNREC-SIRS for review in August 2016.

## **What is the environmental problem at Casper's Auto Parts?**

According to the "South Wilmington Environmental Assessment, Quadrants 3 and 4" report, completed by DNREC in 1996, two shallow soil samples were collected from the Site. Based on the analytical results of the shallow soil sample, metals (including arsenic, cadmium, chromium, copper, lead, manganese, mercury, nickel, and zinc); Poly Aromatic Hydrocarbons [PAHs] (including, bis(2-ethylhexyl)phthalate); pesticides (including, heptachlor epoxide, 4,4'-DDD, alpha-chlordane, and, gamma-chlordane); and, a Polychlorinated Biphenyl [PCB] (Aroclor 1260) were detected above their respective Risk Based Concentrations (RBCs) and/or over three-times their respective background concentrations.

A subsequent report, the "Remedial Investigation Report: South Wilmington Salvage Yards" was completed in 2001. This report included the Site, as well as other salvage yards in the south Wilmington area. According to the report, two surface and one deep soil samples and one groundwater sample were collected from the Site and analyzed. The results identified three metals (arsenic, iron, and lead) and PAH (benzo(a)pyrene) above their respective HSCA Risk-Based Remediation Standards (URS) levels in soils and two metals (aluminum and manganese) above their respective HSCA URS levels in groundwater.

Media sampling for the 2016 RI report included 10 shallow and deep soil samples; three groundwater samples; and, two sediment samples. Samples were initially screened by DNREC laboratories before a selected number were sent to a HSCA-certified laboratory for full TAL/TCL analyses. According to the laboratory results, several metals; a volatile organic compound [VOC]; and, several semi-VOCs [SVOCs] were detected at levels exceeding their respective DNREC-SIRS Screening levels. Several metals and SVOCs were also identified above their respective DNREC-SIRS Screening levels in the deep soil samples as well. Filtered and unfiltered groundwater analyses for inorganics detected several metals above their respective DNREC-SIRS Screening levels. Additionally, several VOCs and SVOCs were detected above their respective DNREC-SIRS Screening levels for groundwater. No pesticides or Poly Chlorinated Biphenyls (PCBs) were detected in soil or groundwater samples collected from the Site. Based on the proximity to the Christina River, DNREC-SIRS requested the collection and analysis of two sediment samples from the adjoining banks of the Site. Results of the analysis identified several metals and a couple of SVOCs above their respective USEPA Region 3 Ecological Risk Screening levels

## **What does the owner want to do at Casper's Auto Parts Site?**

At this time, the Site shall continue to operate as an automotive parts salvage and storage yard.

## **What additional clean-up actions are needed at Casper's Auto Parts Site?**

Due to the current and active use of the site as an automotive parts salvage and storage yard, and the fact that the future use of the site is likely to remain industrial (i.e. "restricted use" vs. residential/"unrestricted use"), DNREC-SIRS 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. Upon closure of the operations at the Site, the Site must be capped with at least one foot of clean fill or impervious material (e.g. buildings, asphalt, or concrete) pursuant to the schedule indicated in the future DNREC-approved Remedial Action Work Plan. If the use of the Site changes in the future, or if new information becomes available that would cause these recommended remedial actions to no longer be protective of human health or the environment, further assessment or remedial action may need to take place on the Site.
2. Maintaining a perimeter fence to prevent trespassing.
3. A proposed Environmental Covenant must be submitted to DNREC for approval within 60 days of the issuance of the Final Plan of Remedial Action.
4. 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 County Recorder of Deeds within 60 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 [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.
5. A Contaminated Materials Management Plan (CMMP) must be submitted to DNREC within 60 days of the issuance of the Final Plan of Remedial Action. The CMMP will provide guidance to enable construction workers to safely handle any potential contaminated soil and groundwater at the Site.
6. The CMMP will be implemented upon its approval by DNREC.

7. A Long-Term Stewardship Plan shall be submitted to DNREC for approval in accordance with the schedule set forth in the approved Remedial Action Work Plan. The LTS plan will detail the site-inspection schedule to be followed in order to ensure the long-term integrity of the remedy.
8. 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.
9. Monitoring wells should be closed and abandoned in accordance with state and local regulations. Well closure notification must be submitted to DNREC within 60 days of the completion of the remedial actions required in this Proposed Plan.
10. 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.

These remedial actions do not relieve Casper's Auto Parts Site from the need to comply with the applicable requirements of other local, State, or Federal regulations and/or programs. If circumstances change or any new information becomes available that relates to the release of hazardous substances at the Site, DNREC-SIRS reserves the right to require additional measures to be taken, as necessary, in order to ensure the protection of both human health and the environment.

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

The Site use will be restricted to non-residential (commercial/industrial) land uses as well as groundwater restrictions by recording the environmental covenant. If circumstances change or any new information becomes available that relates to the release of hazardous substances at the Site, DNREC-SIRS reserves the right to require additional measures to be taken, as necessary, in order to ensure the protection of both human health and the environment

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

The complete file on the Site including the Remedial 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 October 16, 2016 and ends at close of business (4:30 pm) on November 7, 2016. Please send written comments to the DNREC office at 391 Lukens Drive, New Castle, DE 19720 to Morgan McGee-Solomon, Project Officer.

Figure 1: Location Map

Figure 2: Aerial Imagery - 2012

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<p><b>Legend</b></p>		<p><b>FIGURE 1: LOCATION MAP DE-1185 CASPER'S AUTO PARTS WILMINGTON, DELAWARE</b></p>
<p>  Site Boundaries              0 500 1,000 2,000 Feet            1 inch = 1,000 feet         </p>		<p>MMSGIS2016_003</p>

Figure 1: Location Map



Figure 2: Aerial Imagery - 2012

## Glossary of Terms Used in this Proposed Plan

<b>Area of Concern (AOC)</b>	A discrete section of the Site representing the local bounds of contamination in soil or ground water.
<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>Poly chlorinated biphenyls (PCBs)</b>	A synthetic, carcinogenic chemical formerly used in a wide variety of industrial applications but banned from most uses by the US EPA in 1979.
<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>Risk Assessment Guidance for Superfund (RAGS)</b>	An EPA guidance document for superfund sites
<b>Restricted Use</b>	Commercial or Industrial setting
<b>Site Inspection (SI)</b>	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).
<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>USEPA</b>	United States Environmental Protection Agency