

FINAL PLAN OF REMEDIAL ACTION



B STREET PACK AND PROCESS SITE AKA FUTURE EZION FAIR BAPTIST CHURCH

Wilmington, Delaware

DNREC Project No. DE-1442

This Final Plan of Remedial Action (Final Plan) presents the Department of Natural Resources and Environmental Control's (DNREC's) determination that the following remedial action will be required at the future Ezion Fair Baptist Church Site, located at B Street, Pack and Process Site.

- 1) Capping the site with clean fill and constructing a parking lot.
- 2) Installation of a passive flooring ventilation system.
- 3) Maintain the capped areas and the remaining landscaped/vegetated areas as per a DNREC-approved O&M Plan.
- 4) Placement of an Environmental Covenant (EC), consistent with the Uniform Environmental Covenants Act (UECA) that will restrict the site for commercial use.
- 5) If intrusive activities are proposed in the future, the property owner shall implement an environmental oversight program, including a DNREC-approved Contaminated Materials and Water Management Work Plan (CMWMP), during redevelopment to protect workers and properly dispose of excavated soil.

DNREC issued public notice of the Proposed Plan of Remedial Action (Proposed Plan) for the site on June 10, 2009 and opened a 20-day public comment period, with the comment period closing on June 30, 2009. The Proposed Plan recommending the above remedial action is attached. The Proposed Plan also includes the location of additional information found on the DNREC web page and in the DNREC office on Lukens Drive in New Castle.

There were no comments or questions 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.



Kathy M. Stiller, Program Manager II
Division of Air and Waste Management

KLT:tlw; KLT09016.doc; DE-1193 II B-9

APPENDIX 1



PROPOSED PLAN OF REMEDIAL ACTION

B Street Pack and Process

(New location for Ezion Fair Baptist Church)

Wilmington, Delaware

DNREC Project No. DE-1442



June 2009

Delaware Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation & Restoration Branch
391 Lukens Drive
New Castle, Delaware 19720

CONTENTS

- Proposed Plan: Questions and Answers
- Figures 1 and 2
- Appendix: Site Photographs
- Glossary of Terms
- Attachment: *What is a Proposed Plan?*

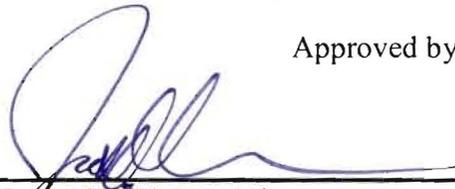
PROPOSED PLAN OF REMEDIAL ACTION

B Street Pack and Process
Wilmington, Delaware
DNREC Project No. DE-1442



Approval:

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

	Approved by:
<hr/>	
James D. Werner, Director Division of Air & Waste Management	
	
<hr/>	
Date	

B Street Pack and Process Property (DE-1442)



What is the B Street Pack and Process Property Site?

The B Street Pack and Process Property located at 600, 610 and 620 Bradford Street; 1410 C Street and 1400 B Street in Wilmington, Delaware (Site) is an approximate 2.83-acre site. The site was initially developed in 1960 and operated by Pack and Process, Inc. until operations ceased in 2007. The property was utilized to package dry granular foods. Historical documentation indicated that prior to development; three rail spurs transected the property and that the site was located in an area of historic fill. The Site is depicted on Figures 1 through 5.

Tax Parcel Numbers: 2605830026, 2605830025, 2605810209, 2605810224, and 2605810203

Address: 600, 610, and 620 Bradford Street; 1410 'C' Street; and 1400 'B' Street

Nearest major intersection: I-495 (at exit 2) and Terminal Avenue

Area: 2.38 acres

Surrounding Property: Surrounding land use is residential, commercial and industrial

Zoning: Light Industrial

Site Utilities: The City of Wilmington provides water and sewer service. Delmarva Power provides electric and natural gas service.

Surface water: The 'B' Street Pack and Process site is approximately 1803 feet west of the Christiana River and 1.85 miles west of the Delaware River. Surface water appears to flow east-southeast towards an adjacent marsh area to the east. The remainder of the surface water appears to flow east towards the Christiana River.

Topography: Generally flat.

Groundwater: Shallow groundwater is located approximately 1-4 feet beneath the ground surface.

What happened at the B Street Pack and Process Property Site?

The site was initially developed in 1960 and operated by Pack and Process, Inc. until operations ceased in 2007. The property was utilized packaging dry granular foods. Historical documentation indicated that prior to development; three rail spurs transected the property and that the site was located in an area of historic fill.

What is the environmental problem at the B Street Pack and Process Property Site?

The subject property is located in a historic fill area in the City of Wilmington. Site investigation observations and laboratory analyses indicated the presence of fill materials (brick, glass, slag, wood, ceramic, etc.) in surface soils. Metals, such as lead and arsenic and the semi-volatile organic compound (SVOC) benzo(a)pyrene were detected above DNREC Uniform Risk Based

Standard (URS) for Restricted Use in surface soils. Metals, such as aluminum, arsenic, and lead and SVOC benzo(a)pyrene were detected above DNREC URS for Restricted Use in subsurface soils. Additional metals and SVOCs were detected above their respective DNREC URS for Unrestricted Use. Contaminants detected indicated conditions typically associated with urban land uses. Surface soils on the subject property were the single medium resulting in unacceptable risks to human health. A surface soil remedy of capping is proposed and recommended at the subject property to prevent daycare children from contacting surface soils. No soils are proposed to be removed off-site.

The data from the Brownfield Remedial Investigation (BRI) was combined with previous investigations and used to identify environmental conditions at the subject property and to evaluate whether those conditions would pose an unacceptable risk to the proposed future industrial or commercial users of the property after its redevelopment.

Based on a review of laboratory analysis results and soil boring logs, contaminants of potential concern (COPCs) exist and are located within the shallow fill materials observed throughout the subject property. The results and observations are consistent with the physical location of the subject property in a low lying area near the Christina River that has been historically filled.

Of the five receptors listed, the groundskeeper, the indoor worker, and the daycare child were determined to have calculated risks above the DNREC cancer risk level of 1E-05. Additionally, the total hazard index (HI) of 3.2 of the daycare child receptor exceeded the noncancer benchmark of one, with incidental soil ingestion of mercury being the major contributor with a HI of 2.1. Therefore preventing groundskeepers, indoor workers, and particularly daycare children from exposure to soil borne contaminants is critical to implementing this remedy. Additionally due the uncertainties with the Johnson and Ettinger (J&E) indoor air vapor intrusion model, and the ability to obtain only one (1) sample from beneath the floor, an indoor air ventilation system is appropriate.

What clean-up actions have been taken at the B Street Pack and Process Property Site?

No clean-up work has been performed at the Site, other than asbestos and lead paint abatement of the existing building.

What clean-up actions are needed at the B Street Pack and Process Property Site?

DNREC's Proposed Plan includes capping the site with clean fill and the construction of a parking lot, the installation of a passive flooring ventilation system, maintaining the capped areas and the remaining landscaped/vegetated areas as specified in a DNREC-approved Operations and Maintenance (O&M) and Long Term Monitoring (LTM) Plan will be prepared and submitted to DNREC for approval in order to maintain the capping remedy for the site. The Plan will include inspection and repair requirements for the capping component of the remedy. Current and/or future owners of the property will be responsible for implementing all aspects and

costs of the approved remedy, including all requirements of the proposed and final plans, the approved O&M and LTM Plan. Also, the placement of an environmental covenant restricting the site to commercial use only, and the prevention of future groundwater use through the City of Wilmington's GMZ. In addition, the property owner will be required to notify DNREC prior to excavation or moving of site soil. If redevelopment is proposed, a Contaminated Materials and Water Management Work Plan (CMWMWP), describing the approach for containing impacted areas of the site, will be prepared and submitted to DNREC-SIRB for approval.

Based on the aforementioned, DNREC recommends the following remedial actions take place:

- 1) Capping the site with clean fill and constructing a parking lot.
- 2) Installation of a passive flooring ventilation system.
- 3) Maintain the capped areas and the remaining landscaped/vegetated areas as per a DNREC-approved O&M Plan.
- 4) Placement of an Environmental Covenant (EC), consistent with the Uniform Environmental Covenants Act (UECA) that will restrict the site for commercial use.
- 5) If intrusive activities are proposed in the future, the property owner shall implement an environmental oversight program, including a DNREC-approved Contaminated Materials and Water Management Work Plan (CMWMWP), during redevelopment to protect workers and properly dispose of excavated soil.

What are the long term plans for the B Street Pack and Process Property Site after the cleanup?

The developer plans to remodel the existing building into the new location of the Ezion Fair Baptist Church, a daycare, and associated parking. Eventually, additional buildings will be constructed on the property; however, there is not a construction schedule currently in place.

DNREC plans to issue a Certificate of Completion of Remedy for the site after the completion of the proposed remedial actions at the site.

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

The complete file on the site, including the Brownfield Remedial Investigation, is available at the DNREC office, 391 Lukens Drive in New Castle. Most documents are also found on:

<http://www.dnrec.state.de.us/dnrec2000/Divisions/AWM/sirb/>

The 20-day public comment period begins on June 20, 2009 and ends at close of business (4:30 pm) on June 30, 2009. Please send written comments to the DNREC office or call Kristen Thornton, Project Manager, at: 302-395-2600.

Glossary of Terms Used in this Proposed Plan

Brownfield	Property that is vacant or underutilized because of the perception or presence of an environmental problem.
Contaminant of Concern (COC)	These are potentially harmful substances at concentrations above acceptable levels (eg metals and PAH).
Certificate 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.
Final Plan of Remedial Action	DNREC's proposal for cleaning up a hazardous site after it has been reviewed by the public and finalized.
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.
Proposed Plan of Remedial Action	A plan for cleaning up a hazardous site submitted by DNREC and subject to public comments.
Risk	Likelihood or probability of injury, disease, or death.
Site Specific Assessment (SSA) and Site Inspection (SI)	Environmental studies of a site including sampling of soils, groundwater, surface water, sediment and/or wastes on the property.

What is a *Proposed Plan*?

A Proposed Plan of Remedial Action (Proposed Plan) is a summary of how DNREC plans to clean up a contaminated site. A Final Plan of Remedial Action (Final Plan) is the adoption of the Proposed Plan, after all comments made by the public within the comment period of twenty days have been considered and addressed by DNREC.

The Delaware State Legislature passed the Hazardous Substance Cleanup Act (HSCA) in 1990. The Legislature made sure that members of the public would be informed about environmental problems in their own neighborhoods and have a chance to express their opinion concerning the clean up of those environmental problems before DNREC takes action.

After DNREC studies a site, it summarizes the problems there and proposes one or more possible solutions in a Proposed Plan. The Proposed Plan contains enough information to allow lay persons to understand the site. More detailed information can be found in the reports and documents approved by DNREC. All of the documents and reports created by DNREC or consultants during the course of the investigation of the site are available to the public at the offices of DNREC-SIRB or at DNREC's website:

<http://www.dnrec.state.de.us/dnrec2000/Divisions/AWM/sirb/sitefiles.asp>.

DNREC issues the Proposed Plan by advertising it in at least one newspaper in the county where the site is located. The legal notices for the Proposed Plans and the Final Plans usually run on Wednesdays or Sundays in the legal classified section of the News Journal and/or the Delaware State News. The public comment period begins on the day (Wednesday), or the day after (Sunday) the newspaper publishes the legal notice for the Proposed Plan.

DNREC frequently holds public meetings during the comment period. Those meetings are usually held near the site in the evening. Citizens can request a public meeting if DNREC did not already schedule one.

Comments are collected at the public meetings, by phone or in writing. DNREC considers all comments and questions from the public before the Proposed Plan is finalized and adopted as a Final Plan.

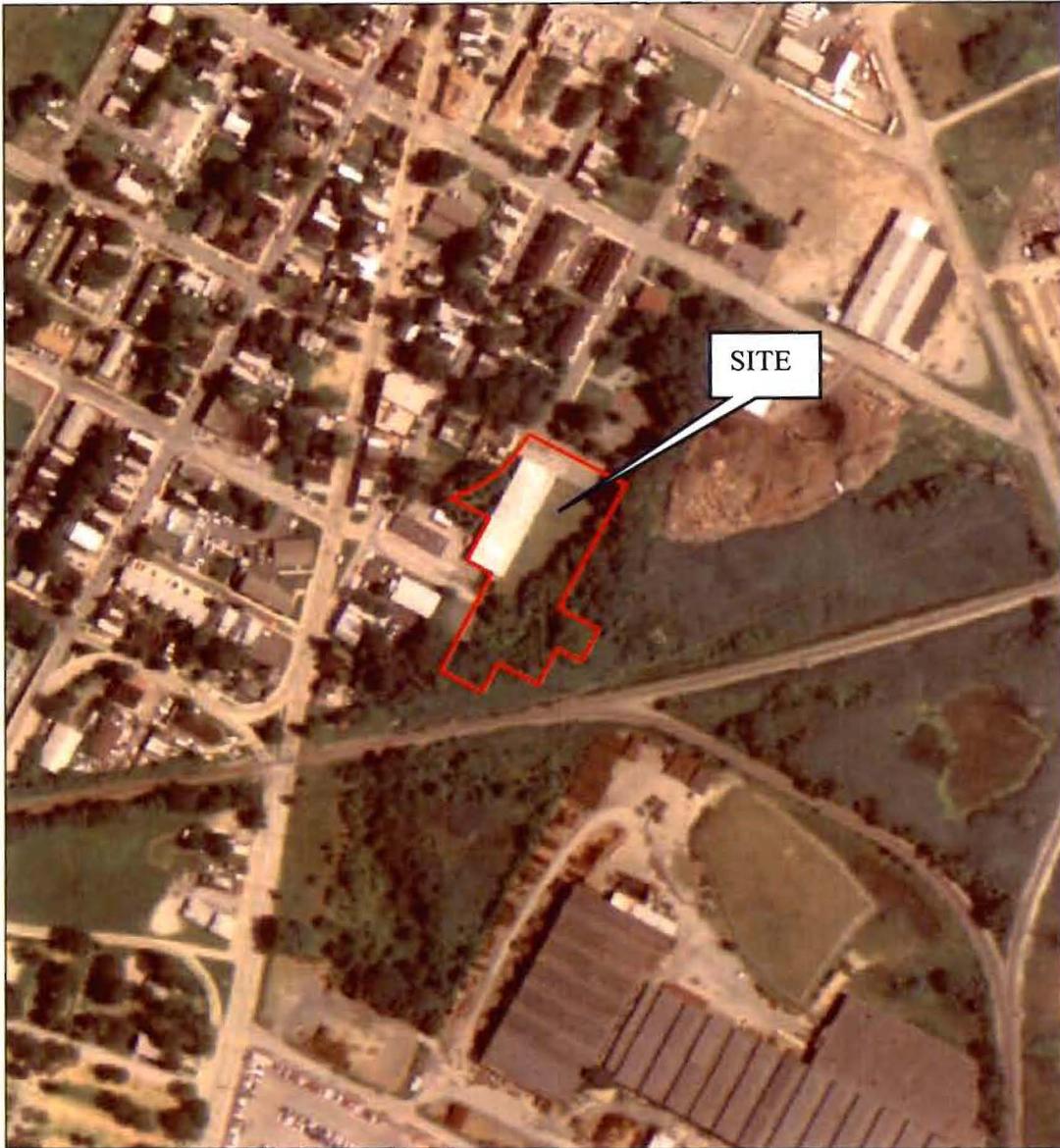
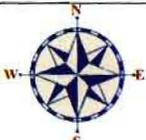


FIGURE 5	2006 SITE AERIAL PHOTOGRAPH
B Street Pack & Process	
DNREC Project ID: DE-1492	
Not to Scale	
	 ENVIRONMENTAL REMEDIATION

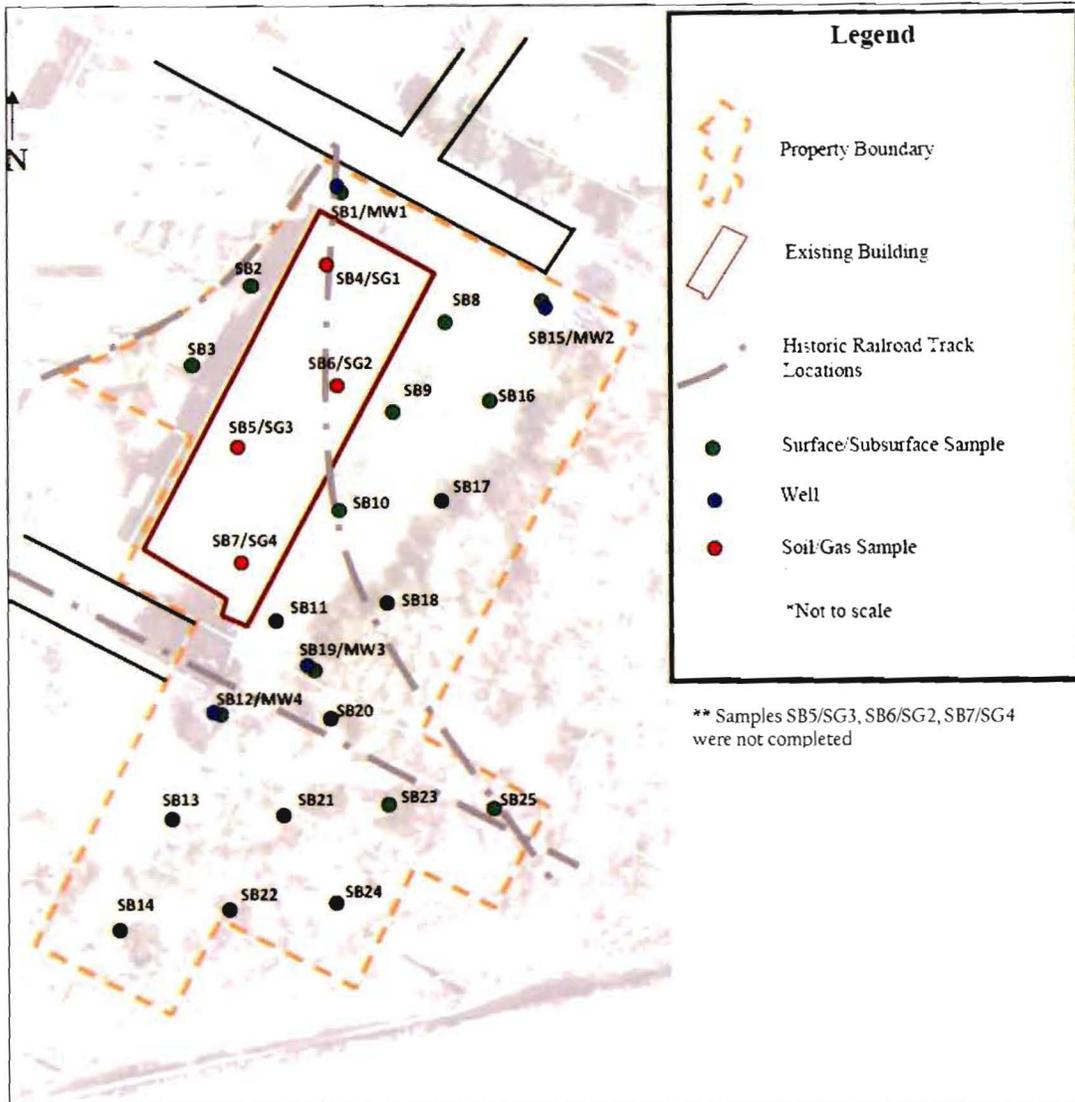


FIGURE 6	SAMPLE LOCATION MAP
B Street Pack & Process	
DNREC Project ID: DE-1492	
Not to Scale	



FIGURE 1	SITE LOCATION MAP
B Street Pack & Process	
DNREC Project ID: DE-1492	
Not to Scale	

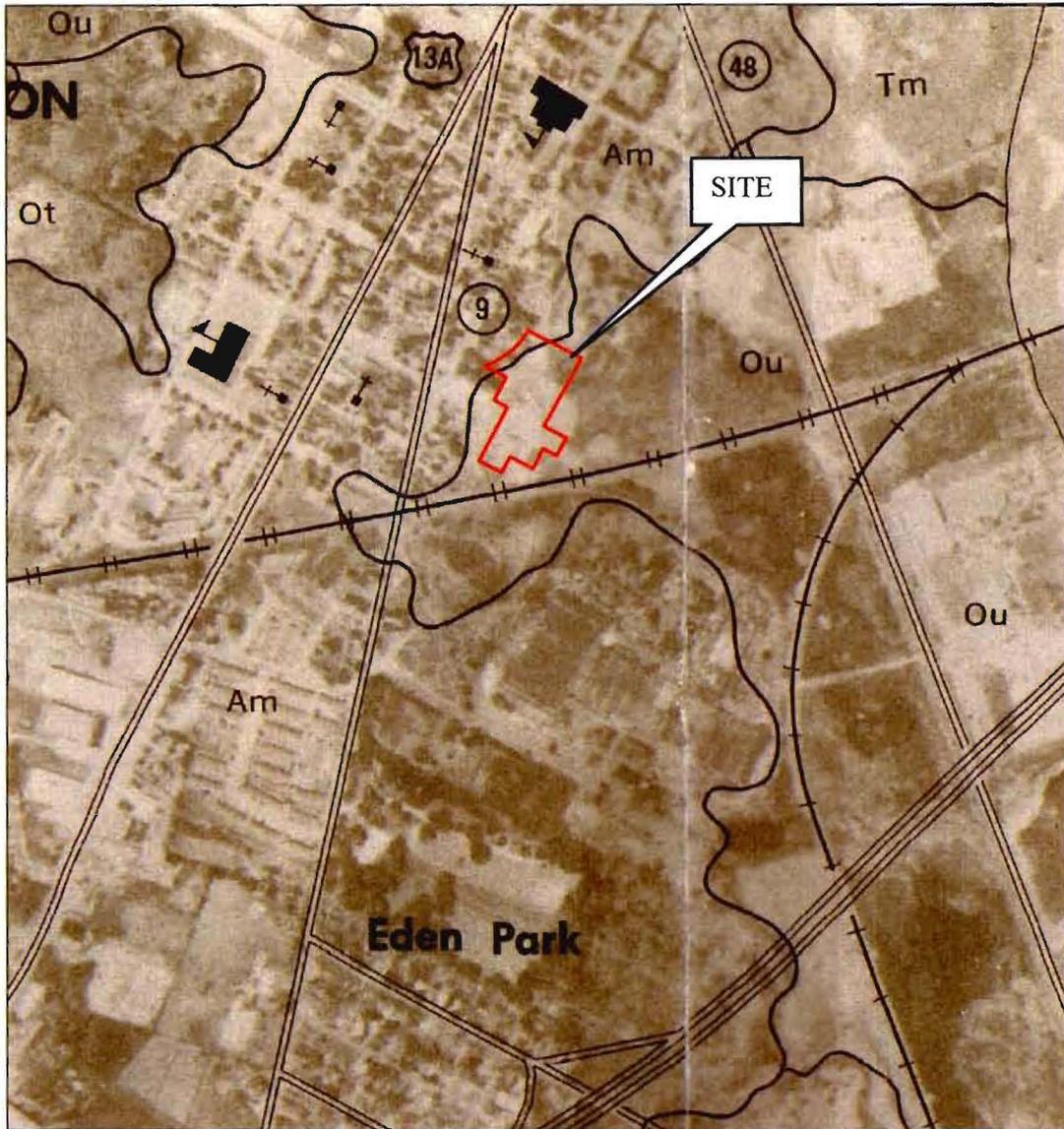


FIGURE 3	SITE SOIL MAP
B Street Pack & Process	
DNREC Project ID: DE-1492	
Not to Scale	

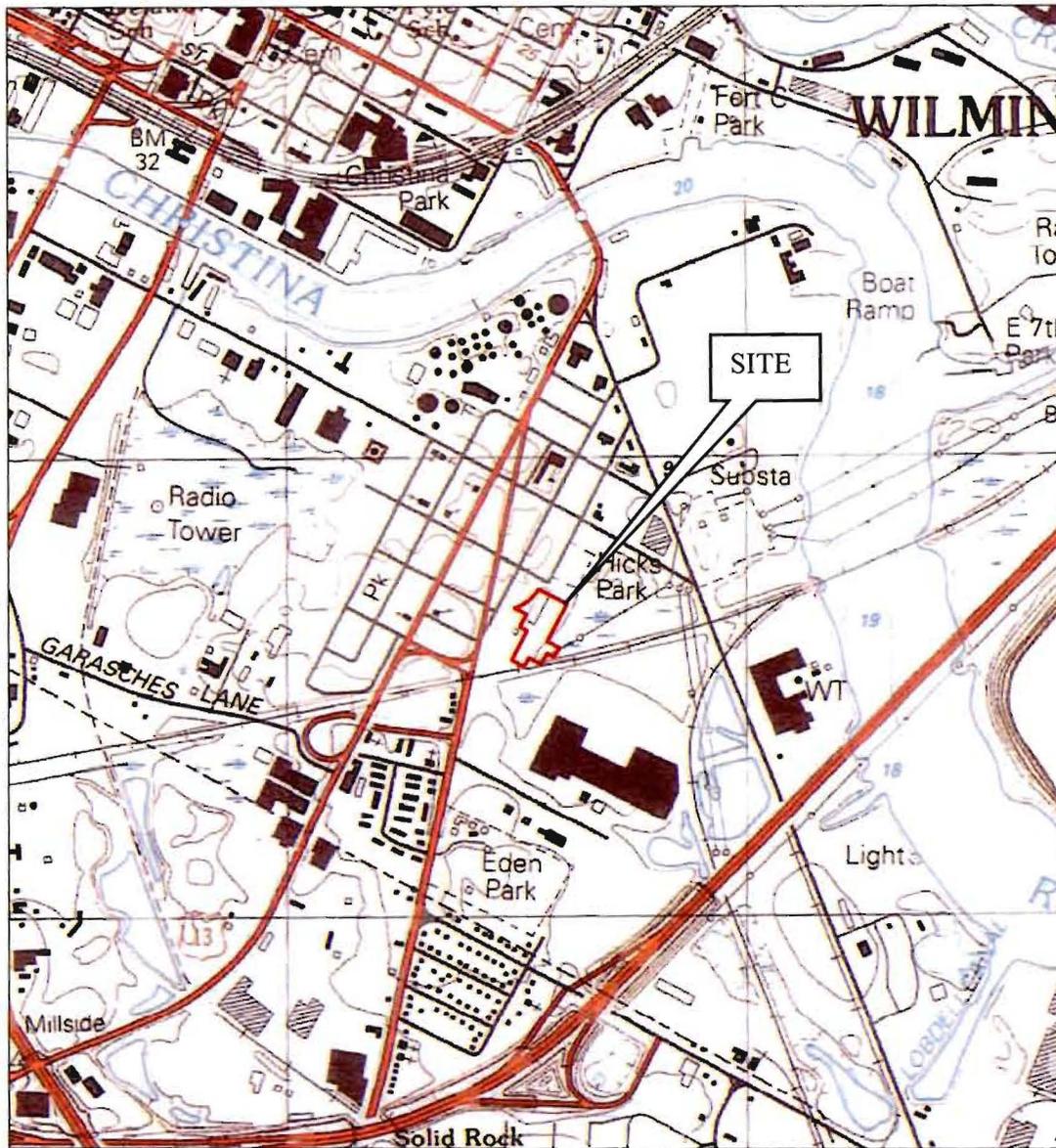


FIGURE 4	TOPOGRAPHIC MAP
B Street Pack & Process	
DNREC Project ID: DE-1492	
Not to Scale	
	<p>JCM ENVIRONMENTAL REMEDICATION</p>