

STATE OF DELAWARE DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL- SITE INVESTIGATION AND RESTORATION BRANCH

PROPOSED PLAN OF REMEDIAL ACTION



320 A Street Site Wilmington, DE

DNREC Project No. DE-1291

This proposed plan of remedial action (proposed plan) presents the Department of Natural Resources and Environmental Control's (DNREC's) preferred cleanup alternative for the remediation at the 320 A Street site (site) in Wilmington. For site-related reports and more information, please see the public participation section of this document.

The purpose of the proposed plan is to provide specific information about the soil contamination and the cleanup alternatives DNREC has considered. In addition, as described in Section 12 of the Delaware Regulations Governing Hazardous Substance Cleanup (Regulations), DNREC will provide notice to the public and an opportunity for the public to comment on the proposed plan. At the comment period's conclusion, DNREC will review and consider all of the comments received and then will issue a final plan of remedial action (final plan). The final plan shall designate the selected remedy, if required, for the site. All investigations of the site, the proposed plan, comments received from the public, DNREC's responses to the comments, and the final plan will constitute the Remedial Decision Record.

This proposed plan summarizes the 1986 Preliminary Assessment/Site Inspection of the Former Krieger Landfill, the 1996 South Wilmington Environmental Assessment, the 2000 Phase II Environmental Site Assessment, the 2003 Facility Evaluation Report, the 2003 Revised Remedial Investigation Report for the Krieger/Finger Property, the 2003 Remedial Investigation/Feasibility Study (RI/FS) Report and the administrative record file upon which this proposed plan is based. Copies of these documents can be obtained or viewed at locations listed at the end of this document.

DNREC's proposed remedy is preliminary and a final decision will not be made until all of the comments received, if any, are considered. The final remedy selected could differ from the proposed remedy based on DNREC's responses to comments received.

INTRODUCTION

The 320 A Street site is a collection of contiguous properties located in the vicinity of the intersection of A Street and South Walnut Street in Wilmington, New Castle County, Delaware (Figure 1-1). The properties occupy approximately 8.9 acres and nine separate tax parcels (Figure 1-2). The site is bounded by A Street to the north, a drainage swale and Walnut Street to the west and commercial properties to the south and east. The Buccini/Pollin Group (BPG) plans to redevelop the parcels to include office building(s), equipment building(s), sidewalks and paved parking lots. In order to accomplish this, BPG has agreed to enter into a Prospective Purchaser Agreement (PPA) with DNREC's Site Investigation and Restoration Branch (SIRB) and to pay for the costs associated with the RI/FS. In addition, BPG has reviewed and summarized prior investigations of the property and performed an additional remedial investigation (RI).

SITE DESCRIPTION AND HISTORY

The site history has been determined based on the review of historical aerial photography and previous documents produced for the area.

A 1937 aerial photograph shows a portion of the site had been cleared by this time, although its exact use is not known. The remaining site area appears to be vegetated. No commercial development can be seen in the area.

A 1961 aerial photograph shows a building located on Parcel 26.050.00.049. Several automobile junkyards can be observed south of the site along Route 13.

Aerial photographs from 1962 through 1977 show disturbance of soils in the area but the building on Parcel 26.050.00.048 was not constructed until after 1977.

ARA Smith's Transfer, a moving company, was located on Parcel 26.050.00.049 in 1986. A City Directory search from 1968 to 1986 showed that there were no tenants prior to ARA Smith's Transfer Company on this parcel. Based on a site visit conducted in 2000, it appeared that the last occupant of this tax parcel was a construction rentals and sales company, WACO Scaffolding and Equipment.

The 1989 aerial photograph shows a building and the southern portion of the site area remains vegetated.

Parcel 26.050.00.048 was owned by M&M Leasing Company and leased to the Grubb Lumber Company. Grubb operated as a storage and transfer facility for construction materials from approximately 1999 to 2003. Site personnel have stated that the previous tenant was a construction company.

INVESTIGATION RESULTS

Based on a review of all the environmental investigations conducted at the site, there were seventy-one (71) sample locations and more than one hundred twenty-five (125) individual samples collected within the site boundaries. The following tables describe which samples had contaminants in soil, groundwater, sediment and surface water that exceeded their respective

DNREC Uniform Risk-Based Standard (URS) values for a restricted use (commercial/industrial) property. These URS values are guidance values above which DNREC evaluates cleanup of the contamination for the given use of the site. The following tables also describe the contaminant, its concentration as well as its respective URS value:

SOIL

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)¹</u>
<u>SB 2-4</u>	Benzo(a)pyrene	2.5	0.8
	Arsenic	24.2	11
<u>SB 3-1</u>	Benzo(a)pyrene	1.1	0.8
<u>SB 7-1</u>	Benzo(a)pyrene	2.3	0.8
	Arsenic	30.6	11
<u>SB 8-4</u>	Benzo(a)pyrene	3.8	0.8
	Arsenic	16	11
<u>SB 10-1</u>	Benzo(a)pyrene	1.6 J	0.8
	Manganese	5110	4100
<u>SB 10-4</u>	Benzo(a)pyrene	5.0	0.8
	Dibenz(a,h)anthracene	1.0	0.8
	Arsenic	87	11
<u>SB 11-4</u>	Arsenic	17.9	11
<u>SB 14-4</u>	Benzo(a)pyrene	1.3	0.8
	Arsenic	12.2	11
<u>SB 15-8</u>	Benzo(a)pyrene	1.6	0.8
	Arsenic	70.1	11
<u>SB 17-1</u>	Benzo(a)pyrene	2.0	0.8
	Arsenic	14.6	11
	Lead	1030	1000
<u>SB 21-4</u>	Benzo(a)pyrene	23	0.8
	Benzo(b)fluoranthene	25	8
	Benzo(a)anthracene	26	8
	Indeno(1,2,3-cd)pyrene	15	8
	Dibenz(a,h)anthracene	4.4	0.8
<u>SB 22-4</u>	Benzo(a)pyrene	1.7	0.8
	Arsenic	54.8	11
<u>SB 23-1</u>	Benzo(a)pyrene	1.7	0.8
	Arsenic	24	11
<u>1306</u>	Aroclor 1254	3.4 D	3
	Aroclor 1260	23 D	3
<u>1308 (4-6)</u>	Benzo(a)pyrene	1.5 JD	0.8
<u>1349 (6-8)</u>	Arsenic	13.2	11
	Lead	1980	1,000

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)¹</u>
<u>1351 (10-12)</u>	Benzo(a)pyrene	3.2 JD	0.8
	Arsenic	16.8	11
	Lead	1,880	1,000
<u>1362 (0-2)</u>	Aroclor 1254	6.8 DP	3
<u>1365 (0-2)</u>	Benzo(a)pyrene	1.5 JD	0.8
	Arsenic	38.2	11
<u>1365 (2-4)</u>	Benzo(a)pyrene	2.7 JD	0.8
	Cadmium	152	100
	Lead	1,580	1,000
	Aroclor 1260	3.2 D	3
<u>1420 (2-4)*</u>	Benzo(a)pyrene	3.8 D	0.8
	Arsenic	15.5	11
	Lead	1,310	1,000
	Aroclor 1260	3.2 D	3
<u>1367 (0-2)</u>	Aroclor 1260	3.4 D	3
<u>1401 (0-2)**</u>	Aroclor 1260	3.5 D	3
<u>Soil Pile #1</u>	Arsenic	43.7	11
	Cadmium	150	100
	Copper	20,400	8,200
	Iron	78,600	61,000
	Lead	19,300	1,000
	Aroclor 1248	5.2 DP	3
	Aroclor 1254	19 D	3
	Aroclor 1260	4.0 DP	3

¹ = Uniform Risk-Based Remediation Standard Value for Protection of Human Health.

* = Field Duplicate of 1365 (2-4).

** = Field Duplicate of 1367 (0-2) DL.

J= Concentration is an estimated value.

D= Sample was diluted during laboratory analysis.

JD= Sample was diluted during laboratory analysis and the detected concentration is an estimate.

P= Greater than 25% difference for detected concentrations between the two Gas Chromatography columns.

GROUNDWATER

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (ug/L)</u>	<u>URS (ug/L)¹</u>
<u>GW-18</u>	Bis (2-Ethylhexyl) phthalate	76	6
	Iron	28,500	300
	Manganese	1410	50
<u>GW-19</u>	Aluminum	919 L	200

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (ug/L)</u>	<u>URS (ug/L)¹</u>
	Iron	11,900	300
	Manganese	181	50
<u>GW-21</u>	Benzo(a)pyrene	2 J	0.2
	Benzo(b)fluoranthene	2 J	0.09
	Benzo(a)anthracene	2 J	0.09
	Indeno(1,2,3-cd)pyrene	1 J	0.09
	Iron	1220	300
	Manganese	610	50
<u>GW-22</u>	3- Methylphenol/ 4- Methylphenol	890	180/18 ^a
	Iron	8300	300
	Manganese	991	50
<u>GW-23</u>	Bis (2-Ethylhexyl) phthalate	8 J	6
	Iron	1340	300
	Manganese	1070	50
<u>MW-3</u>	Aluminum	252	200
	Iron	1,760	300
	Manganese	412	50
	Dieldrin	0.32 J	0.004

¹ = Uniform Risk-Based Remediation Standard Value for Protection of Human Health.

*= Sample was part of the investigation but was not located within the property boundaries.

J= Concentration was detected below the method detection limit and is, therefore, an estimated value.

L= Analyte present. Reported value may be biased low. Actual value is expected to be higher.

^a= Lab was uncertain which chemical was detected therefore both URS values are indicated.

SEDIMENT

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)²</u>
<u>SD-24</u>	Chromium III	105 K	81
	Copper	95.1	34
	Nickel	35.9	21
	Barium	326	20
	Mercury	0.47 K	0.2
	Cadmium	1.46 J	1
	Antimony	2.47 J	2
	Lead	162	47
	Zinc	664	150

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)²</u>
	Arsenic	39.2	8
	Benzo(a)anthracene	0.48 J	0.1
	Acenaphthylene	0.11 J	0.09
	Benzo(a)pyrene	0.5 J	0.1
<u>SD-25</u>	Chromium III	113 K	81
	Copper	112	34
	Nickel	29.2	21
	Mercury	0.77 K	0.2
	Cadmium	3.35 J	1
	Zinc	1,000	150
	Arsenic	42.6	8
	Barium	253	20
	Antimony	2.93 J	2
	Lead	307	47
	Fluoranthene	1.8	0.8
	Benzo(a)anthracene	1	0.1
	Chrysene	1.5	0.9
	Phenol	0.2 J	0.03
	Acenaphthylene	0.26 J	0.09
	Acenaphthene	0.17 J	0.09
	Fluorene	0.14 J	0.1
	Phenanthrene	0.75 J	0.5
	Anthracene	0.41 J	0.3
	Benzo(a)pyrene	1.1	0.1
	P,P DDE	0.085 J	0.03
<u>SD-26</u>	Chromium III	95.1 K	81
	Copper	150	34
	Nickel	42.9	21
	Mercury	1.18 K	0.2
	Cadmium	4.74 J	1
	Zinc	900	150
	Arsenic	81.5	8
	Barium	249	20
	Antimony	4.43 J	2
	Lead	278	47
	Fluoranthene	3.2	0.8
	Benzo(a)anthracene	1.7	0.1
	Chrysene	2.4	0.9
	Phenol	0.17 J	0.03
	Acenaphthylene	0.19 J	0.09
	Acenaphthene	0.38 J	0.09

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)²</u>
	Fluorene	0.25 J	0.1
	Phenanthrene	1.7	0.5
	Anthracene	0.55 J	0.3
	Benzo(a)pyrene	2	0.1
	P,P DDE	0.078 J	0.03
	Indeno(1,2,3-cd)pyrene	1.1 J	0.8
	Bis (2-Ethylhexyl)phthalate	6.5	3
<u>SED 1</u>	Benzo(a)pyrene	0.94 JD	0.1
	Benzo(a)anthracene	0.89 JD	0.1
	Chrysene	1.0 JD	0.9
	Fluoranthene	1.4 JD	0.8
	Phenanthrene	0.73 JD	0.5
	4,4'-DDE	0.12 P	0.03
	Endosulfan I	0.028 P	0.005
	Endosulfan II	0.065 P	0.005
	Antimony	5.0 JN	2
	Arsenic	43.7	8
	Barium	441	20
	Cadmium	12.7	1
	Chromium	117	81
	Copper	131	34
	Lead	309	47
	Mercury	1.2	0.2
	Nickel	29.3	21
	Zinc	1,120	150
<u>SED 2</u>	Aroclor 1248	1.7 P	1.0
	Anthracene	0.37 JD	0.3
	Benzo(a)pyrene	1.6 JD	0.1
	Benzo(a)anthracene	1.5 JD	0.1
	Chrysene	1.7 JD	0.9
	Fluoranthene	2.4 JD	0.8
	Indeno(1,2,3-cd)pyrene	1.0 JD	0.8
	Phenanthrene	1.2 JD	0.5
	4,4'-DDE	0.13	0.03
	4,4'-DDT	0.055 P	0.002
	Endosulfan II	0.085 P	0.005
	Endrin	0.062 P	0.02
	Antimony	5.5 JN	2
	Arsenic	60.6	8

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)²</u>
	Barium	458	20
	Cadmium	6.3	1
	Chromium	142	81
	Copper	170	34
	Lead	361	47
	Mercury	108	0.2
	Nickel	34.6	21
	Zinc	1,400	150
<u>SED 3</u>	Benzo(a)pyrene	1.0 JD	0.1
	Benzo(a)anthracene	0.94 JD	0.1
	Chrysene	1.1 JD	0.9
	Fluoranthene	1.6 JD	0.8
	Phenanthrene	0.9 JD	0.5
	4,4' -DDE	0.06 PJ	0.03
	Endosulfan I	0.03 PJ	0.005
	Antimony	3.7 JN	2
	Arsenic	30.2	8
	Barium	352	20
	Cadmium	4.8	1
	Chromium	101	81
	Copper	167	34
	Lead	257	47
	Mercury	1.8	0.2
	Nickel	33.6	21
	Zinc	905	150
<u>SED 4</u>	Benzo(a)pyrene	0.92 JD	0.1
	Benzo(a)anthracene	0.74 JD	0.1
	Chrysene	0.91 JD	0.9
	Fluoranthene	0.85 JD	0.8
	Phenanthrene	0.68 JD	0.5
	4,4' -DDE	0.046 PJ	0.03
	Endosulfan I	0.023 PJ	0.005
	Antimony	3.4 JN	2
	Arsenic	45.7	8
	Barium	235	20
	Cadmium	2.0	1
	Chromium	237	81
	Copper	47.5	34
	Lead	142	47
	Mercury	0.54	0.2
	Nickel	24.8	21
	Zinc	749	150

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (mg/kg)</u>	<u>URS (mg/kg)²</u>
<u>SED 9*</u>	Benzo(a)pyrene	0.65 JD	0.1
	Benzo(a)anthracene	0.59 JD	0.1
	Phenanthrene	0.55 JD	0.5
	4,4'-DDD	0.04	0.008
	Antimony	2.7 JN	2
	Arsenic	66.3	8
	Barium	243	20
	Cadmium	1.9	1
	Chromium	170	81
	Copper	50.8	34
	Lead	120	47
	Mercury	0.46	0.2
	Zinc	602	150
	<u>SED 5</u>	Methylene Chloride	0.7 J
Benzo(a)pyrene		0.98 JD	0.1
Benzo(a)anthracene		0.81 JD	0.1
Chrysene		1.0 JD	0.9
Fluoranthene		0.9 JD	0.8
Phenanthrene		0.57 JD	0.5
Antimony		3.9 JN	2
Arsenic		87.5	8
Barium		395	20
Cadmium		5.2	1
Chromium		258	81
Copper		111	34
Lead		262	47
Mercury		1.1	0.2
Nickel		40.5	21
Zinc	1270	150	

²= Uniform Risk-Based Remediation Standard Value for Protection of the Environment.

*= Field Duplicate of SED 4.

J= Concentration was detected below the method detection limit and is, therefore, an estimated value.

K= Analyte present. Reported value may be biased high. Actual value is expected to be lower.

D= Sample was diluted during laboratory analysis.

P= Greater than 25% difference for detected concentrations between the two Gas Chromotography columns.

N= Spiked sample recovery not within control limits.

SURFACE WATER

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (ug/L)</u>	<u>URS (ug/L)²</u>
<u>SW 24</u>	Barium	291	4
	Iron	2,190	1,000
	Manganese	478	80
<u>SW DUP*</u>	Gamma Chlordane	0.0074 J	0.004

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (ug/L)</u>	<u>URS (ug/L)²</u>
	Barium	294	4
	Iron	2,010	1,000
	Manganese	463	80
<u>SW 25</u>	Barium	233	4
	Iron	1,950	1,000
	Manganese	302	80
<u>SW 26</u>	Aluminum	126 B	87
	Arsenic	15 L	3
	Barium	225	4
	Iron	3,060	1,000
	Manganese	295	80
<u>SW-1</u>	Bis (2-Ethylhexyl)phthalate	1 JB	0.1
	Aluminum	708 J	87
	Barium	85.0 J	4
	Copper	35.1 J	12
	Iron	1,560	1,000
	Lead	19.1	3
	Manganese	107 J	80
	Zinc	120	110
<u>SW-2</u>	Bis (2-Ethylhexyl)phthalate	0.9 JB	0.1
	Aluminum	1,280 J	87
	Barium	113 J	4
	Copper	42.4 J	12
	Iron	5,500	1,000
	Lead	33.4	3
	Manganese	192 J	80
	Zinc	170	110
<u>SW-3</u>	Bis(2-Ethylhexyl)phthalate	1 JB	0.1
	Aluminum	618 J	87
	Barium	106 J	4
	Copper	35.2 J	12
	Iron	2,110	1,000
	Lead	19.9	3
	Manganese	157 J	80
	Zinc	133	110
<u>SW-4</u>	Bis(2-Ethylhexyl)phthalate	0.8 JB	0.1
	Aluminum	782 J	87
	Barium	107 J	4
	Copper	32.8 J	12
	Iron	2,060	1,000

<u>Sample Location</u>	<u>Contaminant</u>	<u>Concentration (ug/L)</u>	<u>URS (ug/L)²</u>
	Lead	18.5	3
	Manganese	151 J	80
	Zinc	117	110
<u>SW-9**</u>	Bis(2-Ethylhexyl)phthalate	0.9 JB	0.1
	Aluminum	695 J	87
	Barium	99.0 J	4
	Copper	34.8 J	12
	Iron	1,960	1,000
	Lead	17.6	3
	Manganese	144 J	80
<u>SW-5</u>	Bis(2-Ethylhexyl)phthalate	0.8 JB	0.1
	Aluminum	663 J	87
	Barium	91.5 J	4
	Copper	32.4 J	12
	Iron	1,710	1,000
	Lead	16.2	3
	Manganese	138 J	80

²= Uniform Risk-Based Remediation Standard Value for Protection of the Environment.

*= Field Duplicate of Sample SW-24.

**= Field Duplicate of Sample SW-4.

J= Concentration was detected below the method detection limit and is, therefore, an estimated value.

B= Reported value is less than the project-specified Reporting Limit (RL), but greater than the method-specified Instrument Detection Limit (IDL) or Method Detection Limit (MDL).

L= Analyte present. Reported value may be biased low. Actual value is expected to be higher.

The contaminants of concern in soil at the 320 A Street site include metals and polycyclic aromatic hydrocarbons (PAHs). These concentrations exceed the URS values for restricted use. Based on the future use of the site as an industrial/commercial property, a risk assessment was conducted in order to determine the cancer and non-cancer risks associated with exposure to site soils for a construction worker (incidental ingestion and dermal contact) and an indoor commercial worker (incidental ingestion). Based on the risk assessment, non-cancer and cancer risks to the construction worker from the incidental ingestion of soil and/or from dermal contact with the soil are within acceptable limits. Non-cancer and cancer risks to indoor commercial workers from the incidental ingestion of soil are also within acceptable limits.

Groundwater at the site contains several contaminants of concern which include metals and semi-volatile organic compounds (SVOCs) that exceed groundwater URS values. Groundwater at the site is not utilized as a drinking water source. Within the City of Wilmington, the use of groundwater for drinking water purposes is prohibited through a Groundwater Management Zone (GMZ) Memorandum of Agreement (MOA) between DNREC-SIRB, DNREC's Division of Water Resources (DNREC-DWR) and the City of Wilmington. This will restrict potential human exposure to contaminated groundwater via consumption. With respect to the Christina River, mass loading calculations of the contaminants present in groundwater migrating into the Christina River did not result in any exceedances of surface water quality standards.

Sediments located within a drainage swale on the western boundary of the property contain several contaminants of concern including metals, SVOCs and pesticides. A fence exists between the proposed construction site and the drainage swale. The fence combined with dense vegetation along the banks of the swale significantly limits potential access to the swale. Consequently, there is no potential exposure of indoor commercial workers to sediment. Although minimal, there is the potential for a human trespasser to be exposed to sediments if they were to enter the drainage swale from the property located to the west of the swale. Based on conservative assumptions about the age of the trespasser, exposure frequency, exposure duration, exposure routes (i.e. dermal contact and incidental ingestion), skin contact surface area and ingestion rate, a risk assessment concluded that both cancer and non-cancer risks to adolescent trespassers exposed to sediments at the site are within acceptable limits.

Contaminants of concern in surface water include metals and pesticides. The contaminants detected strongly adhere to soil and could only be transported to the Christina River by being carried on soil particles. Due to the fact that once construction is complete approximately nine-tenths of the site will be covered by either a building or pavement, soil will not be available to carry contaminants off-site and into the Christina River. The fence that exists between the swale and the construction site combined with dense vegetation along the banks of the swale eliminates the potential exposure of indoor commercial workers to surface water. Despite deterrents such as a fence and dense vegetation, there is still a minimal chance that a human trespasser could be exposed to surface water if they were to enter the swale from the property located to the west of the swale. As mentioned earlier, based on conservative assumptions about the age of the trespasser, exposure frequency, exposure duration, exposure routes (i.e. dermal contact and incidental ingestion), skin contact surface area and ingestion rate, a risk assessment concluded that both cancer and non-cancer risks to adolescent trespassers exposed to surface water at the site are within acceptable limits.

REMEDIAL ACTION OBJECTIVES

The following qualitative objectives have been determined to be appropriate for the site:

- Prevent future use of the site as an unrestricted (i.e. residential) land use setting;
- Prevent future use of groundwater at the site for any purpose.

These objectives are consistent with the current and proposed future use of the site as a commercial/industrial property in an urban setting, City of Wilmington zoning policies, state regulations governing water supply and worker health and safety.

Based on the qualitative objective, the quantitative objective is:

- A human health risk assessment was conducted, in accordance with the Regulations, based on the future use of the site as a commercial/industrial property. The risk assessment concluded that human exposure to site soil, sediment and surface water does not exceed a carcinogenic risk of 1×10^{-5} or a hazard index of 1.0 and the risk, therefore, is acceptable. In accordance with the risk assessment, the qualitative objective has been satisfied.

A feasibility study was not conducted for the site due to the fact that the human health risk posed by potential exposure to site soil, sediment and surface water was found to be within acceptable limits.

PROPOSED PLAN OF REMEDIAL ACTION

Based on DNREC's evaluation of the site information, which includes current and past environmental investigations, historical information and the above remedial action objectives, the following remedy, as described below, be implemented at the site:

1. Implementation of a deed restriction within ninety (90) days following DNREC's adoption of the final plan that: 1) prohibits current and future residential use of the property; 2) prohibits the installation of any water well on, or use of groundwater at, the site without the prior written approval of DNREC and notes the incorporation of the site into the City of Wilmington GMZ.

The GMZ is an internal DNREC document that restricts groundwater withdrawals at the site. DNREC-SIRB and DNREC-DWR will include the site in the GMZ for the City of Wilmington no later than six (6) weeks following DNREC's adoption of the final plan.

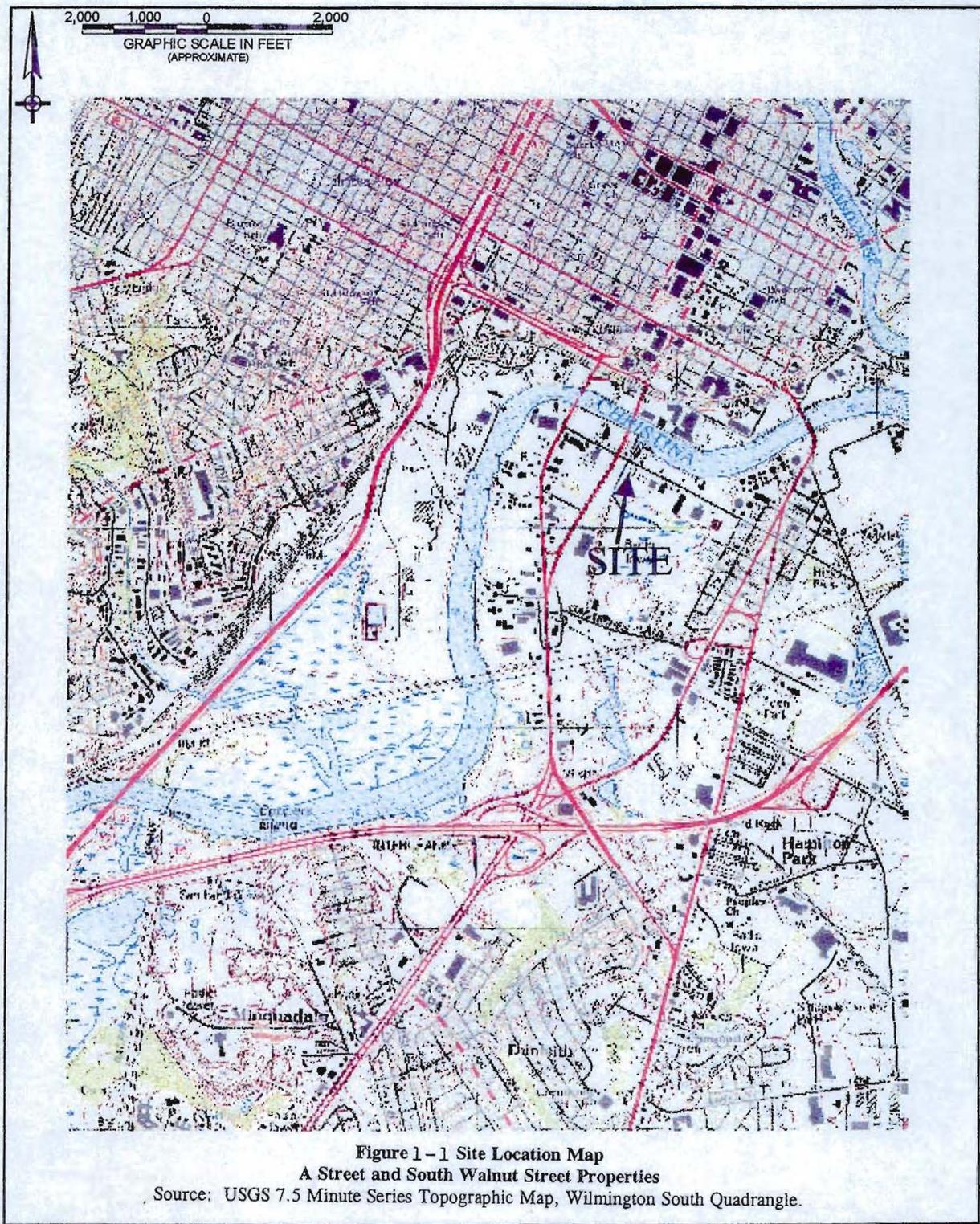
PUBLIC PARTICIPATION
The Department is actively soliciting written public comments and suggestions on the proposed plan of remedial action. The comment period begins February 16, 2004, and ends at the close of business (4:30 p.m.) March 8, 2004.
If you have any questions or concerns regarding the 320 A Street site, or if you would like to view reports or other information regarding this site, please contact the project manager, Rebecca Hawkins, 391 Lukens Drive, New Castle, Delaware 19720 or at 302.395.2600.

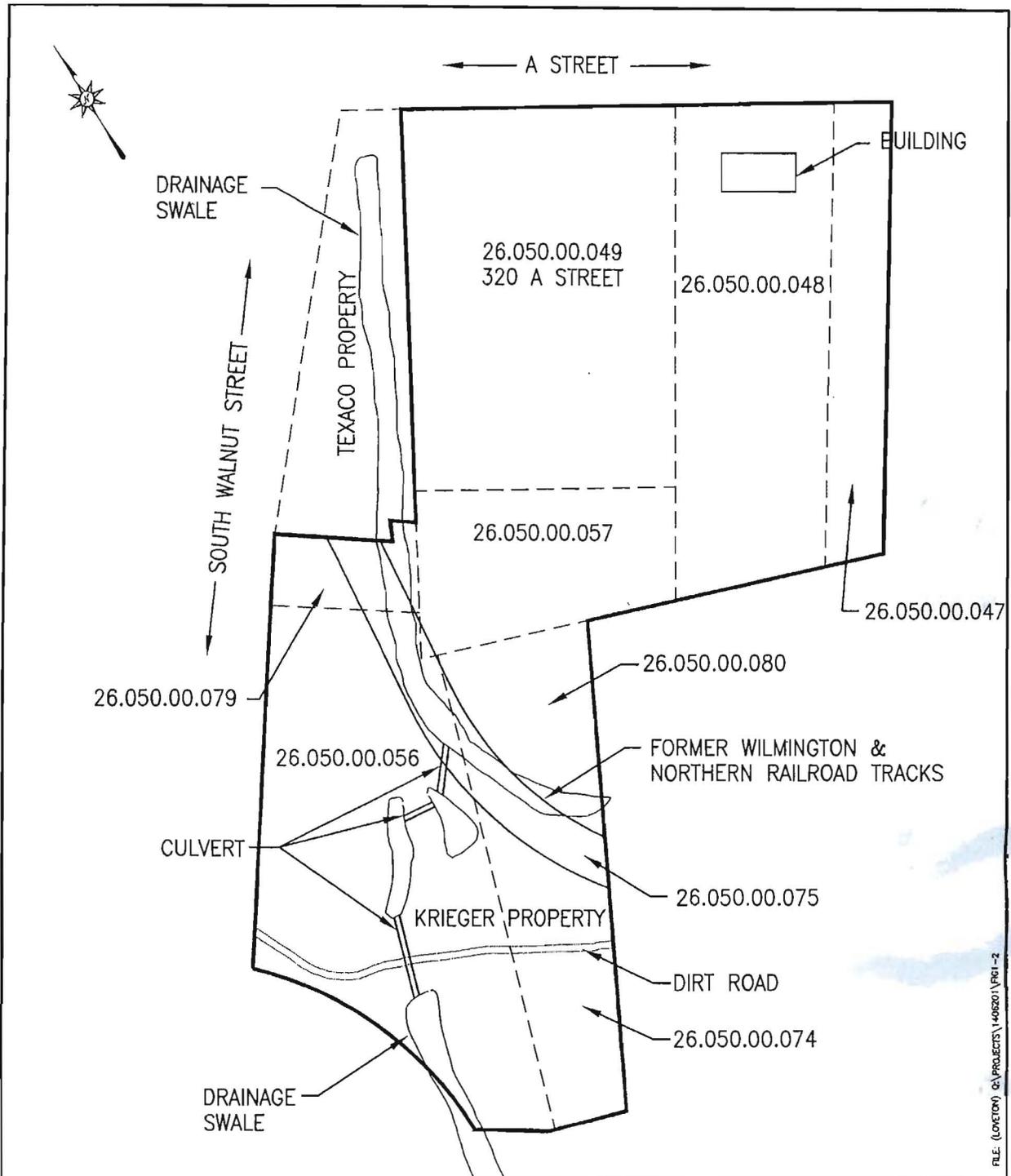


John Blevins
Director, Division of Air and Waste

2.9.04

Date of Review





FILE: (LOVETON) G:\PROJECTS\1406201\FIG1-2

EA ENGINEERING, SCIENCE, AND TECHNOLOGY		A STREET AND SOUTH WALNUT STREET PROPERTIES PROJECT LOCATION			SITE SKETCH			
PROJECT MGR KS	DESIGNED BY KKW	DRAWN BY FDV	CHECKED BY KKW	SCALE NOT TO SCALE	DATE 3-14-03	PROJECT NO 14062.01	FIGURE 1-2	