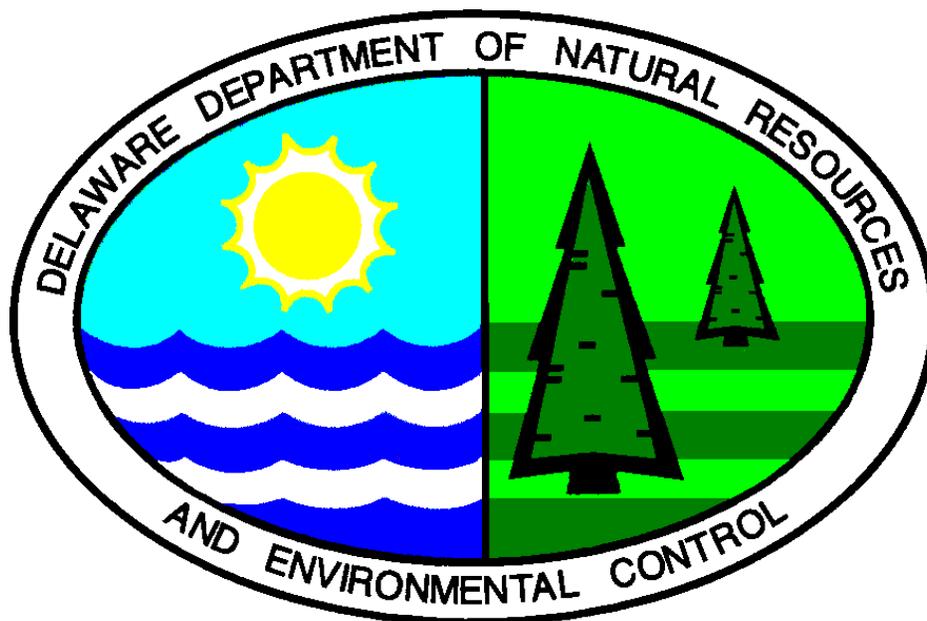


PROPOSED PLAN OF REMEDIAL ACTION

FORMER BELLANCA HANGAR SITE

New Castle, DE

DE 1061



June 2001

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

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I. INTRODUCTION

The Former Bellanca Hangar Site (the “Site”) is located southeast of the intersection of New Castle-Frenchtown Road (Rt. 273) and Centrepoint Boulevard in New Castle, Delaware (See Figure 1). The Site is approximately one acre in size, and is currently open land. The Site is part of a larger 28 acre Site (“Property”) that has been investigated by the Department of Natural Resources and Environmental Control, Site Investigation and Restoration Branch (“DNREC-SIRB”). The Site and the Property are owned by the Trustees of New Castle Common (“Trustees”)

DNREC-SIRB entered into a Voluntary Cleanup Program (“VCP”) Agreement with the Trustees under 7 Del. C. Chapter 91, the Delaware Hazardous Substance Cleanup Act (“HSCA”). Through this Agreement, the Trustees agreed to investigate the potential risks posed to the public health, welfare, and the environment from potential contaminants at the Site. WIK Associates, Inc. (“WIK”) conducted a series of Interim Actions (“IA”) and a Remedial Investigation (“RI”), which are described below. Upon completion of all required tasks, the Trustees expressed their desire to obtain a Certificate of Completion of Remedy from DNREC.

This document is DNREC-SIRB’s Proposed Plan of Remedial Action (“Proposed Plan”) for the Site. It is based on the results of the RI and IA activities conducted at the Site under the provisions of the HSCA and the Regulations Governing Hazardous Substance Cleanup (the “Regulations”). This Proposed Plan presents DNREC-SIRB’s assessment of the potential health and environmental risk posed by the Site.

As described in Section 12 of the Regulations, DNREC-SIRB 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-SIRB will review and consider all of the comments received and the DNREC-SIRB will issue a Final Plan of Remedial Action (“Final Plan”). The Final Plan will designate the selected remedy for the Site. The Proposed Plan, the comments received from the public, DNREC-SIRB’s responses to those comments and the Final Plan will constitute the Remedial Decision Record.

Section II presents a summary of the Site Description and Site History. Section III discusses the Interim Remedial Action conducted at the Site. Section IV provides a description of the Investigation Results. Section V discusses the Proposed Plan of Remedial Action. Section VI discusses Public Participation requirements.

II. SITE DESCRIPTION AND HISTORY

Site Setting

The Former Bellanca Hangar Site is approximately one acre in size, and is bounded generally by Centrepoint Boulevard to the west, Regnier’s Refrigerated Express (leased from the Trustees) to the north, vacant land to the east, and Centrepoint Business Park to the south. The Site is adjacent to the Property, and both are shown on Figure 1.

During the RI, the Property was also investigated. The whole area investigated under the RI (the Site and the Property) is approximately 28 acres and is bounded generally by Centrepoint

Boulevard to the west, Regnier's Refrigerated Express (leased from the Trustees) to the north, Bellanca Lane to the east, Centrepoint Business Park to the southwest and 14th Street to the southeast. Baseball fields occupy the north central portion of the Property and the southern portion is heavily wooded. The remainder of the Property is currently vacant.

Site History

Based on the review of aerial photographs of the Former Bellanca Hangar Site, it appears that development began after 1937. By 1954, the Site was part of a small airport. The Site was maintained as a part of the airport until some time in the 1960s. By 1977, the airport appeared to be no longer in use. The building north of the Site on Frenchtown Road appeared to be used for non-aviation commercial purposes. By 1988/1989, the Site was vacant.

The Site was utilized by Weaver Pole Line Inc. from the early 1970's to approximately 1986 for a variety of industrial activities including the recycling of a type of plastic, (atactic polypropylene). It was also utilized as a drum recycling facility.

In June 1995, a plumbing contractor discovered several buried drums on the Site during the installation of a sewer line. The drums were removed and properly disposed. In May 1996, WIK conducted a magnetometer survey and detected areas of magnetic anomalies. WIK excavated the anomalous areas and uncovered additional drums. Based on the May 1996 finding of additional buried drums, the Trustees entered into a VCP Agreement with the DNREC-SIRB in June 1996. Under the VCP Agreement, the Trustees agreed to investigate the potential presence of buried drums on the Site and the properties.

III. INTERIM REMEDIAL ACTION

Between 1995 and 1999, a total of approximately 36 non-hazardous waste drums, 9 hazardous drums, 4 tons of crushed drums, 1,099 tons of miscellaneous solid waste, 2 Freon canisters, 1 section of transite pipe, and 1 compressed gas cylinder were excavated from the Site and properly disposed. Specific details regarding the work performed during previous investigations at the Site can be found in the Drum Removal Interim Action Report (WIK, August 1997) and the Supplemental Drum Removal Interim Action Report For 1998-1999 Site Activities (WIK, September 2000).

IV. INVESTIGATION RESULTS

In February 2000, WIK prepared a Remedial Investigation Work Plan for the characterization of approximately 28 acres of Trustees' property including the Site and Property. The on-Site activities were performed between May and November 2000.

The purposes of the RI were to: 1) assess and characterize the groundwater, if encountered, within the drum removal and soil contaminated areas, 2) evaluate and characterize whether any more waste materials were buried on the remainder of the property, 3) evaluate risks to public health, welfare, and the environment associated with identified contaminants, and 3) assess, based upon analytical testing, whether further remedial action is required.

A geophysical survey of the Site and Property, using electromagnetic terrain conductivity ("EM") and ground penetrating radar ("GPR") technology, was performed to identify buried materials. The survey was used to identify disturbed soil and buried objects/debris such as

drums, tanks, solid waste, water heaters, metal strapping, wood and wire, all of which have been found buried at the Former Bellanca Hangar Site in the past.

Areas of subsurface anomalies identified in the southwestern portion of the Property were marked for subsequent excavation. No anomalies were detected in the wooded areas or on the Property. The remainder of the investigation was focused on the southwest portion of the Property.

Five Geoprobe borings were advanced in the southwestern corner of the Site where drums and solid waste had been previously removed, to document current groundwater conditions. The borings were completed down to seven to 19 feet below the deepest former waste, with no sign of continuous saturated conditions. The confining layer was reached in all geoprobes borings. A comparison of the soil boring data with the published literature confirms that there is no groundwater within 35 feet of ground surface on the western portion of the Site.

Exploratory excavation was conducted based on the geophysical anomalies detected, suspect areas noted during fieldwork, and reported burial areas. Thirty trenches were excavated across the Property to evaluate subsurface conditions.

When buried waste was found, the materials, their extent, and the surrounding soil conditions were described. Buried waste was removed and staged for disposal. Representative soil samples plus Quality Assurance/Quality Control (“QA/QC”) samples were collected at the base of the excavation to document soil conditions.

In excavations where no buried waste was found, the soil profile was described to document soil conditions. Representative soil samples, plus QA/QC samples, were collected to provide analytical baseline information.

All samples were screened by analyzing for Volatile Organic Compounds (“VOCs”), Semivolatile Organic Compounds (“SVOCs”), Pesticides/ Polychlorinated Biphenyls (“PCBs”), and metals using DNREC-SIRB’s New Castle Laboratory. DNREC-SIRB’s Chemist provided the analytical results, interpretation, and further sampling recommendations to WIK based on the screening results. Sample results were below the DNREC-SIRB Uniform Risk Base Standards (“URS”) for unrestricted use.

Based on a review of the DNREC-SIRB screening sample results and on aerial coverage of the overall anomalous area, representative soil samples were collected and analyzed according to HSCA protocols at STL Edison, a HSCA-approved laboratory located in Edison, New Jersey. These samples were analyzed for VOCs, SVOCs, pesticides, PCBs, metals and cyanide. Sample results were below the DNREC-SIRB Uniform Risk Base Standards (“URS”) for unrestricted use.

During the RI, approximately seven tons of scrap metal, 123 tons of atactic polypropylene polymer, 485 tons of non-hazardous soil and 520 tons of solid waste were excavated and properly disposed off-site. A total of over 2,200 tons of waste material has been removed from the Site and disposed since the time drums were initially discovered during the sewer line installation in 1995.

Based on extensive excavation and laboratory sample analysis, there do not appear to be any contaminants of concern remaining on the Former Bellanca Hangar Site above the URS for unrestricted use. Therefore, there is no risk to human health or the environment at the Site.

The Remedial Investigation activities are detailed in the Remedial Investigation Report for the Former Bellanca Hangar Site prepared by WIK Associates, Inc. in March 2001 and revised in May 2001.

V. REMEDIAL ACTION OBJECTIVES

According to Section 8.4 (1) of the Regulations, site specific remedial action objectives (“RAO”) must be established for all Plans of Remedial Action.

Qualitative objectives describe, in general terms, what the ultimate result of the Remedial Action at the facility should be. The primary receptors of contamination are humans. Therefore, the qualitative RAO for the Site is to prevent human contact such as dermal, inhalation or ingestion of site soils.

Quantitative objectives define the specific levels of Remedial Action to achieve protection of human health and the environment. Based on the quantitative objectives, the qualitative objectives will be to ensure that future Site users, such as Site workers, construction workers, visitors, and trespassers, do not come in contact with Site soils containing contamination above DNREC-SIRB Uniform Risk Base Standards.

The impacted soils were removed from the facility and replaced with clean fill. Therefore, all qualitative or quantitative objectives have been achieved.

VI. PROPOSED PLAN

Based on the results of the Interim Remedial Actions and the Remedial Investigation at the Former Bellanca Hangar Site, DNREC-SIRB proposes No Further Action at the Site. However, if circumstances change or new information becomes available that relates to a release of a hazardous substance at the Site, DNREC-SIRB reserves the right to require additional measures as needed including the collection of groundwater samples.

VII. PUBLIC PARTICIPATION

The Department of Natural Resources and Environmental Control solicits public comments or suggestions on the Proposed Plan and welcomes opportunities to answer questions. Please direct written comments to:

DNREC
Site Investigation and Restoration Branch
391 Lukens Drive
New Castle, Delaware 19720
Attention: Robert Schulte

The Department invites written comment on this Proposed Plan. The comment period begins on **June X, 2001** and concludes on **June X, 2001**. If so requested, a public hearing on the Proposed Plan would be held. The hearing time and place will be announced if the hearing is requested.

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Figure 1: Site Map

Prepared by WIK Associates, Inc
March 2001