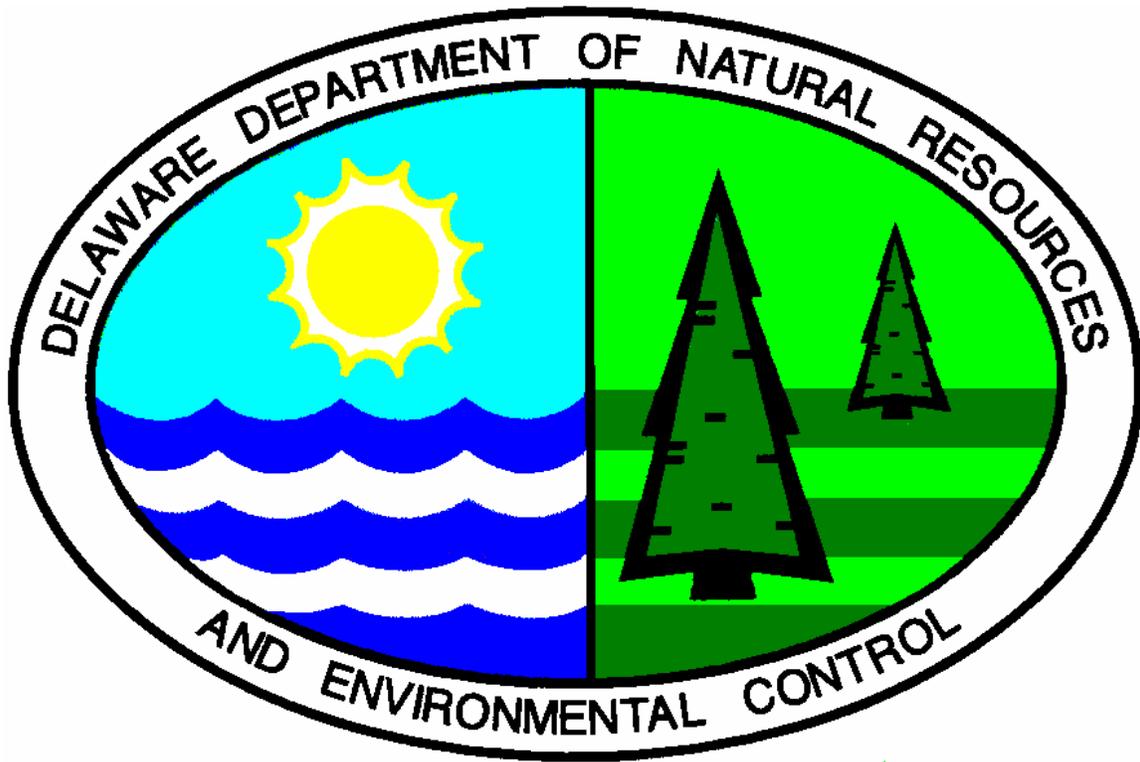


**Proposed Plan of Remedial Action
210 GREENHILL AVENUE SITE
WILMINGTON, DELAWARE
DE-1080**



June 1998

**Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation and Restoration Branch**

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I. INTRODUCTION

This Proposed Plan of Remedial Action (“Proposed Plan”) is issued under the authority of the State of Delaware’s Hazardous Substance Cleanup Act, 7 Del. C. Chapter 91 (“HSCA”). The purpose of the Proposed Plan is to present the public with the Department of Natural Resources and Environmental Control’s (“DNREC’s”) proposed plan to protect public health, welfare, and the environment.

The Ventresca Group, LLC is addressing environmental concerns at the 210 Greenhill Avenue Site under the Voluntary Cleanup Program (“VCP”). Environmental concerns were identified in Phase I and Phase II Environmental Site Assessments conducted by WIK Associates, Inc.

II. ORGANIZATION AND CONTENTS OF THE PROPOSED PLAN

DNREC issues this proposed plan under the provisions of HSCA and the Regulations Governing Hazardous Substance Cleanup (“Regulations”). The Proposed Plan presents DNREC’s assessment of the health and environmental risk posed by the site and plans for further action.

In accordance with the Regulations, DNREC will provide notice to the public and an opportunity for the public to comment on the Proposed Plan in accordance with Section 12 of the Regulations. At the conclusion of the comment period, DNREC will issue a Final Plan of Remedial Action (“Final Plan”). The Final Plan shall designate the selected remedy for the site. The Proposed Plan, the comments received from the public, DNREC’s responses to those comments, and the Final Plan will constitute the Remedial Decision Record.

Section 8 of the Regulations identifies the contents of the Proposed Plan. This Proposed Plan contains the following information:

- A summary of previous investigations
- Remedial Action Objectives
- A plan for the site’s future

III. SITE DESCRIPTION AND HISTORY

The site is referred to as the 210 Greenhill Avenue Site. The site is a 1.16 acre parcel of land located on the northeast corner of Second Street and Greenhill Avenue in Wilmington, Delaware. Improvements to the site include a 64,000 square foot brick building, a loading dock, a paved parking area, a wooden cooling tower, and fences.

Land use in the area immediately surrounding the site is predominantly commercial. The site is currently zoned for commercial use.

The site was first developed by the Wilmington Leather Company between 1900 and 1910. A fire during the 1920s brought the Wilmington Leather Company to ruins. Then during the 1930s the site was re-developed and the building on the site was used as a warehouse until 1994. The site then sat vacant for several years.

In March 1996, WIK Associates, Inc. performed a Phase I Environmental Site Assessment on behalf of a prospective purchaser of the property known as the Breckstone Group, Inc. The assessment recommended that further investigation be performed.

In January 1997, WIK Associates performed a Phase II Environmental Assessment on behalf of another potential purchaser of the property known as the Ventresca Group, LLC. The two investigations identified several environmental concerns.

In January 1997, the Ventresca Group formally entered the VCP by signing an agreement letter and volunteered to perform remedial action at the site.

IV. PREVIOUS INVESTIGATION

WIK Associates, Inc. prepared a Phase I Environmental Site Assessment report for their client, the Breckstone Group, Inc. The report is dated March 6, 1996.

The report provides background information, a site description, approach utilized to conduct the assessment, historical uses of the site, agencies contacted, environmental setting, on-site investigation summaries, and recommendations.

The Phase I report identified several environmental concerns. Those listed below were addressed as an interim response activity:

- Underground Storage Tank (UST)
- Asbestos Containing Material (ACM)
- Polychlorinated Biphenyl (PCBs)/PCB Containing Equipment

The Phase I report recommended further investigation of the site. WIK Associates, Inc. in January 1997, prepared a Phase II Soil Investigation report, for the Ventresca Group, LLC. The investigation consisted of nine soil borings ranging in depth from 2 to 5 feet below grade surface. The samples were analyzed for semi-volatile organic compounds (SVOCs) and metals. Several of the samples contained SVOCs and metals above DNREC-Site Investigation & Restoration Branch and EPA Region III soil standards.

Upon review of the Phase I Environmental Assessment and Phase II Soil Investigation, DNREC-SIRB requested additional information. WIK Associates submitted an addendum to the Phase II Soil Investigation, dated January 16, 1997 to DNREC-SIRB. The additional information confirmed that SVOC contamination was not as widespread as originally suspected.

Based on the reports and addendum, DNREC-SIRB concurred with the Ventresca Group that remedial action is warranted.

V. INTERIM ACTION

If during the course of the HSCA investigation a means becomes apparent to reduce contamination or prevent its spread, appropriate action would be taken. The following remedial interim action has occurred:

- Underground Storage Tank (UST) – Evidence of USTs was discovered during the on-site inspection of the property. An investigation was performed and the tanks were removed in accordance with the Regulations Governing Underground Storage Tank Systems.
- Asbestos – The Phase I report identified asbestos containing material (ACM) as a potential problem. Archway Contracting Company prepared an ACM survey on behalf of the Breckstone Group. Based on the results of that survey it was determined that ACM would be removed in accordance with the Regulations Governing Control of Air Pollution.
- Polychlorinated Biphenyl (PCBs)/PCB Containing Equipment – Three pad-mounted electrical transformers, three pole-mounted electrical transformers, and an elevator were observed to be present on the property. Fluids in this type of equipment have been known to contain PCB containing fluids. Laboratory analysis identified PCBs in the fluid from the pad-mounted transformers. The transformers were disposed of in accordance with the Federal Toxic Substance Control Act (TSCA).
- Building Demolition – Most of the site was covered by a 64,000 square foot building. The building and associated improvements were demolished and removed from the site.

VI. REMEDIAL ACTION OBJECTIVES

The remedial action objective for this site is to minimize or eliminate exposure of humans to surface and subsurface soil.

It is important to note that groundwater was not investigated and that the remedial action objective is intended to address direct exposure to soil only. In order to prevent contact with groundwater, DNREC has determined that the establishment of a groundwater management zone is necessary.

VII. FEASIBILITY STUDY

A Feasibility Study (FS) was prepared by Tetra Tech Incorporated to evaluate remedial alternatives. Containment remedies, institutional controls, and no action were evaluated as potential remedies for the site. The evaluation was performed in accordance with the Regulations. The interim response activities performed at the site were also included in the evaluation of remedial alternatives.

The FS concluded that a combination of remedial alternatives is necessary to accomplish the remedial action objective.

VIII. RISK EVALUATION SUMMARY

The previous investigations of the site have identified several environmental concerns. DNREC has determined that the successful completion of the interim response action, construction of a soil cap, and use of a deed restriction at the site will reduce the threat posed by the site to public health, welfare, and the environment.

IX. PROPOSED REMEDIAL ACTION

The proposed remedial action includes a combination of remedial measures. The preferred remedy includes:

- A. Construction of a soil cap
- B. Institutional Control – Deed Restriction
- C. Establishment of a Groundwater Management Zone (GMZ)

X. PUBLIC PARTICIPATION

It should be noted that in this case the construction of the soil cap has already occurred. Typically, the proposed plan is presented to the public before implementation of a remedy however, due to regulatory requirements of the City of Wilmington construction has been completed. The City of Wilmington's Code requires property owners to immediately clear the property of all rubbish, refuse, and building material resulting from demolition activities. The code also requires the site to be filled to meet adjoining grades and finished with six inches of topsoil.

The soil cap as constructed meets the remedial action objective and its use is supported by DNREC.

As mentioned in Section IV, groundwater was not investigated and the soil cap is not intended to protect groundwater. Further investigation and/or action will be required before any decisions regarding use of groundwater will be made by DNREC.

DNREC actively solicits public comments or suggestions on the Proposed Plan. Please direct written comments to:

DNREC – Site Investigation and Restoration Branch
391 Lukens Drive
New Castle, DE 19720
Attn: Steven Langseder

The comment period begins Friday June 26, 1998 and ends Friday July 17, 1998. Comments and/or requests for a public hearing may be submitted in writing to Steven Langseder by the close of business (4:30PM) on July 17, 1998 at the above address.

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