

PROPOSED PLAN OF REMEDIAL ACTION

Wiley Cork Site
Wilmington, DE

DNREC Project No. DE-324

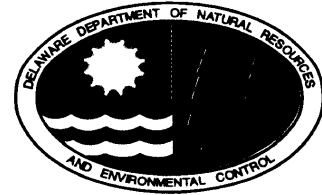


July 2007

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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What is the Wiley Cork Site? The site is a Delaware certified Brownfield, which is currently being redeveloped by the New Destiny Fellowship (NDF), Inc. It is located at 1400 North Church Street in Wilmington, DE 19802.

Tax Parcel Numbers: 26-036.20-001 & 26-036.20-018
Nearest major intersection: North Church and Thatcher Street
Size: approximately 8 acres
Zoning: Commercial; office buildings and manufacturing facility
A Certified Brownfield
Not within the 100-500year flood plain.
Surrounding land use is residential and commercial.
The Site is within an established Wilmington Groundwater Management Zone (GMZ)

What caused the contamination at the Wiley Cork Site? Investigations indicate that prior to the development of the property, fill material was brought onsite. Therefore, Site contaminants could be attributed to impacted fill material.

Historical maps show that prior to 1927, the southwestern portion of the area was predominantly marshland. Contaminated fill material was later placed on the Site during development. In later years, the previous owners (Wiley Cork Co.) used the Site as a cork manufacturing facility. However, there is no connection between Site contaminants and cork manufacturing operations. Wiley Cork Co. discontinued operations in the late 1990s.

What are the environmental problems at the Wiley Cork Site? Arsenic and polynuclear aromatic hydrocarbons (PAHs) are present in site soils above DNREC's residential and commercial risk-based standards. The cumulative risk to human health due to these contaminants is above acceptable levels.

DNREC conducted a Site Specific Assessment (SSA) in 2005 and followed it with a Site Inspection in 2006. Both investigations indicated that arsenic and polynuclear aromatic hydrocarbons (PAH) are present in site soils at concentrations above acceptable levels. The investigations also show that aluminum and iron are present in groundwater above the Environmental Protection Agency's (EPA) Secondary Maximum Contaminant Levels (SMCL). However, there is no exposure to groundwater contaminants because groundwater at the Site is not utilized. In addition to the investigations, DNREC performed a human health risk assessment (HHRA) in accordance to the EPA's Risk Assessment Guidance for Superfund (RAGS) as well as applicable requirements of the Delaware Hazardous Substance Control Act (HSCA). The result of the HHRA indicated that the cumulative risk to human

health due to the presence of arsenic and PAHs in site soils is above DNREC's risk management level of 1×10^{-5} .

What does the owner want to do at the Wiley Cork Site? The owner intends to use the site for commercial purposes. The plan for redevelopment includes the demolition of some structures; construction of a parking lot; and renovation of some dilapidated buildings on the eastside of the Site. The owner's aim is to build a community center, which could include a bank, food service, and social needs sections.

What cleanup actions were taken at the site? The following cleanup actions have been taken onsite:

- 1). The removal of containers with both known and unknown chemicals in 2006.
- 2). The abatement of asbestos and lead containing materials in onsite buildings. This was completed in February 2007 in preparation for future demolition.
- 3). The removal of over 9-tons of debris in February 2007. The debris stemmed from the demolition of a dilapidated building southeast of the Site.

What other cleanup actions are needed at the Wiley Cork Site? DNREC proposes that the following cleanup actions need to be taken by the owner:

- 1). Impervious barrier over the Site
- 2). Environmental covenant restricting groundwater use and soil excavation
- 3). Operation & Maintenance (O&M) Plan to ensure barrier protectiveness

1). A concrete or asphalt pavement will be constructed on the site to limit direct contact with contaminated soil. If any locations of the site can/will not be paved for any reason, a two (2) foot clean soil cap will be required.

2). The Delaware's Uniform Environmental Covenants Act, UECA (Title 7, Del. Code Chapter 79, Subtitle II), will be required at the Site, within 90-days following DNREC's adoption of the Final Plan of Remedial Action. This covenant will prohibit groundwater as a source of potable water; prohibit soil excavation and use; and restrict the use of the Site to nonresidential (commercial/industrial).

3). A DNREC-approved O&M Plan will be established and implemented within 90- days following the construction and completion of the barrier. The O&M Plan will detail the procedures and practices including regular inspections to minimize the potential for disturbing the barrier, and to promote its long-term integrity.

What are the long-term plans for the Site after the cleanup? The current owner plans to develop this Site as a commercial property, which will require compliance with the proposed UECA and O&M Plan. This Site will be eligible for a Certificate of Completion of Remedy at the completion of the cleanup.

The proposed cleanup actions will hold as long as the use of the Site remains commercial/non residential. However, if the use of the Site should change in the future, this will trigger a reevaluation and adjustment of the cleanup actions to accommodate the change.

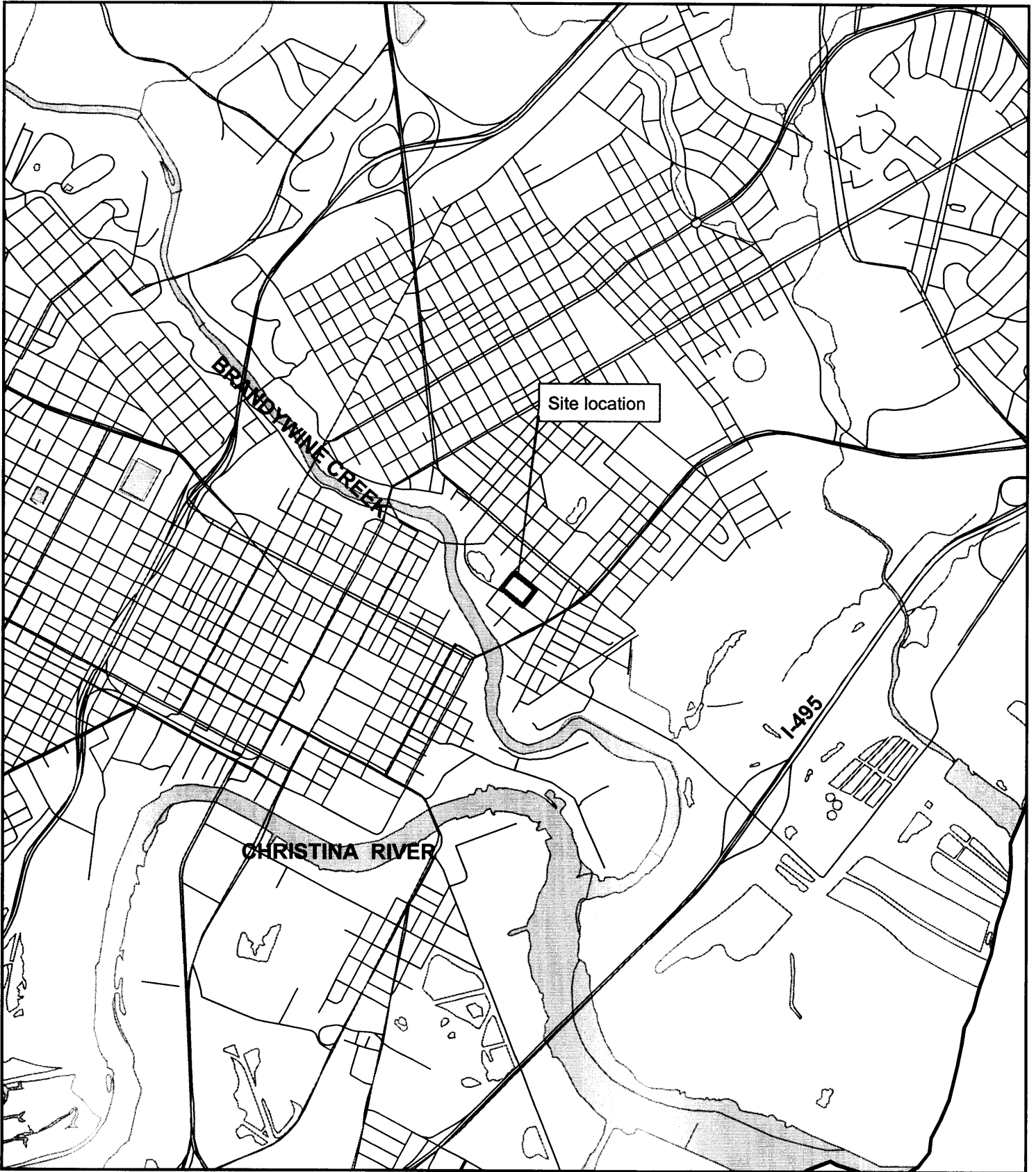
How can I find additional information or comment on the Proposed Plan?

The complete file on the site, which includes the SSA, SI and HHRA report, 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 ends on July _____, 2007. Please send written comments to the DNREC office or call Babatunde Asere, Project Manager, at 302-395-2600.

BTA:ebg
BTA07019
DE 0324 II B8



Site location

BRANDYWINE CREEK

CHRISTINA RIVER

I-495

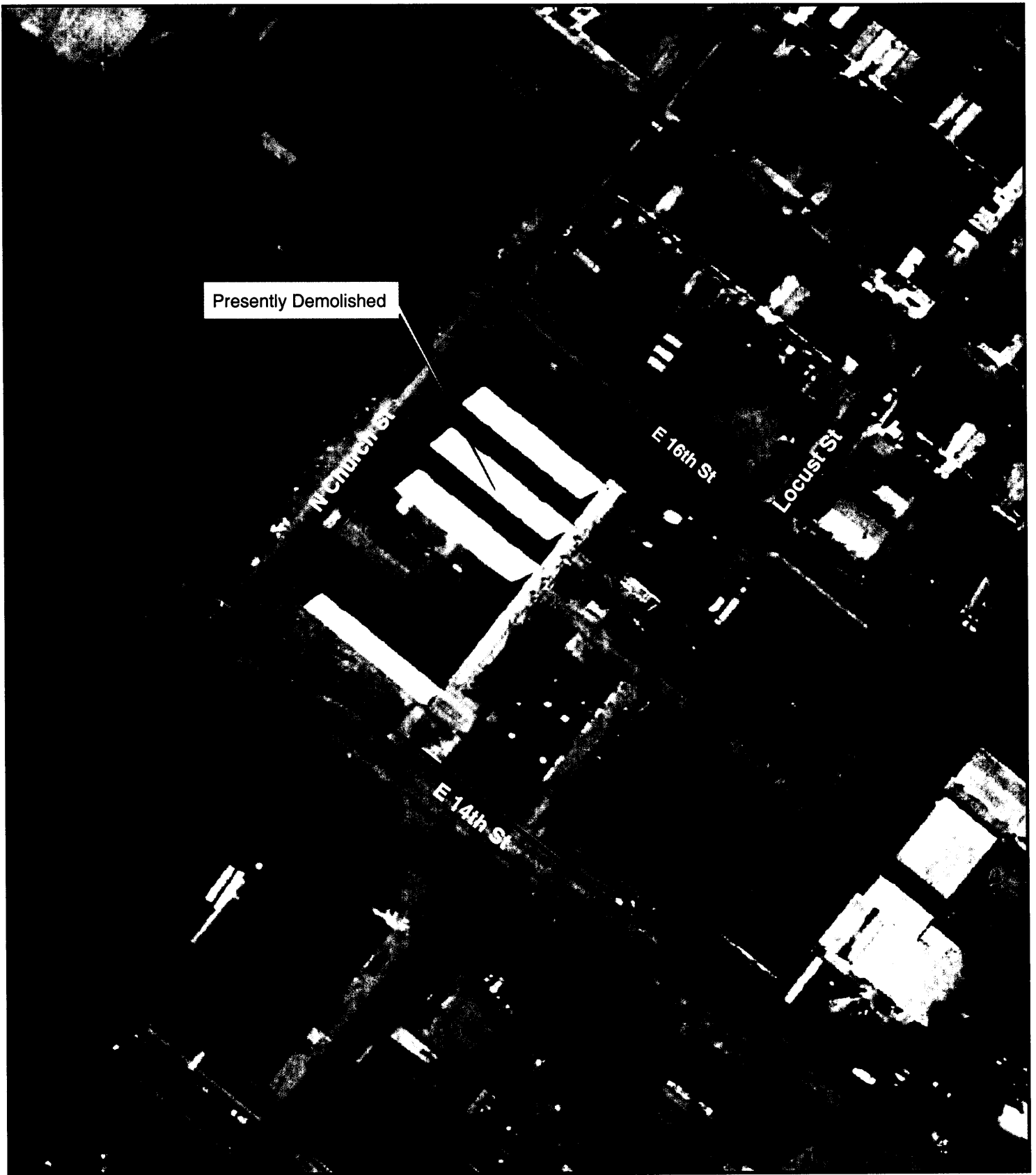


1:26,473

1 inch equals 2,206 feet

**SITE INVESTIGATION &
RESTORATION BRANCH
391 LUKENS DR
NEW CASTLE, DE 19720-2774
302.395.2600**

**FIGURE 1
Site Location in Wilmington
From 2002 DNREC Arcmap**



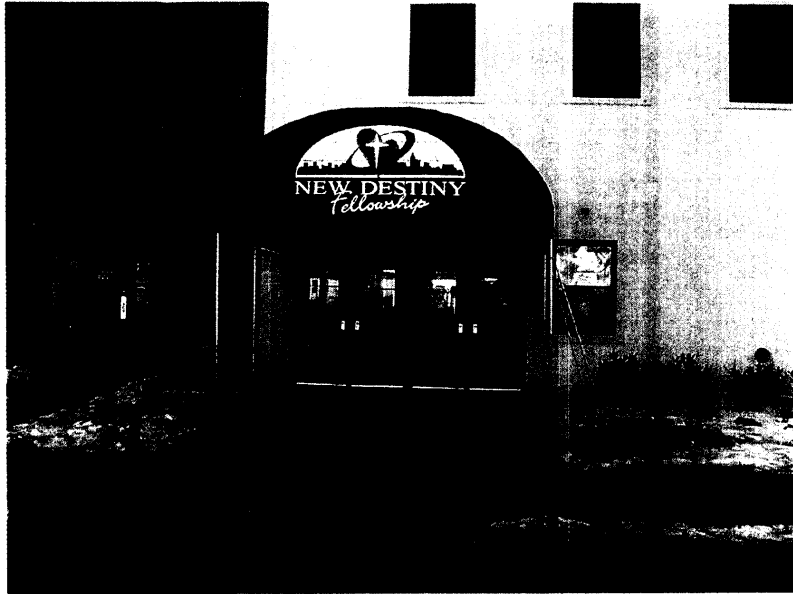
1:1,400

1 inch equals 125 feet

**SITE INVESTIGATION &
RESTORATION BRANCH
391 LUKENS DR
NEW CASTLE, DE 19720-2774
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**FIGURE-2
2002 AERIAL OF
WILEY CORK
From 2002 DNREC Arcmap**

Site Pictures



Entrance/front section of site



Center of the Site (Locust Road)



Northwest side of the property next to Church Street



Old warehouse section southeast of the plant

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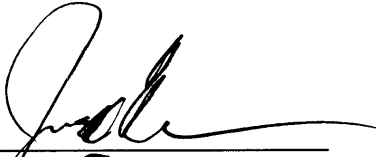
DNREC Project No. DE-324



July 2007

Approval:

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


2 JULY 2007
James D. Werner, Director
Division of Air and Waste Management

Glossary of Terms Used in this Proposed Plan

BrightFields	A private environmental consulting company that conducted the Phase II investigation for the property owner.
Brownfield	Property that is vacant or underutilized because of the perception or presence of an environmental problem.
Certified Brownfield	A brownfield that DNREC has determined is eligible for partial funding through the Delaware Brownfields Program.
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.
*Exposure	Contact with a substance through inhalation, ingestion, or direct contact with the skin. Exposure may be short term (acute) or long term (chronic).
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.
Risk Assessment Guidance for Superfund (RAGS)	An EPA guidance document for superfund sites
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.
Wiley Cork Site	The 8-acre parcel of land that is the subject of this Plan that will be redeveloped into a community center.

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.
