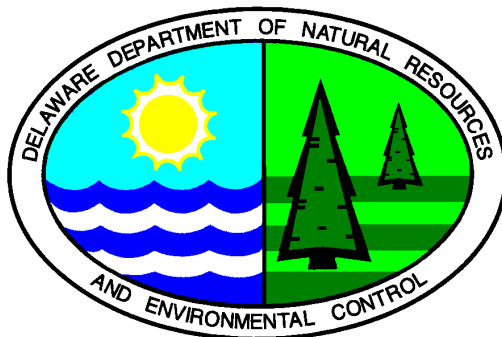


FINAL PLAN OF REMEDIAL ACTION



Former Star Building Property Site

*West Street and Justison Street
Wilmington, Delaware*

*August 6, 2008
DNREC Project No. DE-1425*

This Final Plan of Remedial Action (Final Plan) presents the Department of Natural Resources and Environmental Control's (DNREC's) requirements to address environmental contamination at the Former Star Building Property site (Site).

DNREC issued public notice of the Proposed Plan of Remedial Action (Proposed Plan) for the Site on July 13, 2008 and opened a 20-day public comment period. The Proposed Plan is attached. There were no comments or questions from the public. Therefore, the Proposed Plan is adopted as the Final Plan.

Final Plan will consist of the following requirements:

- The surface of the Site will be covered with a cap which may consist of buildings, pavement, or a minimum of two feet of DNREC-approved clean fill material in the landscaped areas.
- All construction and redevelopment work will continue to be done in accordance with the DNREC-approved Former Star Building Concrete Slab Removal Work Plan, DNREC-approved Contaminated Material and Water Management Work Plan (CMWMWP), and the Site Specific Health and Safety Plan (HASP), which results in removal and disposal of excavated contaminated material.
- After construction of the parking lots, a hydraulically up-gradient and a down-gradient well will be placed in the deeper aquifer which will be used as a part of the area wide groundwater monitoring network for the Wilmington Riverfront.
- Soil contaminated with elevated levels of lead (over 1000 milligrams per kilogram) will be disposed off site as encountered during construction to prevent future construction workers from exposure to the contaminated soil.
- Site owner will record an environmental covenant consistent with Delaware's Uniform Environmental Covenants Act, UECA (Title 7, Del. Code Chapter 79, Subtitle II). The environmental covenant will include: limit to commercial development, prohibit land disturbing activities without DNREC's prior written approval except in landscaping areas, and will prohibit the installation of wells and use of any groundwater at the Site.

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- Implement a DNREC-approved Operation and Maintenance (O&M) Plan to detail the procedures and practices to be followed in order to minimize disturbing the cap and to promote the long-term integrity of the cap.

Approval:

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

Kathleen Stiller Banning, Program Manager II
Site Investigation and Restoration Branch

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