



PROPOSED PLAN OF REMEDIAL ACTION

1039-1043 Clifford Brown Walk Site
Wilmington, Delaware
DNREC Project No. DE-1690



April 2021

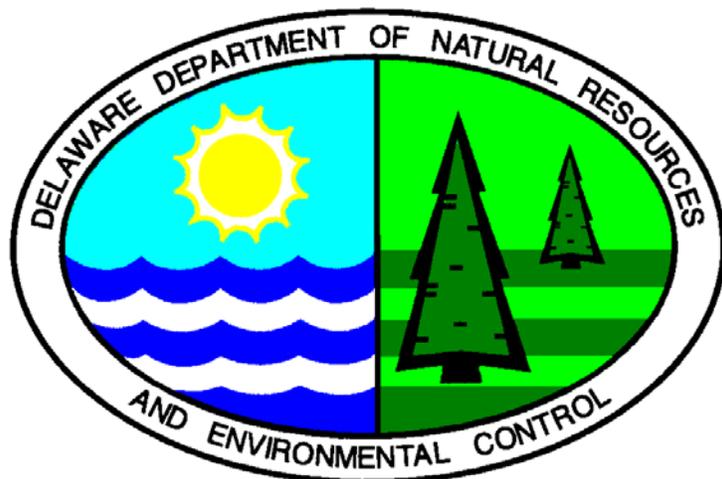
Delaware Department of Natural Resources and Environmental Control
Division of Waste and Hazardous Substances
Remediation Section
391 Lukens Drive
New Castle, Delaware 19720

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Approval:

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

Approved by: 
Qazi Salahuddin, Environmental Program Administrator Remediation Section
04/05/2021
Date



What is the Proposed Plan of Remedial Action?

The Proposed Plan of Remedial Action (Proposed Plan) summarizes the clean-up (remedial) actions that are being proposed to address contamination found at the 1039-1043 Clifford Brown Walk Site (Site) and provides the opportunity for public comment. A legal notice is published in the newspaper for a 20-day comment period. After the 20-day comment period, DNREC considers and addresses all public comments received and will publish a Final Plan of Remedial Action (Final Plan) for the Site.

What is the Former 1039-1043 Clifford Brown Walk Site?

The Site is located at 1039, 1043 Clifford Brown Walk and 314, 316, and 318 East 11th Street, in Wilmington, Delaware (Figure 1). The property consists of New Castle County tax parcel numbers 26-036.10-088, 26-036.10-089, 26-036.10-046, 26-036.10-047, and 26-036.10-048, totaling approximately 0.16 acres (Figure 2). The Site is located at the intersection of E. 11th Street and Clifford Brown Walk. The Site consists of a 2-story vacant commercial building, which was last used as an administrative building for a tannery, and an unoccupied rowhome. These buildings occupy the parcels on Clifford Brown Walk, while the three parcels on E. 11th Street are vacant lots containing no structures.

What happened at the 1039-1043 Clifford Brown Walk Site?

The commercial building located at the 1043 Clifford Brown Walk property was registered as the Main Office of the New Castle Leather Company. It was built in 1917 and operated from 1933 to 1977. It has been vacant since the close of operations. Historic aerial photographs suggest that the 314-318 E. 11th St. properties were previously the site of residential rowhomes. Aerial photographs indicate all the structures were removed by 1992, and the E. 11th Street properties have remained vacant since.

What are the environmental problems at the 1039-1043 Clifford Brown Walk Site?

The Site was investigated due to potential environmental impacts related to historic commercial uses of the property, and the site's association with a former tannery (which was located across 11th street). An Environmental Protection Agency (EPA) funded Site-Specific Assessment (SSA) was conducted in 2019 which concluded contamination to be present in Site soils and groundwater. Due to limited funding available for the SSA, data gaps existed in the SSA that needed to be filled with additional assessment including, soil samples that were not fully spatially representative, the installation of only one (1) groundwater well, and the absence of a

human health risk assessment. As such, the Site was accepted into the Delaware Brownfield Program to finish the assessment, in 2020.

A Brownfield Investigation was completed for the Site in June 2020. During the Brownfield Investigation, 9 soil borings were advanced on-site with 9 shallow and 6 deep soil samples collected (Figure 2). No deep soil samples were collected in the three (3) hand auger borings. Additionally, two (2) of the soil borings were converted into monitoring wells and a groundwater sample was collected at each well. A groundwater sample was also collected from the well that was installed during the SSA.

Following analysis of groundwater samples, the volatile and toxic compounds of chloroform and mercury were identified in multiple wells. Possible residential exposure to these contaminants in groundwater via vapor intrusion into indoor air was evaluated using the EPA Vapor Intrusion Screening Level (VISL) calculator. The calculated carcinogenic risk for resident exposure to chloroform in groundwater via indoor air was determined to be unacceptable; therefore, additional evaluation was needed to further assess this potential vapor risk. As such, two (2) sub-slab vapor samples were collected from the rowhome structure proposed for mixed-use. Benzene and naphthalene were detected above DNREC screening levels in one (1) sample (chloroform was not identified above screening levels in any sub-slab vapor sample). Using this confirmatory vapor data, additional analysis was conducted to identify risk to residents and/or indoor workers by using the EPA VISL calculator. The calculated non-carcinogenic and carcinogenic risks for resident and indoor worker exposure to the contaminants via indoor air were determined to be acceptable (not of concern).

As part of the Brownfield Investigation, a human health risk assessment was performed using the data from the 2019 SSA and the 2020 Brownfield Investigation. The risk assessment indicated that exposure to contaminants of concern (COCs) in Site surface (shallow) soil presents an unacceptable risk for residents and groundwater COCs present an unacceptable risk to residents and indoor workers. The human health risks in Site soils include PAHs (benzo[a]pyrene, dibenz(a,h)anthracene, benz[a]anthracene, and benzo[b]fluoranthene, indeno[1,2,3-cd]pyrene) and a metal (thallium). COCs identified to attribute to risk in groundwater at the site include chloroform and dissolved metals (cobalt, manganese, and mercury). The City of Wilmington has an active Groundwater Management Zone (GMZ) restricting groundwater access (withdrawal and use). Additionally, the Site is supplied water by the City of Wilmington, which obtains potable water from other sources/locations.

In addition, a non-destructive targeted lead-based paint (LBP) testing and an asbestos assessment of suspect asbestos containing material (ACM) was performed at the Site following the BFI. Asbestos and Lead based paint were confirmed to exist in one or both structures. Lead-based paint and asbestos-containing materials, if encountered, should be abated and/or stabilized as required by the federal government and State of Delaware prior to renovation or demolition activities.

What does the owner want to do at the 1039-1043 Clifford Brown Walk Site?

The Brownfield Developer intends to redevelop the Site for mixed (commercial and residential) use. Redevelopment plans currently anticipate remediating the site and redeveloping the former

corner office building into a cultural heritage center and redeveloping the rowhome structure for mixed use (an office with second floor residence).

What additional clean-up actions are needed at the 1039-1043 Clifford Brown Walk Site?

DNREC proposes the following remedial actions for the 1039-1043 Clifford Brown Walk site, which needs to be completed before a Certification of Completion of Remedy (COCR) can be issued:

1. Submit a Remedial Action Work Plan for DNREC's approval within 60 days after the issuance of the Final Plan of Remedial Action.
2. Cap the existing Site soils with at least two (2) feet of DNREC-approved fill material consistent with residential-use requirements over a pervious marker barrier or cap with other barriers to impacted soils such as buildings, asphalt, and/or concrete to eliminate the exposure to future Site users to existing Site soils.
3. Submit an Environmental Covenant for DNREC's approval within 60 days after the issuance of the Final Plan of Remedial Action.
4. Record an Environmental Covenant, consistent with Delaware's Uniform Environmental Covenants Act (*Title 7, Del. Code Chapter 79, Subtitle II*) (UECA), in the office of the Recorder of Deeds within 60 days of DNREC approving the Remedial Action Work Plan. The Environmental Covenant will include the following:
 - [a.] Limitation of Groundwater Withdrawal. No groundwater wells shall be installed and no groundwater shall be withdrawn from any well on the Property without the prior written approval of DNREC-RS and DNREC Division of Water;
 - [b.] Compliance with the Long Term Stewardship Plan. All work required by the Long Term Stewardship Plan must be performed to DNREC's satisfaction in accordance with the Plan; and,
 - [c.] Compliance with Contaminated Materials Management Plan. All work required by the CMMP must be performed to DNREC's satisfaction in accordance with the Plan.
5. Submit to DNREC a CMMP within 60 days of the issuance of a Final Plan of Remedial Action. The CMMP will allow construction workers to safely handle any potential contaminated soil and groundwater at the Site during and following redevelopment.
6. Implement the CMMP upon DNREC approval.

7. Submit a Long-Term Stewardship (LTS) Plan pursuant to the schedule set in the DNREC approved Remedial Action Work Plan. The LTS Plan shall detail the site-inspection schedule to be followed in order to ensure the long-term integrity of the remedy.
8. Implement the LTS Plan upon DNREC approval.
9. Submit a Remedial Action Completion Report to DNREC within 60 days of the completion of the remedial actions required in this Proposed Plan.
10. Request a COCR within 60 days of DNREC approval of the Remedial Action Completion Report.

What are the long term plans for the Site after the cleanup?

The development plans for the Site include redeveloping the property into a cultural heritage center and a mixed-use rowhome. The Site will have active LTS requirements (including Site inspections and reporting) to ensure the selected remedies remain intact and effective at protecting human health and the environment.

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

The complete file on the Site including the Brownfield Investigation Report and other various reports are available at the DNREC office, 391 Lukens Drive in New Castle, 19720. Most documents are also found under facility name “1039-1043 Clifford Brown Walk” at:

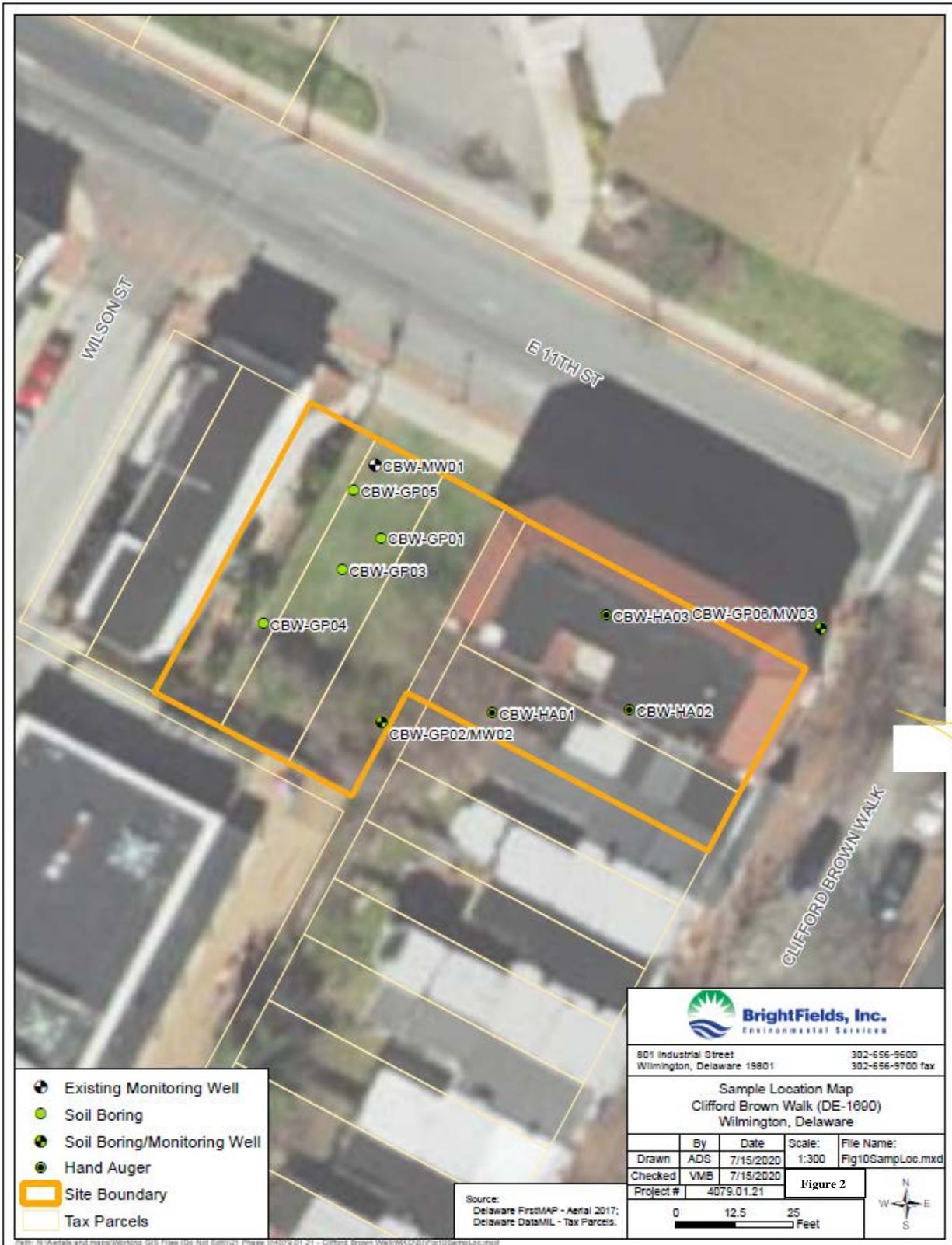
<http://www.nav.dnrec.delaware.gov/den3/Detail/FacilityDetail.aspx?id=10749592>

The 20-day public comment period begins on April 7, 2021 and ends at close of business (4:30 pm) on Tuesday April 27, 2021. Please send written comments to Caleb Melvin, Project Officer at RS_Public_Comments@delaware.gov.

- Figure 1: Site Location Map
Figure 2: Site Location Aerial with Sample Locations

CRM; slw
CRM21017.doc
DE-1690 II B8





- Existing Monitoring Well
- Soil Boring
- Soil Boring/Monitoring Well
- Hand Auger
- Site Boundary
- Tax Parcels

BrightFields, Inc.
Environmental Services

801 Industrial Street
Wilmington, Delaware 19801

302-656-9600
302-656-9700 fax

Sample Location Map
Clifford Brown Walk (DE-1690)
Wilmington, Delaware

By	ADS	Date	7/15/2020	Scale:	1:300	File Name:	Fig10SampleLoc.mxd
Checked	VMB	Date	7/15/2020	Figure 2			
Project #	4079.01.21						

Source:
Delaware FirstMAP - Aerial 2017;
Delaware DataMIL - Tax Parcels.

0 12.5 25 Feet

Glossary of Terms Used in this Proposed Plan

Brownfield Development Agreement (BDA)	This legal agreement is between a potential developer of a Delaware-certified Brownfields Site and the DNREC. The developer agrees to investigate and cleanup a Brownfields property under the oversight of the Department in exchange for liability protection.
Brownfield Investigation (BFI)	Thorough environmental study of a site which includes 1) sampling of site environmental media and/or wastes on the property and 2) conducting a preliminary risk assessment using the data collected to determine the risk posed to human health and the environment.
Certified Brownfield	A Brownfield that DNREC has determined is eligible for partial funding through the Delaware Brownfields Program
Certification 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.
Contaminant of Concern (COC)	Potentially harmful substances at concentrations above acceptable levels.
Contaminated Materials Management Plan	A written plan specifying how potentially contaminated material at a Site will be sampled, evaluated, staged, transported and disposed of properly.
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 adopted plan for cleaning up a hazardous site.
Groundwater Management Zone	A geographical area where DNREC restricts drilling for ground water because it is contaminated
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.
Risk Assessment	A quantitative evaluation of only the most obvious and likely risks at a site
Risk	Likelihood or probability of injury, disease, or death.
Risk Assessment Guidance for Superfund (RAGS)	An EPA guidance document for superfund sites
Restricted Use	Commercial or Industrial setting
RS (DNREC-RS)	Remediation Section of DNREC, which oversees cleanup of sites that were contaminated as a result of past use, from dry cleaners to chemical companies