



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
& ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
391 LUKENS DRIVE  
NEW CASTLE, DELAWARE 19720-2774

SITE INVESTIGATION &  
RESTORATION SECTION

TELEPHONE: (302) 395 - 2600  
FAX No.: (302) 395 - 2601

December 5, 2017

Mr. Matt Hershberger, P.E.  
Environmental Alliance, Inc.  
5341 Limestone Road  
Wilmington, DE 19808

**RE: Comments- November 2, 2017 Long-Term Stewardship Termination Request  
29984 Pinnacle Way (DE-1555)  
Dagsboro, DE 19939**

Dear Mr. Hershberger:

The DNREC Site Investigation and Restoration Section (DNREC-SIRS) has reviewed the Long-Term Stewardship Plan (LTS) Termination Request for the 29984 Pinnacle Way site (Site). DNREC-SIRS offers the following comments.

**General Comments:**

Many of the monitoring well results have detection levels for arsenic and lead that are elevated above the screening levels making it impossible to determine if the wells may have had an exceedance. Monitoring of the metals should continue with a detection level that is below the lead and arsenic screening levels until it can be determined that no risk is present. Please note that other labs can achieve the appropriate detection levels for lead and arsenic.

DNREC is in the process of developing groundwater background threshold limit values (BTVs) for cobalt as well as several other metals. The BTVs should be published in the DNREC screening tables in January or February 2018. The proposed cobalt BTV could change the interpretation of the results; therefore, DNREC suggests waiting until the BTVs are finalized before recommencing the LTS sampling.

**Specific Comments:**

**Page 3, last paragraph, row 13-** Please correct the spelling of previous.

**Page 4, 1<sup>st</sup> paragraph, row 7-** This sentence states that reaching cis-1,2-dichloroethene is an indication of complete degradation of PCE. This is incorrect. The end point of the PCE

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December 5, 2017

Mr. Hershberger

degradation process is ethylene. Please correct. However, DNREC does agree that contamination has not migrated offsite. However, since the contamination remains onsite, the contamination may present a risk in the future if conditions change and the contamination migrates offsite. In lieu of termination of the sampling, DNREC is willing to discuss reducing the number of wells sampled at the source and point of compliance wells and increasing the period between sampling events based on the trend analysis or other analysis.

**Page 4, 2<sup>nd</sup> paragraph-** Please indicate if the modeling results match the downgradient results.

Please re-submit the request once the corrections are completed. If you have any questions or comments, please don't hesitate to contact me at (302) 395-2600.

Sincerely,

A handwritten signature in blue ink that reads "Richard M. Galloway, P.G.".

Richard M. Galloway, P.G.  
Project Manager

RMG:gpb  
RMG17091.doc  
DE 1555 II D 1

pc: Qazi Salahuddin, Environmental Program Manager II  
Morgan Price, Project Manager