



September 25, 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Peronti
GM Wilmington Assembly Plant
108 Boxwood Road
Newport, DE 19804

Subjects: AST Permanent Closure in Place Verification – Tanks A, B, C, and F;
Further Investigation Required for Tank F;
No Further Action Required for Tanks A, B, and C

RE: Wilmington Assembly Plant
108 Boxwood Rd.
Newport, DE

Facility ID: 7-000218
Project #: N0908068
File Code: 02, 34, 30

Dear Mr. Peronti:

The Delaware Department of Natural Resources and Environmental Control Tank Management Branch (DNREC-TMB) conducted a site inspection at the above referenced facility on December 9, 2008 to verify the statuses of the below listed ASTs.

Tank ID	Capacity	Former Product	Status
A	39,000 gal.	Purge Solvent	Permanently Closed
B	60,900 gal.	Diesel	Permanently Closed
C	40,000 gal.	Gasoline	Permanently Closed
F	275,000 gal.	Heating Fuel #6	Permanently Closed

Based upon the site inspection and submitted documentation, including the site assessment report, the above listed ASTs have met the requirements of DE Admin. Code 1352 State of the Delaware *Regulations Governing Aboveground Storage Tanks* (AST Regulations) Part B, §16 for Permanent Closure in Place. Tank IDs A, B, C, and F will no longer be assessed annual AST registration fees.

In order to bring Tank IDs A, B, C and F back into service to store Regulated Substances, the DNREC-TMB must be notified and Tank IDs A, B, C, and F will be required to meet new AST standards according to the AST Regulations.

Further Investigation Required for Tank F

Based on the AST Closure Document submitted by Conestoga-Rovers & Associates (CRA) on August 18, 2009 for the above ASTs, SVOC concentrations exceeding applicable standards exist

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in the area of Tank F. Therefore, CRA recommended that the area of SVOC exceedances be delineated further. The DNREC-TMB agrees with CRA's recommendations.

Next Steps

Within thirty (30) days following receipt of this letter please submit a detailed work plan for the proposed further investigation. Within ninety (90) days following receipt of this letter, the results of the investigation must be submitted to this office for review.

No Further Action Required for Tanks A, B, and C

Based on the documentation submitted to date regarding the site assessment in the area of Tanks A, B, and C, it appears that the contamination remaining in the subsurface is limited in extent. Therefore, any residual contamination at this site should not pose a threat to human health and safety or the environment. Consequently, no further action (NFA) is required for the above-referenced tanks at this time, *as long as the residual contamination onsite remains undisturbed or the use of the site does not change*. Essentially, the site may be used "as is," *subject to the following conditions*:

- If the petroleum compounds remaining in the soil or ground water on-site are disturbed in the future by digging, boring, dewatering or other means, a contaminated materials management plan must be approved in advance by DNREC-TMB prior to engaging in such activities.
- Any petroleum impacted excavated soils may not be re-used as "clean fill." Any on-site re-use of excavated soils must be approved in advance by DNREC-TMB.
- If petroleum impacted excavated soils are transported off-site, they must be hauled by a State-licensed solid waste hauler and disposed or remediated in an approved manner.

This NFA letter pertains *only* to petroleum released from aboveground storage tanks A, B, and C at the above-referenced location. Also, the NFA letter is *only* applicable under 7 Del. C., Chapter 74A, *The Jeffrey Davis Aboveground Storage Tank Act* and Delaware's *Regulations Governing Aboveground Storage Tank Systems*, and does not represent a determination under any other Federal, State or local law.

In addition, pursuant to "*Regulations Governing Aboveground Storage Tank Systems*," and 7 Del.C., Chapter 74A, this letter does not release the Responsible Parties from liability for any future problem related or unrelated to the 2009 site assessment or the aboveground storage tanks currently and/or formerly at this location. If any new releases are identified, immediate action must be taken to eliminate any threat to public health and safety and to the environment, and the DNREC-TMB must be notified.

Next Steps

In all cases, DNREC-TMB reserves the right to re-assess the site in the future if new information comes to light regarding possible petroleum contamination.

If you have any questions regarding this matter, please contact me at (302)395-2500. Your efforts towards protecting Delaware's environment are greatly appreciated.

Sincerely,



Aaron Siegel
Hydrologist
Tank Management Branch

JSR/ARS/dpc
ars2009-061

pc: Henry Alexander, P.E., Conestoga-Rovers & Associates, 410 Eagleview Boulevard,
Suite 110, Exton, PA 19341
Erich Schuller, DNREC-TMB