



BrightFields, Inc.
Environmental Services

May 9, 2016

Tank Management Section
Delaware Department of Natural
Resources and Environmental Control
391 Lukens Drive
New Castle DE 19720

RECEIVED MAY 13 2016

RE: Quarterly Monitoring Report – Fourth Quarter 2015
Former General Motors Plant, 801 Boxwood Rd, Wilmington, DE
UST Facility ID 3-000541; LUST Project ID N8708035
BrightFields File # 2734.04.51

To whom it may concern:

Enclosed, please find a copy of the *Quarterly Monitoring Report* for the above referenced site. This report covers system operations and monitoring from September 24, 2015 through December 30, 2015.

BrightFields, Inc. (BrightFields) will continue to operate the soil vapor extraction (SVE) system next quarter.

If you have any questions about the *Quarterly Monitoring Report* or require any additional information, please contact me at (302) 656-9600.

Sincerely,

BrightFields, Inc.

Ken Hannon
Engineering Program Manager

CC: Rick Galloway, DNREC
Pamela Barnett, RACER Trust

**AIR PERMIT WAIVER
QUARTERLY MONITORING REPORT
FOURTH QUARTER 2015**

**FORMER GENERAL MOTORS PLANT
801 BOXWOOD ROAD, WILMINGTON, DELAWARE**

UST Facility ID: 3-000541

LUST Project#: N8708035

DE-1149 Operable Unit 4

Prepared For:

Air Quality Management Section
Division of Air and Waste Management
Department of Natural Resources &
Environmental Control
391 Lukens Drive
New Castle, Delaware 19720

Submitted and Prepared By:



BrightFields, Inc.
Environmental Services

801 Industrial Street
Wilmington, DE 19801
(302) 656-9600

File # 2734.04.51

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INTERNAL QUALITY CONTROL SHEET

This Quarterly Monitoring Report has been prepared by BrightFields, Inc. (BrightFields). This Report represents BrightFields' knowledge of conditions on the subject site at the time of preparation.

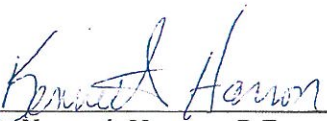
This Quarterly Monitoring Report was prepared and reviewed by the following BrightFields personnel:

Prepared By:



Kelly E. Power
Environmental Analyst

Reviewed and Approved By:



Kenneth Hannon, P.E.
Engineering Program Manager



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QUARTERLY MONITORING REPORT

1.0 INTRODUCTION

BrightFields, Inc. (BrightFields) has been retained by the Revitalizing Auto Communities Environmental Response (RACER) Trust to install and operate an interim remediation system to remediate hydrocarbon contamination in soil vapors and prevent migration of soil vapors to offsite receptors located at the Former General Motors Plant on Boxwood Road in Wilmington, Delaware, Underground Storage Tank (UST) Facility ID 3-000541 (herein referred to as the "Site") (Figure 1). This Quarterly Monitoring Report is being submitted to meet the requirements of the State of Delaware Department of Natural Resources and Environmental Control (DNREC) Permit Waiver for air emissions and to document the conditions of the Site during this reporting period.

Petroleum contamination has been confirmed present at the Site through numerous investigations. The contamination appears to have resulted from the historical operation of the Site and leakage from several former USTs.

This Quarterly Monitoring Report is the third report prepared for the interim remediation system. This report describes the system installation and covers all operations from September 24, 2015 through December 23, 2015 and contains operations details, monitoring details, and air sampling results.

The remediation system was installed by BrightFields and started in late March 2015. During this quarter, the soil vapor extraction (SVE) system was operated for 1,983.7 hours. System inspection field sheets are included in Appendix A.

1.1 Purpose

This Quarterly Monitoring Report has been prepared to meet air permit waiver requirements. The permit waiver is included as Appendix B.

1.2 Site History

The Former General Motors Plant is approximately 142 acres consisting of two tax parcels. The larger parcel is 126.6 acres with a 3-million square foot auto assembly plant, waste water



treatment plant, and parking lots. The second parcel is a 15-acre undeveloped wooded lot. The surrounding use of the Site is commercial and residential.

Historical research indicates that the main plant facility was constructed by General Motors in 1947 and operated until July 2009. General Motors filed for bankruptcy in June 2009 and the property was purchased by Fisker Automotive in July 2010. In March 2011, the RACER Trust was formed as part of the bankruptcy settlement to clean up and promote redevelopment of Former General Motors properties. In April 2014, Wanxiang Delaware acquired the property.

An April 9, 1990 letter from DNREC to General Motors stated that 12 underground storage tanks (USTs) were removed from the property. Ten of those tanks were adjacent to the Anchor Motor Freight Building, located in the southeast section of the plant along Dodson Avenue. Additionally, one gasoline UST (GMGT-1) was removed from near the southeastern corner of the assembly plant and one waste oil tank (WW-1) was removed from the stormwater area. The USTs contained diesel (four tanks), gasoline (three tanks), heating oil (two tanks), waste oil (two tanks), and engine oil (one tank).

A contaminated groundwater plume extends from the Anchor Motor Freight Building towards the northeast across Dodson Avenue. Groundwater contamination includes several volatile organic compounds (VOCs) including 1,2,4-trimethylbenzene, benzene, ethylbenzene, toluene, and xylenes (BTEX). Groundwater contamination also includes semivolatile organic compounds (SVOCs) including naphthalene and 2-methylnaphthalene. Subsurface contaminated soil extends from the edge of the Anchor Motor Freight Building to approximately the eastern edge of Dodson Avenue. Soil contamination also consists of VOCs including 1,2,4-trimethylbenzene, benzene, ethylbenzene, toluene, and xylenes.

Results of a vapor intrusion investigation, with sampling events from October 2012 through December 2013, show that offsite contaminated soil vapors extended from the edge of the property to approximately 100 feet east of Dodson Avenue. Soil gas samples that were collected contain VOCs, including 1,2,4-trimethylbenzene, benzene, ethylbenzene, and xylenes.

In July 2014, BrightFields completed a Focused Feasibility Study (FFS) for the Site to address potential vapor intrusion issues into nearby residential structures along Dodson Avenue. The FFS evaluated remedial alternatives and selected installation of a SVE system as an interim vapor phase remediation.

1.3 System Installation

In order to facilitate the remediation activities for the property, BrightFields installed six 2-inch diameter extraction wells northeast of the Anchor Motor Freight Building from December 17 to December 19, 2014. The wells were drilled to depths of approximately 20 feet below ground surface (bgs) and screened from approximately 12 feet bgs to 20 feet bgs. Each screen is 2-inch outer diameter polyvinyl chloride (PVC), 12 feet in length, with a slot size of 0.020 inches.

BrightFields began installing the underground conveyance piping to the blower on February 6, 2015. Each well was connected to the manifold by a separate 2-inch PVC line. An additional 4-inch PVC pipe was installed in the conveyance trench and capped inside of the trench box for future use if needed.

The installation was completed in February 2015 and system start-up was implemented on March 30, 2015.

1.4 Description of System

The remediation system consists of a Falco 300 Catalytic Oxidizer with a 15-horsepower (hp) regenerative blower. The blower is capable of extracting 295 standard cubic feet per minute (scfm) of vapor flow at 60-inches of water vacuum. The blower is connected to extraction wells SVE-01 through SVE-06 (Figure 2).

Extracted vapors are currently treated by means of a catalytic oxidizer. Main components of the treatment system are as follows:

- Below ground piping to connect remediation wells to the system;
- Regenerative 15-hp SVE vacuum blower; and,
- Catalytic oxidizer to treat the extracted soil-gas.

There is a 40-gallon water knockout drum between the manifold and the catalytic oxidizer. A high-level switch connected to the water knockout drum turns off the blower and catalytic oxidizer to prevent drawing water into the catalytic oxidizer.



2.0 SYSTEM OPERATIONS AND MONITORING

BrightFields started the SVE system on March 30, 2015. This Quarterly Monitoring Report documents the remediation and monitoring activities performed at the Site from September 23, 2015, through December 23, 2015 (the fourth quarter of 2015). This report is the third monitoring period of system operations.

2.1 Operations

During the monitoring period from September 24, 2015 to December 23, 2015, the SVE system was not in operation on two occasions. The SVE system was turned off on October 27, 2015 to allow for groundwater stabilization prior to performing slug tests on October 29, 2015. It remained off until November 4, 2015, when the blower filter was changed and the system was turned back on. The SVE system was turned off on the second occasion on December 23, 2015 to allow for stabilization prior to performing the baildown test. The system remained off for the rest of the quarter during the baildown test. It was restarted on January 4, 2016.

2.2 Site Visits

With the exception of two weeks, the SVE system was inspected once per week during this quarter in an effort to optimize system operations and ensure compliance with the permit waiver requirements. The table below outlines the inspection dates and significant notes collected at the time of the inspection (the raw field sheets are included in Appendix A).

The following table presents the inspection dates and relevant information. Bolded dates represent dates that air bag samples were collected.

Inspection Dates:	Significant Notes:
10/1/2015	System running successfully.
10/8/2015	System running successfully.
10/22/2015	Collected air bag samples. Hand bailed product from SVE-03.
10/27/2015	Turned off system to allow system to stabilize prior to slug tests.
10/29/15	System off for stabilization. Performed slug tests.
11/2/2015	Inspected pressure port and it was free of debris. System off upon arrival and departure.

Inspection Dates:	Significant Notes:
11/4/2015	Changed blower filter. Inspected VCV filter and it appeared to be clean. Turned system back on.
11/17/2015	Collected air bag samples.
11/25/2015	System running successfully. Hand bailed product from SVE-03.
12/1/2015	System running successfully.
12/10/2015	System running successfully.
12/15/2015	Collected air bag samples. Checked blower filter.
12/22/2015	System running successfully. Checked low pressure switch low pressure port.
12/23/2015	System running successfully. Turned off system to stabilize prior to baildown test.

2.3 Compliance

Air samples were collected from the system to evaluate the efficiency of the system and to comply with the air permit waiver. Grab air samples were collected during system operations at the influent (pre-treatment) and at the effluent to the catalytic oxidizer (post-treatment) using one liter Tedlar® bags. Influent samples provided information pertaining to the mass extraction of hydrocarbons of subsurface soil vapor, and the effluent samples provided information regarding the efficiency of the catalytic oxidizer destruction of the contaminants, prior to their discharge to the atmosphere. All air samples were submitted to Eurofins Scientific in Lancaster, Pennsylvania for analysis using Environmental Protection Agency (EPA) Method TO-18. Raw mass loading/emission estimates and analytical data for each air bag sample collected are provided in Appendix C and Appendix D, respectively.

Based on the analytical data and data collected during the site visits, the effluent discharge estimates for this monitoring period have not exceeded the limit of 0.1 pounds (lbs)/hour or 2.4 lbs/day (system post treatment).

Table 1 provides the SVE System Monitoring Data summary and Chart 1 displays the estimated hydrocarbon mass removal for the SVE system. The mass removal estimate for the SVE system was approximately 1,243 lbs of petroleum hydrocarbons for this quarter.

2.4 Slug Tests

On October 29, 2015, BrightFields performed slug tests in DA-MW36D, DA-MW36S, DA-MW37, DA-MW38, DA-MW39, DA-MW42, GM-MW49, and GM-MW50. Results of the pilot test will be summarized in the Feasibility Study for the Site.

2.5 Free Product Recovery

On October 22, 2015, SVE-03 was gauged and 0.31 feet of product were observed in the well. The separate phase product was hand bailed. Approximately 0.31 gallon of product was removed from the well.

On November 25, 2015, 0.28 feet of product were observed in SVE-03. Approximately 0.04 gallon of product was hand bailed from the well and sent to a Suburban Testing Labs for a petroleum scan analysis.

Assuming the density of diesel fuel, approximately 2.5 lbs of product were removed from SVE-03 on October 22 and November 25, 2015. Recovered product was placed in a 55-gallon steel drum and is staged onsite for future disposal.

2.6 Well Survey

Landmark Science & Engineering surveyed the six extraction wells and two newly installed monitoring wells (GM-MW49 and GM-MW50) on October 27, 2015. Wells were surveyed to a horizontal accuracy of ± 1 foot using the North American Datum 1983 (NAD83) and to a vertical accuracy of ± 0.01 foot using the North American Vertical Datum 1988 (NAVD88). The survey report is included as Appendix E.

3.0 SUMMARY

This Quarterly Monitoring Report documents remediation system operations conducted at the Site from September 24, 2015 through December 23, 2015. During this period, the SVE system was operated for 1,983.7 hours. The system was turned off twice to allow stabilization prior to slug tests and the baildown test.

3.1 Estimated Recovery

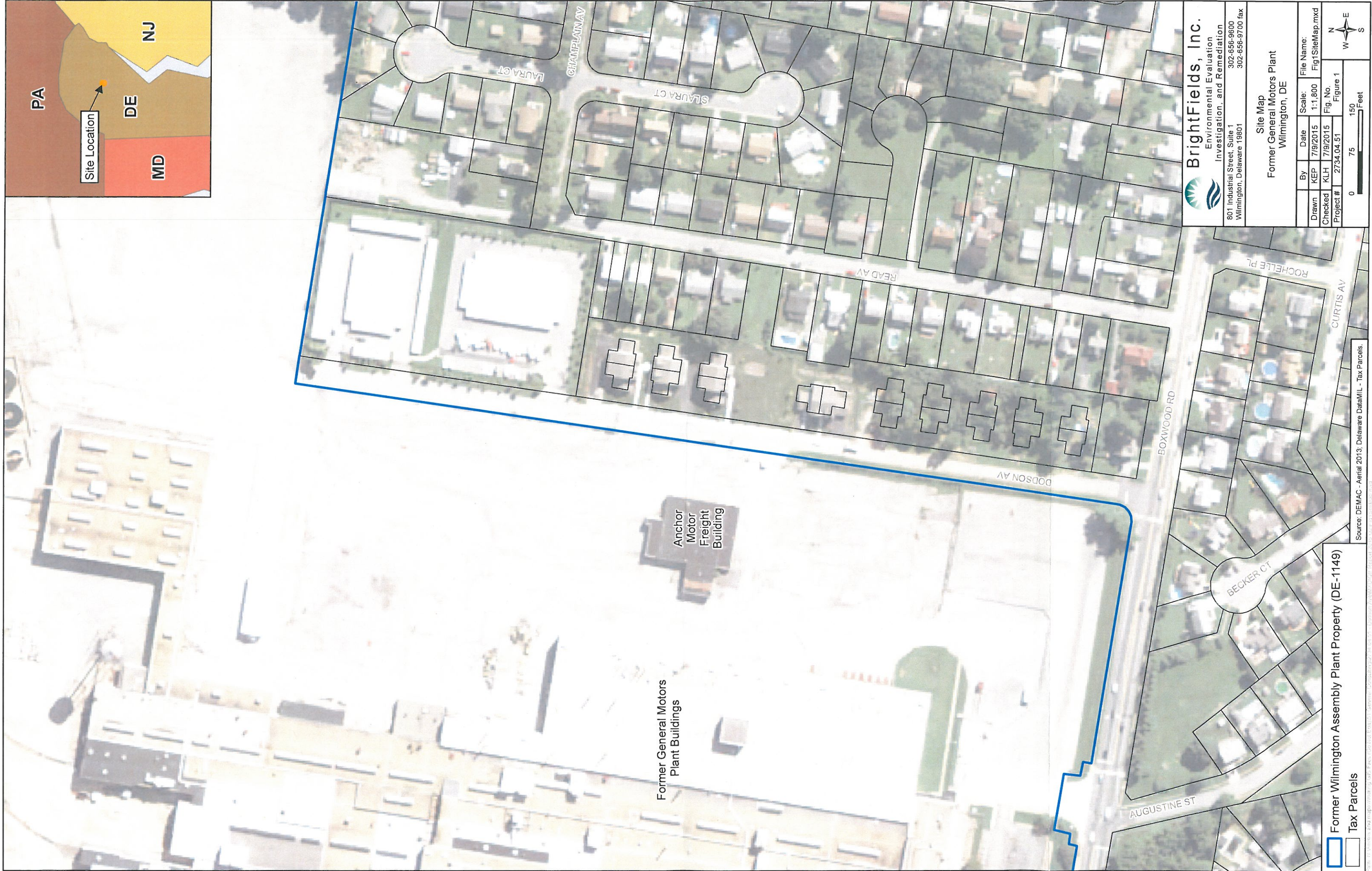
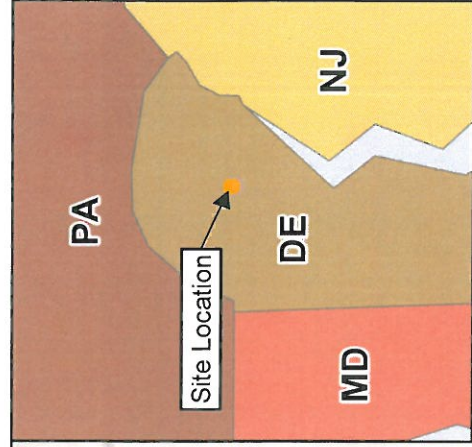
Based on the monitoring data, the total mass of hydrocarbons removed during this monitoring period from SVE recovery efforts is estimated to be approximately 1,243 lbs. Since startup on March 30, 2015, an estimated 3,301 lbs of hydrocarbons have been removed by the SVE system. An additional 8 lbs was removed as separate phase product by hand bailing during the third and fourth quarter.

3.2 Plan for Next Quarter

The remediation effort began in late March 2015; since that date, significant quantities of VOCs have been recovered. BrightFields will continue to operate the SVE system and monitor recovery, as required by the permit waiver. In addition, BrightFields will install a passive bailer in SVE-03 to remove separate phase product.



FIGURES





BrightFields, Inc.
Environmental Evaluation
Investigation, and Remediation
801 Industrial Street, Suite 1
Wilmington, Delaware 19801
302-656-9600
302-656-9700 fax

Site Map
Former General Motors Plant
Wilmington, DE

Drawn	By	Date	Scale	File Name:
KEP	KEP	7/9/2015	1:1,800	Fig1SiteMap.mxd

Checked	Project #	Date	Fig. No.
KLH	2734.04.51	7/9/2015	Figure 1

0 75 150 Feet

N

W

E

S

☒ Former Wilmington Assembly Plant Property (DE-1149)
☐ Tax Parcels

Source: DEMAC - Aerial 2013; Delaware DataMIL - Tax Parcels.





BrightFields, Inc.
Environmental Evaluation
Investigation, and Remediation
801 Industrial Street, Suite 1
Wilmington, Delaware 19801
302-656-9600
302-656-9700 fax

SVE System Layout
Former General Motors Plant
Wilmington, Delaware

By	KEP	Date	8/18/2015	Scale	1:720	File Name	Fig2SVE_Sys.mxd
Drawn	KEP	8/18/2015	1:720	Checked	KLH	8/18/2015	Figure 2
Project #	2734.04.51						

0 30 60 Feet

N

W

E

S

Source: DEMAC - Aerial 2013; Delaware DataMIL - Tax Parcels;
New Castle County Office of Administrative Services - GIS
and Mapping Services.

 SVE Extraction Well

 SVE Conveyance Piping

 SVE Catalytic Oxidizer Unit (housed in shed)

 Fence

 Former Wilmington Assembly Plant Property (DE-1149)

 Tax Parcels

Quarterly Monitoring Report
4th Quarter 2015
Former General Motors Plant
Wilmington, Delaware



BrightFields, Inc.

TABLE

TABLE 1
Soil Vapor Extraction System Monitoring Data
Former GM Plant
Wilmington, DE

Date	Vacuum ("H ₂ O)	Influent Air Velocity (FPM - 3" pipe)	Influent Air Flow Rate (CFM)	Influent Vapor Concentration		Effluent Vapor Concentration		Cat/Ox Operating Temperatures		
				PID (ppmv)	Lab (ppmv)	PID (ppmv)	Lab (ppmv)	T1 (°C)	T2 (°C)	T3 (°C)
10/1/15	32.5	NM	295*	120.3	-	1.2	-	330	348	353
10/8/15	31.0	NM	283*	109.5	-	1.1	-	330	344	350
10/22/15	32.0	5,386	277	96.7	96.9	5.2	0	330	345	350
10/27/15	32.5	NM	295	106.1	-	0.9	-	330	346	352
11/4/15	31.0	NM	283*	146.1	-	2.2	-	330	352	362
11/17/15	32.0	5,862	301	130.0	150	6.3	0	330	350	355
11/25/15	32.5	NM	295*	136.9	-	1.0	-	330	350	355
12/1/15	32.0	NM	289*	150.1	-	1.4	-	330	348	353
12/10/15	31.0	4,397	226	162.6	-	1.4	-	330	348	353
12/15/15	31.0	4,271	220	113.5	140	4.2	0	330	347	353
12/22/15	31.5	4,316	222	138.1	-	1.4	-	330	347	352
12/23/15	31.5	3,792	195	148.5	-	1.1	-	330	346	352

Notes :

FPM - feet per minute

CFM - cubic feet per minute

NM - not measured

PID - photoionization detector

ppmv - parts per million by volume

* - Estimated flow rate from blower backpressure based on Falco 300 online calculator.

Bold indicates dates in which air bags were collected for laboratory analysis.

Lab vapor concentration is the total VOCs (less methane) detected in the air bag laboratory analysis.

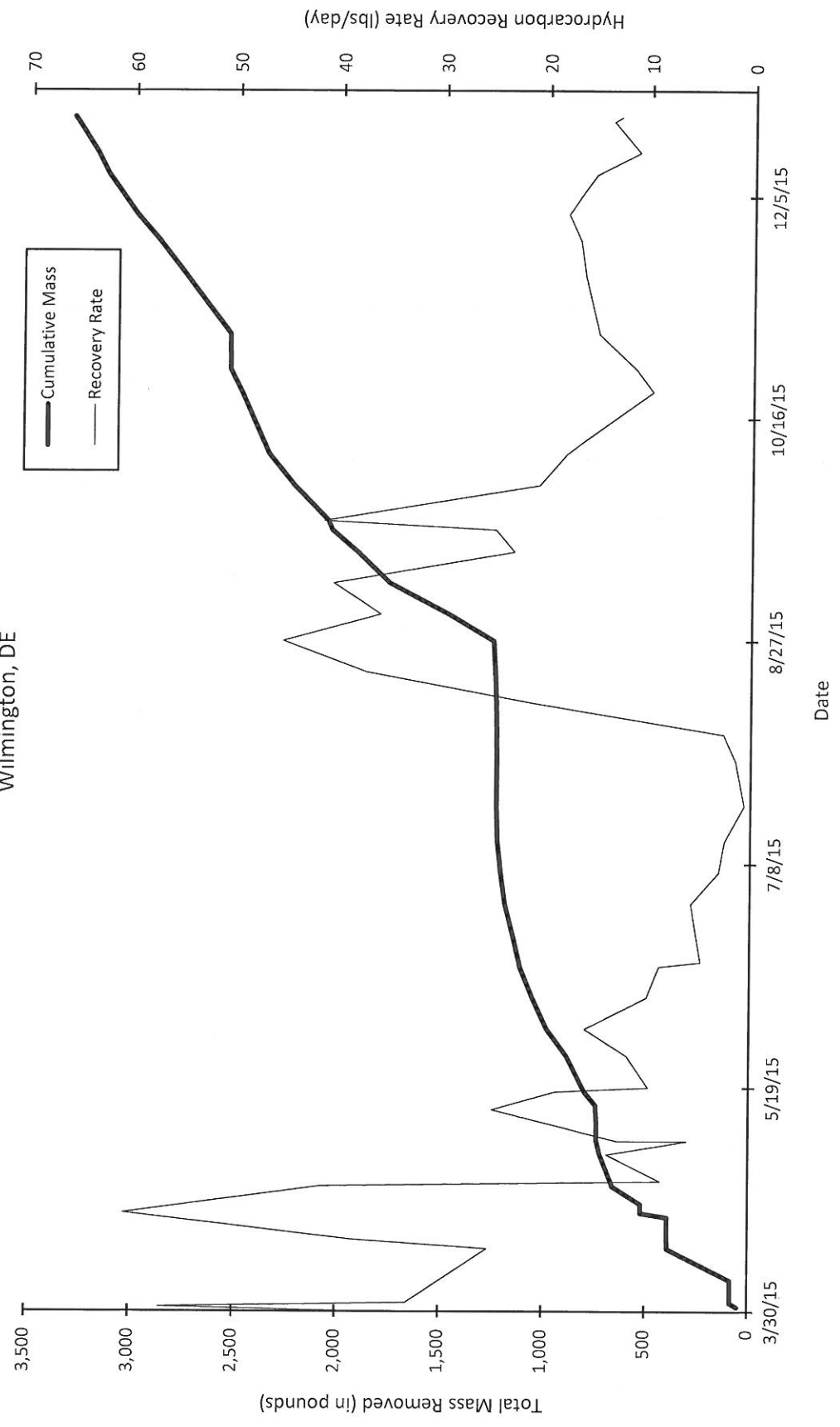
Quarterly Monitoring Report
4th Quarter 2015
Former General Motors Plant
Wilmington, Delaware



BrightFields, Inc.

CHART

Chart 1
 Soil Vapor Extraction System
 Hydrocarbon Mass Removal Estimate
 Falco 300
 Former GM Plant
 Wilmington, DE



Quarterly Monitoring Report
4th Quarter 2015
Former General Motors Plant
Wilmington, Delaware



BrightFields, Inc.

APPENDICES



APPENDIX A

SYSTEM INSPECTION FIELD SHEETS

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 10/1/15; 16:38

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.2
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			120.3
	Cat/Ox Run Time (hours)			3,101.6
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			348
T3	Cat/Ox Temperature - T3 (°C)			353
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-45
BP	Blower Backpressure (inches WC)			32.5
	Water Level Check			Not Checked
Air Bag Sample Times:		Influent	Effluent	Laboratory
		16:49	16:48	FIELD SCRIN

Additional Comments/Work Performed:

Estimated flow rate = 295 SCFM based on blower backpressure (calculated
using Falco 300 online calculator); Did not check water level since pump
must be plugged into outlet outside of shed and it was raining during system
check

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 10/8/15; 12:32

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.1
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			109.5
	Cat/Ox Run Time (hours)			3,265.5
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			344
T3	Cat/Ox Temperature - T3 (°C)			350
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-45
BP	Blower Backpressure (inches WC)			31
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		12:36	12:35	FIELD SCRN

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Estimated flow rate = 283 SCFM based on blower backpressure (calculated
using Falco 300 online calculator); Turned off system to check water level at

12:38; Startup complete at 12:44

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 10/22/15; 10:20

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	267	Not Measured
SVE-03	SVE-03	100	605	Not Measured
SVE-04	SVE-04	100	Out of Range*	Not Measured
SVE-05	SVE-05	0	-	Not Measured
SVE-06	SVE-06	100	179	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			3,071
EFF	Cat/Ox Effluent PID (ppm)			5.2
INF	Cat/Ox Influent Velocity (fpm)			5,386
INF	Cat/Ox Influent PID (ppm)			96.7
	Cat/Ox Run Time (hours)			3,599.2
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			345
T3	Cat/Ox Temperature - T3 (°C)			350
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-45
BP	Blower Backpressure (inches WC)			32
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		10:32	10:22	Lanc Labs

Additional Comments/Work Performed:

* - high moisture was observed in SVE-04 which may have affected air

velocity meter; Cat/Ox Effluent PID taken directly from sample port = 1.0

ppm; Influent PID taken directly from sample port = 101.0 ppm; Turned off

system to check water level and bail product from SVE-03 at 10:55; Bailed

approximately 40 oz product out of SVE-03; Startup complete at 11:46

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 10/27/15; 09:10

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	OFF
Alarms			NONE	N/A
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			0.9
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			106.1
	Cat/Ox Run Time (hours)			3,717.2
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			346
T3	Cat/Ox Temperature - T3 (°C)			352
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-43
	Blower Influent Pressure (inches WC)			-59
BP	Blower Backpressure (inches WC)			32.5
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		9:18	9:15	FIELD SCRIN

Additional Comments/Work Performed:

Estimated flow rate = 295 SCFM based on blower backpressure (calculated using Falco 300 online calculator); Turned off system to check water level at 09:19; System will remain turned off for well survey and slug tests to be conducted this week

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 11/2/15; 14:10

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			OFF	OFF
Alarms			N/A	N/A
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data		Reading	
EFF	Cat/Ox Effluent Velocity (fpm)		Not Measured	
EFF	Cat/Ox Effluent PID (ppm)		Not Measured	
INF	Cat/Ox Influent Velocity (fpm)		Not Measured	
INF	Cat/Ox Influent PID (ppm)		Not Measured	
	Cat/Ox Run Time (hours)		Not Measured	
T1	Cat/Ox Temperature - T1 (°C)		Not Measured	
T2	Cat/Ox Temperature - T2 (°C)		Not Measured	
T3	Cat/Ox Temperature - T3 (°C)		Not Measured	
MV	Manual Valve Percentage Open		Not Measured	
	Recirculation Valve Percentage Open		Not Measured	
VCV	VCV Percentage Open		Not Measured	
	Filter Influent Pressure (inches WC)		Not Measured	
	Blower Influent Pressure (inches WC)		Not Measured	
BP	Blower Backpressure (inches WC)		Not Measured	
	Water Level Check		Not Measured	
Air Bag Sample Times:		Influent	Effluent	Laboratory
		-	-	-

Additional Comments/Work Performed:

Onsite to check pressure port; Pressure port is free of debris; Jim Lunn of Falmouth Products suggests checking blower filter on a monthly basis and replacing filter if necessary

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 11/4/15; 14:12

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			OFF	ON
Alarms			N/A	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			2.2
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			146.1
	Cat/Ox Run Time (hours)			3,718.0
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			352
T3	Cat/Ox Temperature - T3 (°C)			362
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-45
BP	Blower Backpressure (inches WC)			31
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		14:15	14:13	FIELD SCRIN

Additional Comments/Work Performed:

Changed blower filter; Checked VCV filter and it did not need to be
cleaned; Startup complete at 14:01; Waited for temperatures and VCV to
stabilize prior to performing system check; Temperatures fluctuated slightly
during system check; Cat/Ox Effluent PID and Influent PID measured directly
from sample ports; Estimated flow rate = 283 SCFM based on blower
backpressure (calculated using Falco 300 online calculator)

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 11/17/15; 12:15

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	-	Not Measured
SVE-02	SVE-02	100	121	Not Measured
SVE-03	SVE-03	100	250	Not Measured
SVE-04	SVE-04	100	Out of Range*	Not Measured
SVE-05	SVE-05	0	-	Not Measured
SVE-06	SVE-06	100	263	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			2,776
EFF	Cat/Ox Effluent PID (ppm)			6.3
INF	Cat/Ox Influent Velocity (fpm)			5,862
INF	Cat/Ox Influent PID (ppm)			130.0
	Cat/Ox Run Time (hours)			4,027.9
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			350
T3	Cat/Ox Temperature - T3 (°C)			355
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-48
BP	Blower Backpressure (inches WC)			32
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		12:30	12:20	Lanc Labs

Additional Comments/Work Performed:

* - high moisture was observed in SVE-04 which may have affected air velocity meter; Cat/Ox Effluent PID taken directly from sample port = 1.2 ppm; Influent PID taken directly from sample port = 134.1 ppm; Turned off system to check water level at 12:43; Startup complete at 12:50

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 11/25/15; 09:58

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.0
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			136.9
	Cat/Ox Run Time (hours)			4,217.6
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			350
T3	Cat/Ox Temperature - T3 (°C)			355
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-43
	Blower Influent Pressure (inches WC)			-50
BP	Blower Backpressure (inches WC)			32.5
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		10:03	10:02	FIELD SCRN

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Estimated flow rate = 295 SCFM based on blower backpressure (calculated using Falco 300 online calculator); Turned off system to check water level

and gauge SVE-03 at 10:04; SVE-03 headspace = 847.7 ppm, DTP = 15.24

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 12/1/15; 13:40

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.4
INF	Cat/Ox Influent Velocity (fpm)			Not Measured
INF	Cat/Ox Influent PID (ppm)			150.1
	Cat/Ox Run Time (hours)			4,364.6
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			348
T3	Cat/Ox Temperature - T3 (°C)			353
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-42
	Blower Influent Pressure (inches WC)			-48
BP	Blower Backpressure (inches WC)			32
	Water Level Check			Not Checked
Air Bag Sample Times:		Influent	Effluent	Laboratory
		13:46	13:45	FIELD SCRIN

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Estimated flow rate = 289 SCFM based on blower backpressure (calculated using Falco 300 online calculator); Did not check water level due to rain

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 12/10/15; 10:46

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	-	Not Measured
SVE-02	SVE-02	100	522.0	Not Measured
SVE-03	SVE-03	100	795.0	Not Measured
SVE-04	SVE-04	100	-	Not Measured
SVE-05	SVE-05	0	-	Not Measured
SVE-06	SVE-06	100	490.0	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.4
INF	Cat/Ox Influent Velocity (fpm)			4,397.0
INF	Cat/Ox Influent PID (ppm)			162.1
	Cat/Ox Run Time (hours)			4,577.7
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			348
T3	Cat/Ox Temperature - T3 (°C)			353
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-41
	Blower Influent Pressure (inches WC)			-47
BP	Blower Backpressure (inches WC)			31
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		10:52	10:49	FIELD SCRIN

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Did not measure velocity in SVE-04 due to high moisture; Turned off system

to check water level at 11:05; Startup complete at 11:11

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 12/15/15; 10:40

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	-	Not Measured
SVE-02	SVE-02	100	839.0	Not Measured
SVE-03	SVE-03	100	1,075.0	Not Measured
SVE-04	SVE-04	100	-	Not Measured
SVE-05	SVE-05	0	-	Not Measured
SVE-06	SVE-06	100	581.0	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			4.2
INF	Cat/Ox Influent Velocity (fpm)			4,271.0
INF	Cat/Ox Influent PID (ppm)			113.5
	Cat/Ox Run Time (hours)			4,695.9
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			347
T3	Cat/Ox Temperature - T3 (°C)			353
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-40
	Blower Influent Pressure (inches WC)			-45
BP	Blower Backpressure (inches WC)			31
	Water Level Check			ABSENT
Air Bag Sample Times:		Influent	Effluent	Laboratory
		10:52	10:46	LANC LABS

Additional Comments/Work Performed:

Cat/Ox Effluent PID taken directly from sample port = 1.4 ppm; Influent PID

taken directly from sample port = 113.7 ppm; Did not measure velocity in

SVE-04 due to high moisture; Checked blower filter and it appeared to be

clean; Turned off system to check water level at 11:08; Startup complete at

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 12/22/15; 10:30

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	ON
Alarms			NONE	NONE
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.4
INF	Cat/Ox Influent Velocity (fpm)			4,316.0
INF	Cat/Ox Influent PID (ppm)			138.1
	Cat/Ox Run Time (hours)			4,863.6
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			347
T3	Cat/Ox Temperature - T3 (°C)			352
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-42
	Blower Influent Pressure (inches WC)			-48
BP	Blower Backpressure (inches WC)			31.5
	Water Level Check			Not Checked
Air Bag Sample Times:		Influent	Effluent	Laboratory
		10:38	10:36	FIELD SCRNM

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Checked low pressure switch low pressure port and it was free of debris;

Did not check water level due to rain

**Former General Motors Plant
Wilmington, DE
System Check Sheet**

Name: Kelly Power

Date/Time: 12/23/15; 14:50

SOIL VAPOR EXTRACTION SYSTEM				
Status			Arrival	Departure
SVE System			ON	OFF
Alarms			NONE	N/A
Tag ID	Location	% Open	Velocity (fpm)	PID (ppm)
SVE-01	SVE-01	0	Not Measured	Not Measured
SVE-02	SVE-02	100	Not Measured	Not Measured
SVE-03	SVE-03	100	Not Measured	Not Measured
SVE-04	SVE-04	100	Not Measured	Not Measured
SVE-05	SVE-05	0	Not Measured	Not Measured
SVE-06	SVE-06	100	Not Measured	Not Measured
Tag ID	Additional Data			Reading
EFF	Cat/Ox Effluent Velocity (fpm)			Not Measured
EFF	Cat/Ox Effluent PID (ppm)			1.1
INF	Cat/Ox Influent Velocity (fpm)			3,792.0
INF	Cat/Ox Influent PID (ppm)			148.5
	Cat/Ox Run Time (hours)			4,891.9
T1	Cat/Ox Temperature - T1 (°C)			330
T2	Cat/Ox Temperature - T2 (°C)			346
T3	Cat/Ox Temperature - T3 (°C)			352
MV	Manual Valve Percentage Open			50%
	Recirculation Valve Percentage Open			0%
VCV	VCV Percentage Open			95%
	Filter Influent Pressure (inches WC)			-41
	Blower Influent Pressure (inches WC)			-47
BP	Blower Backpressure (inches WC)			31.5
	Water Level Check			Not Checked
Air Bag Sample Times:		Influent	Effluent	Laboratory
		14:53	14:51	FIELD SCRIN

Additional Comments/Work Performed:

Cat/Ox Effluent PID and Influent PID measured directly from sample ports;

Did not check water level due to rain; Turned system off at 14:56 to allow
stabilization prior to baildown testing



APPENDIX B

PERMIT WAIVER



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR & WASTE MANAGEMENT
715 GRANTHAM LANE
NEW CASTLE, DELAWARE 19720

AIR QUALITY MANAGEMENT
SECTION

TELEPHONE: (302) 323-4542
FAX NO.: (302) 323-4598

March 23, 2015

Brightfields Inc.
801 Industrial Street
Wilmington, Delaware 19801

ATTENTION: Ken Hannon
Engineering Program Manager

UST Facility ID#: 3-000541
LUST Project ID #: N8708035

SUBJECT: Former GM Plant
801 Boxwood Road, Wilmington, DE 19804
SVE System, Dodson Avenue

Dear Mr. Hannon:

This is in reference to the information in your submission dated December 29, 2014, in which you requested, on behalf of Brightfields Inc., the Department's permission to operate a Soil Vapor Extraction system for the owner, Racer Trust, controlled by thermal incineration with controlled rate located at the Former GM Plant at 801 Boxwood Road, Newport, Delaware 19804.

In the Department's opinion, the air contaminant emissions from this proposed source have little or no potential to cause a condition of air pollution; therefore, since this equipment will emit less than 0.1 pounds per hour and 2.4 pounds per day, permits for installation and operation are not required as long as the said equipment is operating as described on Form AQM-12 dated December 29, 2014 and signed by Pamela Barnett.

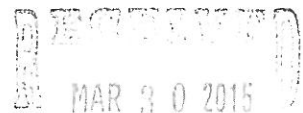
When the system is placed in operation, the owner or operator shall immediately fine-tune the system components based upon inlet Volatile Organic Compound (VOC) concentrations to ensure that VOC emissions do not exceed the emission limit of 0.1 pounds per hour and 2.4 pounds per day.

The owner or operator shall, at a minimum, perform system monitoring as follows:

- Field samples from the influent and effluent shall be collected and field screened using a PID at least twice a month.
- Influent and effluent samples shall be collected for laboratory analysis on a monthly basis. These samples shall be tested for benzene, toluene, ethylbenzene, and xylenes (BTEX), Total Petroleum Hydrocarbons (TPH) C₁-C₄, and TPH C₅-C₁₀ using Reference Method 18.

The following information shall be recorded, initialed, and maintained in a log book:

- Monthly VOC concentrations and inlet gas flow rate;



DE: _____

Delaware's good nature depends on you!

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Brightfields Inc.
801 Industrial Street
Wilmington, Delaware 19801
Former GM Plant, 801 Boxwood Road
Permit Waiver
March 23, 2015
Page 2

- The date, time and results of each field analysis;
- The date, time collected, and results of each laboratory analysis;
- The date, type of work, and reason for any maintenance performed on the equipment;
- Calculated thermal destruction efficiencies based upon the monitoring results; and
- Inlet gas flow proportioning adjustments required to avoid exceedance of the 0.1 pound per hour and 2.4 pounds per day VOC emission limit.

All air monitoring results from the process shall be forwarded to the Department's Underground Storage Tank Branch and the Site Investigation and Restoration Branch (SIRB) on a quarterly basis as part of the normal report to that Branch. Reference UST Facility ID # **3-000541** and LUST Project ID# **N8708035** when submitting these results.

If any change in operation is necessary (i.e. emission rates, flow rates, etc.) to the above equipment, the Department's Air Quality Management, Site Investigation And Restoration and Underground Storage Tank Branches shall be notified, in writing, two (2) weeks prior to commencement of operation of this equipment.

If, at any time, the above equipment fails to meet the requirements of Regulation No. 2, Section 2.1(a), either by exceeding the emission limitation of 2.4 pounds per day on a site-wide basis or by causing a condition of air pollution, then operation of said equipment shall be immediately discontinued and shall be reported to the Department via the Emergency Notification and Complaint Hotline (1-800-662-8802). The equipment shall remain inactive until the necessary permits have been issued or the problem has been resolved to the satisfaction of the Department.

Sincerely,



Everett L. DeWhitt, Jr., PhD.
Environmental Engineer
Engineering & Compliance Branch

PEF
F:\EngAndCompliance\eld15013

pc: Dover File
Paul E. Foster, P.E.
Rick Galloway, P.G.



APPENDIX C

MASS LOADING / EMISSIONS

ESTIMATES FROM AIR BAG SAMPLES

APPENDIX C
Soil Vapor Extraction System Vapor Mass Loading / Emissions Estimates
Former GM Plant
Wilmington, DE

Date	PID Readings				Laboratory Data			
	Mass Loading Rate		Mass Emissions Rate		Destruction Efficiency		Mass Loading Rate	
	(lbs/hr)	(lbs/day)	(lbs/hr)	(lbs/day)	(%)	(%)	(lbs/hr)	(lbs/day)
10/1/15	0.87	20.8	0.042	1.0	95.2%	-	-	-
10/8/15	0.76	18.1	0.037	0.88	95.2%	-	-	-
10/22/15	0.41	9.7	0.022	0.52	94.6%	0.35	8.4	0
11/4/15	0.63	15.0	0.0094	0.23	98.5%	-	-	-
11/17/15	0.68	16.4	0.029	0.69	95.8%	0.59	14.2	0
11/25/15	0.70	16.9	0.0045	0.11	99.4%	-	-	-
12/1/15	0.76	18.1	0.0061	0.15	99.2%	-	-	-
12/10/15	0.64	15.4	0.0048	0.11	99.3%	-	-	-
12/15/15	0.46	11.2	0.014	0.33	97.0%	0.40	9.7	0
12/22/15	0.57	13.7	0.0047	0.11	99.2%	-	-	-
12/23/15	0.54	13.0	0.0032	0.078	99.4%	-	-	-

Notes :

PID - photoionization detector

Bold indicates dates in which air bags were collected for laboratory analysis.

10/22/15 through 12/23/15 mass emissions assume response factor of 1 since no VOCs were detected in effluent sample laboratory analysis.



APPENDIX D

AIR BAG ANALYTICAL DATA

ANALYTICAL RESULTS

Prepared by:

Eurofins Lancaster Laboratories Environmental
2425 New Holland Pike
Lancaster, PA 17601

Prepared for:

Brightfields, Inc.
801 Industrial St.
Suite I
Wilmington DE 19801

November 04, 2015

Project: Dodson Ave/2734.045.51

Submittal Date: 10/23/2015

Group Number: 1603537

PO Number: 13226

Release Number: 2734.04.51

State of Sample Origin: DE

Client Sample Description

DA-EFF-102215 Grab Air

DA-INF-102215 Grab Air

Lancaster Labs (LL) #

8103264

8103265

The specific methodologies used in obtaining the enclosed analytical results are indicated on the Laboratory Sample Analysis Record.

Regulatory agencies do not accredit laboratories for all methods, analytes, and matrices. Our scopes of accreditation can be viewed at <http://www.eurofinsus.com/environment-testing/laboratories/eurofins-lancaster-laboratories-environmental/resources/certifications/>.

ELECTRONIC COPY TO
ELECTRONIC COPY TO
Brightfields, Inc.
Brightfields, Inc.

Attn: Kelly Power

Attn: Ken Hannon

Respectfully Submitted,



Megan A. Moeller
Senior Specialist

(717) 556-7261

Sample Description: DA-EFF-102215 Grab Air
Dodson Ave/2734.04.51

LL Sample # AQ 8103264
LL Group # 1603537
Account # 04549

Project Name: Dodson Ave/2734.045.51

Collected: 10/22/2015 10:22 by KP

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

Submitted: 10/23/2015 17:05

Reported: 11/04/2015 09:56

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod	ppm(v)	ppm(v)	
07090	Benzene	71-43-2	N.D.	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	N.D.	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	N.D.	5	1
07090	Ethylbenzene	100-41-4	N.D.	0.4	1
07090	Methane	74-82-8	180	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	N.D.	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1530030AA	10/27/2015 21:59	Alexander D Sechrist	1

Sample Description: DA-INF-102215 Grab Air
Dodson Ave/2734.04.51

LL Sample # AQ 8103265
LL Group # 1603537
Account # 04549

Project Name: Dodson Ave/2734.045.51

Collected: 10/22/2015 10:32 by KP

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

Submitted: 10/23/2015 17:05

Reported: 11/04/2015 09:56

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod	ppm(v)	ppm(v)	
07090	Benzene	71-43-2	0.5 J	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	7 J	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	88	5	1
07090	Ethylbenzene	100-41-4	0.4 J	0.4	1
07090	Methane	74-82-8	210	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	1 J	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1530030AA	10/27/2015 22:28	Alexander D Sechrist	1

Quality Control Summary

Client Name: Brightfields, Inc.
Reported: 11/04/2015 09:56

Group Number: 1603537

Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

All Inorganic Initial Calibration and Continuing Calibration Blanks met acceptable method criteria unless otherwise noted on the Analysis Report.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank MDL</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: M1530030AA	Sample number(s): 8103264-8103265							
Benzene	N.D.	0.5	ppm(v)	111	111	75-111	0	30
C2-C4 Hydrocarbons as hexane	N.D.	5.	ppm(v)					
>C4-C10 Hydrocarbons hexane	N.D.	5.	ppm(v)					
Ethylbenzene	N.D.	0.4	ppm(v)	98	96	59-159	2	30
Methane	N.D.	2.	ppm(v)					
Toluene	N.D.	0.8	ppm(v)	126	124	77-143	1	30
Xylene (total)	N.D.	0.7	ppm(v)	91	89	70-134	2	30

* - Outside of specification

- (1) The result for one or both determinations was less than five times the LOQ.
- (2) The unspiked result was more than four times the spike added.

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

RL	Reporting Limit	BMQL	Below Minimum Quantitation Level
N.D.	none detected	MPN	Most Probable Number
TNTC	Too Numerous To Count	CP Units	cobalt-chloroplatinate units
IU	International Units	NTU	nephelometric turbidity units
umhos/cm	micromhos/cm	ng	nanogram(s)
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
µg	microgram(s)	mg	milligram(s)
mL	milliliter(s)	L	liter(s)
m3	cubic meter(s)	µL	microliter(s)
		pg/L	picogram/liter
<	less than		
>	greater than		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg) or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

Laboratory Data Qualifiers:

- B - Analyte detected in the blank
- C - Result confirmed by reanalysis
- E - Concentration exceeds the calibration range
- J (or G, I, X) - estimated value $\geq$ the Method Detection Limit (MDL or DL) and $<$ the Limit of Quantitation (LOQ or RL)
- P - Concentration difference between the primary and confirmation column $>40\%$. The lower result is reported.
- U - Analyte was not detected at the value indicated
- V - Concentration difference between the primary and confirmation column $>100\%$. The reporting limit is raised due to this disparity and evident interference...

Additional Organic and Inorganic CLP qualifiers may be used with Form 1 reports as defined by the CLP methods. Qualifiers specific to Dioxin/Furans and PCB Congeners are detailed on the individual Analysis Report.

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff.

This report shall not be reproduced except in full, without the written approval of the laboratory.

Times are local to the area of activity. Parameters listed in the 40 CFR Part 136 Table II as "analyze immediately" are not performed within 15 minutes.

WARRANTY AND

ANALYTICAL RESULTS

Prepared by:

Eurofins Lancaster Laboratories Environmental
2425 New Holland Pike
Lancaster, PA 17601

Prepared for:

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

November 24, 2015

Project: Dodson Ave/2734.045.51

Submittal Date: 11/18/2015

Group Number: 1610473

PO Number: 13293

Release Number: 2734.04.51

State of Sample Origin: DE

Client Sample Description

DA-EFF-111715 Grab Air

DA-INF-111715 Grab Air

Lancaster Labs (LL) #

8140407

8140408

The specific methodologies used in obtaining the enclosed analytical results are indicated on the Laboratory Sample Analysis Record.

Regulatory agencies do not accredit laboratories for all methods, analytes, and matrices. Our scopes of accreditation can be viewed at <http://www.eurofinsus.com/environment-testing/laboratories/eurofins-lancaster-laboratories-environmental/resources/certifications/>.

ELECTRONIC Brightfields, Inc.
COPY TO
ELECTRONIC Brightfields, Inc.
COPY TO

Attn: Kelly Power

Attn: Ken Hannon

Respectfully Submitted,



Megan A. Moeller
Senior Specialist

(717) 556-7261

Sample Description: DA-EFF-111715 Grab Air
Dodson Ave/2734.0451

LL Sample # AQ 8140407
LL Group # 1610473
Account # 04549

Project Name: Dodson Ave/2734.045.51

Collected: 11/17/2015 12:10 by KP

Brightfields, Inc.

Submitted: 11/18/2015 19:20

801 Industrial St.

Reported: 11/24/2015 10:14

Suite 1

Wilmington DE 19801

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod ppm(v)		ppm(v)	
07090	Benzene	71-43-2	N.D.	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	N.D.	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	N.D.	5	1
07090	Ethylbenzene	100-41-4	N.D.	0.4	1
07090	Methane	74-82-8	240	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	N.D.	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1532530AA	11/21/2015 15:32	Alexander D Sechrist	1



Lancaster
Laboratories

Analysis Report

2425 New Holland Pike, PO Box 12425, Lancaster, PA 17605-2425 • 717-656-2300 Fax: 717-656-2681 • www.lancasterlabs.com

Sample Description: DA-INF-111715 Grab Air
Dodson Ave/2734.04.51

LL Sample # AQ 8140408
LL Group # 1610473
Account # 04549

Project Name: Dodson Ave/2734.045.51

Collected: 11/17/2015 12:30 by KP

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

Submitted: 11/18/2015 19:20

Reported: 11/24/2015 10:14

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod	ppm(v)	ppm(v)	
07090	Benzene	71-43-2	0.5 J	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	8 J	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	140	5	1
07090	Ethylbenzene	100-41-4	0.4 J	0.4	1
07090	Methane	74-82-8	290	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	1 J	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1532530AA	11/21/2015 16:01	Alexander D Sechrist	1

Quality Control Summary

Client Name: Brightfields, Inc.
Reported: 11/24/2015 10:14

Group Number: 1610473

Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

All Inorganic Initial Calibration and Continuing Calibration Blanks met acceptable method criteria unless otherwise noted on the Analysis Report.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank MDL</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: M1532530AA	Sample number(s): 8140407-8140408							
Benzene	N.D.	0.5	ppm(v)	78	82	75-111	4	30
C2-C4 Hydrocarbons as hexane	N.D.	5.	ppm(v)					
>C4-C10 Hydrocarbons hexane	N.D.	5.	ppm(v)					
Ethylbenzene	N.D.	0.4	ppm(v)	86	87	59-159	2	30
Methane	N.D.	2.	ppm(v)					
Toluene	N.D.	0.8	ppm(v)	100	98	77-143	1	30
Xylene (total)	N.D.	0.7	ppm(v)	81	82	70-134	2	30

*- Outside of specification

(1) The result for one or both determinations was less than five times the LOQ.

(2) The unspiked result was more than four times the spike added.

P##### is indicative of a Background or Unspiked sample that is batch matrix QC and was not performed using a sample from this submission group.

Explanation of Symbols and Abbreviations

The following defines common symbols and abbreviations used in reporting technical data:

RL	Reporting Limit	BMQL	Below Minimum Quantitation Level
N.D.	none detected	MPN	Most Probable Number
TNTC	Too Numerous To Count	CP Units	cobalt-chloroplatinate units
IU	International Units	NTU	nephelometric turbidity units
umhos/cm	micromhos/cm	ng	nanogram(s)
C	degrees Celsius	F	degrees Fahrenheit
meq	milliequivalents	lb.	pound(s)
g	gram(s)	kg	kilogram(s)
µg	microgram(s)	mg	milligram(s)
mL	milliliter(s)	L	liter(s)
m3	cubic meter(s)	µL	microliter(s)
		pg/L	picogram/liter
<	less than		
>	greater than		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg) or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

Laboratory Data Qualifiers:

- B - Analyte detected in the blank
- C - Result confirmed by reanalysis
- E - Concentration exceeds the calibration range
- J (or G, I, X) - estimated value $\geq$ the Method Detection Limit (MDL or DL) and $<$ the Limit of Quantitation (LOQ or RL)
- P - Concentration difference between the primary and confirmation column $>40\%$. The lower result is reported.
- U - Analyte was not detected at the value indicated
- V - Concentration difference between the primary and confirmation column $>100\%$. The reporting limit is raised due to this disparity and evident interference...

Additional Organic and Inorganic CLP qualifiers may be used with Form 1 reports as defined by the CLP methods. Qualifiers specific to Dioxin/Furans and PCB Congeners are detailed on the individual Analysis Report.

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

Measurement uncertainty values, as applicable, are available upon request.

Tests results relate only to the sample tested. Clients should be aware that a critical step in a chemical or microbiological analysis is the collection of the sample. Unless the sample analyzed is truly representative of the bulk of material involved, the test results will be meaningless. If you have questions regarding the proper techniques of collecting samples, please contact us. We cannot be held responsible for sample integrity, however, unless sampling has been performed by a member of our staff.

This report shall not be reproduced except in full, without the written approval of the laboratory.

Times are local to the area of activity. Parameters listed in the 40 CFR Part 136 Table II as "analyze immediately" are not performed within 15 minutes.

WARRANTY AND LIMITS OF LIABILITY - In accepting analytical work, we warrant the accuracy of test results for the sample as submitted. THE FOREGOING EXPRESS WARRANTY IS EXCLUSIVE AND IS GIVEN

ANALYTICAL RESULTS

Prepared by:

Eurofins Lancaster Laboratories Environmental
2425 New Holland Pike
Lancaster, PA 17601

Prepared for:

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

December 28, 2015

Project: Dodson Ave/2734.04.51

Submittal Date: 12/16/2015

Group Number: 1618130

PO Number: 13350

Release Number: 2734.04.51

State of Sample Origin: DE

Client Sample Description

DA-EFF-121515 Grab Air

DA-INF-121515 Grab Air

Lancaster Labs (LL) #

8179573

8179574

The specific methodologies used in obtaining the enclosed analytical results are indicated on the Laboratory Sample Analysis Record.

Regulatory agencies do not accredit laboratories for all methods, analytes, and matrices. Our scopes of accreditation can be viewed at <http://www.eurofinsus.com/environment-testing/laboratories/eurofins-lancaster-laboratories-environmental/resources/certifications/>.

ELECTRONIC COPY TO
ELECTRONIC COPY TO
Brightfields, Inc.
Brightfields, Inc.

Attn: Kelly Power

Attn: Ken Hannon

Respectfully Submitted,



Megan A. Moeller
Senior Specialist

(717) 556-7261

Sample Description: DA-EFF-121515 Grab Air
Dodson Ave/2734.04.51

LL Sample # AQ 8179573
LL Group # 1618130
Account # 04549

Project Name: Dodson Ave/2734.04.51

Collected: 12/15/2015 10:46 by KP

Brightfields, Inc.

Submitted: 12/16/2015 17:25

801 Industrial St.

Reported: 12/28/2015 15:10

Suite 1

Wilmington DE 19801

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod	ppm(v)	ppm(v)	
07090	Benzene	71-43-2	N.D.	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	N.D.	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	N.D.	5	1
07090	Ethylbenzene	100-41-4	N.D.	0.4	1
07090	Methane	74-82-8	92	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	N.D.	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1535130AA	12/17/2015 14:59	Alexander D Sechrist	1

Sample Description: DA-INF-121515 Grab Air
Dodson Ave/2734.04.51

LL Sample # AQ 8179574
LL Group # 1618130
Account # 04549

Project Name: Dodson Ave/2734.04.51

Collected: 12/15/2015 10:52 by KP

Brightfields, Inc.
801 Industrial St.
Suite 1
Wilmington DE 19801

Submitted: 12/16/2015 17:25

Reported: 12/28/2015 15:10

CAT No.	Analysis Name	CAS Number	Result	Method Detection Limit	Dilution Factor
Volatiles in Air		EPA 18 mod/EPA 25 mod	ppm(v)	ppm(v)	
07090	Benzene	71-43-2	0.8 J	0.5	1
07090	C2-C4 Hydrocarbons as hexane	n.a.	8 J	5	1
07090	>C4-C10 Hydrocarbons hexane	n.a.	130	5	1
07090	Ethylbenzene	100-41-4	0.4 J	0.4	1
07090	Methane	74-82-8	310	2	1
07090	Toluene	108-88-3	N.D.	0.8	1
07090	Xylene (total)	1330-20-7	1 J	0.7	1

General Sample Comments

All QC is compliant unless otherwise noted. Please refer to the Quality Control Summary for overall QC performance data and associated samples.

Laboratory Sample Analysis Record

CAT No.	Analysis Name	Method	Trial#	Batch#	Analysis Date and Time	Analyst	Dilution Factor
07090	BTEX/MTBE/Hydrocarbons by GC	EPA 18 mod/EPA 25 mod	1	M1535130AA	12/17/2015 15:29	Alexander D Sechrist	1

Quality Control Summary

Client Name: Brightfields, Inc.
Reported: 12/28/2015 15:10

Group Number: 1618130

Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD was performed, unless otherwise specified in the method.

All Inorganic Initial Calibration and Continuing Calibration Blanks met acceptable method criteria unless otherwise noted on the Analysis Report.

Laboratory Compliance Quality Control

<u>Analysis Name</u>	<u>Blank Result</u>	<u>Blank MDL</u>	<u>Report Units</u>	<u>LCS %REC</u>	<u>LCSD %REC</u>	<u>LCS/LCSD Limits</u>	<u>RPD</u>	<u>RPD Max</u>
Batch number: M1535130AA	Sample number(s): 8179573-8179574							
Benzene	N.D.	0.5	ppm (v)	99	100	71-116	1	30
C2-C4 Hydrocarbons as hexane	N.D.	5.	ppm (v)					
>C4-C10 Hydrocarbons hexane	N.D.	5.	ppm (v)					
Ethylbenzene	N.D.	0.4	ppm (v)	90	84	59-144	7	30
Methane	N.D.	2.	ppm (v)					
Toluene	N.D.	0.8	ppm (v)	108	109	77-143	1	30
Xylene (total)	N.D.	0.7	ppm (v)	87	85	58-148	2	30

*- Outside of specification

(1) The result for one or both determinations was less than five times the LOQ.

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g	gram(s)	kg	kilogram(s)
µg	microgram(s)	mg	milligram(s)
mL	milliliter(s)	L	liter(s)
m3	cubic meter(s)	µL	microliter(s)
		pg/L	picogram/liter
<	less than		
>	greater than		
ppm	parts per million - One ppm is equivalent to one milligram per kilogram (mg/kg) or one gram per million grams. For aqueous liquids, ppm is usually taken to be equivalent to milligrams per liter (mg/l), because one liter of water has a weight very close to a kilogram. For gases or vapors, one ppm is equivalent to one microliter per liter of gas.		
ppb	parts per billion		
Dry weight basis	Results printed under this heading have been adjusted for moisture content. This increases the analyte weight concentration to approximate the value present in a similar sample without moisture. All other results are reported on an as-received basis.		

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- B - Analyte detected in the blank
- C - Result confirmed by reanalysis
- E - Concentration exceeds the calibration range
- J (or G, I, X) - estimated value $\geq$ the Method Detection Limit (MDL or DL) and

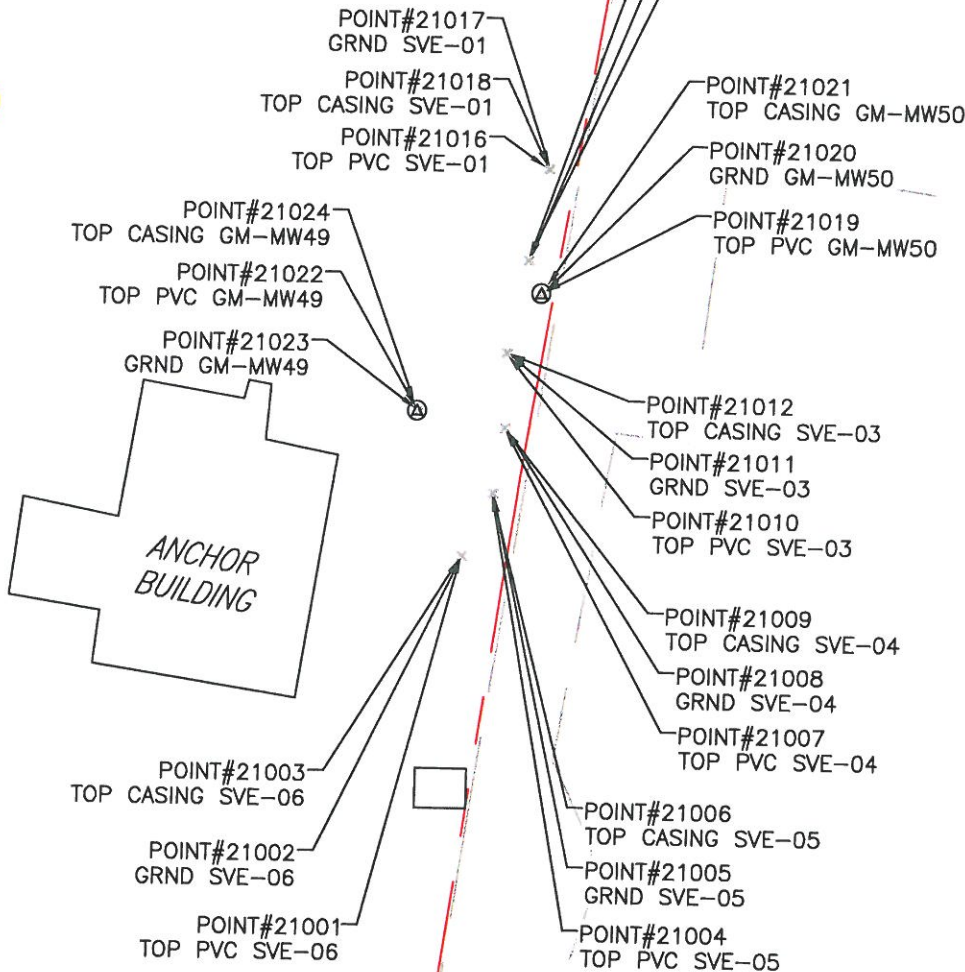


APPENDIX E

MONITORING WELL SURVEY REPORT

GENERAL NOTES

1. TAX PARCEL: 07-042.10-055
2. SITE AREA: 126+/- ACRES
3. POSTAL ADDRESS: 801 BOXWOOD RD, WILMINGTON, DE
4. RECORD PLAN NO: MF# 13286
5. SOURCE OF TITLE: 20100719-0037264, E-45-579
6. DATUM: VERTICAL: NAVD 1988 IN FEET
HORIZONTAL: DESPC MAD 83 IN FEET
7. EXISTING ZONING: HI (HEAVY INDUSTRIAL)
8. INITIAL DATE OF SURVEY: OCTOBER 17, 2011,
ADDITIONAL LOCATIONS: OCTOBER 27, 2015.
9. THIS PLAN WAS PREPARED WITHOUT THE BENEFIT OF A TITLE SEARCH AND DOES NOT REPRESENT A PERIMETER SURVEY. PROPERTY LINES SHOWN ARE FOR GRAPHICAL PURPOSES ONLY.



BORING SAMPLING POINTS
AND MONITORING WELLS LOCATION PLAN

FORM

