



March 12, 2018 Update:

The property was used for agricultural purposes prior to the mid-1940s and as an 18-hole golf course and country club through 2015. The historical use of the property may have caused contamination at the Site, and while Shipley Road Investments, LLC did not cause the potential contamination, they will complete the proper investigation and, if necessary, cleanup as the current owner of the Site.

Shipley Road Investments, LLC entered into a Voluntary Cleanup Program (VCP) Agreement with the Delaware Department of Natural Resources & Environmental Control (DNREC) pursuant to the Hazardous Substance Cleanup Act (HSCA) in May 2016. Under the VCP, DNREC's Site Investigation and Restoration Section (SIRS) provides oversight of environmental investigation and remediation activities to ensure that future Site conditions are protective of human health and the environment. Following satisfactory investigation, and if necessary, cleanup activities, DNREC will issue a Certification of Completion of Remedy (COCR) to Shipley Road Investments, LLC, thereby releasing Shipley Road Investments, LLC of any further obligations or liability for historical contamination at the Site.

Environmental Alliance, Inc. (Alliance), a certified HSCA consultant, has worked on behalf of Shipley Road Investments, LLC to satisfy these environmental requirements since entering the VCP. The following activities, some of which occurred prior to the VCP Agreement, have been implemented to address environmental concerns, maintain regulatory compliance, and put the property on a pathway to regulatory closure (i.e., receipt of the COCR):

- Two (2) 1,000 gallon (gasoline and diesel) aboveground storage tanks (ASTs) were removed in mid-2016.
- In late April 2016, one (1) 300 gallon used oil UST was removed from immediately adjacent to the northwest corner of the maintenance building. This UST is being closed through DNREC-TMS.
- Prior to Shipley Road Investments, LLC entering the VCP Agreement, Alliance completed an extensive soil investigation in 2015. The investigation focused on the constituent Arsenic in shallow soil, and select samples were analyzed for other target compounds. The 2015 soil investigation identified elevated levels of Arsenic, particularly in fairways from the depth of 0.0-0.5' below ground surface.
- After Shipley Road Investments, LLC entered the VCP Agreement, Alliance completed a more thorough investigation of the Site in 2016. Samples were collected from Site shallow and deep soil, groundwater, sediment, and surface water. Samples were analyzed for some (or all) of DNREC's target list volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs), and metals substances.

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- In 2017, Alliance prepared a Remedial Investigation / Feasibility Study (RI/FS) Report utilizing data collected during the 2015 and 2016 Site investigations. The RI/FS Report included the following:
 - The Site history and background.
 - A characterization of the Site's geology and hydrogeology.
 - A summary of the environmental investigations' scope and methods of sample collection.
 - A summary of laboratory data.
 - A comparison of laboratory data to published DNREC-SIRS human health and ecological screening level values.
 - A human health risk assessment, completed using the laboratory analytical data.
 - Defining remedial action objectives to address contamination, primarily Arsenic in shallow soil, found at the Site.
 - Screening and evaluating potential remedial alternatives to address the Arsenic impact in shallow soil.
 - Recommending potential remedial actions that will address the Arsenic impact in shallow soil to allow for future use of the Site that is protective of human health and the environment.

The full Remedial Investigation / Feasibility Study Report was submitted to Ms. Lindsay Hall of DNREC-SIRS in late July 2017 and is currently under review. Upon receipt of DNREC's comments on the RI/FS Report, Alliance will work with Shipley Road Investments, LLC to address DNREC's comments, finalize the report, and subsequently remediate the Site pursuant to HSCA.