



September 24, 2025

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**Sent via electronic mail**  
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RE: DNREC-RS Determination - 608 NE Front Street Milford, Kent County, Delaware

Dear Mr. Simeone:

The Delaware Department of Natural Resources and Environmental Control, Remediation Section (DNREC-RS) was notified of Hazardous Substance Cleanup Act (HSCA) Reporting Level exceedances of hazardous substances in groundwater and soil samples collected during a Phase II Environmental Site Assessment at the 608 NE Front Street Milford, Kent County, Delaware.

DNREC-RS has reviewed the Limited Phase II Environmental Site Assessment prepared by Geo-Technology Associates, Inc. (GTA) dated September 9, 2025 for the subject property consisting of one parcel of land (5-16 -8307-01-2700-000) comprising approximately 6.7 acres. The subject property contains a vacant garage/office, two pole barns, wooded land, and open land. Historically, the subject property operated as a boatyard and boat maintenance facility from at least 1944 until 2005. Additionally, the United States Army Corps of Engineers (USACE) reportedly occupied the subject property for an unknown duration of time prior to the last property transfer.

Nine soil samples were collected for analyses of Volatile Organic Compounds (VOCs) via United States Environmental Protection Agency (USEPA) Method 8260B, Semi-Volatile Organic Compounds (SVOCs) via USEPA Method 8270, Total Petroleum Hydrocarbons (TPH) Diesel Range Organics (DRO) and Gasoline Range Organics (GRO) via USEPA Method 8015C, Resource Conservation and Recovery Act (RCRA) Metals by USEPA Method 6010, and the DNREC REM list of per- and polyfluoroalkyl substances (PFAS) by USEPA Method 537. Three groundwater samples were analyzed for VOCs by USEPA Method 8260, TPH-DRO and TPH-GRO by USEPA Method 8015, and the DNREC REM list of PFAS by USEPA Method 537.

TPH-DRO was detected at a concentration of 1,500 milligrams per kilogram (mg/kg) in soil sample GTA- 10, above the HSCA Screening Level and Reporting Level of 1,000 mg/kg. However, there were no VOCs and SVOCs detected above the HSCA Screening Levels indicating no potential risk associated with the TPH-DRO exceedance.

Lead was detected at a concentration of 221 mg/kg in soil sample GTA-10, above the HSCA Screening Level of 100 mg/kg, and above the HSCA Reporting Level of 200 mg/kg. However, the average of three shallow samples collected by GTA and analyzed at the laboratory was below the HSCA Reporting Level of 200 mg/kg.

Chloroform was reported at a concentration of 0.56 micrograms per liter ( $\mu\text{g/L}$ ) in groundwater sample GTA-MW2, which exceeds the HSCA Screening Level of 0.22  $\mu\text{g/L}$ , but is below the HSCA Reporting Level of 80  $\mu\text{g/L}$ .

Perfluorononanoic acid (PFNA) was reported at a concentration of 0.0083  $\mu\text{g/L}$  in groundwater sample GTA-MW2, which exceeds the HSCA Screening Level of 0.0059  $\mu\text{g/L}$ , but is below the HSCA Reporting Level of 0.01  $\mu\text{g/L}$ .

Perfluorooctanesulfonic acid (PFOS) was reported at a maximum concentration of 0.017 µg/L in groundwater sample GTA-MW2, which exceeds the HSCA Screening Level of 0.0002 µg/L, and the HSCA Reporting Level of 0.004 µg/L. Perfluorooctanoic acid (PFOA) was reported at a maximum concentration of 0.018 µg/L in groundwater sample GTA-MW3, which exceeds the HSCA Screening Level of 0.0000027 µg/L, and the HSCA Reporting Level of 0.004 µg/L.

PFAS are not naturally occurring in groundwater, as these are human made "forever chemicals". PFAS have been detected throughout Delaware's groundwater, including in Kent County, due to widespread human activity and their extreme persistence in the environment. The reported concentrations of PFAS at the subject property appear to be consistent with those conditions.

Based on information you provided to DNREC-RS, proposed apartment buildings will be connected to the City of Milford public water. The utilities have already been brought from the street to the property during the installation of the entrance required by DELDOT. Since shallow groundwater is not proposed for use at the property, the exposure pathways are currently incomplete and will remain so in the future based on the proposed redevelopment.

In September 2025, DNREC-RS contacted the USACE via email and they indicated that the subject property is not listed as a Formerly Used Defense Site (FUDS) in their database. However, it is located approximately 1/2 mile away from the Milford and Sussex Ordnance Company FUDS.

DNREC-RS also reviewed a copy of the 2006 letter from John H. Wilken Jr., Ordnance and Explosives Safety Specialist at USACE. The letter indicated that a 75 mm shrapnel round and 40 mm projectile were discovered in the clamshell driveway, however, after further investigation by the USACE, the subject property was deemed clear of military munitions. Additional information was found in the February 2007 report for the USACE entitled *Site Specific Final Report - Investigation of Munitions and Explosives of Concern (MEC) in Clamshell Driveways, Walkways and Stockpiles; Various Locations: Delaware, Maryland, New Jersey, Virginia (Delmarva*

Peninsula). It is unknown to DNREC-RS what other operations, if any, the USACE conducted at the subject property.

Based on the above information, DNREC-RS has determined that no action is needed under the Hazardous Substance Cleanup Act (HSCA) at this time, and the owner/operator may proceed with land disturbing activities at the subject property. However, if there is evidence of a release during the upcoming land disturbing activities, please notify DNREC within 24 hours and follow the procedures outlined in the DNREC-RS' Guidance for Notification Requirements (updated October 2024). If there is any evidence of munitions or explosives of concern, do not approach, touch, move or disturb it. Please call 911 and advise the police of what you saw and where you saw it. The following website from the Department of Defense provides various munitions safety information:

<https://www.denix.osd.mil/uxo/home/>.

If you have any questions, please feel free to contact me at 302.395.2600.

Sincerely,



Mariya Chiger  
Hydrologist

cc: Amy Bryson Program Manager II, DNREC-WHS- Remediation Section

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