

Exhibit 6
GM-OU-4 Public Hearing
April 9, 2020



BrightFields, Inc.
Environmental Services

August 14, 2015

Mr. Rick Galloway
DNREC-SIRS
391 Lukens Drive
New Castle, DE 19720-2774

RE: Operable Unit 4 Additional Characterization Work Plan
Former Wilmington Assembly Plant
Wilmington, Delaware
BrightFields File #2734.04.51

Dear Mr. Galloway:

BrightFields, Inc. (BrightFields) is pleased to submit this Work Plan on behalf of our client, Revitalizing Auto Communities Environmental Response (RACER) Trust. As part of the Remedial Investigation/Feasibility Study (RI/FS) for the Former Wilmington Assembly Plant Site (Site), further evaluation of the petroleum tank area is warranted to define the extent of contamination so that remediation options can be reviewed and evaluated.

In March 2015, a soil vapor extraction (SVE) system was installed as an Interim Remedial Measure (IRM) to prevent the potential migration of volatile organic compounds (VOCs) in soil gas from impacting the newly constructed townhome properties along Dodson Avenue. The interim SVE system will be utilized to conduct a pilot test to assess the optimal operational parameters of the system and determine the radius of influence of the system on the subsurface.

Additionally, a supplemental investigation will be performed to further characterize soil and groundwater in Operable Unit 4 (OU-4) (identified in the Site Remedial Investigation Report as Area of Interest (AOI) 16 & 17 – Former Petroleum Dispensing and Underground Storage Tank (UST) Area). OU-4, AOI 16, and AOI 17 are shown on Figure 1. The data will be used to define the extent of contamination and develop a contaminant mass estimate for remediation.

The data collected from the IRM pilot testing and soil and groundwater investigation efforts will be summarized and used in the OU-4 Feasibility Study.

BACKGROUND

In July 2015, a Remedial Investigation Report (RI) was completed for the Former Wilmington Assembly Plant property. This report summarized all of the investigation activities performed on the Site by Conestoga Rovers & Associates (CRA), as well as the on-site and off-site investigation activities performed by BrightFields.

AOI 16 (Petroleum Dispensing Area) initially consisted of a petroleum dispensing station located on the northern wall of the southern half of the Anchor Building. Based on the findings



of the initial RI, the AOI was expanded to include the area where historical USTs were located near the eastern property boundary along Dodson Avenue. The AOI was expanded again based on the results of supplemental RI activities to include privately owned commercial and residential properties east of the Site. These areas define the extent of OU-4, shown on Figure 1.

A human health risk assessment was performed as part of the RI Report. The contaminants of potential concern (COPCs) in OU-4 consisted of cobalt and manganese in surface soil and 2-methylnaphthalene in subsurface soil. Calculated health risks were below acceptable levels for OU-4. Therefore, no further action was recommended for OU-4 soil.

In groundwater, site-wide COPCs included various VOCs, semi-volatile organic compounds (SVOCs), metals, and, Aroclor-1260. Off-site groundwater associated with OU-4 was also evaluated through a risk assessment. The major contributors to the calculated risk ($3.2\text{E-}04$) for the off-site resident potable groundwater exposure were ethylbenzene ($9.7\text{E-}05$) and naphthalene ($2.2\text{E-}04$). The major contributors to the calculated hazard index (20) for the off-site resident potable groundwater exposure were naphthalene (5.9), 1,2,4-trimethylbenzene (12), and xylene (1.5). The off-site impacts are further discussed in the BrightFields July 2014 Vapor Intrusion and Groundwater Delineation Investigation Report.

The results of this off-site investigation showed petroleum contamination next to the Anchor Motor Freight Building in OU-4, including a VOC groundwater plume around the source area. Soil gas appeared to be migrating eastward across Dodson Avenue as well as north/northeast in the direction of groundwater flow. The indoor air sampling results showed that residual contamination from the Former Wilmington Assembly Plant did not appear to be the cause of VOCs in townhomes east of OU-4. Soil borings advanced in the vicinity of the former UST area revealed an approximately 3-foot smear zone of petroleum contamination at around 17 feet below ground surface in the saturated zone above the water table. The residual smear zone appears to be the continuing source of the groundwater and soil gas contamination. The approximate extent of impacted soil, soil gas, and groundwater impacts are shown on Figure 2. Analytical data for previous soil and groundwater samples are shown on Figure 3 and 4, respectively.

Additionally, during the installation of the SVE wells in December 2014, soil samples were collected and analyzed for target compound list (TCL) VOCs and SVOCs. Four VOCs (1,2,4-trimethylbenzene, benzene, ethylbenzene, and total xylenes) and one SVOC (2-methylnaphthalene) exceeded their respective DNREC screening levels.

SCOPE OF WORK

The following scope has been developed and outlined in consultation with both the Delaware Department of Natural Resources and Environmental Control (DNREC) and RACER:

- **IRM Pilot Testing:**

The interim SVE system will be used to conduct a pilot test to assess the optimal operational parameters of the system and determine the radius of influence of the system on the subsurface. The data collected during the pilot test will be used to more efficiently operate the existing system and to assess if the system should be expanded to additional wells and be used in the full-scale remediation of Operable Unit 4. To evaluate the system, the blower will extract vapor from wells SVE-03 and SVE-04. Air flow, soil vapor concentration, and vacuum will be monitored in those wells. Vacuum influence will also be monitored in nearby wells. The tests will be multiple step tests at varying vacuum and flow rates for each of the tested wells. The pilot test is expected to be conducted over a two day period.

- **Soil and Groundwater Investigation:**

A Geoprobe[®] rig will be used to collect soil samples from approximately twenty soil boring locations within OU-4. The proposed locations of the first eleven soil borings were determined based on existing soil and groundwater data obtained from previous investigations. The remaining nine soil boring locations will be determined based upon the field observations made during the advancement of the first eleven soil borings. If the sample results from the twenty soil borings indicate that further “step-out” delineation samples points may be necessary, then BrightFields will discuss the amount and location of additional samples with the DNREC Project Manager. The initial proposed sample locations are shown on Figure 5. Soil samples will be collected over a two day period and will be analyzed for TCL VOCs and TCL SVOCs. In addition, 1,2,4-trimethylbenzene will be requested to be reported for all samples collected. Approximately 22 soil samples will be collected. Matrix spike/matrix spike duplicate (MS/MSD), trip blank, and duplicate samples will be collected as part of the Quality Control (QC) requirements.

A Geoprobe[®] rig will also be used to install two, two-inch diameter groundwater monitoring wells. The location of the monitoring wells will be determined based on field observations of observed soil contamination and the highest soil sample results. BrightFields anticipates that the wells will be installed in the area to the north of the Anchor Motor Freight Building (shown on Figure 5).

Once the wells are installed, they will be sampled, along with up to 14 wells previously installed in the area, for TCL VOCs and TCL SVOCs. In addition, 1,2,4-trimethylbenzene will be requested to be reported for all samples collected. MS/MSD, trip blank, and duplicate samples will be collected as part of the QC requirements.

Soil and purge water generated during the soil and groundwater investigation activities will be disposed appropriately.

BrightFields will have the new monitoring wells professionally surveyed for elevation and location.



- **Slug Testing:**

As part of the groundwater evaluation, a slug test will be implemented to determine the hydraulic properties in the Site area. This data will be used to predict the performance of potential remedial options that will be reviewed as part of the OU-4 Feasibility Study. The slug test will be conducted in the two newly installed wells over a two-day period. The slug tests will also be conducted in MW-36S, MW-36D, MW-37, MW-38, MW-39, and MW-42. Data collected from this effort will be summarized and used in the OU-4 Feasibility Study.

- **Report Preparation**

BrightFields will use the data collected during the supplemental investigation to further delineate the extent of contamination and develop a contaminant mass estimate. The mass estimate will be used to identify potential remedies and develop a schedule and cost estimate for remediation. Data collected from this effort will be summarized and used in the Operable Unit 4 Feasibility Study.

SCHEDULE OF WORK

BrightFields will begin the proposed work within three weeks of DNREC's approval.

We appreciate your review of this Work Plan and look forward to DNREC's approval. Please call Ken Hannon or me at (302) 656-9600 if you have any additional questions or concerns.

Sincerely,
BrightFields, Inc.

A handwritten signature in dark ink that reads "Jenna E. Harwanko". The signature is written in a cursive, flowing style.

Jenna Harwanko
Program Manager

Attachments:

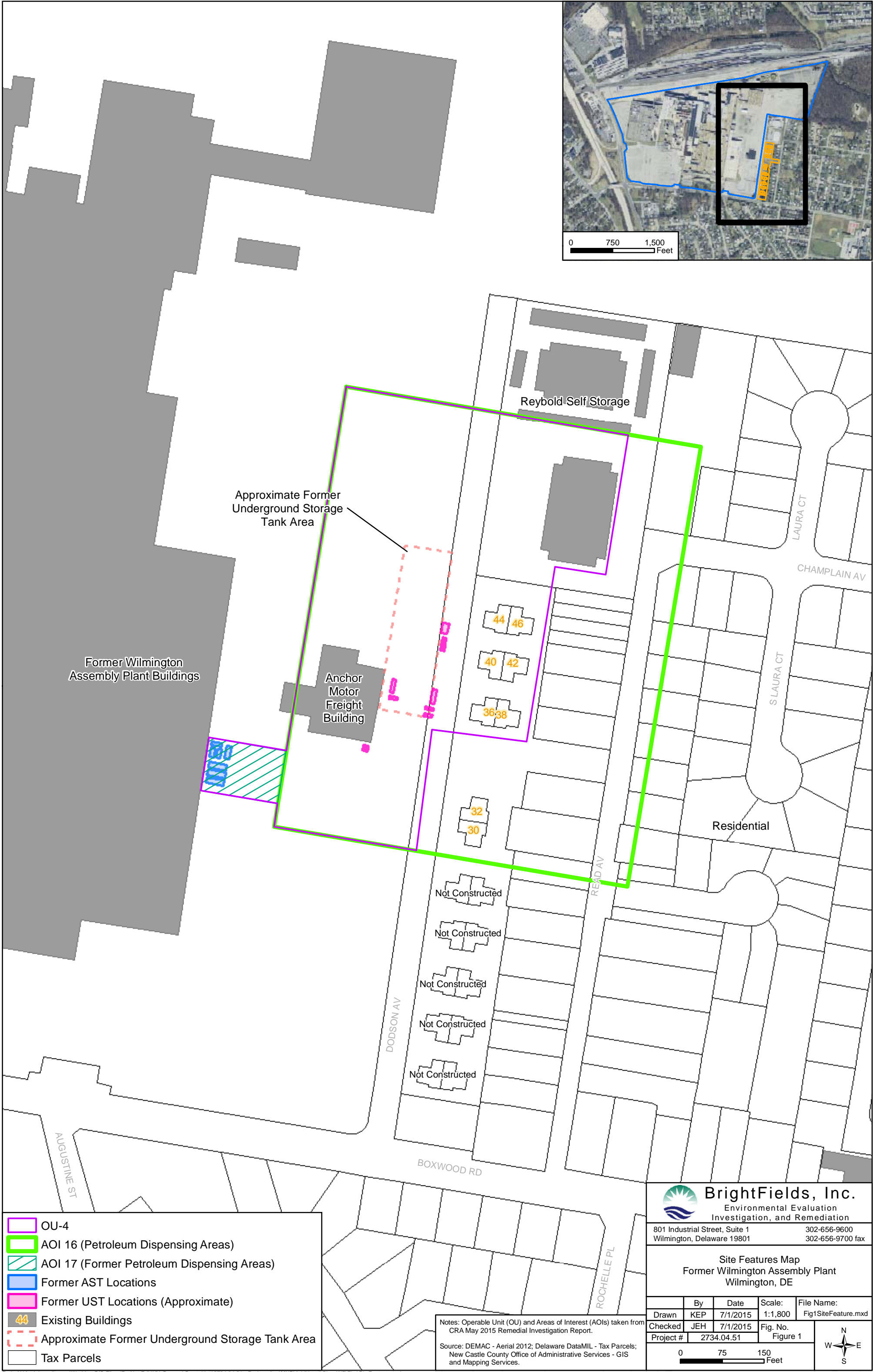
- Figure 1 – Site Features Map
- Figure 2 – Extent of Impact
- Figure 3 – Soil Contaminant Distribution
- Figure 4 – Groundwater Contaminant Distribution
- Figure 5 – Proposed Sample Locations

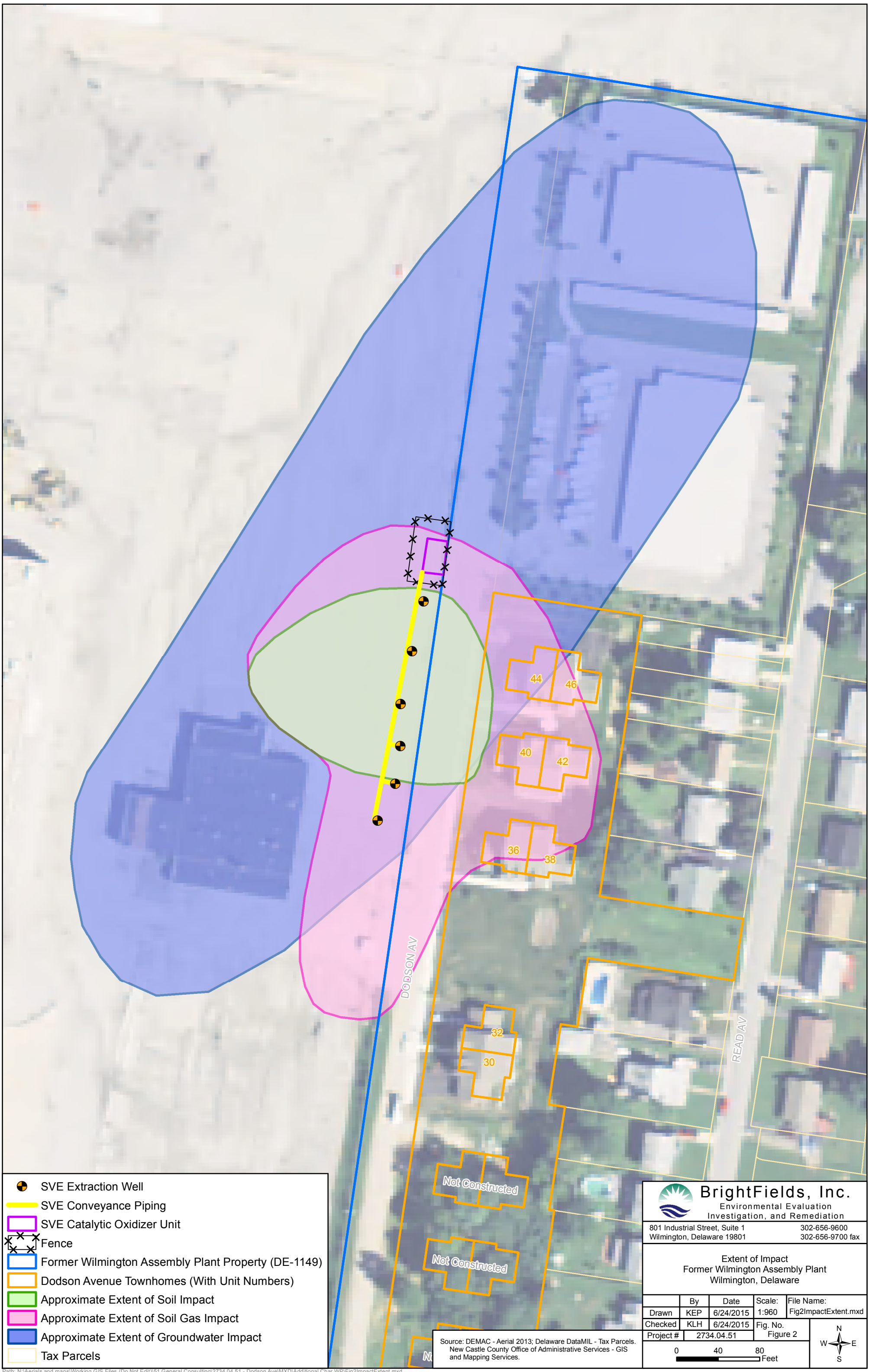
cc: Pam Barnett, RACER

Mr. Rick Galloway
OU-4 Additional Characterization Work Plan
Former Wilmington Assembly Plant
Wilmington, Delaware



FIGURES





- SVE Extraction Well
- SVE Conveyance Piping
- SVE Catalytic Oxidizer Unit
- Fence
- Former Wilmington Assembly Plant Property (DE-1149)
- Dodson Avenue Townhomes (With Unit Numbers)
- Approximate Extent of Soil Impact
- Approximate Extent of Soil Gas Impact
- Approximate Extent of Groundwater Impact
- Tax Parcels

BrightFields, Inc.
Environmental Evaluation
Investigation, and Remediation

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Extent of Impact
Former Wilmington Assembly Plant
Wilmington, Delaware

	By	Date	Scale:	File Name:
Drawn	KEP	6/24/2015	1:960	Fig2ImpactExtent.mxd
Checked	KLH	6/24/2015	Fig. No.	
Project #	2734.04.51	Figure 2		

04080

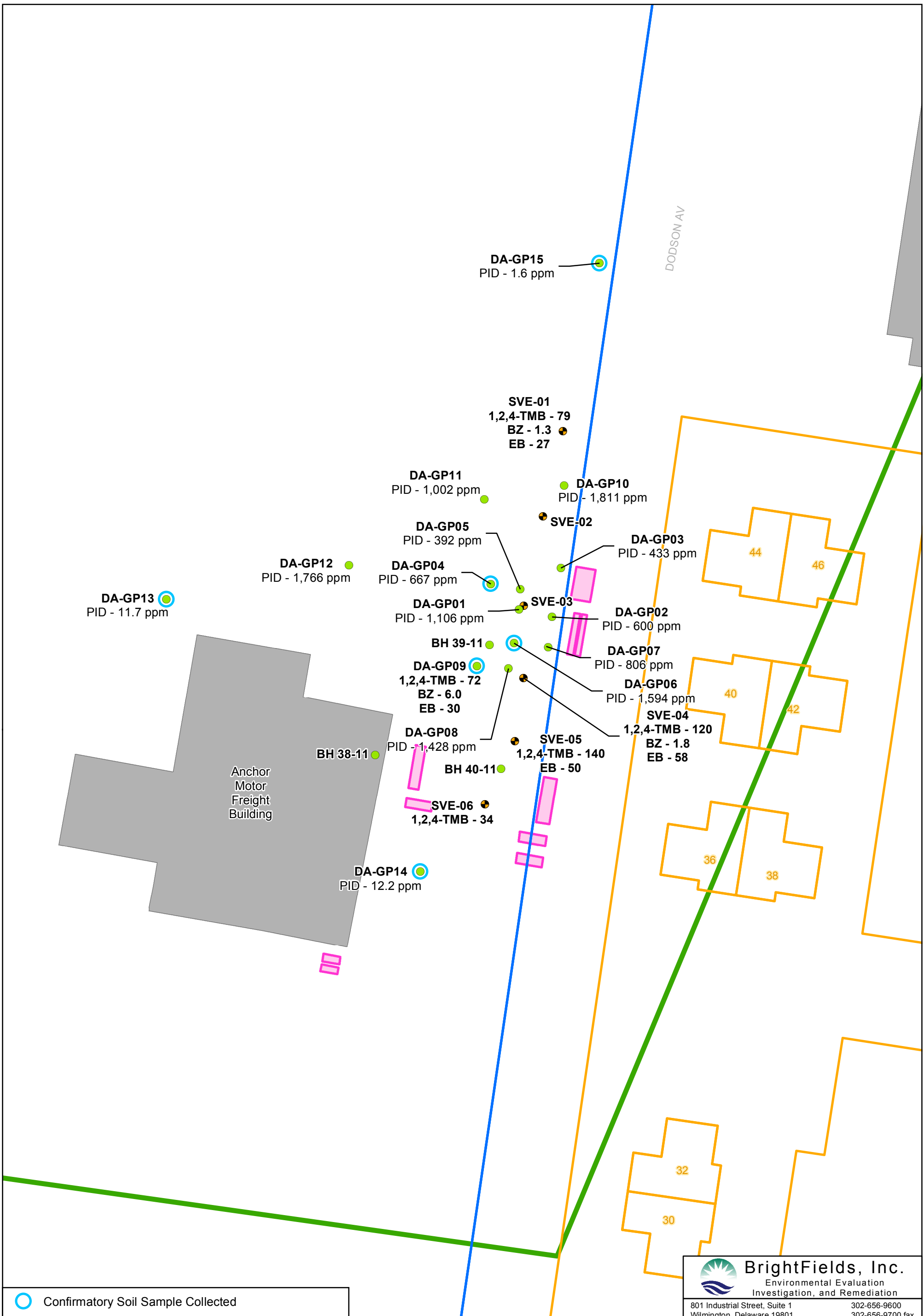
Feet

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Confirmatory Soil Sample Collected

Previous Soil Sample

SVE Well

General Area for the Additional OU-4 Characterization

Former Wilmington Assembly Plant Property (DE-1149)

Dodson Avenue Townhomes (With Unit Numbers)

Former UST Locations (Approximate)

Existing Buildings

Notes:
Contaminant concentrations shown as mg/kg.
Sample locations with PID concentrations were field screened.
ppm - Parts per Million
PID - Photoionization Detector
Only analytical concentrations that exceed respective DNREC
January 2015 Screening Level are shown for the following contaminants.

1,2,4-TMB - 1,2,4-Trimethylbenzene
BZ - Benzene
EB - Ethylbenzene
NP - Naphthalene
U - Not Detected
J - Estimated Concentration

BrightFields, Inc.
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Soil Contaminant Distribution (Non-Metals)
Former Wilmington Assembly Plant
Wilmington, Delaware

	By	Date	Scale:	File Name:
Drawn	KEP	7/2/2015	1:600	Fig3SoilContam.mxd
Checked	KLH	7/2/2015	Fig. No.	
Project #	2734.04.51		Figure 3	

02550

Feet

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DA-MW44	3/26/2013	6/27/2013	9/17/2013
	ug/L	ug/L	ug/L
SVOC			
2-Methylnaphthalene	11 U	10 U	10 U
Naphthalene	11 U	10 U	10 U
VOC			
1,2,4-Trimethylbenzene	1.0 U	1.0 U	1.0 U
Benzene	0.97 J	1.0 U	1.0 U
Chloroform (Trichloromethane)	0.40 J	0.25 J	0.15 J
Ethylbenzene	1.0 U	1.0 U	1.0 U
Isopropyl benzene	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	1.0 U	1.0 U	1.0 U
Toluene	1.0 U	1.0 U	1.0 U
Xylenes (total)	3.0 U	3.0 U	3.0 U

DA-MW42	3/26/2013	6/28/2013	9/18/2013
	ug/L	ug/L	ug/L
SVOC			
2-Methylnaphthalene	22/21	20/21	28/29
Naphthalene	170/160	170/170	210/220
VOC			
1,2,4-Trimethylbenzene	730/480	570/580	750/790
Benzene	5.0 U/1.5	0.91 J/0.79 J	2.0 U/5.0 U
Chloroform (Trichloromethane)	5.0 U/1.0 U	2.0 U/2.0 U	2.0 U/5.0 U
Ethylbenzene	750/660	490/480	510/500
Isopropyl benzene	39/54	33/33	36/34
Methyl tert butyl ether (MTBE)	5.0 U/1.0 U	2.0 U/2.0 U	2.0 U/5.0 U
Toluene	330/320	220/220	210/200
Xylenes (total)	1300/1100	920/910	1300/1300

VAS-12	10/17/2012 (18-23) ft BGS	10/17/2012 (23-28) ft BGS	10/17/2012 (28-33) ft BGS	10/17/2012 (33-38) ft BGS
	ug/L	ug/L	ug/L	ug/L
SVOC				
2-Methylnaphthalene	15	11 U	10 U	10 U
Naphthalene	3.0 J	11 U	10 U	10 U
VOC				
Benzene	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	0.99 J	0.15 J	1.0 U	1.0 U
Isopropyl benzene	11	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	1.0 U	0.61 J	0.62 J	0.33 J
Toluene	0.52 J	0.36 J	0.29 J	0.20 J
Xylenes (total)	8.6	0.90 J	0.46 J	3.0 U

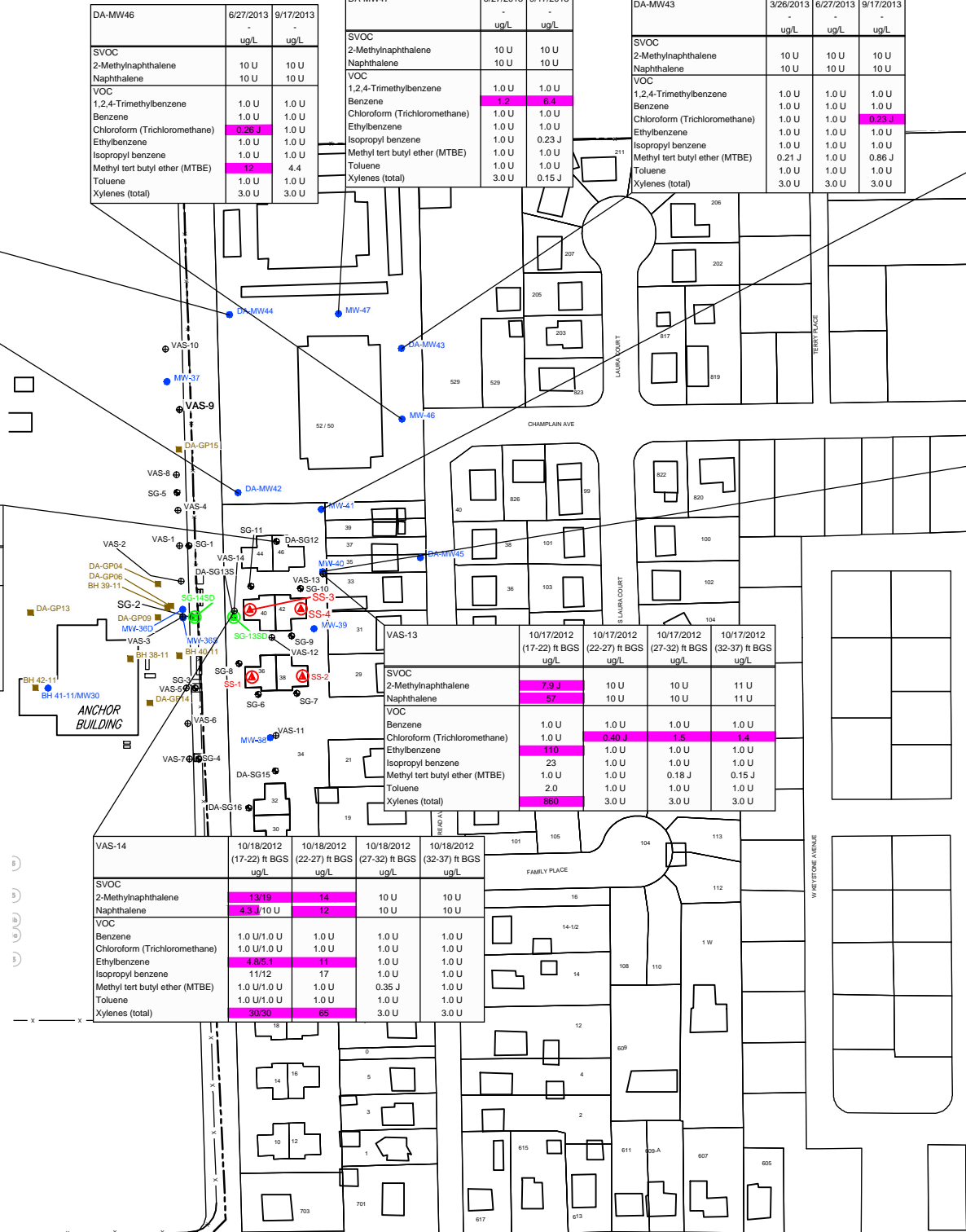
DA-MW46	6/27/2013	9/17/2013
	ug/L	ug/L
SVOC		
2-Methylnaphthalene	10 U	10 U
Naphthalene	10 U	10 U
VOC		
1,2,4-Trimethylbenzene	1.0 U	1.0 U
Benzene	1.0 U	1.0 U
Chloroform (Trichloromethane)	0.26 J	1.0 U
Ethylbenzene	1.0 U	1.0 U
Isopropyl benzene	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	1.0 U	1.0 U
Toluene	1.0 U	1.0 U
Xylenes (total)	3.0 U	3.0 U

DA-MW47	6/27/2013	9/17/2013
	ug/L	ug/L
SVOC		
2-Methylnaphthalene	10 U	10 U
Naphthalene	10 U	10 U
VOC		
1,2,4-Trimethylbenzene	1.0 U	1.0 U
Benzene	1.2	6.4
Chloroform (Trichloromethane)	1.0 U	1.0 U
Ethylbenzene	1.0 U	1.0 U
Isopropyl benzene	1.0 U	0.23 J
Methyl tert butyl ether (MTBE)	1.0 U	1.0 U
Toluene	1.0 U	1.0 U
Xylenes (total)	3.0 U	0.15 J

DA-MW43	3/26/2013	6/27/2013	9/17/2013
	ug/L	ug/L	ug/L
SVOC			
2-Methylnaphthalene	10 U	10 U	10 U
Naphthalene	10 U	10 U	10 U
VOC			
1,2,4-Trimethylbenzene	1.0 U	1.0 U	1.0 U
Benzene	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	1.0 U	1.0 U	0.23 J
Ethylbenzene	1.0 U	1.0 U	1.0 U
Isopropyl benzene	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	0.21 J	1.0 U	0.86 J
Toluene	1.0 U	1.0 U	1.0 U
Xylenes (total)	3.0 U	3.0 U	3.0 U

MW-41	10/22/2012	6/28/2013	9/18/2013
	ug/L	ug/L	ug/L
SVOC			
2-Methylnaphthalene	11/7.6 J	10 U	10 U
Naphthalene	150/120	26	10 U
VOC			
1,2,4-Trimethylbenzene	-	1.0 U	1.0 U
Benzene	2.0 U/2.0 U/1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	2.0 U/2.0 U/1.0 U	1.0 U	1.0 U
Ethylbenzene	520/580/1.0 U	1.9	0.63 J
Isopropyl benzene	31/34	0.52 J	0.24 J
Methyl tert butyl ether (MTBE)	2.0 U/2.0 U/1.0 U	1.7	0.55 J
Toluene	240/260	1.0 U	1.0 U
Xylenes (total)	270/360	3.0 U	3.0 U

MW-40	10/22/2012	6/28/2013	9/18/2013
	ug/L	ug/L	ug/L
SVOC			
2-Methylnaphthalene	18	10 U	10 U
Naphthalene	82	10 U	10 U
VOC			
1,2,4-Trimethylbenzene	-	1.0 U	1.0 U
Benzene	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	1.0 U	2.7	1.6
Ethylbenzene	140	1.0 U	1.0 U
Isopropyl benzene	20	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	1.0 U	1.0 U	1.0 U
Toluene	2.1	1.0 U	1.0 U
Xylenes (total)	660	3.0 U	3.0 U



LEGEND

- APPROXIMATE FACILITY BOUNDARY
- - - FENCELINE
- RAILWAY/SOIL SAMPLE LOCATION
- MONITORING WELL
- SOIL GAS SAMPLE LOCATION
- BOREHOLE
- INDOOR AIR AND SUB SLAB SAMPLE LOCATION
- NESTED SOIL GAS SAMPLE LOCATION (ONE AT 6" DEEP & ONE ABOVE WATER TABLE)
- ▲ SEDIMENT SAMPLE LOCATION
- SEDIMENT/SURFACE WATER SAMPLE LOCATIONS
- SURFACE WATER SAMPLE LOCATION
- ⊙ TEST TRACK METALS DELINEATION SAMPLE
- LOCATION SAMPLED FOR COPC PARAMETER LIST (SCREENING OR LAB ANALYSIS)- NO EXCEEDANCE
- INDICATES EXCEEDANCE OF CRITERIA

PARAMETER	DNREC SIRS Screening Level (2014) (ug/L)
2-Methylnaphthalene	2.7
Naphthalene	0.14
1,2,4-Trimethylbenzene	1.5
Benzene	0.39
Chloroform (Trichloromethane)	0.19
Ethylbenzene	1.3
Isopropyl benzene	39
Methyl tert butyl ether (MTBE)	10
Toluene	86
Xylenes (total)	19

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

FORMER WILMINGTON ASSEMBLY PLANT
REMEDIAL INVESTIGATION REPORT
OFF-SITE GROUNDWATER NON-METAL COPCS EXCEEDING SCREENING CRITERIA



Source Reference:			
Project Manager: G. CARLI	Reviewed By: REVIEWED BY	Date: MARCH 2015	
Scale: 1"=100'	Project No: 17338-T04	Report No: 020	Drawing No: 4.18


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Groundwater Contaminant Distribution
Former Wilmington Assembly Plant
Wilmington, Delaware

Project # 2734.04.51 Fig. No. Figure 4



- Proposed Boring Location
- Proposed Monitoring Well Location
- Previous Soil Sample
- Existing Monitoring Well
- SVE Well
- SVE Conveyance Piping
- SVE Catalytic Oxidizer Unit
- Fence
- Former AST Locations
- Former UST Locations (Approximate)
- Former Wilmington Assembly Plant Property (DE-1149)
- Dodson Avenue Townhomes (With Unit Numbers)
- General Area for the Additional OU-4 Characterization



BrightFields, Inc.
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Proposed Sample Locations
Former Wilmington Assembly Plant
Wilmington, Delaware

	By	Date	Scale:	File Name:
Drawn	KEP	8/6/2015	1:960	Fig5PropSamp.mxd
Checked	VMB	8/6/2015	Fig. No.	
Project #	2734.04.51		Figure 5	

Note:
Additional boring locations and monitoring wells
will be selected based on field observations.
Source:
DEMARC - Aerial 2013.

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Feet

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