



# ARM Group Inc.

Earth Resource Engineers and Consultants

November 29, 2016

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Parcel B22 Road and Utility Investigation  
Plan (Revision 1)  
Responses to MDE/USEPA Comments  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group Inc. (ARM) is pleased to provide the following responses to comments received from the Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA) in an email dated November 21, 2016. The MDE and USEPA provided comments regarding the previously submitted Road and Utility Investigation Plan (B22) dated November 4, 2016. Responses to specific comments are provided below.

## Responses to Comments:

1. *Section 7.1: Revise all sections as necessary to state that the Composite Worker scenario will also be included to provide a complete representation of potential risks.*

The requirement to include a Composite Worker scenario for this work was subsequently agreed upon by the agencies on November 21, 2016 to not be applicable. No changes have been made to the Work Plan sections. Composite Worker scenarios will continue to be addressed as part of the Phase II Investigations for associated parcels.

2. *Section 7.1, Identification of COPCs: Revise this section to state that the non-carcinogen PALs will be revised to be set at a hazard quotient of 0.1 for COPC identification.*

This comment has been acknowledged and the requested change has been made for COPC identification. COPCs will now include all compounds which exceed a non-cancer HQ of 0.1.

3. *Section 7.1, Assessment of DRO/GRO and Oil & Grease*
  - a. *Contrary to the third and fourth sentences of this section, DRO/GRO and Oil & Grease are equally important, as both can cause equally adverse effects in surface waters and aquatic sediments if inadvertently released; thus, the sentences should be deleted.*
  - b. *Revise this section to add the following after the second sentence: “Any exceedance locations near the proposed subsurface utilities must be fully delineated. In addition, the final Response and Development Work Plan must include a plan to prevent mobilization of the petroleum and/or oil and grease to these features, which may include removal, soil stabilization, sealing of utilities, etc.”*

The language for DRO/GRO and Oil & Grease has been revised to reflect comment (a). Comment (b) has been addressed to reflect that TPH/Oil & Grease exceedances or non-aqueous phase liquid (NAPL) observations within close proximity to the proposed subsurface utilities will be delineated and addressed in the Response and Development Work Plan, if applicable.

4. *Section 7.1, Risk Characterization Approach*
  - a) *Revise the first sentence of this section by adding the bold as follows: “For the road/utility EU, if the baseline risk ratio for each non-carcinogenic COPC or **cumulative target organ** does not exceed 1 . . . ”*
  - b) *Revise the lead concentrations according to the comments provided for the Parcel B15 Response and Development Work Plan.*

The relevant sections for both items have been addressed as requested.

#### **Additional Revisions:**

5. The “Risk Characterization Approach” in Section 7.1 has been updated to reflect that health and safety measures, as opposed to capping, are appropriate to mitigate potential risk for the proposed utility and road installations. This change is applicable because risk is being evaluated for the Construction Worker scenario.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group Inc. at 410-290-7775.

Respectfully submitted,  
ARM Group Inc.



Eric S. Magdar  
Senior Geologist



T. Neil Peters, P.E.  
Vice President

