Response and Development Work Plan Addendum Retail Area #1

Area B: Sub-Parcel B6-2 Tradepoint Atlantic Sparrows Point, Maryland

Prepared for:

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ARM Project 160443M-6

Respectfully Submitted,

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New Pets

TABLE OF CONTENTS

1.0 INT	RODUCTION	1
1.1.	Background	
1.2.	Objectives	1
2.0 RA	DWP ADDENDUM	2
2.1.	Requirements of the Addendum	2
2.2.	Retail Area #1	3
	2.2.1. General Development Protocols	3
	2.2.2. Proposed Layout and Capping Remedy	3
	2.2.3. Construction Worker Intrusive Work	4
	2.2.4. Temporary Access Restrictions – Interim Measures	4
3.0 RE	PORTING AND IMPLEMENTATION SCHEDULE	6
	FIGURES	
Figure 1	Proposed Layout of Retail Area #1	Following Text
	APPENDICES	
Appendix A	A Development Drawings	Following Text
Appendix 1	Site Plan Drawing with Access Roads	Following Text
Appendix (Sample Photograph for Temporary Fencing	Following Text

1.0 INTRODUCTION

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1.1. BACKGROUND

ARM Group Inc. (ARM), on behalf of EnviroAnalytics Group (EAG), has prepared this Response and Development Work Plan (RADWP) Addendum to facilitate the construction of a Royal Farms station designated as Retail Area #1. This retail lot is proposed for occupancy and use on Sub-Parcel B6-2 (the Site). The construction and use of any retail lot at the Site must be approved by the Maryland Department of the Environment (MDE) and the United Stated Environmental Protection Agency (USEPA). The proposed major grading and utility installation tasks for the Site were covered by the Sub-Parcel B6-2 RADWP, which is currently under agency review for approval. The RADWP provided a Screening Level Risk Assessment (SLRA) for the entire Site to evaluate potential risks to Composite Workers and Construction Workers. The SLRA concluded that a capping remedy would adequately protect Composite Workers (and site visitors) from potential future exposures once the retail lots are occupied. The SLRA also determined the length of time that Construction Workers can perform intrusive work at the Site before site-specific health and safety measures may be needed for worker protection.

1.2. OBJECTIVES

The RADWP specified that a brief addendum detailing the site plan for each retail lot would be provided to the MDE and USEPA once the plans for each retail lot were finalized. The RADWP stated that the addendum would need to include the layout of the proposed retail lot, along with an indication of the proposed final capping remedy. The *primary objectives* of this document are to allow the construction of the proposed retail lot at the Site, and to allow occupancy prior to full implementation of the site-wide (Sub-Parcel B6-2) capping remedy. A *secondary objective* of this document is to demonstrate that there are no concerns related to the proposed intrusive work schedule for Construction Workers.

2.0 RADWP ADDENDUM

2.1. REQUIREMENTS OF THE ADDENDUM

The Sub-Parcel B6-2 RADWP provides minimum cross sections and specifications for all types of capping remedies which may be installed during the development of each retail lot, including requirements for any paved areas, landscaped areas, and/or stormwater ponds. The RADWP is the primary guidance document for all future development activities associated with the retail area. The RADWP established the following procedure to obtain agency approval to begin the construction of each individual retail lot:

Once plans for each retail lot are finalized, the MDE and USEPA will be provided with a brief RADWP Addendum detailing the site plan for the retail lot, along with an indication of the proposed final capping remedy, and a discussion of any concerns related to the intrusive work schedule (if any) associated with the construction of the applicable retail lot. Multiple retail lots may be combined into the same addendum if the sequencing of development is conducive to a single submission. The SLRA presented herein will serve as the primary reference document for any future development associated with Sub-Parcel B6-2, and addenda will be prepared and submitted to the agencies as necessary.

In addition, the proposed retail lot may be constructed and occupied prior to full implementation of the capping remedy which is required for the entire Site. The site-wide capping remedy throughout Sub-Parcel B6-2 is proposed to be installed using a phased approach as the individual retail lots are designed. To facilitate the use of the proposed retail lot, interim measures are required to protect workers and visitors, as outlined in the RADWP as follows:

Depending on occupancy opportunities prior to the completion of all retail development phases, access restrictions or other mechanisms will be used to prevent potential exposures to uncapped portions of the Composite Worker Area during the interim period to temporarily prevent potential exposures until the required capping remedy is fully implemented. With these temporary restrictions, the Composite Worker and child/youth visitors will not be exposed to potentially impacted soils while commercial activities are being conducted on (completed) capped portions of the Site. If occupancy of the Site is proposed prior to full implementation of the capping remedy for the Composite Worker Area, a detailed RADWP Addendum must be submitted to the agencies and approved prior to use. The RADWP Addendum would need to include details of the proposed interim measures including locations and protocols for the installation and maintenance of the proposed remedy. The interim measures could include temporary access restrictions (e.g., fencing) and/or temporary capping mechanisms (e.g., crushed concrete), among other possible responses.

2.2. RETAIL AREA #1

2.2.1. General Development Protocols

The construction of the retail lot will remain subject to all development implementation protocols outlined in the Sub-Parcel B6-2 RADWP, including but not limited to the following:

- Development activities will be conducted under the property-wide Health and Safety Plan
- Full-time oversight will be provided by an Environmental Professional (EP)
- Soil screening requirements will be implemented as required
- Erosion and sediment controls will be installed as required
- Dust monitoring will be implemented as required
- If dewatering is necessary, sampling and disposal will be conducted as required
- The NAPL Contingency Plan will be implemented as required
- Utility backfill materials must be approved by the MDE Voluntary Cleanup Program (VCP). MDE VCP clean fill approved for commercial land use will be required at depths and alignments where the utility trench could be considered to be part of a landscaped cap (i.e., depths less than or equal to 2 feet). Slag or other "non-clean" approved backfill may be used in areas where the utility trench will be covered by an additional cap.

2.2.2. Proposed Layout and Capping Remedy

Development drawings for the proposed retail lot are provided in **Appendix A**. As indicated in the drawings, the proposed retail lot will include a commercial building, car wash, and multiple fuel stations. The retail lot will be capped by paved driveways and parking areas, paved building slabs, and landscaped areas between the paved areas. All of the cross sections for each type of proposed capping remedy will be required to meet the minimum thicknesses given in the Sub-Parcel B6-2 RADWP.

Outside of the defined lease boundary, ingress and egress driveways will be constructed to allow access to and from the retail lot. As indicated in the site plan drawing provided in **Appendix B**, paved drives are currently proposed along several alignments adjacent to the lease boundary. The locations of paved ingress/egress roads are subject to agency review and approval. The paved drives will also be subject to the minimum cap thicknesses given in the Sub-Parcel B6-2 RADWP. The major utility trenching and installation tasks will be conducted under the scope of work described in the Sub-Parcel B6-2 RADWP. However, as shown in the site plan drawing in **Appendix B**, utility tie-ins will be installed under this addendum.

2.2.3. Construction Worker Intrusive Work

As demonstrated in the Sub-Parcel B6-2 RADWP, the Site will be raised in elevation with net fill. Only limited intrusive activities are required for the development of this retail lot, and any such intrusive activities would be conducted through the construction fill materials placed during the mass grading of the Site. As indicated in the site plan drawing provided in **Appendix B**, the only utility work proposed under this addendum will be minor utility tie-ins. There are no concerns for Construction Workers based on the limited scope of intrusive work required for this development project. The SLRA presented in the Sub-Parcel B6-2 RADPW indicated that an exposure duration of 36 days did not result in any potentially unacceptable risk or hazard.

2.2.4. Temporary Access Restrictions – Interim Measures

As stated above, agency approval is required if portions of the Site will be occupied prior to full implementation of the capping remedy for the entire Sub-Parcel B6-2. The interim measures for the proposed retail lot have not been selected at this time, but will consist of either 1) the installation of perimeter fencing to prohibit access to uncapped areas of the Site or 2) a capping remedy consisting of crushed concrete to be placed over the remaining undeveloped areas of the Site. The installation of either interim measure would satisfy the agency requirement to address potential exposures for a Composite Worker or visitor. The MDE and USEPA will be notified once the interim measures (fence and/or crushed concrete) are selected. The selection of the interim measures may depend on the sequencing and spacing of this development project in relation to other nearby retail lots.

If a perimeter fence is selected as an interim measure, it will be constructed using non-ground intrusive chain link temporary storm fencing. A sample photograph of the temporary fencing which has previously been approved for use on the Tradepoint Atlantic property is included as **Appendix C**. If the placement of crushed concrete is selected as an interim measure, recycled crushed concrete sourced from the Tradepoint Atlantic property (which has been used by MCM Construction Inc. for various redevelopment projects) will be placed in a 4-inch thick layer in all applicable areas. Any recycled concrete must be approved as "clean" with a pile designation and sampling results provided to the MDE for review.

Regardless of the selected interim measures, construction oversight by an EP will ensure and document that the interim measures are built as designed and appropriate environmental and safety protocols are followed. All construction activities, including the installation of the interim measures, remain subject to the requirements given in the Sub-Parcel B6-2 RADWP. The EP shall provide records to document:

- Daily observations of construction activities during remedy installation
- Proper remedy construction, including alignment and thickness (if applicable)
- Other encountered conditions covered by the RADWP, as applicable

Regular inspections will be required to verify that there are no potential exposure risks for Composite Workers or visitors caused by deficiencies in the interim measures. Inspections of the interim measures will be completed at a minimum frequency of monthly. The responsible party will perform inspections, perform maintenance of the interim measures, and retain inspection records. If the responsible party determines that an exposure risk is present (e.g., missing or damaged sections of fence; exposed areas of soil or missing crushed concrete cap), the MDE must be notified within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If a corrective action is required, the MDE notification will include documentation of the observed conditions and the location of any repairs.

3.0 REPORTING AND IMPLEMENTATION SCHEDULE

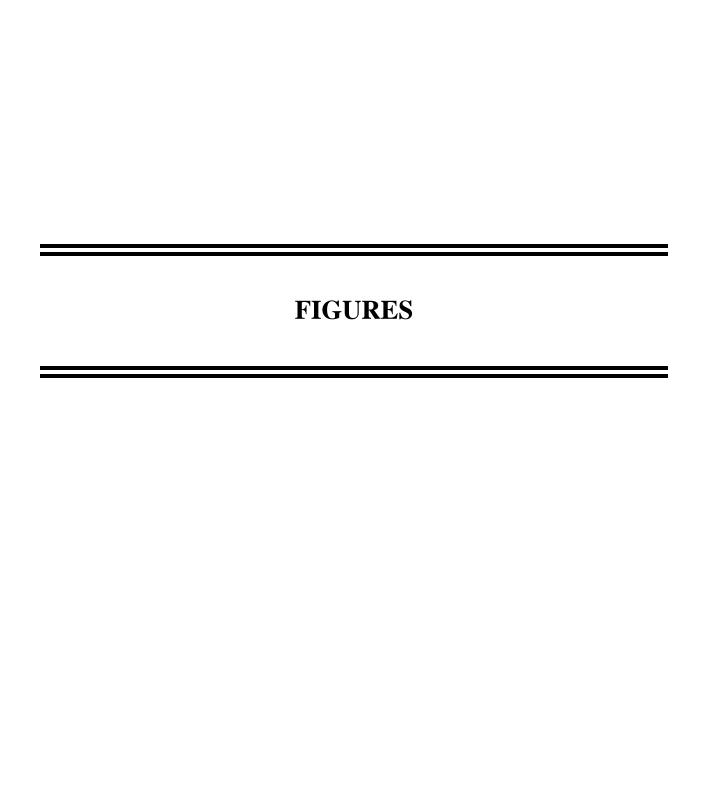
As stated in the Sub-Parcel B6-2 RADWP, a Development Completion Report and Notice of Readiness for Use will be prepared following construction of each proposed retail lot. In addition to summarizing the completed capping activities, records shall be provided to document the installation of the selected interim measures.

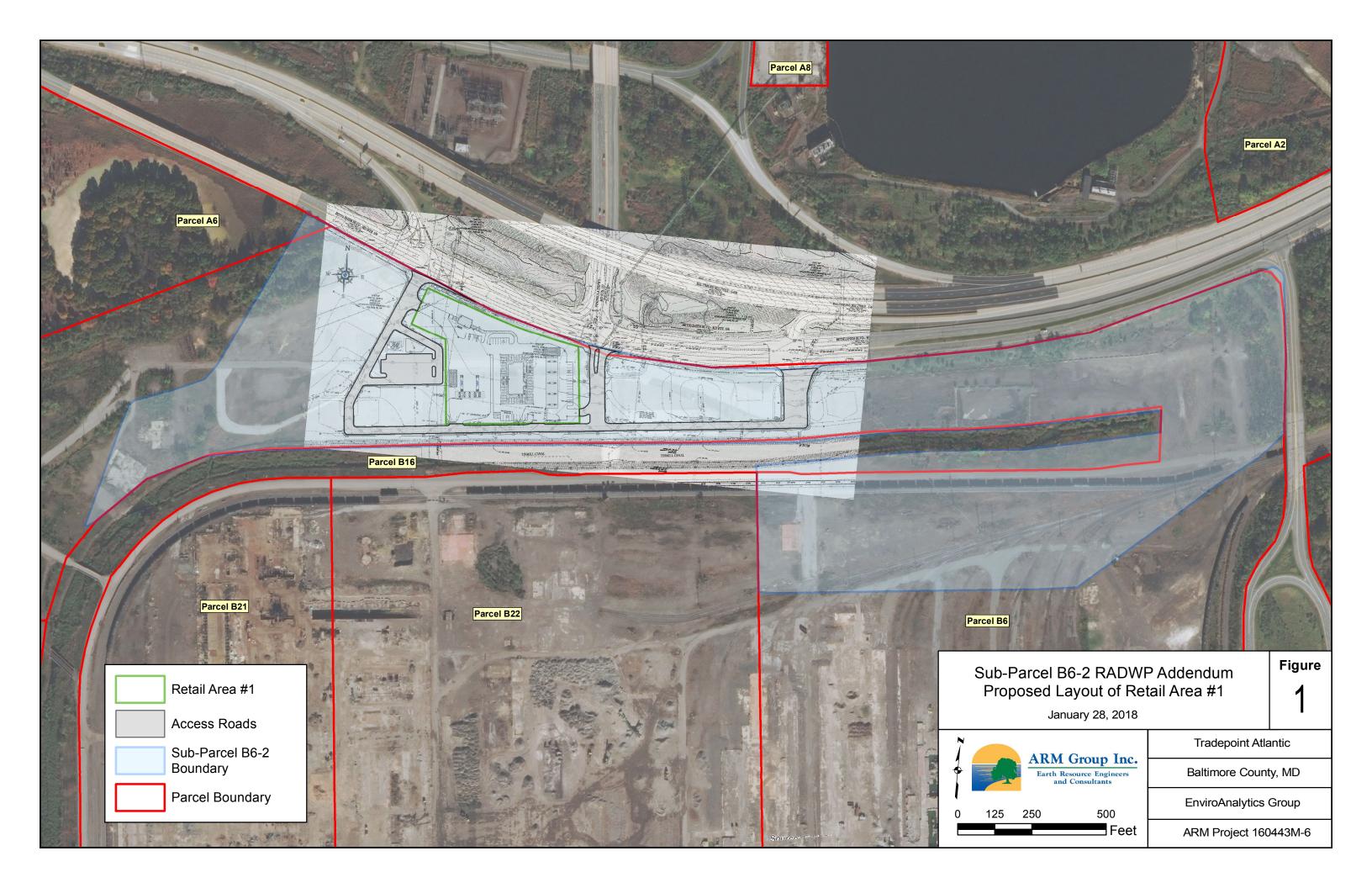
As specified in the preceding section, if the results of the monthly inspections of the interim measures indicate that an exposure risk is present, the MDE must be notified within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If no deficiencies are apparent and the interim measures do not require any substantial maintenance, the results of the inspections may be reported to the MDE and USEPA on an annual basis. In addition, the MDE and USEPA will be provided with a written notice at least 30 days prior to any planned removal or modification to the proposed interim measures once they have been installed.

The proposed implementation schedule is shown below.

<u>Task</u>	Proposed Completion Date	
Anticipated RADWP Addendum Approval	March 23, 2018	
Permanent Capping Remedy Installation	August 2018	
Interim Measures Installation	August 2018	
Submittal of Completion Report/ Notice of Readiness for Use*	September 2018	
Submittal of Interim Measures Inspection & Maintenance Results	Annually Following Interim Measures Installation (Deficiencies reported within 48 hours)	
	10 110 610)	

^{*}Notice of Readiness for Use shall be prepared by Professional Engineer registered in Maryland and submitted with the Development Completion Report to certify that the work is consistent with the requirements of this RADWP Addendum and the retail lot is suitable for occupancy.

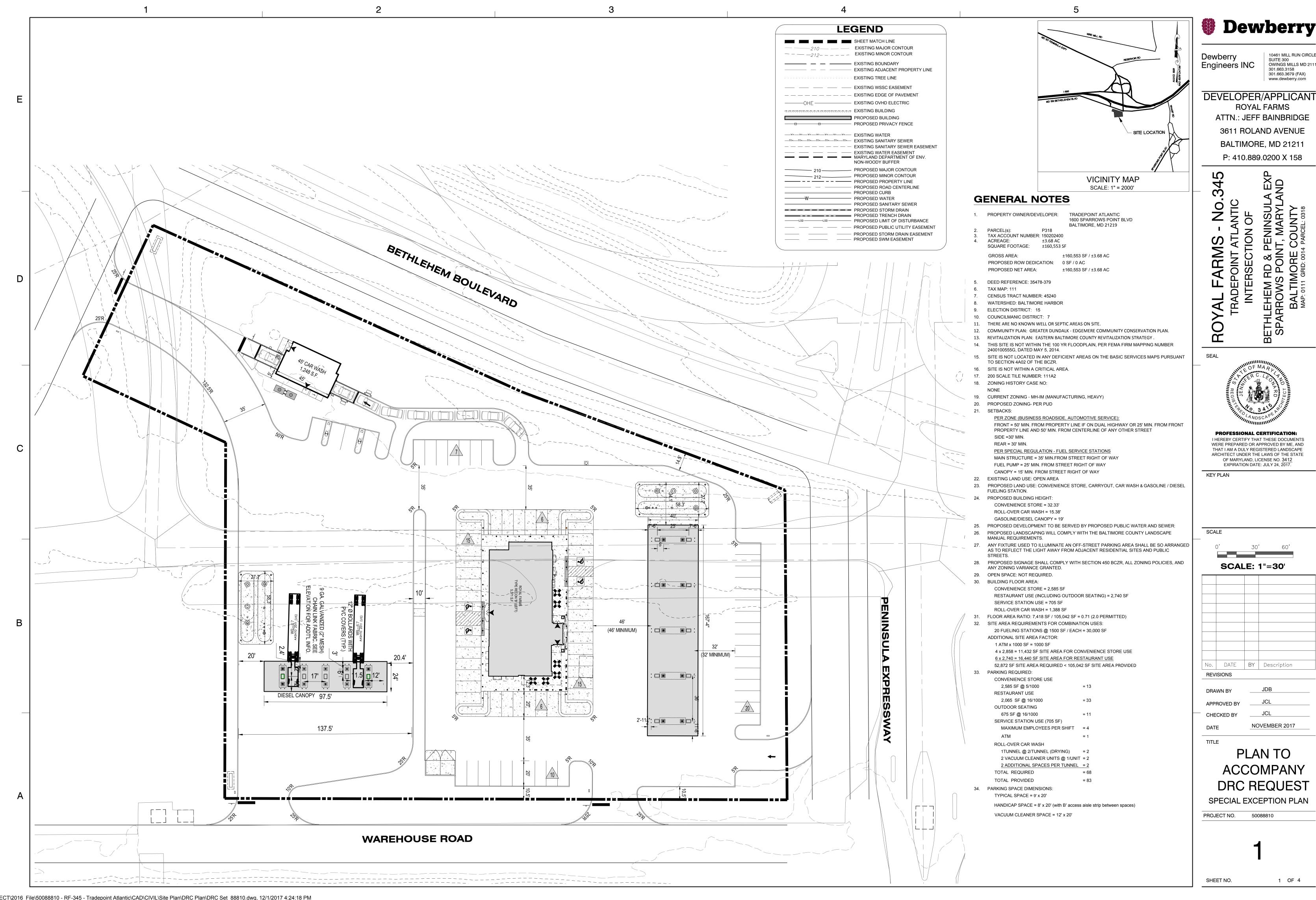




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APPENDIX A

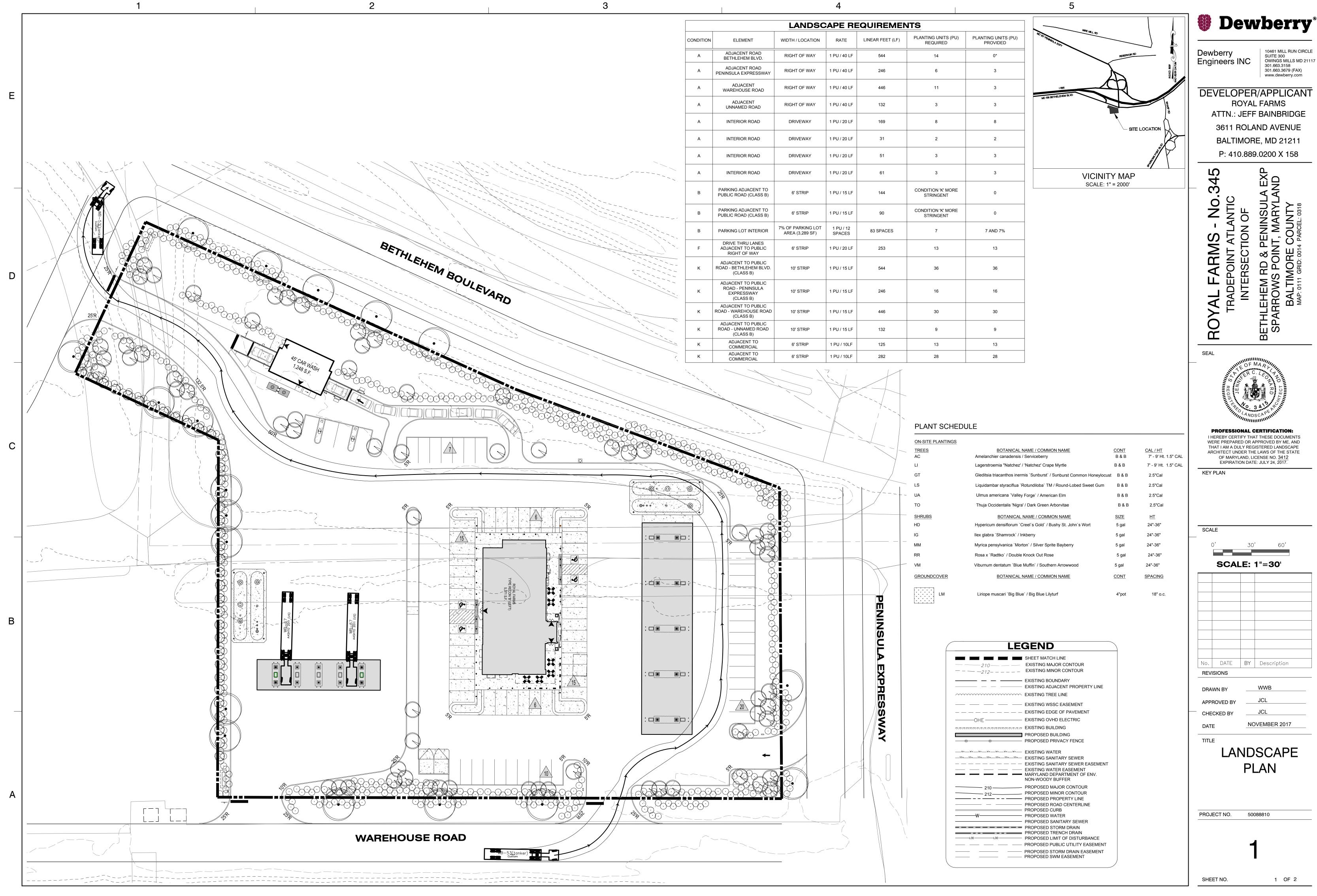
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OWINGS MILLS MD 21117 301.663.3679 (FAX)



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APPENDIX B

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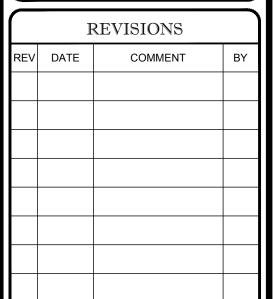
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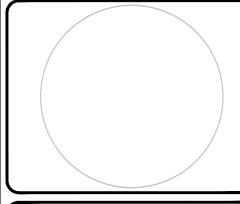
NORTH SIDE RETAIL CGU



LOCATION OF SITE RETAIL AREA BETHLEHEM BLVD (MD RTE. 158) TAX MAP 111, PARCEL 318 BALTIMORE, MD 21219 BALTIMORE COUNTY



901 DULANEY VALLEY ROAD, SUITE 801 TOWSON, MARYLAND 21204 Phone: (410) 821-7900 Fax: (410) 821-7987 MD@BohlerEng.com



NORTH SIDE RETAIL CGU

APPENDIX C



Non-Ground Intrusive Chain Link Temporary Storm Fencing Sample Photograph

Provided by Tradepoint Atlantic on January 5, 2018