



# ARM Group LLC

Engineers and Scientists

December 9, 2020

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

Re: Comment Response Letter:  
Remnant Sampling Work Plan  
Area A: Parcel A1  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic, ARM Group LLC (ARM) is providing this Comment Response Letter with responses to comments received from the Maryland Department of the Environment (MDE) and United States Environmental Protection Agency via email on December 2 and December 4, 2020. The comments were received following agency review of the Remnant Sampling Work Plan (dated November 30, 2020) for an undeveloped portion of the Tradepoint Atlantic property on Area A: Parcel A1 (the Site).

An updated version of the Remnant Sampling Work Plan (Revision 1) is provided along with this Comment Response Letter. Responses to specific comments are provided below; the original comments are included in italics with the responses following.

1. *MDE: Can you have ARM clarify the steps for collecting ~~composite~~ [homogenized] samples from the top 2' of soil? This is outside of our typical sampling protocol so it needs to be more detailed.*

The homogenized soil samples will be collected as specified in the Quality Assurance Project Plan (QAPP) Field Standard Operating Procedure (SOP) No. 008 – Surface Soil Sample Collection. Briefly, the top sampling interval will be homogenized to create a representative sample from 0 to 2 feet below ground surface (bgs) by mixing in a decontaminated or dedicated glass or stainless-steel bowl. The homogenized sample will contain an equal volume of soil from throughout the vertical interval. Mixing will be performed only after collecting any samples for volatile organic compounds (VOCs) and gasoline range organics (GRO) analysis, because volatile organics should always be collected directly from the sample location.

2. *USEPA: In order to complete a surface and sub-surface SLRA, the three proposed surface soil locations for the A1 remnant must include standard sub-surface soil sampling consistent with the Tradepoint QAPP. Revise accordingly.*

Subsurface sampling has been added into the work scope. The proposed borings will be conducted in accordance with the standard QAPP protocols.

3. *USEPA: For the remnant surface soil samples, please eliminate the term “composite”, as these are individual samples that will not be combined.*

The “composite” term has been removed and replaced with “homogenized”, which is consistent with the terminology used in Field SOP No. 008.

4. *USEPA: Revise the analyte/method list to include all standard analytes/methods according to the QAPP.*

The standard list of analytes will be collected for all sample intervals.

5. *USEPA: Regarding the use of the surface soils as a 2 ft cap for the subsurface if supported by the data, the Agencies will allow this approach, which is inconsistent with the standard cap requirement of 2 ft of clean fill underlain by marker geotextile, only for remnants on the Tradepoint property which have no likelihood of future development due to their size and location.*

The comment is acknowledged. Since this is a remnant investigation the existing surface soils may act as a cap if supported by the data. As noted in the Work Plan, the findings of this investigation will be included in a Remnant Screening Level Risk Assessment (SLRA) Report that addresses Composite and Construction Worker risk scenarios

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

Respectfully Submitted,  
ARM Group LLC



Taylor R. Smith, P.E.  
Project Manager



T. Neil Peters, P.E.  
Senior Vice President

