



ARM Group Inc.

Engineers and Scientists

December 14, 2018

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

Re: Response and Development Work Plan
Area A: Parcel A11 (Revision 2)
Comment Response and Transmittal Letter
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 United States Environmental Protection Agency (USEPA) in an email dated November 20, 2018. The USEPA provided review comments regarding the previous Response and Development Work Plan (RADWP) submission (Revision 1) for Sub-Parcel A11-1 (the Site) of the Tradepoint Atlantic property located in Sparrows Point, Maryland. This letter provides responses to the comments and demonstrates that the requested changes to the RADWP have been addressed in a satisfactory manner. Responses to the comments are provided below; the original comments are included in italics with responses following. One additional comment was received from the Maryland Department of the Environment (MDE) via an email sent by Tradepoint Atlantic on December 4, 2018. The MDE comment is addressed in the "Additional Revisions" section below.

The revised RADWP text is provided as **Attachment 1** for incorporation into the Sub-Parcel A11-1 RADWP (Revision 2). The enclosed CD provides a compiled PDF of the entire report with the inserted replacement text. Revised cover and spine cardstock sheets are also provided for insertion into the binders currently held by the agencies.

- 1. Our review of the A11-1 RDWP has found that the proposed use of upgraded or modified PPE for the construction worker in this RDWP is not acceptable. The alternatives include: 1) revise the RDWP to include a construction worker SLRA and abide by the acceptable exposure frequency, or 2) use certified 40 hour OSHA HAZWOPER trained workers.*

TradePoint Atlantic has elected to use OSHA HAZWOPER trained workers for the development work on Sub-Parcel A11-1. Relevant sections of the RADWP have been updated as noted below.

- 2. The following sections refer to the upgraded PPE and should be revised: Sections 3.2.3, 4.0, 5.1, and 5.3. In addition, Section 5.3 refers to the possible use of Level C PPE. If that were necessary, that would again require the use of certified 40 hour OSHA HAZWOPER trained workers who are annually fit tested.*

The listed sections have been updated to indicate that OSHA HAZWOPER trained workers will perform all of the required intrusive construction work or activities which require the handling of potentially impacted materials. OSHA HAZWOPER trained workers will not be required during construction activities which do not have a significant exposure risk, such as above-grade building construction.

The contractor providing the OSHA HAZWOPER trained workers will develop a site-specific Health and Safety Plan (HASP) which will be applied to all workers who may be engaged in intrusive construction work or otherwise handle potentially impacted materials. The property-wide EAG HASP has been removed from this RADWP submission; the relevant hard copy pages (formerly **Appendix G**) can be discarded.

Additional Revisions:

3. Section 3.3.5.3 (Short-Term Effectiveness) was revised to indicate that site-specific health and safety controls would be executed by OSHA HAZWOPER trained workers.
4. Section 5.1.2 (Soil Excavation and Utility Trenching) was revised to indicate that the Environmental Professional (EP) will be responsible for monitoring organic vapor concentrations in the worker breathing zone within the trenches, and will coordinate with the designated Site Safety Officer to determine whether any increased level of health and safety protection is required. Section 5.3 (referenced above) was updated in a similar fashion, and states that a Site Safety Officer must be designated in the contractor's HASP.
5. Section 5.1.3 (Soil Sampling and Disposal) was updated to remove the reference to Greys Landfill as a disposal location for unsuitable materials. The MDE has noted that sediment generated from the Tin Mill Canal (TMC) as a result of ongoing cleanup work is the only material being landfilled at this point, although this may change in the future.
6. Section 5.6 (Construction Oversight) was updated to remove the EP's responsibility for the enforcement of the HASP. The designated OSHA HAZWOPER Site Safety Officer will be responsible for ensuring compliance with the requirements of the HASP, and for enforcing these requirements (as noted in the revised Section 5.3).



7. The anticipated final approval date has been revised in the schedule (Section 7.0). The conditional approval received from the agencies on October 15, 2018 is still referenced.

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.



Taylor R. Smith
Project Engineer



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

