



ARM Group LLC

Engineers and Scientists

July 15, 2020

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

Re: Comment Response Letter:
Response and Development Completion
Report - Area B: Parcel B15, Revision 0
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group LLC (ARM) is pleased to provide the following updated attachments to address the comments received from the Maryland Department of the Environment (MDE) via email on April 25, 2019 regarding the Response and Development Completion Report - Area B: Parcel B15, Revision 0 (Completion Report) dated April 3, 2018 for the development work completed on a portion of the Tradepoint Atlantic property located in Sparrows Point, Maryland designated as Parcel B15. The MDE stated that a new revision of the Completion Report would not be required. Thus, a revised Completion Report is not being submitted at this time. Instead, this Comment Response Letter should be maintained with the Completion Report (submission) to ensure that the updates discussed herein are properly documented.

Enclosed please find two hard copies (with two CDs) of this Comment Response Letter with a revised **Figure 2** and additional attachments. The attachments provided are to be maintained with the previously submitted Completion Report currently in agency possession. Responses to the comments are provided below; the original comments are included in italics with responses following.

1. *Pg. 12 - Confirm that this statement should read "(3 inches of subbase and 7 inches of asphalt in the heavy duty areas and 6 inches of subbase and 4 inches of asphalt in the LIGHT duty areas)".*

The statement is correct as revised in the comment above.

2. *Provide a figure that shows the locations of NAPL piezometers B15-008-PZ and B15-003-PZ (or add it to Figure 2).*

A revised version of **Figure 2** showing the locations of NAPL piezometers B15-008-PZ and B15-003-PZ is included with this Comment Response Letter.

3. *Provide well/piezometer abandonment logs.*

Abandonment logs for piezometers B15-003-PZ, B15-012-PZ, B15-014-PZ, and B15-018-PZ are provided as **Attachment 1**. NAPL screening piezometer B15-008-PZ was retained and converted to a flush mount. Piezometer B15-018-PZ was destroyed during construction activities, as noted on the attached abandonment form.

4. *Provide additional details regarding dust monitoring, including: locations of monitoring and daily logs.*

ARM completed the mandatory dust monitoring during construction activities in the Original Development Area of Parcel B15. A real-time dust meter (ThermoElectron Corporation Personal Data RAM 1000AN) was utilized to monitor the dust produced during construction activities. Dust concentrations were recorded in the active work zone every 15 minutes during construction activities with exposed subgrade in the Original Development Area. The data are provided in **Attachment 2**.

Dust monitoring during development activities in the Expansion Development Area was conducted by GTA's field technician using a TSI DustTrak II testing device. Dust concentrations were recorded by GTA's field technician from several locations two to three times daily during construction activities in the Expansion Development Area, as indicated in **Attachment 3**. The data are provided in **Attachment 3**.

No dust concentrations exceeding 3.0 mg/m³ were noted from upwind of the Site during either phase of development. No visible dust was produced during paving activities. Asphalt trucks produced minor visible dust when travelling on unpaved areas, but no dust concentration exceedances of 3.0 mg/m³ were noted during any construction activities in either the Original or Expansion Development Area. While not required, a water truck was utilized at the direction of the Contractor during development in the Expansion Development Area.



5. *Appendix D: Daily Field Logs - this section consists solely of photos. Are there daily field notes that correspond with the photos or additional notes that can be provided by the on-site environmental contractor?*

Appendix D was intended to present a photograph log from Expansion Development Area activities, as noted in the Table of Contents and in Section 2.0. The reference to Daily Field Reports in Section 2.8 was intended to address grading details for the Expansion Development Area provided in the photographs taken by GTA during construction. Additional field notes recorded during ARM and GTA oversight are provided in **Attachment 4** and **Attachment 5**, respectively.

6. *Section 2.7: "graded aggregate base material" - Submit any receipts/manifests for off-site aggregate placed on the parcel and specifically identify the material brought on-site.*

All fill material placed during Parcel B15 development consisted of blast furnace slag from the Sparrows Point site. As no off-site material was brought to Parcel B15, no manifests were generated.

7. *Section 2.8: "replacement aggregate material" - Please be more specific.*

All fill material placed during Parcel B15 development consisted of blast furnace slag from the Sparrows Point site.

Additional Notes:

1. The Containment Remedy Operations and Maintenance Plan included with the Parcel B15 Response and Development Completion Report as **Appendix K** has been updated to include a revised Pavement Inspection Form. The revised Containment Remedy Operations and Maintenance Plan is included in **Attachment 6**.

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 Inc.



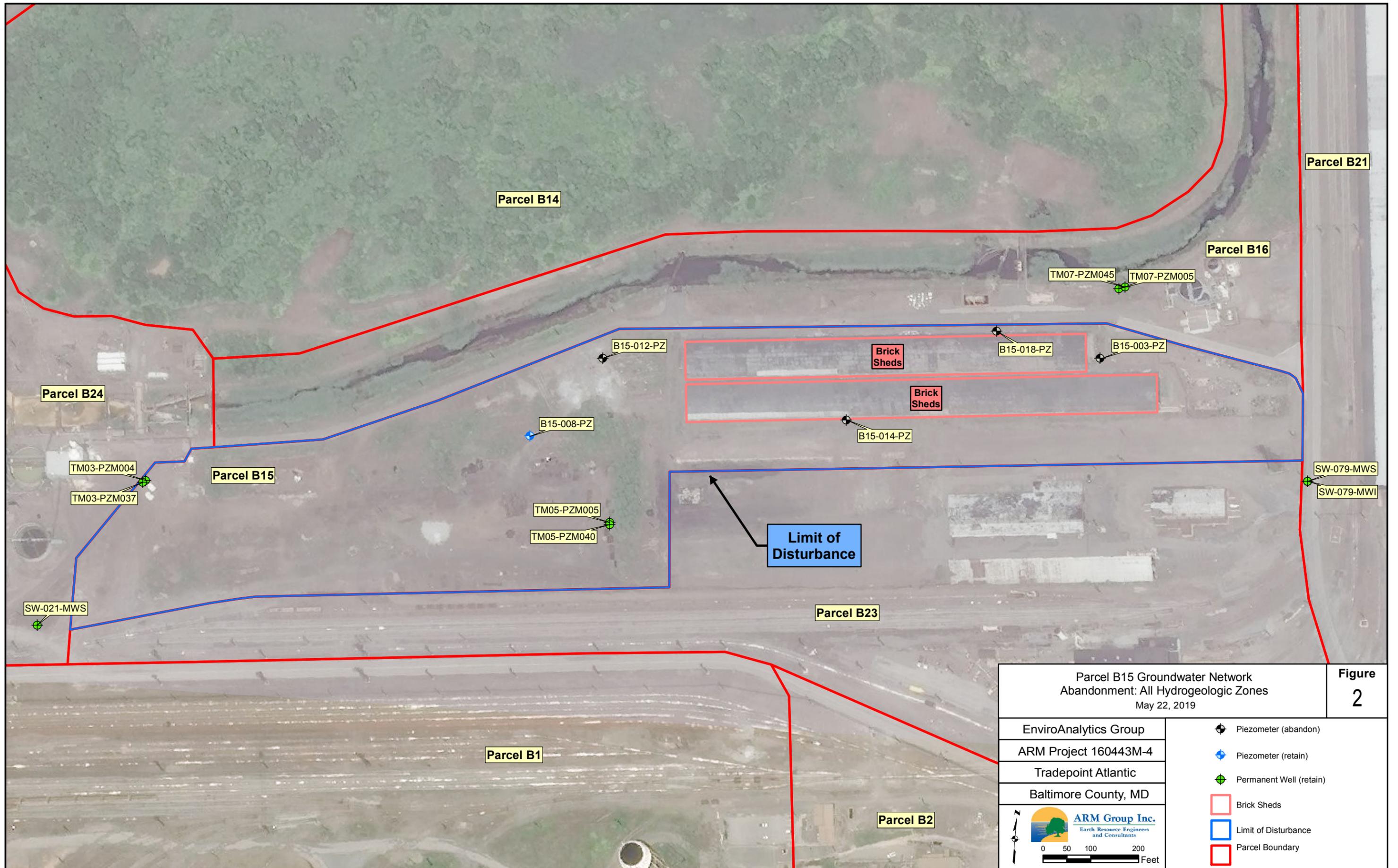
Melissa A. Replogle, E.I.T.
Project Engineer



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



FIGURES



Parcel B15 Groundwater Network Abandonment: All Hydrogeologic Zones May 22, 2019		Figure 2						
EnviroAnalytics Group ARM Project 160443M-4 Tradepoint Atlantic Baltimore County, MD	<table border="0"> <tr> <td>◆ Piezometer (abandon)</td> </tr> <tr> <td>◆ Piezometer (retain)</td> </tr> <tr> <td>● Permanent Well (retain)</td> </tr> <tr> <td>□ Brick Sheds</td> </tr> <tr> <td>□ Limit of Disturbance</td> </tr> <tr> <td>□ Parcel Boundary</td> </tr> </table>		◆ Piezometer (abandon)	◆ Piezometer (retain)	● Permanent Well (retain)	□ Brick Sheds	□ Limit of Disturbance	□ Parcel Boundary
◆ Piezometer (abandon)								
◆ Piezometer (retain)								
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□ Parcel Boundary								
<table border="0"> <tr> <td style="text-align: center;"> ARM Group Inc. <small>Earth Resource Engineers and Consultants</small> </td> </tr> </table>			 ARM Group Inc. <small>Earth Resource Engineers and Consultants</small>					
 ARM Group Inc. <small>Earth Resource Engineers and Consultants</small>								

ATTACHMENT 1

Well/Piezometer Abandonment Form

Well/Piezometer ID: B15-003-PZ

General Project Information:

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: B15

Abandonment Date: 10/13/16

Abandonment Contractor: GSI

Abandonment Method (circle appropriate):

1. PVC → Pulled / Split / Perforated / Left-In-Place
2. Abandoned → Grout / Bentonite Chips

Field Equipment: Oil-Water Probe

ARM Representative(s): Lisa Perrin

Well Diameter: 1 inch

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log): 17.3 ft	Depth to Water (TOC): Not recorded
Measured: Not recorded	Depth to NAPL (TOC): Not recorded

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): B15-003-PZ Screening Piezometer

Please Note: If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

Additional Comments (if any):

Transcribed from ARM field book records. Piezometer was abandoned prior to the MDE directive to gauge piezometers a final time prior to abandonment.



ARM Group Inc.

Earth Resource Engineers and Consultants

9175 Guilford Road - Suite 310 Columbia,

Maryland 21046

(410) 290-7775 FAX: (410) 290-7775

Well/Piezometer Abandonment Form

Well/Piezometer ID: B15-012-PZ

General Project Information:

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: B15

Abandonment Date: 10/13/16

Abandonment Contractor: GSI

Abandonment Method (circle appropriate):

- 1. PVC → Pulled / Split / Perforated / Left-In-Place
- 2. Abandoned → Grout / Bentonite Chips

Field Equipment: Oil-Water Probe

ARM Representative(s): Lisa Perrin

Well Diameter: 1 inch

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log): 22.7 ft	Depth to Water (TOC): Not recorded
Measured: Not recorded	Depth to NAPL (TOC): Not recorded

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): _____

Please Note: If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

Additional Comments (if any):

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Well/Piezometer Abandonment Form

Well/Piezometer ID: B15-014-PZ

General Project Information:

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: B15

Abandonment Date: 10/13/16

Abandonment Contractor: GSI

Abandonment Method (circle appropriate):

1. PVC → Pulled / Split / Perforated / Left-In-Place
2. Abandoned → Grout / Bentonite Chips

Field Equipment: Oil-Water Probe

ARM Representative(s): Lisa Perrin

Well Diameter: 1 inch

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log): 22.5 ft	Depth to Water (TOC): Not recorded
Measured: Not recorded	Depth to NAPL (TOC): Not recorded

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): _____

Please Note: If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

Additional Comments (if any):

Transcribed from ARM field book records. Piezometer was abandoned prior to the MDE directive to gauge piezometers a final time prior to abandonment.



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Well/Piezometer Abandonment Form

Well/Piezometer ID: B15-018-PZ

General Project Information:

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: B15

Abandonment Date: 10/13/16

Abandonment Contractor: GSI

Abandonment Method (circle appropriate):

1. PVC → Pulled / Split / Perforated / Left-In-Place
2. Abandoned → Grout / Bentonite Chips

Field Equipment: Oil-Water Probe

ARM Representative(s): Lisa Perrin

Well Diameter: 1 inch

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log): 19.4 ft	Depth to Water (TOC): Not recorded
Measured: Not recorded	Depth to NAPL (TOC): Not recorded

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): _____

Please Note: If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

Additional Comments (if any):

Transcribed from ARM field book records. Piezometer was destroyed and covered with asphalt during construction activities and thus could not be abandoned.



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ATTACHMENT 2

**Dust Monitor Readings
Original Development Area**

Date and Time	Dust Reading (mg/m ³)	Location
10/31/2016 8:00	0.027	Work Zone
10/31/2016 8:15	0.016	Work Zone
10/31/2016 8:30	0.019	Work Zone
10/31/2016 8:45	0.054	Work Zone
10/31/2016 9:00	0.251	Work Zone
10/31/2016 9:15	0.071	Work Zone
10/31/2016 9:30	0.100	Work Zone
10/31/2016 9:45	0.073	Work Zone
10/31/2016 10:00	0.014	Work Zone
10/31/2016 10:15	0.431	Work Zone
10/31/2016 10:30	0.637	Work Zone
10/31/2016 10:45	0.453	Work Zone
10/31/2016 11:00	0.029	Work Zone
10/31/2016 11:15	0.536	Work Zone
10/31/2016 11:30	0.095	Work Zone
10/31/2016 11:45	0.561	Work Zone
10/31/2016 12:00	0.342	Work Zone
10/31/2016 12:15	0.709	Work Zone
10/31/2016 12:30	0.047	Work Zone
10/31/2016 12:45	0.645	Work Zone
10/31/2016 13:00	0.502	Work Zone
10/31/2016 13:15	0.471	Work Zone
10/31/2016 13:30	0.365	Work Zone
10/31/2016 13:45	0.223	Work Zone
10/31/2016 14:00	0.288	Work Zone
10/31/2016 14:15	0.003	Work Zone
10/31/2016 14:30	0.013	Work Zone
10/31/2016 14:45	0.008	Work Zone
10/31/2016 15:00	0.012	Work Zone
10/31/2016 15:15	0.007	Work Zone
10/31/2016 15:30	0.009	Work Zone
11/1/2016 8:45	1.085	Work Zone
11/1/2016 9:00	0.385	Work Zone
11/1/2016 9:15	1.562	Work Zone
11/1/2016 9:30	0.857	Work Zone
11/1/2016 9:45	1.257	Work Zone
11/1/2016 10:00	1.444	Work Zone
11/1/2016 10:15	0.131	Work Zone
11/1/2016 10:30	0.036	Work Zone
11/1/2016 10:45	0.825	Work Zone
11/1/2016 11:00	0.350	Work Zone
11/1/2016 11:15	0.710	Work Zone
11/1/2016 11:30	0.065	Work Zone
11/1/2016 11:45	0.247	Work Zone
11/1/2016 12:00	0.025	Work Zone
11/1/2016 12:15	0.012	Work Zone
11/1/2016 12:30	0.490	Work Zone
11/1/2016 12:45	0.019	Work Zone
11/1/2016 13:00	0.012	Work Zone
11/1/2016 13:15	0.689	Work Zone
11/1/2016 13:30	2.172	Work Zone
11/1/2016 13:45	0.044	Work Zone
11/1/2016 14:00	0.019	Work Zone

Date and Time	Dust Reading (mg/m ³)	Location
11/1/2016 14:15	1.826	Work Zone
11/1/2016 14:30	0.689	Work Zone
11/1/2016 14:45	1.357	Work Zone
11/1/2016 15:00	0.102	Work Zone
11/1/2016 15:15	0.097	Work Zone
11/1/2016 15:30	2.758	Work Zone
11/1/2016 15:45	1.089	Work Zone
11/1/2016 16:00	1.300	Work Zone
11/2/2016 8:00	0.141	Work Zone
11/2/2016 8:15	0.602	Work Zone
11/2/2016 8:30	0.070	Work Zone
11/2/2016 8:45	0.203	Work Zone
11/2/2016 9:00	0.265	Work Zone
11/2/2016 9:15	0.834	Work Zone
11/2/2016 9:30	0.293	Work Zone
11/2/2016 9:45	0.324	Work Zone
11/2/2016 10:00	0.244	Work Zone
11/2/2016 10:15	0.924	Work Zone
11/2/2016 10:30	1.006	Work Zone
11/2/2016 10:45	0.918	Work Zone
11/2/2016 11:00	0.105	Work Zone
11/2/2016 11:15	0.147	Work Zone
11/2/2016 11:30	0.034	Work Zone
11/2/2016 11:45	0.144	Work Zone
11/2/2016 12:00	0.165	Work Zone
11/2/2016 12:15	0.541	Work Zone
11/2/2016 12:30	0.573	Work Zone
11/2/2016 12:45	1.883	Work Zone
11/2/2016 13:00	1.682	Work Zone
11/2/2016 13:15	1.128	Work Zone
11/2/2016 13:30	0.097	Work Zone
11/2/2016 13:45	0.763	Work Zone
11/2/2016 14:00	1.011	Work Zone
11/2/2016 14:15	0.883	Work Zone
11/2/2016 14:30	0.045	Work Zone
11/2/2016 14:45	0.168	Work Zone
11/2/2016 15:00	0.257	Work Zone
11/2/2016 15:15	1.319	Work Zone
11/2/2016 15:30	0.407	Work Zone
11/2/2016 15:45	0.445	Work Zone
11/2/2016 16:00	1.932	Work Zone
11/2/2016 16:15	0.788	Work Zone
11/3/2016 7:45	0.115	Work Zone
11/3/2016 8:00	1.733	Work Zone
11/3/2016 8:15	0.084	Work Zone
11/3/2016 8:30	0.054	Work Zone
11/3/2016 8:45	0.131	Work Zone
11/3/2016 9:00	0.111	Work Zone
11/3/2016 9:15	0.264	Work Zone
11/3/2016 9:30	0.169	Work Zone
11/3/2016 9:45	0.110	Work Zone
11/3/2016 10:00	0.392	Work Zone
11/3/2016 10:15	0.324	Work Zone

Date and Time	Dust Reading (mg/m ³)	Location
11/3/2016 10:30	0.132	Work Zone
11/3/2016 10:45	1.289	Work Zone
11/3/2016 11:00	0.642	Work Zone
11/3/2016 11:15	1.383	Work Zone
11/3/2016 11:30	0.231	Work Zone
11/3/2016 11:45	0.163	Work Zone
11/3/2016 12:00	0.044	Work Zone
11/3/2016 12:15	1.405	Work Zone
11/3/2016 12:30	0.427	Work Zone
11/3/2016 12:45	0.096	Work Zone
11/3/2016 13:00	0.069	Work Zone
11/3/2016 13:15	0.055	Work Zone
11/3/2016 13:30	0.911	Work Zone
11/3/2016 13:45	0.029	Work Zone

ATTACHMENT 3

Dust Monitor Readings
Expansion Development Area

Date and Time	Dust Reading (mg/m ³)	Location
4/14/2017 11:00	0.015	2
4/14/2017 11:00	0.046	3
4/14/2017 11:00	0.014	4
4/14/2017 13:15	0.024	6
4/14/2017 13:15	0.080	7
4/14/2017 13:15	0.028	8
4/14/2017 13:15	0.014	9
4/14/2017 14:30	0.024	3
4/14/2017 14:30	0.020	4
4/14/2017 14:30	0.054	5
4/17/2017 9:30	0.017	Work Zone
4/17/2017 9:30	0.021	Work Zone
4/17/2017 9:30	0.032	Work Zone
4/17/2017 9:30	0.008	Work Zone
4/17/2017 10:30	0.007	Work Zone
4/17/2017 10:30	0.012	Work Zone
4/17/2017 10:30	0.036	Work Zone
4/17/2017 10:30	0.010	Work Zone
4/17/2017 14:30	0.027	Work Zone
4/17/2017 14:30	0.023	Work Zone
4/17/2017 14:30	0.004	Work Zone
4/17/2017 14:30	0.036	Work Zone
4/18/2017 8:30	0.005	4
4/18/2017 8:30	0.005	5
4/18/2017 8:30	0.005	6
4/18/2017 11:30	0.010	2
4/18/2017 11:30	0.005	3
4/18/2017 11:30	0.009	9
4/18/2017 14:30	0.011	2
4/18/2017 14:30	0.005	3
4/18/2017 14:30	0.008	9
4/19/2017 9:30	0.009	1
4/19/2017 9:30	0.009	9
4/19/2017 9:30	0.010	10
4/19/2017 12:30	0.009	1
4/19/2017 12:30	0.008	9
4/19/2017 12:30	0.009	10
4/20/2017 10:00	0.010	2
4/20/2017 10:00	0.014	3
4/20/2017 10:00	0.014	4

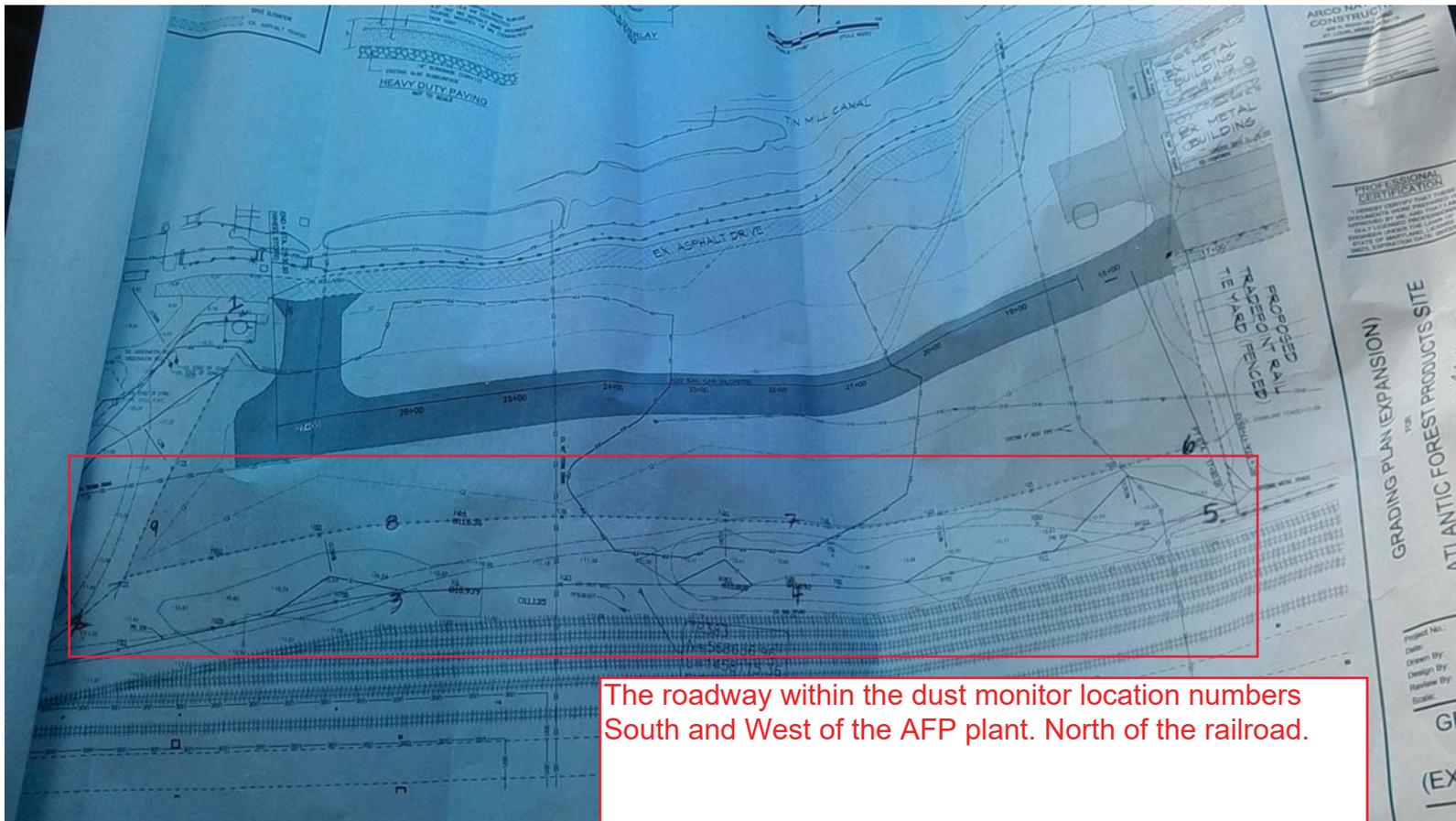
Date and Time	Dust Reading (mg/m ³)	Location
4/20/2017 10:00	0.009	9
4/20/2017 10:00	0.009	10
4/20/2017 13:00	0.009	3
4/20/2017 13:00	0.012	4
4/20/2017 13:00	0.015	5
4/21/2017 8:30	0.049	2
4/21/2017 8:30	0.051	3
4/21/2017 8:30	0.048	8
4/21/2017 8:30	0.050	9
4/21/2017 11:30	0.049	2
4/21/2017 11:30	0.051	3
4/21/2017 11:30	0.049	8
4/21/2017 11:30	0.049	9
4/24/2017 8:30	0.008	2
4/24/2017 8:30	0.010	9
4/24/2017 8:30	0.008	10
4/24/2017 11:30	0.009	2
4/24/2017 11:30	0.008	9
4/24/2017 11:30	0.008	10
4/24/2017 14:30	0.012	2
4/24/2017 14:30	0.006	9
4/24/2017 14:30	0.006	10



SKETCH

Project No. _____
Project Name: AFP (American Forestry Products)

Date: 04 / 14 / 2017
Sketch No. 1



The roadway within the dust monitor location numbers South and West of the AFP plant. North of the railroad.

ATTACHMENT 4



Site Name: Tradepoint Atlantic Site Location: Parcel B15 ARM Proj. No.: 160443M-4-4 Site Manager: ARM Inspector: Melissa Replogle Contractor: Gray & Son	Client: EnviroAnalytics Group Date: October 28, 2016 Arrival Time: 10:30 AM Departure Time: 11:30 AM Weather: low 50's, sunny, very windy Notes:
Equipment:	Site Personnel:

Construction Activities: Picking up large chunks of old asphalt in subbase, subbase placed (completed prior to observation), white limestone subbase placed (completed prior to observation), vibrating roller over white limestone subbase, asphalt paving, smooth drum roller
 Jersey barrier near wells moved to edge of parcel, wells covered with tubes)

Observations by ARM: Drove and walked perimeter, took photos.

Majority of east side of parcel paved (near Railroad Tracks)
 8-10' strips paved along north and south sides of buildings (directly adjacent), and north side of RR tracks
 White limestone subbase laid on majority of western side of parcel
 No paving on south side of RR tracks on western side of parcel

Sandy gravel subbase: 6-8" (100% complete)
 White limestone subbase: ~1" (~90% complete)
 Pavement flush with top of railroad tracks: ~4" (~50% complete)



Site Name: Tradepoint Atlantic	Client: EnviroAnalytics Group
Site Location: Parcel B15	Date: October 31, 2016
ARM Proj. No.: 160443M-4-4	Arrival Time: 7:45 AM Departure Time: 3:30 PM
Site Manager: Keith Alley	Weather: sunny, 50-60s, light wind (south)
ARM Inspector: Nick Kurtz	Notes:
Contractor: ARCO and Gray & Son	
Equipment: 1 - HAMM HD110 Roller 1 - HAMM HD14 Roller 1 - CAT AP1055D Asphalt Paver	Site Personnel: 7 - Grey & Son 1 - ARCO

Construction Activities: Gray & Son was asphalt paving the first 2.5 inches of asphalt across the white #10 stone base along the western portion of the site. Grey & Son also completed compaction testing and coring of 1st asphalt layer.

Observations by ARM:

- Gray & Son asphalt paving crew laying 1st layer (2.5 inches) of asphalt across the western portion of the parcel.
- No visible dust during rolling and paving activities; steam observed from rollers
- Minor dust visible when trucks and equipment drove on white stone base; however, trucks drove slow to keep the dust at a minimal level
- The large and small rollers, with water attachment, compacted the hot asphalt.
- Additional Gray & Son crew arrived to complete the compaction testing via a nuclear density gauge and asphalt cores



<p>Site Name: Sparrows Point</p> <hr/> <p>Site Location: Parcel B15</p> <hr/> <p>ARM Proj. No.: 160443M-4-4</p> <hr/> <p>Site Manager: Keith Alley</p> <hr/> <p>ARM Inspector: Melissa Replogle</p> <hr/> <p>Contractor: ARCO; Gray & Son</p>	<p>Client: EnviroAnalytics Group</p> <hr/> <p>Date: November 1, 2016</p> <hr/> <p>Arrival Time: 6:45 AM Departure Time: 4:15 PM</p> <hr/> <p>Weather: 50's</p> <hr/> <p>Notes: Wind from E (AM) Wind from S (PM)</p>
<p>Equipment:</p> <ul style="list-style-type: none"> 1 - HAMM HD110 Roller 1 - HAMM HD14 Roller 1 - CAT AP1055D Asphalt Paver 1 - Deere 554J 1 - CAT 246D 1 - CAT 248B 	<p>Site Personnel:</p> <ul style="list-style-type: none"> 10- Gray & Son 1 - ARCO 3 - Carlos Fence

Construction Activities:

Asphalt paving first layer (2.5") between buildings; inside RR tracks on eastern side; western side of parcel
Fence post hole digging

Roof spray coating at east end of southern building

Observations by ARM:

Asphalt trucks couldn't fit between the buildings - dumped asphalt on a 1st layer-paved area, then asphalt was brought in with Deere 554J and CAT skid steer loaders
One worker using a leaf blower to move light debris along the south building edge
Ran out of asphalt- down from 10:15-10:30

No visible dust during paving, some minor visible dust when trucks drive over white #10 stone



<p>Site Name: Sparrows Point</p> <p>Site Location: Parcel B15</p> <p>ARM Proj. No.: 160443M-4-4</p> <p>Site Manager: Keith Alley</p> <p>ARM Inspector: Melissa Replogle</p> <p>Contractor: ARCO; Gray & Son</p>	<p>Client: EnviroAnalytics Group</p> <p>Date: November 2, 2016</p> <p>Arrival Time: 7:00 AM Departure Time: 4:00 PM</p> <p>Weather: 60s, sunny</p> <p>Notes:</p>										
<p>Equipment:</p> <table border="0"> <tr> <td>1 - HAMM HD110 Roller</td> <td>1 - CAT 248B skid steer loader</td> </tr> <tr> <td>1 - HAMM HD14 Roller</td> <td>1 - Bobcat T590 auger</td> </tr> <tr> <td>1 - CAT AP1055D Asphalt Paver</td> <td>1 - Wirtgen W120F planer</td> </tr> <tr> <td>1 - Deere 554J wheel loader</td> <td></td> </tr> <tr> <td>1 - CAT 246D skid steer loader</td> <td></td> </tr> </table>	1 - HAMM HD110 Roller	1 - CAT 248B skid steer loader	1 - HAMM HD14 Roller	1 - Bobcat T590 auger	1 - CAT AP1055D Asphalt Paver	1 - Wirtgen W120F planer	1 - Deere 554J wheel loader		1 - CAT 246D skid steer loader		<p>Site Personnel:</p> <p>10 - Gray and Son 1 - ARCO 3 - Carlos Fence</p>
1 - HAMM HD110 Roller	1 - CAT 248B skid steer loader										
1 - HAMM HD14 Roller	1 - Bobcat T590 auger										
1 - CAT AP1055D Asphalt Paver	1 - Wirtgen W120F planer										
1 - Deere 554J wheel loader											
1 - CAT 246D skid steer loader											
<p>Construction Activities:</p> <p>Asphalt paving 1st layer (2.5") in western side of parcel Fence post hole digging Pavement crushing near RR tracks on eastern edge of parcel Roof spray coating on eastern half of southern building</p>											
<p>Observations by ARM:</p> <p>No visible dust from paving activities Some visible dust from trucks driving Gray & Son employee - nuclear gauge testing and pavement coring</p>											



<p>Site Name: Sparrows Point</p> <p>Site Location: Parcel B15</p> <p>ARM Proj. No.: 160443M-4-4</p> <p>Site Manager: Keith Alley</p> <p>ARM Inspector: Melissa Replogle</p> <p>Contractor: ARCO; Gray & Son</p>	<p>Client: EnviroAnalytics Group</p> <p>Date: November 3, 2016</p> <p>Arrival Time: 7:15 AM Departure Time: 4:00 PM</p> <p>Weather: 60s-70's, sun->cloudy->rain</p> <p>Notes:</p>										
<p>Equipment:</p> <table border="0"> <tr> <td>1 - HAMM HD110 Roller</td> <td>1 - CAT 248B skid steer loader</td> </tr> <tr> <td>1 - HAMM HD14 Roller</td> <td>1 - Bobcat T590 auger</td> </tr> <tr> <td>1 - CAT AP1055D Asphalt Paver</td> <td>1 - Gradall XL4100</td> </tr> <tr> <td>1 - Deere 554J wheel loader</td> <td></td> </tr> <tr> <td>1 - CAT 246D skid steer loader</td> <td></td> </tr> </table>	1 - HAMM HD110 Roller	1 - CAT 248B skid steer loader	1 - HAMM HD14 Roller	1 - Bobcat T590 auger	1 - CAT AP1055D Asphalt Paver	1 - Gradall XL4100	1 - Deere 554J wheel loader		1 - CAT 246D skid steer loader		<p>Site Personnel:</p> <p>10 - Gray and Son 1 - ARCO 3 - Carlos Fence</p>
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1 - CAT AP1055D Asphalt Paver	1 - Gradall XL4100										
1 - Deere 554J wheel loader											
1 - CAT 246D skid steer loader											
<p>Construction Activities:</p> <p>Asphalt paving: small patch near RR tracks on NE corner; western edge, NW side near buildings mostly 1st layer (2.5")</p> <p>second layer started, stopped work at 14:00 due to rain</p> <p>Fence post hole digging</p>											
<p>Observations by ARM:</p> <p>Morning discussion with Keith: they plan to finish first layer, then start second layer (another 2.5")</p> <p>The fence alignment goes through the NaSH tank on NW corner and telephone poles on southern edge- fence will be moved to avoid obstructions</p> <p>Heavy duty paving (3 layers) along RR tracks- will be flush with rest of 2nd layer</p> <p>Gray & Son employee- nuclear guage and coring</p>											



<p>Site Name: Sparrows Point</p> <p>Site Location: Parcel B15</p> <p>ARM Proj. No.: 160443M-4-4</p> <p>Site Manager: Keith Alley</p> <p>ARM Inspector: Melissa Replogle</p> <p>Contractor: ARCO; Gray & Son</p>	<p>Client: EnviroAnalytics Group</p> <p>Date: November 4, 2016</p> <p>Arrival Time: 9:45 AM Departure Time: 11:00 AM</p> <p>Weather: 50s, sunny, some wind from N</p> <p>Notes:</p>
<p>Equipment:</p> <ul style="list-style-type: none"> 1 - HAMM HD110 Roller 1 - HAMM HD14 Roller 1 - CAT AP1055D Asphalt Paver 1 - Deere 554J wheel loader 1 - CAT 246D skid steer loader 1 - CAT 248B skid steer loader 1 - Bobcat T590 auger 	<p>Site Personnel:</p> <ul style="list-style-type: none"> 10 - Gray and Son 1 - ARCO 3 - Carlos Fence
<p>Construction Activities:</p> <p>Asphalt paving: 2nd layer (2.5") on SW side of site</p> <p>A few rows along the RR tracks are complete, now paving southern edge of western side of parcel</p> <p>Fence post hole digging</p>	
<p>Observations by ARM:</p> <p>All area south of RR tracks on SW side of site are either paved (2 or 3 layers- for heavy paving along RR tracks) or have tack down Gray & Son - nuclear guage and coring</p> <p>No visible dust</p> <p>Fence post holes- at 10:45, 6 points left to be started along northern edge of building (western side)</p>	



Site Name: Sparrows Point	Client: EnviroAnalytics Group
Site Location: Parcel B15	Date: November 5, 2016
ARM Proj. No.: 160443M-4-4	Arrival Time: 9:45 AM Departure Time: 11:00 AM
Site Manager: Keith Alley	Weather: 60s, sunny, wind from W
ARM Inspector: Melissa Replogle	Notes:
Contractor: ARCO; Gray & Son	
Equipment: 1 - HAMM HD14 Roller	Site Personnel:
	1 - Gray and Son

Construction Activities: Asphalt paving: Rolling
On arrival: Gray & Son had left at noon, one roller still working

Roof spraying

Observations by ARM: Only rolling during observation
Had paved all area south of RR tracks on western side of site
5 strips north of RR tracks along tracks, 2 more strips had tack

No visible dust
All fence post holes have been dug, ~25% have posts set in concrete



Site Name: Sparrows Point	Client: EnviroAnalytics Group
Site Location: Parcel B15	Date: November 6, 2016
ARM Proj. No.: 160443M-4-4	Arrival Time: 7:00 AM Departure Time: 8:30 AM
Site Manager: Keith Alley	Weather: low 40s, slight wind from N
ARM Inspector: Melissa Replogle	Notes:
Contractor: ARCO; Gray & Son	

Equipment: 1 - HAMM HD110 Roller 1 - HAMM HD14 Roller 1 - CAT AP1055D Asphalt Paver 1 - Deere 554J wheel loader 1 - CAT 246D skid steer loader 1 - CAT 248B skid steer loader	Site Personnel: 10 - Gray and Son 1 - ARCO
--	---

Construction Activities: Asphalt paving: on northern side of RR tracks on western side of site

Observations by ARM: Conversation with Keith on arrival: Saturday (11/5)- asphalt plant shut down at noon - paving team finished with the trucks en route to site, then left

Today: no visible dust
Gray & Son: nuclear guage

Paved over piezometer cap, then scraped off asphalt to re-expose cap

No fence work by 8:30 am



<p>Site Name: Sparrows Point</p> <p>Site Location: Parcel B15</p> <p>ARM Proj. No.: 160443M-4-4</p> <p>Site Manager: Keith Alley</p> <p>ARM Inspector: Melissa Replogle</p> <p>Contractor: ARCO; Gray & Son</p>	<p>Client: EnviroAnalytics Group</p> <p>Date: November 6, 2016</p> <p>Arrival Time: 7:00 AM Departure Time: 8:15 AM</p> <p>Weather: high 30s - 40s</p> <p>Notes:</p>
<p>Equipment:</p> <ul style="list-style-type: none"> 1 - HAMM HD110 Roller 1 - HAMM HD14 Roller 1 - CAT AP1055D Asphalt Paver 1 - Deere 554J wheel loader 1 - CAT 246D skid steer loader 1 - CAT 248B skid steer loader 	<p>Site Personnel:</p> <p>2 - Gray and Son</p>

Construction Activities: No paving activity during observation - learned paving team was completing a patch elsewhere- would take several hours
Some paver maintenance/prep occurred
Gray & Son - nuclear guage

Observations by ARM: All fence posts have been placed in concrete, a taller post ever 40 posts
Excavated soil piles still present

Most of western side of site has top layer, onlya a small section on northern portion of western side still needs to be paved



Site Name: Sparrows Point Site Location: Parcel B15 ARM Proj. No.: 160443M-4-4 Site Manager: Keith Alley ARM Inspector: Melissa Replogle Contractor: ARCO; Gray & Son	Client: EnviroAnalytics Group Date: November 6, 2016 Arrival Time: 7:00 AM Departure Time: 8:15 AM Weather: high 30s - 40s Notes:
Equipment: 1 - Gradall XL4100	Site Personnel: 1 - Gray & Son 1 - ARCO

Construction Activities: Soil and debris clean-up in SW corner of site

Observations by ARM:

On arrival: No construction activity yet

Have completed all of western side of site- top layer
Paved between RR tracks

Fence work: all posts set, most have tops (except last 2); horizontal rod connecting all but last 6 posts; ~33% have fencing
Soil piles still present next to ~33% of fence posts, rest have been moved to one pile near fence

Monitoring wells - done paving around them- can be finished now

Conversation with Keith:
Fence contractors will be working later and will finish moving soil piles
Side ramps to buildings to be paved- this is the only remaining paving work
Still need to clean and destage
Note on fence post soil piles and other waste soil: MCM has taken some waste soil and deposited in a designated area next to landfill - some may have been re-used for FedEx development

Materials being unloaded onto pavement from a RR car - to continue

12:30: fence close to done

ATTACHMENT 5



Project Name: AFP (American Forestry Products) Date: 04 / 14 / 2017 GTA Rep: Nicholas Woodward
 Project No.: _____ Client: TPA Weather: Sunny Temperature: 70s °F

Location of Work:

Roadway West to East, along South end of site

Plans Referenced:

Grading Plan (Expansion) for AFP, prepared by Morris & Ritchie Associates

Description of Work:

Technician arrived on site to observe Gray & Sons' fine grading of slag fines amongst the South roadway.
 ATOA: Gray & Son were working from hub location 18084 & 18035 to 18038 & 18040 (cut/fill ranging from C-3" to F-.47"). They utilized Gradall XL4100II to excavate the area. Once area was cut/fill to sub grade Gray & Son utilized Deere Grader 672D to fine grade the area. Once area to sub grade, they utilized Ingersoll Rand 77DX vibratory flat drum roller for compaction of sub grade.

In the NW end of the lot, Allied Environmental, working for ARMS Group, works to hand dig and install sonnet-tubes around observation wells for asphalt to go against them. Once paved, they will come back and adjust to be flush with asphalt surface.

Wind: SW/WNW/ESE
 Dust monitor:
 11:00a 2) 0.015, 3) 0.046, 4) 0.014 1:15p 6) 0.024, 7) 0.080 8) 0.028, 9) 0.014
 2:30p 3) 0.024, 4) 0.020, 5) 0.054

Remarks/Deficiencies/Failing Tests:

Nuclear Gauge: Soil Asphalt None
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

Portal-to-Portal Time: 8
 Mileage: 31

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

GTA Reviewer: _____



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PHOTOS

Project No. _____
Project Name: AFP (American Forestry Products)

Date: 04 / 14 / 2017
Photo Page No. 1





PHOTOS

Project No. _____
Project Name: AFP (American Forestry Products)

Date: 04 / 14 / 2017
Photo Page No. 2





Project Name: Atlantic Forest Products (AFP) Date: 4 / 17 / 17 GTA Rep: B. Kregel
 Project No.: 31170758 Client: Tradepoint Atlantic Weather: cloudy / rainy Temperature: 65 °F

Location of Work:

sub-grade for future parking and lumber storage south of the existing lot

Plans Referenced:

Description of Work:

Gray & Son worked grading (cutting to 0 elevation for paving) the sub-grade for the future parking and lumber storage south of the existing lot. The subgrade was observed as construction equipment was driven on it and it generally appeared stable. Dust level testing was performed around the construction activity using a TSI DustTrak II testing devise. Test results generally met project requirements. Gray & Son used a water truck to control the dust and it rained lightly several times during the day.

Dusts reading:
 9:30am 0.017, 0.021, 0.032, 0.008
 11:30am 0.007, 0.012, 0.036, 0.010
 2:30pm 0.027, 0.023, 0.004, 0.036 mg /m cu.)

Remarks/Deficiencies/Failing Tests:

Nuclear Gauge: Soil Asphalt None
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

Portal-to-Portal Time: 5.0
 Mileage: 35

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

GTA Reviewer: _____



PHOTOS

Project No. 31170758
Project Name: Atlantic Forest Products (AFP)

Date: 4 / 17 / 17
Photo Page No. 1





Project Name: AFP Date: 04 / 18 / 2017 GTA Rep: Nicholas Woodward
 Project No.: 31170758 Client: TPA Weather: Sunny Temperature: 60s °F

Location of Work:

South West and South end of site (West to East) roadway.

Plans Referenced:

Grading Plan (Expansion) for AFP Site @ TPA, prepared by Morris & Ritchie Associates, Inc.

Description of Work:

Gray & Son, foreman, Gary and crew, fine grade the Eastern end of the roadway sub grade. From hub locations 18008 & 18046 to 18084 & 18035. The cut/fill area ranged from C-3.0" to F-.47" in an area approx. 300'x65'. Once the long stretch of area West to East had been fine graded and ready for blacktop. Gray & Son moved to the South West corner of site to continue fine grading. They found that they needed to cut approx. 8" from corner hub 18069 and more as they head North to hub 18071 at approx. 12" cut. They utilized Cat D8T dozer and Deere 672D grader to cut hardened slag from area.

wind: ESE
 dust monitor: 8:30a 4) 0.005, 5) 0.005, 6) 0.005 11:30a 2) 0.010, 3) 0.005, 9) 0.009
 2:30p 2) 0.011, 3) 0.005, 9) 0.008

Remarks/Deficiencies/Failing Tests:

Nuclear Gauge: Soil Asphalt None
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

Portal-to-Portal Time: 5
 Mileage: 35

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

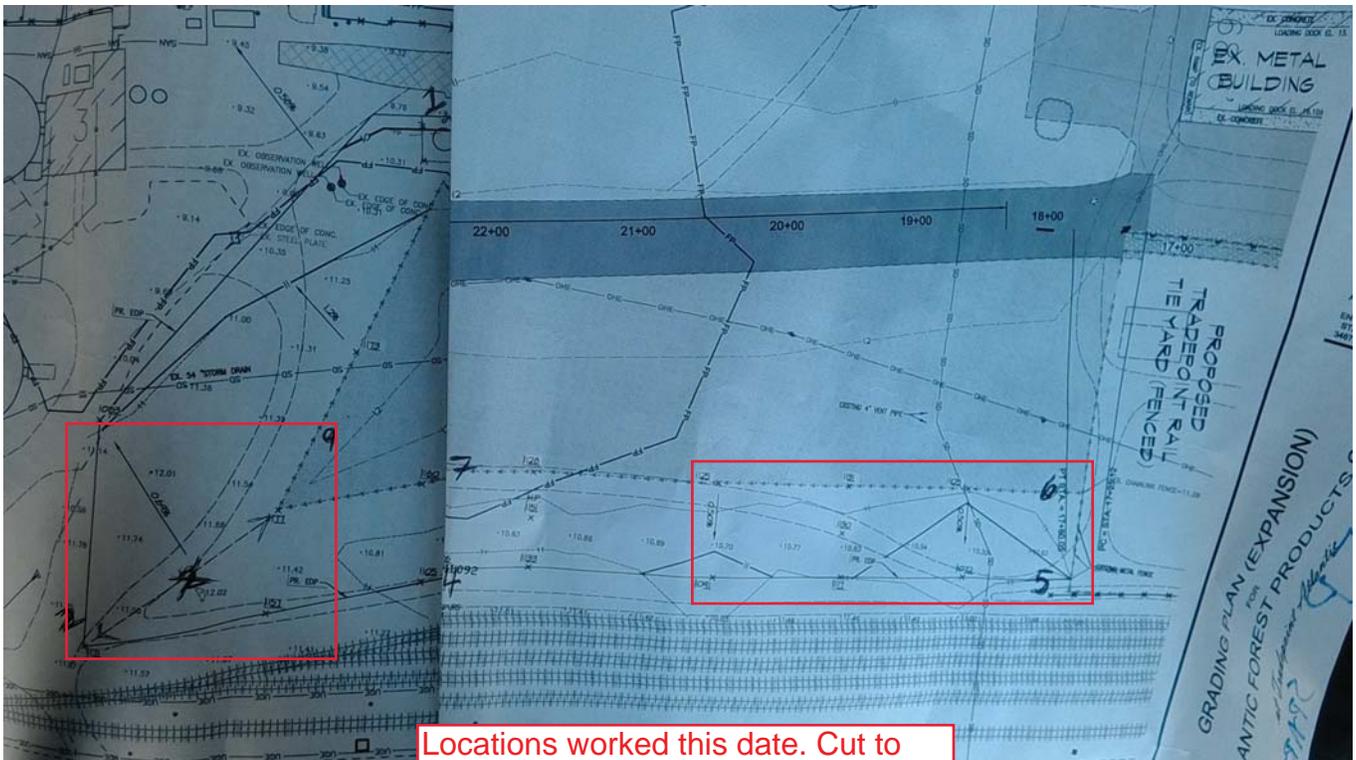
GTA Reviewer: _____



SKETCH

Project No. 31170758
Project Name: AFP

Date: 04 / 18 / 2017
Sketch No. 1



Locations worked this date. Cut to sub grade.



PHOTOS

Project No. 31170758
Project Name: AFP

Date: 04 / 18 / 2017
Photo Page No. 1





PHOTOS

Project No. 31170758
Project Name: AFP

Date: 04 / 18 / 2017
Photo Page No. 2





Project Name: AFP Date: 04 / 19 / 2017 GTA Rep: Nicholas Woodward
 Project No.: 31170758 Client: TPA Weather: Part Sun Temperature: 59 °F

Location of Work:

South East corner of site - rough grading
 Stakes and hubs are gone.

Plans Referenced:

Grading Plan (Expansion) for AFP Site @ TPA, prepared by Morris & Ritchie Associates, Inc.

Description of Work:

GTA arrive on site to monitor dust and observe rough grading for parking lot. Gray & Son work at the SE corner of site and on the West side of the EX. EOP to cut extremely solid sub grade approx. 6" and ensure grade to drain water from asphalt. They utilize Deere 672D grader to cut slag material and utilize Ingersoll Rand 77DX vibratory flat drum roller for compaction. All cut blast furnace slag material and fines to stockpile, West of the site; to be taken by MCM.

GTA technician added a 10th dust location to the plan for a more accurate reading of the West side of site.
 Wind: NNW
 Dust monitor:
 9:30a 1) 0.009, 9) 0.009, 10) 0.010
 12:30p 1) 0.009, 9) 0.008, 10) 0.009

Remarks/Deficiencies/Failing Tests:

Work slowed due to CAT D8T blade hydraulic issue, after cutting solid sub grade.

Nuclear Gauge: Soil Asphalt None
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

Portal-to-Portal Time: 3
 Mileage: 32

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

GTA Reviewer: _____



Project Name: AFP Date: 04 / 20 / 2017 GTA Rep: Nicholas Woodward
 Project No.: 31170758 Client: TPA Weather: Rain/Overcast Temperature: 59 °F

Location of Work:

Parking lot, South and SW of site.

Plans Referenced:

Grading Plan (Expansion) -TPA prepared by Morris & Ritchie Associates, Inc.

Description of Work:

Gray & Son, Foreman, Gary and crew continue cutting lot to sub grade. They cut approx. 4" from the West to NW side with 1.2% of fall to drain water. They utilized Deere 672D to grade and fine grade area and a vibratory flat drum roller Ingersoll Rand 77DX for compaction. GTA observed proof roll of the entire lot before applying asphalt. The area was observed to be stable. Gray & Son began asphalt paving base 19mm over slag sub grade @ 2" thick with an air temp. of 59 degrees F and an initial ground temp. of 57.6 degrees F. The maximum theoretical density of the material was 164.4. Gray & Son drilled cores, pictures below. GTA performed density tests of asphalt over approx. 1300' x 5 passes. All recorded densities met the project specs.

Wind: SSW - rain ended at 10:00a / SE
 Dust monitor: 10:00a 2) 0.010, 3) 0.014, 4) 0.014, 9) 0.009, 10) 0.009
 1:00p 3) 0.009, 4) 0.012, 5) 0.015

Remarks/Deficiencies/Failing Tests:

Nuclear Gauge: Soil Asphalt None
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

Portal-to-Portal Time: 6.5
 Mileage: 35

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

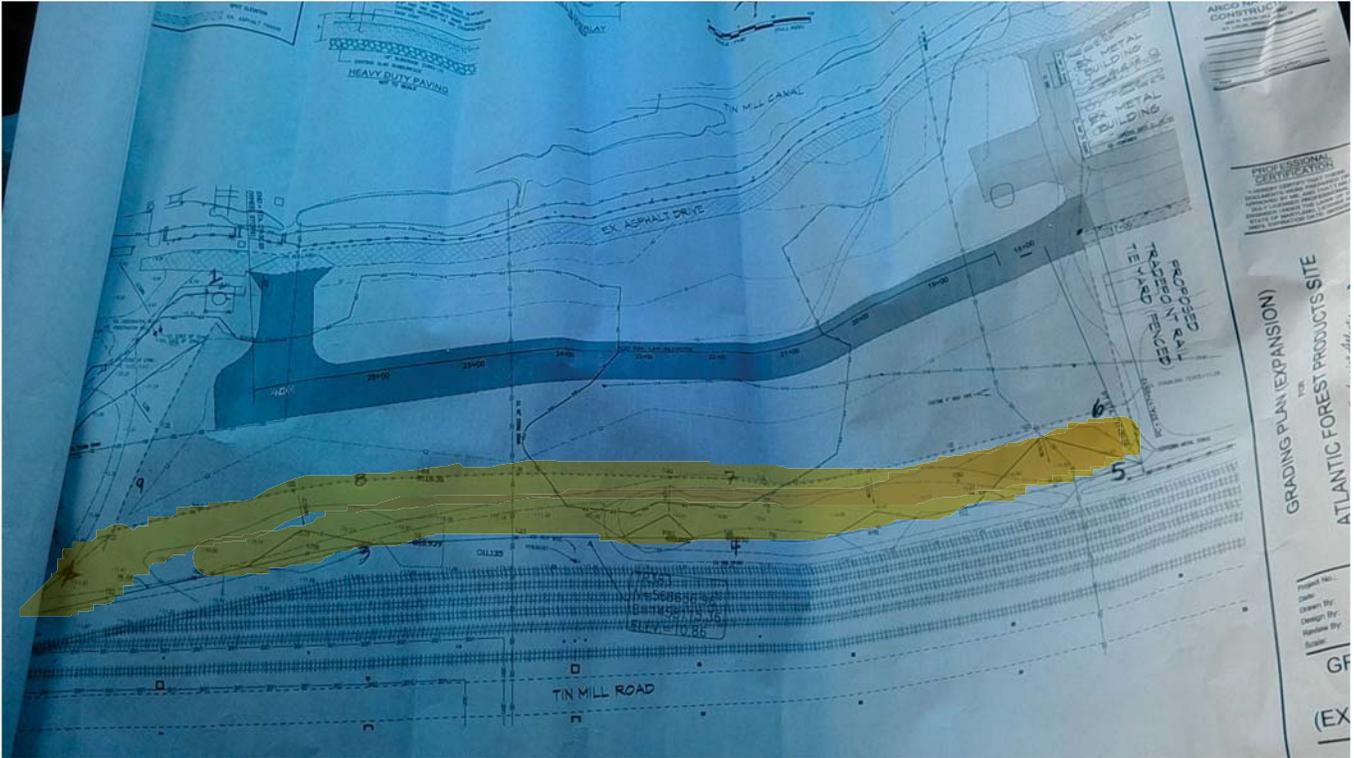
GTA Reviewer: _____



SKETCH

Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Sketch No. 1





PHOTOS

Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Photo Page No. 1



Southern, Eastern side of lot- asphalt



West and NW of lot fine graded



Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Photo Page No. 2



West and NW lot fine graded



West and NW lot Slag fines stockpile



Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Photo Page No. 4





Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Photo Page No. 6





Project No. 31170758
Project Name: AFP

Date: 04 / 20 / 2017
Photo Page No. 5





Project Name: AFP Date: 04 / 21 / 2017 GTA Rep: Nicholas Woodward
 Project No.: 31170758 Client: TPA Weather: Rain/overcast Temperature: 59 °F

Location of Work:

SW of site. South and SW parking lot

Plans Referenced:

Grading Plan (Expansion) -TPA prepared by Morris & Ritchie Associates, Inc.

Description of Work:

Gray & Son place 4" riser over existing manhole approx. 25' South of existing observation wells, which are already prepared for asphalt with 12" sonnet tubes around them.
 Gray & Son begin applying 19mm asphalt base to slag fines sub grade with an air temp of 59 degrees F and an initial ground temp. of 57 degrees F @ 2" in thickness; with a maximum theoretical density of 164.4. They began paving the Eastern edge of the West side of the lot approx. 340' for 2.5 passes. Gray & Son left early due to T-storms.

Wind: SE
 Dust monitor: 8:30a 2) 0.049, 3) 0.051, 8) 0.048, 9) 0.050
 11:30a 2) 0.049, 3) 0.051, 8) 0.049, 9) 0.049

Remarks/Deficiencies/Failing Tests:

Extra work that Gray & Son took care of: removal of jersey walls, steel obstructions, etc.

Nuclear Gauge: Soil Asphalt None Portal-to-Portal Time: 5
 Mileage: 34
 Attachments: Location Sketch Photos Nuclear Field Density Concrete Test Report
 Material Tickets Subgrade Preparation Report Foundation Observation Report
 Other _____

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

GTA Reviewer: _____



PHOTOS

Project No. 31170758
Project Name: AFP

Date: 04 / 21 / 2017
Photo Page No. 1



West lot facing North
West lot facing South





Project No. 31170758
Project Name: AFP

Date: 04 / 21 / 2017
Photo Page No. 2





Project Name: AFP Date: 04 / 24 / 2017 GTA Rep: Nicholas Woodward
 Project No.: 31170758 Client: TPA Weather: overcast/rain Temperature: 54 °F

Location of Work:

West parking lot, West side of site

Plans Referenced:

Grading Plan (Expansion) AFP for TPA prepared by Morris & Ritchie Associates, Inc.

Description of Work:

Gray & Son pave 19mm base asphalt @ 2" thick, in the West parking lot (approx. 340' x50') with an initial air temperature of 53 degrees F and a ground temp. of 55 degrees F. Technician called the plant for a maximum theoretical density of 164.2pcf. GTA performed nuclear density tests of asphalt between 200 and 180 degrees F and cooling. Compaction passed.

Wind: SSW
 8:30a 2) 0.008, 9) 0.010, 10) 0.008
 11:30a 2) 0.009, 9) 0.008, 10) 0.008
 2:30p 2) 0.012, 9) 0.006, 10) 0.006

Remarks/Deficiencies/Failing Tests:

Nuclear Gauge: Soil Asphalt None Portal-to-Portal Time: 4.25
 Attachments: Location Sketch Photos Nuclear Field Density Mileage: 32
 Material Tickets Subgrade Preparation Report Foundation Observation Report Concrete Test Report
 Other _____

The daily report is preliminary and is provided solely as evidence that a site visit was performed.

GTA Reviewer: _____

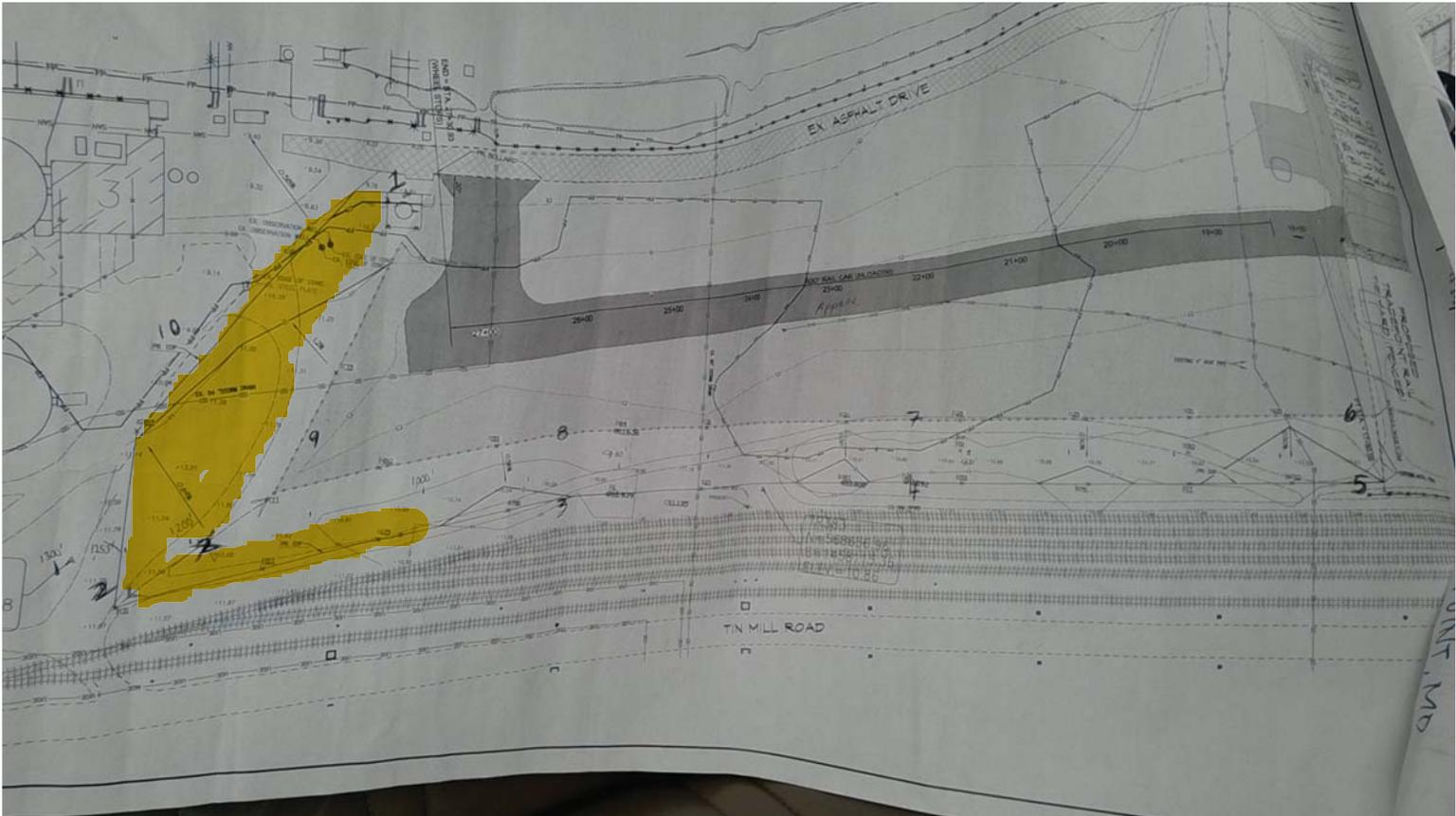


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SKETCH

Project No. 31170758
Project Name: AFP

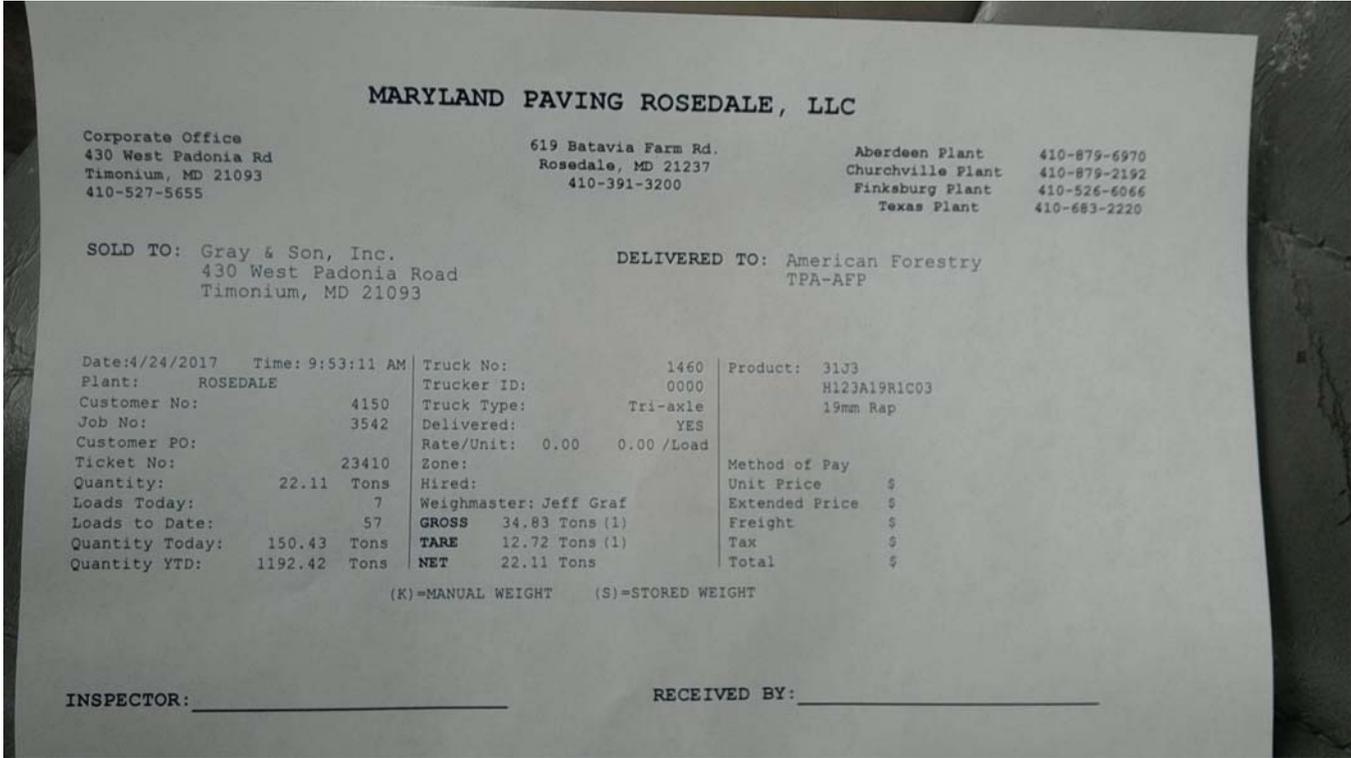
Date: 04 / 24 / 2017
Sketch No. 1





Project No. 31170758
 Project Name: AFP

Date: 04 / 24 / 2017
 Photo Page No. 1





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Geotechnical and Environmental Consultants

PHOTOS

Project No. 31170758
Project Name: AFP

Date: 04 / 24 / 2017
Photo Page No. 2



Photo taken from North edge of West lot, facing South



ATTACHMENT 6

CONTAINMENT REMEDY OPERATIONS AND MAINTENANCE PLAN

PARCEL B15 FORMER SPARROWS POINT STEEL MILL

Containment Remedy Operations and Maintenance Overview

In accordance with the Parcel B15 Development Completion Report for development on a designated portion of the Sparrows Point Peninsula in Sparrows Point, MD (the Site), post remediation care requirements include compliance with the conditions placed on the No Further Action Letter, Certificate of Completion, and deed restrictions recorded for the Site. In addition, maintenance will be performed on the capped areas to control degradation and exposure to the underlying soil. Inspections of the capped areas will be conducted annually. The responsible party will perform cap inspections, maintenance of the cap, and retain cap inspection records. Maintenance records will include the date of the inspection, name of the inspector, any noted issues, and subsequent resolution of the issues. Maintenance records will be maintained in a designated area at the Site for Maryland Department of the Environment (MDE) inspection and review, if requested.

The containment remedy (cap) has been constructed as described in the Parcel B15 Development Completion Report. The following sections provide details of the Operations and Maintenance Plan (O&M Plan) procedures to be followed at the Site to assess when maintenance of the capped areas is necessary.

Designated Pavement Area Inspections

The designated paved areas, as identified in the Development Completion Report, will be maintained to ensure integrity of the cap. Paved areas subject to this O&M Plan include both exterior pavements (parking lots and roads) and interior pavements (building slabs).

Pavement area inspections will be conducted on an annual basis to ensure that the capped areas are maintained as needed. During the inspection, the capped surfaces will be inspected to check for the following potential conditions:

- Differential settlement and significant surface-water ponding;
- Erosion or cracking of the cap materials; and
- Obstruction or blocking of drainage facilities.

When inspections indicate that cap repair is necessary, repairs will be completed as soon as practically possible in compliance with any recorded deed restrictions. The work will be documented on a form similar to the attached example Pavement Inspection Form. The inspection documentation will include the results of each inspection, recommended maintenance actions, and the actual maintenance/repair implemented. The responsible party will maintain inspection forms and any resulting repair records.

Inspector: _____

Date/Time of Inspection: _____

Title: _____

Date of Last Inspection: _____

Organization: _____

Weather: _____

Area	Cap Material	Item	Observation	Action(s) Taken	Date Completed	Comments/Additional Observations
Parking Areas	Asphalt	Alligator Cracking - If present, include estimate of area, location via description and photographs (attach to Inspection Form).				
		Cracks less than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Cracks greater than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Holes - If present, include number of holes, width and depth of each hole, location via description and photographs (attach to Inspection Form).				
		Ponding water or signs of ponding water - If present, include location via description and photographs (attach to Inspection Form).				
		Signs of settlement - If present include via description and photographs (attach to Inspection Form).				
		Other observations related to the condition of the cap and potential for cap damage - If present, include location via description and photographs (attach to Inspection Form).				
		General Condition - Include photographs of capped area (attach to Inspection Form).				

Tradepoint Atlantic
 Sub-Parcel B15
 Inspection Form

Inspector: _____

Date/Time of Inspection: _____

Title: _____

Date of Last Inspection: _____

Organization: _____

Weather: _____

Area	Cap Material	Item	Observation	Action(s) Taken	Date Completed	Comments/Additional Observations
Sidewalks	Concrete	Alligator Cracking - If present, include estimate of area, location via description and photographs (attach to Inspection Form).				
		Cracks less than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Cracks greater than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Holes - If present, include number of holes, width and depth of each hole, location via description and photographs (attach to Inspection Form).				
		Ponding water or signs of ponding water - If present, include location via description and photographs (attach to Inspection Form).				
		Signs of settlement - If present include via description and photographs (attach to Inspection Form).				
		Other observations related to the condition of the cap and potential for cap damage - If present, include location via description and photographs (attach to Inspection Form).				
		General Condition - Include photographs of capped area (attach to Inspection Form).				

Tradepoint Atlantic
 Sub-Parcel B15
 Inspection Form

Inspector: _____

Date/Time of Inspection: _____

Title: _____

Date of Last Inspection: _____

Organization: _____

Weather: _____

Area	Cap Material	Item	Observation	Action(s) Taken	Date Completed	Comments/Additional Observations
Building Slab	Concrete	Alligator Cracking - If present, include estimate of area, location via description and photographs (attach to Inspection Form).				
		Cracks less than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Cracks greater than 0.5" wide - If present, include number of cracks, location via description and photographs (attach to Inspection Form).				
		Holes - If present, include number of holes, width and depth of each hole, location via description and photographs (attach to Inspection Form).				
		Ponding water or signs of ponding water - If present, include location via description and photographs (attach to Inspection Form).				
		Signs of settlement - If present include via description and photographs (attach to Inspection Form).				
		Other observations related to the condition of the cap and potential for cap damage - If present, include location via description and photographs (attach to Inspection Form).				
		General Condition - Include photographs of capped area (attach to Inspection Form).				