



ARM Group LLC

Engineers and Scientists

February 23, 2021

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

Re: Comment Response Letter:
Coke Point Area – Corrective Measures
Study Investigation Report
Area B: Parcels B10, B11, and B12
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the following response to a comment provided by the United States Environmental Protection Agency (USEPA) via email on January 28, 2021 regarding the previous submission of the Corrective Measures Study Investigation Report (Revision 1 dated January 15, 2021) for the Coke Point Area (CPA, the Site) of the TPA property located in Sparrows Point, Maryland.

The Corrective Measures Study Investigation Report has been revised and is provided accompanying this Comment Response Letter. The responses to the USEPA's comments are given below; the original comments are included in italics with the responses following.

- 1. The report contains a new Table 2 which includes groundwater elevation measurements from selected site-wide wells across the CPA on August 12, 2020. The columns labelled TOC Elevation and Measured DTW appear to be transposed. For example, the TOC elevation for well GD01-MWI is shown as 30.71 feet AMSL, and the depth to water is shown as 7.30 feet. The calculated groundwater elevations only appear to be correct if the TOC elevation is 7.30 feet AMSL and the depth to water is 30.71 feet. All other wells are similarly incorrect. Please correct the table.*

Table 2 has been corrected.

- 2. New Figures 4 and 5 indicate that the data presented is from 8/12/20 (same date as water elevations presented in Table 2), but the data presented on the figures does not match the data provided in Table 2 for any well. In addition, Table 2 does not include all of the*

wells shown in Figures 4 and 5 (and vice versa). Please correct Figures 4 and 5 with data from the same measurement date and wells as provided in Table 2 (and/or update Table 2 to include all of the wells shown on Figures 4 and 5).

The data previously included in **Table 2** matched sampling purge log measurements; however, this table has been updated to include gauging data from August 12, 2020 that were used to construct groundwater elevation contours shown on **Figure 4** and **Figure 5**.

3. *EPA's comments 4, 5, and 6 all indicated the need for additional source delineation/evaluation to determine if additional source control actions would be needed related to contamination found at wells CO05, CO08, and CO212. The responses agree that the sources cannot be confirmed, but do not propose any specific action in the CMS to address the issue. The CMS should address uncertainty related to the adequacy of source delineation, either by additional source delineation in the CMS or as part of remedy implementation.*

Additional groundwater delineation will be conducted around wells CO05-PZM006, CO08-PZM005, and CO212-MWS in order to determine if additional source control action would be necessary. This letter proposes installation and sampling of seven shallow zone piezometers and two intermediate zone piezometers as shown on the attached **Figure 1** and **Figure 2**. Samples will be analyzed for VOCs and PAHs.

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



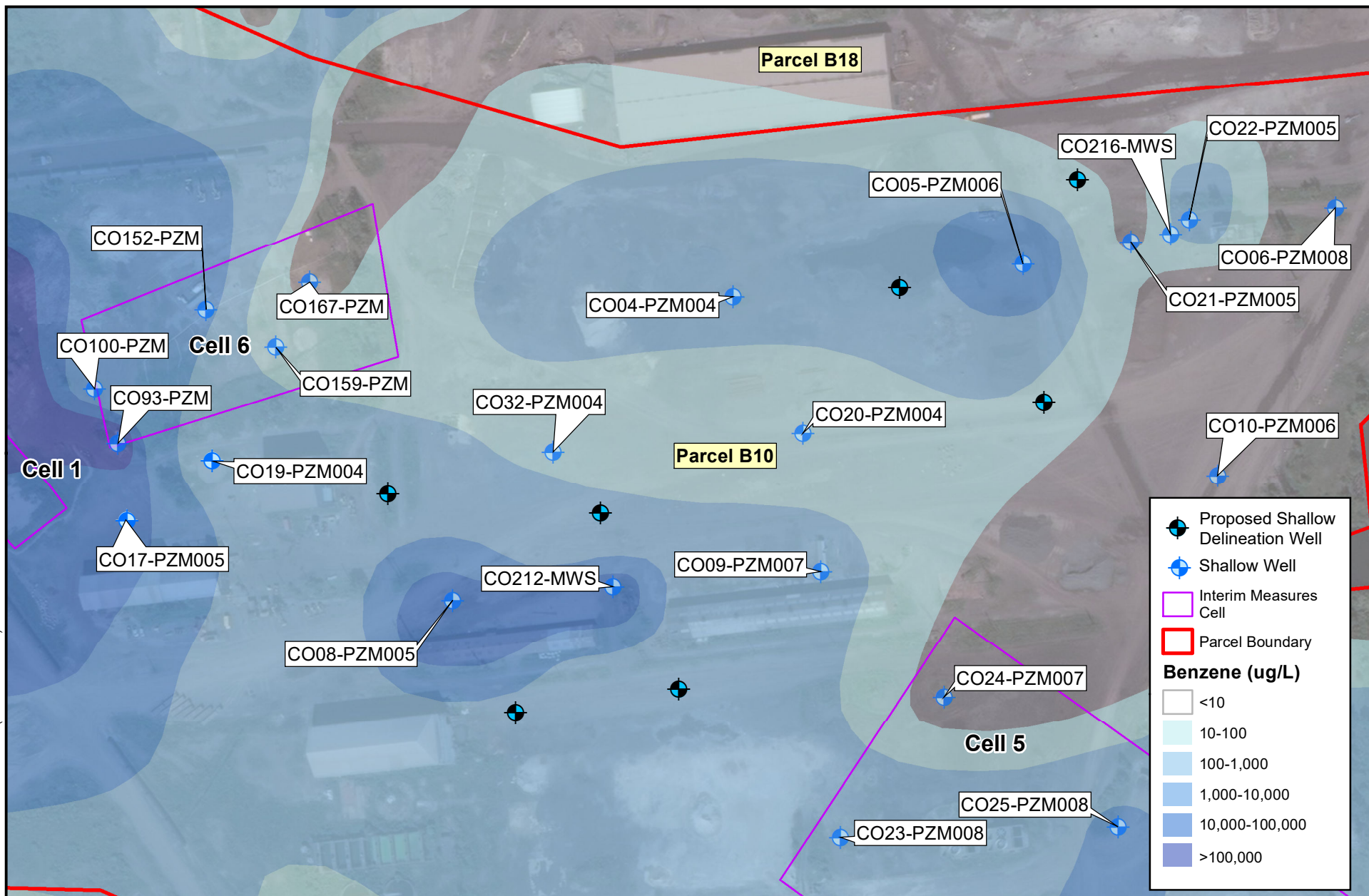
Joshua M. Barna, G.I.T.
Staff Geologist



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



FIGURES



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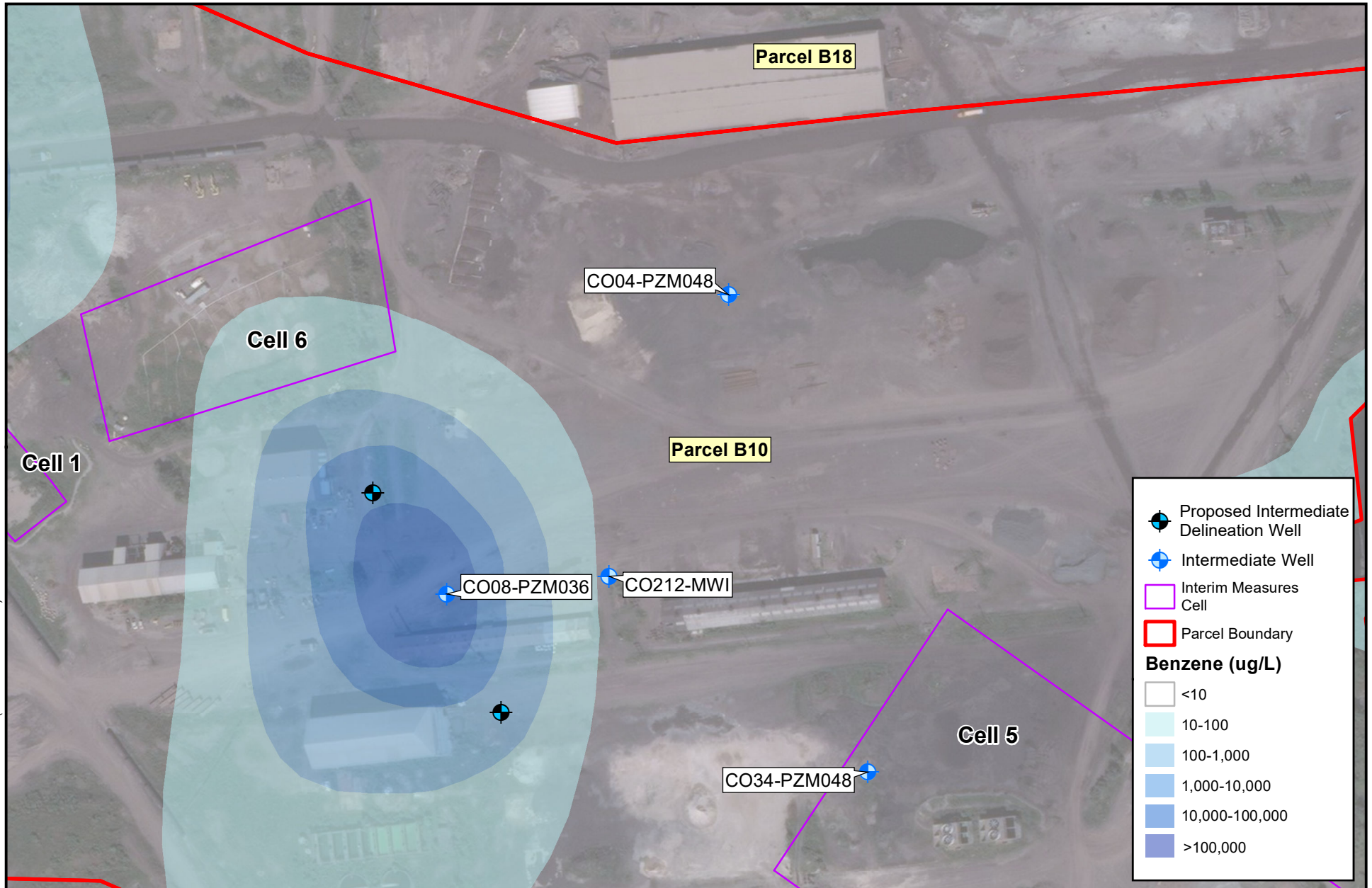
1 inch = 250 feet

0 125 250
Feet

**Coke Oven Area - Shallow Zone
Proposed Delineation GW Locations**

Date: 2/12/2021

**Figure
1**



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1 inch = 250 feet

0 125 250
Feet

Coke Oven Area - Intermediate Zone
Proposed Delineation GW Locations

Date: 2/12/2021

**Figure
2**