



The U.S. Environmental Protection Agency  
The Maryland Department of the Environment



October 2021

# Project Fact Sheet

## Trade Point Atlantic (Sparrows Point) Baltimore, Maryland

### Background

The U.S. Environmental Protection Agency (EPA) and the Maryland Department of the Environment (MDE) (together, the Agencies) are overseeing the investigation, remediation, and redevelopment of the Trade Point Atlantic (TPA) facility formerly called Sparrows Point Terminal (SPT). The work at the Facility is governed by a Settlement Agreement (SA) between EPA and SPT, pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Resource Conservation Recovery Act (RCRA) and a Consent Decree (CD) amongst EPA, MDE and prior owner Sparrows Point LLC (SPLLC), under RCRA and State authorities. SPT has also signed an Administrative Consent Order with MDE and has entered the entire property into the Voluntary Cleanup program.

The SA was developed to govern TPA's assumption of the environmental investigation and remediation measures at the site while it redevelops the Facility. Meanwhile, prior redeveloper/owner SPLLC has assumed the remaining obligations under the CD and the offshore area has been deferred from EPA's RCRA Corrective Action Program to the CERCLA Program. The SA does not require SPT to perform any offshore work.

### Facility Update

This Fact Sheet provides information on RCRA site investigation status and activities performed from April 2021 – October 2021, and activities planned for the remainder of 2021 and early 2022. The Agencies are publishing this updated fact sheet in lieu of a fall public meeting to give the public the opportunity to fully participate in reviewing and commenting on the proposed listing to place the Bear Creek Sediments on the Superfund National Priorities List. Information on the Bear Creek listing can be found at the following link: [The Superfund Program Bear Creek Sediments Site](#). The Agencies recognize that the CERCLA and RCRA processes are distinct and still anticipate holding twice annual public meetings, as appropriate, to provide the public with a status update on the RCRA Corrective Action process. Additionally, the Agencies will hold a public hearing during the public comment period for the site-wide groundwater proposed remedy, as discussed in Section 5.III., below.

### 1. Phase II Investigation Work Plans

The Agencies have received and reviewed Phase II Investigation Work Plans with proposed soil, groundwater and soil gas sampling points based on the location of potential releases from historical processes conducted at that parcel and sufficient additional sampling locations to provide coverage of the entire parcel. Since the Agency's April 2021 Fact Sheet update, no new work plans have been submitted for review.

In addition to the Phase II Investigation Work Plans, the Agencies review and approve targeted soil and groundwater sampling plans if results from the initial investigations warrant further work. These plans are submitted as necessary and vary in scope and focus (e.g., delineation of non-aqueous phase liquids (NAPLs) or elevated metals).

### 2. Phase II Investigation Reports

Upon approval of the Phase II Investigation Work Plan, field work can begin on the Parcel. Once the field work is completed and the data is validated, an Investigation Report summarizing the sample results is submitted for the Agencies for review. Since the Agency's April 2021 Fact Sheet posting, no new Phase II Investigation Reports have been submitted for review. Phase II Investigations have been completed on most of the parcels within the Sparrows Point property. Parcels remaining for soil investigation include portions of Parcel A12, Parcel A15 (High Head Reservoir), Parcel A16, and Parcel B12 (Former Coke Point Landfill).

### Contact and Resource Information

Please direct any questions about this project to either:

Ms. Barbara Brown  
Maryland Department of Environment  
(410) -537-3212  
[barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov)

Mr. Moshood Oduwole  
U.S. EPA  
Land, Chemicals & Redevelopment Division  
(215) 814-3362  
[oduwole.moshood@epa.gov](mailto:oduwole.moshood@epa.gov)

Mr. Joseph Vitello  
U.S. EPA  
Superfund & Emergency Management Division  
(215) 814-3354  
[vitello.joseph@epa.gov](mailto:vitello.joseph@epa.gov)

Additional information can be found at:

[EPA RCRA Program - Trade Point Atlantic](#)

[EPA Removal Program - Trade Point Atlantic](#)

[MDE Hazardous Site Information-TPA](#)

[MDE Voluntary Cleanup Program- TPA](#)

[The Superfund Program Bear Creek Sediments Site](#)

### 3. Response and Development Work Plans

This process ensures that redevelopment occurs in a way that protects human health and the environment. During the development phase for each sub-parcel, quarterly status reports are submitted to the Agencies for review to ensure compliance with approved Work Plans. The Agencies have recently approved or are currently reviewing these work plans:

#### Area A Parcel

- A8-2 Addendum
- A10-1 Addendum
- A11-2 Addendum

#### Area B Parcels

- B2-3 Addendum
- B4-2 Addendum
- B5-1 Addendum
- B6-2 Addendums Retail Areas #2 and #3
- B7-1 Baltimore County Transfer Property
- B14-1
- B24-1

### 4. Response and Development Completion Reports

The Agencies have approved or are currently reviewing these completion reports, submitted since April 2021:

#### Area A Parcel

- A4 - Rev. 1
- A11-1

### 5. Other Updates

#### I. Parcel B13 – Naphthalene Contamination (Odor Concerns)

MDE began receiving complaints of mothball-like odors emanating from the Sparrows Point Site in May 2019. It was determined that an area of naphthalene contamination was exposed during slag reclamation activities occurring within Parcel B13, located directly south of the Penwood Canal and west of Old Road Bay. Slag processing was immediately halted in the naphthalene contaminated area and clay material was used to cover an exposed cut face that exhibited significant odors. To mitigate remaining odors emanating from recently processed slag piles, MDE approved and observed the placement of Posi-Shell, an environmental coating, to cover the piles until a plan could be developed to handle the material while minimizing the risk of mobilizing naphthalene vapors. The Posi-Shell has continued to be applied to piles as needed to maintain the integrity of the coating. The Agencies are currently working with TPA to identify the most effective method for handling the processed slag piles. Additional soil delineation has recently been completed to determine the extent and severity of naphthalene contamination that remains in place within the historic slag stockpile area, south of the temporarily capped cut face. A CMS report for this area is currently under review. The Agencies have committed to and will be notifying the public when a plan has been approved to manage both the processed slag piles and remaining unprocessed slag material located within Parcel B13. This notification will be provided to neighboring community associations prior to any work being conducted in these areas.

#### II. Corrective Measure Study – Rod & Wire Mill, Coke Oven and Site-Wide Groundwater

On February 1, 2021, the Agencies approved three Corrective Measures Studies (CMS) work plans: one for the Coke Point Area groundwater, one for the Rod and Wire Mill groundwater, and one for remaining site-wide groundwater outside the Coke Point and Rod and Wire Mill areas (site-wide groundwater). The Agencies are currently reviewing the CMS report for site-wide groundwater.

EPA initially anticipated issuing the Statement of Basis detailing a proposed remedy for the site-wide groundwater by September 2021. However, the review of the CMS report is taking longer than originally anticipated. The Agencies are extensively reviewing the report to ensure that any proposed remedy in a Statement of Basis is protective of human health and the environment. Once the CMS report is finalized, EPA expects that a Statement of Basis will be issued within 60 days of its approval. The Agencies will hold a public hearing during the Statement of Basis public comment period.

### III. CMS – Parcel B22 – Former PORI Lagoon Area

In December 2020, the Agencies required a CMS be submitted to address contamination present in the former PORI Lagoon located in the northern area of Parcel B22. Excavation and removal of impacted sediments within the lagoon was conducted and low-permeability capping will be installed, concurrent with development ongoing on Sub-Parcel B22-2. Areas downgradient of the PORI lagoon will be subject to a long-term groundwater monitoring plan.

### IV. Parcel B-14 - Humphrey's Impoundment

Humphrey's Impoundment, identified as Parcel B-14, is located to the north of the Humphrey's Wastewater Treatment Plant. Historically the impoundment was used as a dewatering area for on-site sludges and slurry materials generated from various areas on-site. Results of the Phase II Investigation identified widespread NAPL impacts throughout the former impoundment. The Agencies received a CMS Report, Rev. 0, dated April 27, 2021, and comments were issued in August 2021. The CMS Report, Rev. 1 was submitted September 8, 2021, and is currently under Agency review. Additionally, TPA submitted a RADWP for Parcel B14-1, dated June 2, 2021, which proposed development of a large portion of the impoundment to be conducted in conjunction with work related to the CMS. The RADWP is under review.

### V. Offshore

On September 9, 2021, EPA proposed the Bear Creek Sediments to the National Priorities List under the federal Superfund Program. Information on the Bear Creek listing can be found at the following link: [The Superfund Program Bear Creek Sediments Site.](#)

