



# ARM Group Inc.

Earth Resource Engineers and Consultants

February 19, 2018

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

Re: Response and Development Work Plan  
Addendum  
Sub-Parcel B5-1 (Revision 1)  
Responses to MDE/USEPA Comments  
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 Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA) in two emails dated January 31, 2018. The MDE provided comments on the Response and Development Work Plan (RADWP) Addendum, Interim Remedy for Phased Occupancy and Use & Proposed Rail Track Cross Section, for Sub-Parcel B5-1 dated January 5, 2018 (Revision 0).

Responses to specific comments are provided below; original comments are included in italics with responses following. This submission represents Revision 1 of the RADWP Addendum.

- 1. The plan should specify which interim remedy or both they will be using and confirm if figures accurately reflect the locations.*

The interim remedy for Sub-Parcel B5-1 will consist of both 1) the installation of perimeter fencing around uncapped areas of the Site and 2) a capping remedy consisting of crushed concrete to be placed over the undeveloped areas of the Site. The building layout and interim remedies are shown on the modified development plan drawing included with the B5-1 RADWP Addendum. A fence is proposed for the undeveloped area to the north of the Sub-Parcel B5-1 Phase 1 development area, while a crushed concrete remedy is proposed for the undeveloped area to the south.

2. *Any recycled concrete must be approved in advance as "clean" with pile designation and sampling results provided.*

Section 2.2 has been modified to include the statement that any recycled concrete must be approved as “clean” with a pile designation and sampling results provided to the MDE for review.

3. *Revise Section 4 notifications-interim measures require more frequent inspections-monthly-also notify MDE of problems with 48 hours and fix within 15 days.*

The inspection and notification requirements have been updated in Section 3.2 (Interim Remedy Inspection and Maintenance Requirements) and in Section 4.0 (Reporting and Implementation Schedule).

4. *What is ballast material?-must be certified as clean to be considered part of the "cap"*

The ballast material is not considered a part of the required capping remedy for the B5 Building exposure unit. The overlying 7-inch thick layer of asphalt is sufficient to act as the cap.

5.

- a. *Revise to provide a construction schedule for the rail track spur.*

The rail spur construction will be performed within the same time period as the building and paving installation. The schedule presented in Section 4.0, Reporting and Implementation Schedule, has been modified to include the rail spur construction. The dates presented in the schedule have also been updated.

- b. *Revise Section 2.3 to note that the SLRA showed that 105 days of construction worker exposure did not result in any unacceptable risk or hazard.*

A summary table of results of the Construction Worker SLRA as well as a brief discussion have been added to Section 1.2. The requested statement has also been added to Section 2.3.

6. *Page 3-Include the construction worker summary table and description.*

As discussed in the response to the previous comment, a summary table of results of the Construction Worker SLRA and a brief discussion have been added to Section 1.2.



7. *Section 2.3 Rail Track Cross Section-include discussion of construction worker risks.*

Because the rail spur construction will occur concurrently with the building and paving installation, no additional risk to the Construction Worker is presented by the proposed rail spur construction. This discussion has been added to Section 2.3.

8. *Update schedule, if necessary.*

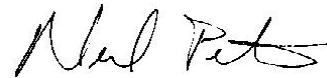
The schedule has been updated to reflect the currently anticipated reporting and implementation dates.

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.



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



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

