



ARM Group LLC

Engineers and Scientists

December 31, 2020

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

Re: Comment Response Letter:
Response and Development Work Plan (Rev. 2)
Area A: Sub-Parcel A10-1
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the enclosed revision of the Response and Development Work Plan (RADWP) for the portion of the TPA property designated as Area A: Sub-Parcel A10-1 (the Site) to the Maryland Department of the Environment (MDE) and United States Environmental Protection Agency (USEPA), collectively "the Agencies". The development project was placed on hold in mid-2020, but the updated RADWP (Revision 2) is being submitted at this time to present a new development plan for the sub-parcel. ARM is also providing responses to specific comments received from the MDE via email on April 9, 2020 regarding the previous submission of the Sub-Parcel A10-1 RADWP (Revision 1 dated March 16, 2020). Responses to the specific MDE comments are given below; the original comments are included in italics with the responses following.

1. *It is the Agencies understanding that the A10-1 will be sold, as MDE has received the 30 day notification required by the AOC*

The revised RADWP references a "tenant"-the RADWP must clearly identify the tasks which will be completed by TPA and by the prospective purchaser. The RADWP must be revised to address issues related to the sale of the property. A detailed construction schedule including when the project will be handed over to the purchaser must be included. Future access rights must be addressed to ensure that TPA will have access rights for future monitoring well installation, monitoring and possibly remediation once the property is transferred.

The project no longer includes a property sale. TPA will retain ownership of the property and it will be occupied by a Tenant. The comment is no longer applicable.

2. *The entire portion of parcel A10-1 that is transferred to a new owner must be addressed as necessary and approved by the Agencies to prevent exposure to contaminated soil.*

See response to Comment #1.

3. *TPA shall provide a monthly status report by the 5th day of the month starting May 5th summarizing all RADWP related activities. This report shall be emailed to the MDE and EPA project coordinators including Ms. Jennifer Sohns.*

Progress reports summarizing construction activities have been provided to the Agencies quarterly for other development projects. We propose the same reporting procedure for this project.

4. *Section 4.3.5 Sub-Slab Vapor Barrier – Figure 9 depicts only 4 paired sub-slab soil gas/indoor air monitoring locations for the proposed 553,650 sq. ft. warehouse, which are an insufficient number for the size of the proposed building. Revise to retain the existing location for the office, and eliminate the remaining three locations to replace as follows: space out two locations in the northeast corner to cover the A10-025(S)-PZ elevated CVOC location; space out three locations to cover the future production area, A10-039(S)-PZ and A10-034(S)-PZ elevated CVOC locations; space out two locations to cover the NAPL piezometers in the southeast corner; and space out four locations throughout the remaining warehouse area. For the revised Figure 9, overlay the piezometers described above on the figure.*

Although the specific layout of the building has been updated since this comment was received, several sample additions and adjustments were made. Note that the building footprint was reduced from approximately 550,000 square feet to approximately 400,000 square feet. A total of 10 paired sample locations are proposed. The revised floor plan is provided in **Appendix D** and is shown on **Figure 10** along with the updated sample locations. The piezometer locations are also shown on the figure for reference.

5. *Please notify the Agencies if the final building configuration is significantly altered from the development plan provided in the revised RADWP prior to collection of the indoor air samples.*

The development plan has been significantly altered. Updated development plans have been provided in **Appendix D** (including a new floor plan). If additional significant changes are made, the Agencies will be notified prior to collecting indoor air samples.

6. *Please include a summary of the soil gas and indoor air sampling procedures and analyte list as an appendix in the RADWP.*



The soil gas and indoor air appendix has not yet been completed. However, it will be submitted to the MDE as an Addendum to the RADWP. This is noted in Section 5.5 (Post Remediation Requirements). Since these sampling procedures are not relevant for the construction phase of development, TPA requests conditional approval to begin construction. The Addendum will be submitted to the MDE within 30 days.

7. *Section 4.2.7 and Section 5.2.2 Dewatering – Provide additional detail on sampling frequency for water going through carbon units. Water discharged to the un-lined temporary pond should not exceed MDE's discharge limits. Volumes pumped, testing results and other data related to dewatering activities will be reported in monthly status reports – the monthly status reports may be compiled in the Development Completion Report.*

The un-lined temporary pond is no longer proposed based on the revised development plans. Section 4.2.7 has been revised to remove references to the stormwater pond and microbioretention facility that were previously proposed. Section 5.2.2 has been updated to require a water sample be collected for every 20,000 gallons of treated water passing through the units. If adjustments to the dewatering sampling plan are proposed, these will be submitted to the Agencies for review prior to implementation. Sampling results will be included in quarterly progress reports (per Comment #3) and the results will ultimately be included in the final Development Completion Report.

8. *Section 5.4 Institutional Controls – The Agencies may require additional institutional controls such as the requirement for additional vapor testing and/or a vapor barrier in future construction at the site and the requirement to inspect and maintain the existing vapor barrier. Please note this section refers to the "tenant" not the future property owner.*

Section 5.4 has been updated with an additional requirement to further evaluate vapor control measures if another enclosed structure is proposed in the future on the Site. As noted in Comment #1, the project no longer includes a property sale.

9. *Section 5.5 Post Remediation Requirements – Please revise this section as noted in previous comments regarding the property transfer. A NFA will not be issued until the following have been received, reviewed and approved by the Agencies:*
 - a. *Completion Report*
 - b. *O&M plan*
 - c. *Sampling data that demonstrates pre-occupancy indoor air levels do not exceed the standards.*
 - d. *Figure with appropriate meets n bounds description and legal description for inclusion in final documents (please work with Mr. Joel Hennessy EPA on preparing the appropriate figure)*



As noted in Comment #1, the project no longer includes a property sale. The listed items will be provided to the Agencies upon their completion. These are required on all TPA development projects (except for the indoor air pre-occupancy sampling data which is required on Sub-Parcel A10-1 due to site-specific conditions).

Additional Revisions:

10. The proposed Site boundary and building layout have been modified. New development plan drawings are provided in **Appendix D**, and the complete set of RADWP figures has been revised to reflect the new site plans/layout. The changes to the site boundary and limit of disturbance (LOD) also necessitated the adjustment of acreage values in the Screening Level Risk Assessment (SLRA) (**Appendix B** and **Table 7** through **Table 15**). There were no notable changes in the SLRA results.
11. The narrow western “remnant area” that was previously pictured on **Figure 4** has been eliminated based on the expanded boundary of the Site. Discussion of the western remnant was removed from Section 1.0 and Section 4.2.6.
12. A new figure is provided as **Figure 8** to show the various types of capped surfaces proposed to be installed throughout the sub-parcel. Similar figures were recently requested by the Agencies on other development projects, along with a request to include this type of figure in future RADWP submissions. This new figure is referenced in Section 4.0 (and subsections). All subsequent figures have been re-numbered.
13. **Figure 9** and Section 4.1 have been updated to reflect the current abandonment status of piezometers that were previously located on the Site. All have been abandoned.
14. Naphthalene PALs for soil and groundwater have been updated in **Table 1** and **Table 3**, and the constituent of potential concern (COPC) cancer screening value in **Table 7** has been updated based on revised USEPA guidance. There were no additional PAL exceedances identified based on the revised PALs. Naphthalene was not identified as a COPC, so no further adjustments were necessary in the SLRA.
15. The Implementation Schedule (Section 7.0) has been updated.
16. The TPA property-side Health and Safety Plan (HASP) is included as an electronic attachment (rather than an appendix as in the prior version of the RADWP). The HASP is referenced in Section 5.3.
17. The Parcel A10 Test Pitting Completion Report dated July 14, 2020 has been included as an additional electronic attachment. The report is referenced in Section 3.2.5.



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



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