Site Location

The Union Mill property, totaling approximately 3.69-acres, is located at 1500 Union Avenue in Baltimore City, Maryland 21211. The property, situated in a mixed industrial/commercial/residential area, is bounded to the north and west by a Pepsi Cola bottling facility, to the east by Buena Vista Avenue and residential homes, and to the south by Union Avenue and residential and commercial properties. The site is improved with a “U” shaped structure comprised of multiple one, two and three story buildings dating back to 1865. The total footprint encompasses approximately 68,789 square feet. An outdoor courtyard is located in the center of the “U” shaped structure.

At the time of application to the Voluntary Cleanup Program (VCP), the property was unoccupied. The site has since been redeveloped for mixed use commercial tenants and residential apartments. The site and local vicinity receives public water and sewer services. The topography slopes to the west and shallow ground water is approximately four to eight feet below ground surface and flows toward the southwest. The nearest surface water body is the Jones Falls, located approximately 230 feet west of the property.

Site History

Construction of the Mt. Vernon-Woodberry Cotton Mill began in 1865. The mill contained at least six buildings that were utilized for different mill processes (weaving, spinning, twisting and carding). Operations ceased at the cotton mill by 1915. In 1928, Poole Engineering and Machine Company occupied the site and a railroad spur connected the northern portion of the property. Poole Engineering and Machine Company used building 1 for assembling items and buildings 2 and 3 as machine shops. By 1950, Wheelwright-Folger, Inc. and H-B Manufacturing Co, Incorporated occupied the site. Furniture and chrome furniture manufacturing and assembling operations were performed.

Between 1962 and 2008, Life-Like Products, Inc. and a subsidiary Lifoam Products occupied the property. Life-Like Products, Inc. shape molded polystyrene foam products, most notably model railway accessories. Expanded polystyrene beads (EPS) were stored at the property in small silo-like containers and used to create molds for the products. Screen printing using the silk screen process occurred on the foam product manually and electric dryers were used in assembly to dry the final products and seal the paint or dye designs. Between 2008 and 2010, office space portions of the property were leased by Stevenson Engineering Company.
Environmental Investigations And Actions

In March 2004, a limited environmental review of Life-Like Products, Inc. U.S. manufacturing facilities was performed. The report discussed facility operations and identified the site as a small quantity generator of hazardous waste (waste ink and cleanup solvent). The report also identified the previous abandonment and removal of multiple heating oil underground storage tanks (USTs) (one 8,000-gallon, one 6,000-gallon and one 2,000-gallon USTs). In June 2009, a Phase I Environmental Site Assessment (ESA) was performed on the property. In July 2009, a Phase II ESA was conducted that identified the presence of metals, semi-volatile organic compounds (SVOCs), and petroleum hydrocarbons in the soil and low levels of volatile organic compounds (VOCs) in the shallow groundwater.

In September 2009, an updated Phase I ESA was conducted that identified recognized environmental conditions (RECs) associated with the historical use of the property. In October 2009, a Supplemental Phase II ESA was conducted on the property to investigate potential fill and UST areas. That investigation identified fill covered material; most notably in the courtyard area and petroleum contaminated soils were also observed in historic UST locations. The prospective purchaser conducted a limited Phase II ESA in November 2009 that revealed the existence of slightly elevated concentrations of trichloroethylene in soil gas beneath the building slabs. Additional sampling was conducted in May 2010 which verified the elevated concentrations of metals, SVOCs and total petroleum hydrocarbons diesel range organics (TPH-DRO) in the soil, elevated VOCs in the sub-slab soil gas and elevated concentrations of VOCs in the groundwater. A geophysical evaluation was performed on the western property area including the western courtyard using ground penetrating radar and magnetometer surveys. The interpretations of the survey identified two potential anomalies. Exploratory pits were dug in the anomaly areas and fill material was identified. A subterranean brick lined tunnel system was also revealed beneath the concrete slab of the former boiler house building #4.

In June 2010, a Phase II ESA Addendum was conducted that revealed elevated concentration of metals in the tunnel sediment. In July 2010, a Phase II ESA addendum was conducted to investigate the extent of the sub-surface tunnel system and define the extent of lead and cadmium contamination identified north and east of building #4. The investigation revealed high concentrations of cadmium that subsequently failed the toxicity characteristic leaching procedure. In August 2010, another Phase II ESA Addendum was conducted to identify if mercury soil gas exists and to fully delineate the vertical and lateral extent of lead and cadmium contamination previously identified.

In September 2010, another Phase II ESA Addendum was conducted to help refine the extent and possible sources of cadmium contamination. In October 2010, additional sampling investigation occurred to further refine the extent of cadmium contamination. In May 2011, a previously unknown 3,000-gallon heating oil UST was discovered south of building #4.
Additional investigation for free product was conducted and the Oil Control Program closed the case on January 18, 2012. During implementation of the Response Action Plan (RAP) further delineation and soil removal was performed for cadmium contaminated soil that exhibited the characteristic of toxicity; 389.21 tons of soil was removed and disposed as hazardous waste and further evaluation was completed for the subterranean tunnel system that identified the tunnel system remained below the boiler house.

**Current Status**

On May 20, 2010, a VCP application was submitted by Seawall Union Avenue, LLC seeking a Certificate of Completion as an inculpable party. Future property use was indicated as Tier 1B, restricted residential use, Tier 2B restricted commercial or Tier 3B restricted industrial land use. On November 16, 2010, the Department accepted the Union Mill property into the program and requested a RAP be completed. On January 13, 2011, the Department approved the revised RAP. Implementation of the RAP was initiated in January 2011 and completed in March 2012. The Department has determined that the implementation and completion of the RAP has met the requirements of the Department and issued a Certificate of Completion on August 7, 2012.