



# ARM Group Inc.

Engineers and Scientists

October 24, 2019

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

Re: Comment Response Letter:  
Modifications to RADWP Addendum  
Royal Farms Station – Retail Area #1  
Area B: Sub-Parcel B6-2  
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 provided by the Maryland Department of the Environment (MDE) via email on September 17, 2019. The MDE provided comments regarding the previous submission of a letter dated September 6, 2019 which requested modifications to the previously approved Response and Development Work Plan (RADWP) Addendum (dated May 22, 2018) for the Royal Farms Station designated as Retail Area #1. The Royal Farms Station is to be constructed within the larger retail area designated as Sub-Parcel B6-2 (the Site) of the Tradepoint Atlantic property located in Sparrows Point, Maryland. A revised “Request for Modifications” letter for the existing RADWP Addendum is included with this Comment Response Letter. Responses to specific MDE comments are given below; the original comments are included in italics with responses following.

1. *Based on this plan there will be no fencing around the developed Royal Farms/marketing center areas, with exception of a 4' fence at the TMC. This means that the entirety of the B6-2 parcel will be open and accessible? Maybe a figure depicting where existing fencing is located would be useful.*

A revised version of **Figure 2** is provided which shows the proposed fence alignments. The Retail Area #1, Marketing Center, and surrounding ingress/egress roads will be surrounded on three sides by either permanent fence (south side) or temporary construction fence (east and west sides). Bethlehem Boulevard is located to the north. The text of the “Request for Modifications” letter has been updated with this information.

- 2. Is the 4' fence installation along the TMC detailed in that RDWP? OR the B6-2 RDWP? I looked through both of these plans and didn't see any mention of fencing but I could have missed it. Will the fencing extend the entirety of the canal portion of B6-2? In the figure it ends at the adjacent roadways depicted.*

The 4-foot fence along the Tin Mill Canal (TMC) was not proposed in previous plans but is proposed to be added under the “Request for Modifications” letter. Ultimately, the proposed 4-foot high fence will extend along the TMC for the full length of the retail area designated as Sub-Parcel B6-2, but at this time only the length corresponding to the proposed site work will be installed. The alignment is shown on the revised **Figure 2**.

The 4-foot fence will include protective signage spaced at regular intervals along the TMC. **Figure 2** includes an inset detail with the proposed signage design. The text of the “Request for Modifications” letter has been updated with this information.

- 3. The roadway to the south of the marketing center and Royal Farms is within the B6-2 RDWP and therefore capped as detailed in that development plan. Can you confirm?*

Confirmed – The referenced road will be capped as described in the RADWP Addendum dated May 22, 2018.

- 4. Is there fencing along Bethlehem Boulevard? I cannot recall if there is fencing along this northern roadway that would prevent entrance to the rest of B6-2.*

There is no fence along Bethlehem Boulevard. The two historical access roads from Bethlehem Boulevard have both been incorporated into the proposed ingress/egress roads for the Royal Farms Station. There are no additional roads providing public access from Bethlehem Boulevard to the Site.

- 5. Also, the last paragraph of this letter states that TPA is waiting for approval to begin temporary cover and fencing work. I'm guessing this means the TMC fence but like I stated above, I cannot find details re: this fencing. The only thing I see is the statement re: installation of a 4' tall fence south of the roadway. It is intended to be permanent? Within the paved/landscaped cap?*

As noted in the response to Comment #2, the 4-foot fence along the TMC was not proposed in previous plans. The 4-foot fence is intended to be permanent, and ultimately will extend along the TMC for the full length of the retail area. This fence will be installed along the edge of the southern road (any nominal space between the road and fence line would be capped with a landscaped cap).



6. *Also, please point me to the details re: TMC capping of the surface grade adjacent to the canal slopes (i.e., the area that abuts B6-2). I couldn't find anything but the slope/canal capping detail.*

Currently there is no specific plan documenting a capping/sloping plan for the area between the edge of the newly placed riprap in the capped TMC and the edge of the capped retail area. A separate plan will be developed for the area(s) of Parcel B16 and Parcel B6 between the TMC and the retail area. Since this area will be outside of the proposed 4-foot fence, it does not represent a potential exposure risk for Sub-Parcel B6-2.

7. [Supplemental response received from the MDE via email on September 30, 2019 based on additional correspondence with Tradepoint Atlantic]: *As an interim capping measure 1 foot of clean fill for commercial land use may be used in place of the crushed concrete and can be described in the revised addendum.*

**Figure 2** has been revised to indicate that the areas previously specified as crushed concrete will instead be capped with certified clean fill. The fill will be required to meet the MDE's requirements for commercial land use. The text of the "Request for Modifications" letter has been updated with this information.

#### **Additional Revisions**

8. In accordance with the requirements of the Sub-Parcel B6-2 RADWP, all landscaped caps are required to have a geotextile marker fabric placed between the clean fill (the cap) and the underlying soils. Tradepoint Atlantic is proposing to use the Mirafi<sup>®</sup> 140N nonwoven geotextile as the preferred marker fabric for the retail area. A product sheet for this marker fabric has been included as a new **Attachment 1** with the "Request for Modifications" letter, and a reference to the fabric has been added in a new section "Selection of Marker Fabric" within the letter. Upon authorization this marker fabric (or an equivalent variant) will be used during the construction of Retail Area #1.
9. The anticipated schedule of completion has been updated from the end of the 1<sup>st</sup> Quarter 2020 to the end of the 2<sup>nd</sup> Quarter 2020.

If you have questions regarding any information covered in this document, please feel free to contact ARM Group Inc. at (410) 290-7775.

Respectfully submitted,  
ARM Group Inc.



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