



# ARM Group LLC

Engineers and Scientists

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June 2, 2020

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

Re: Comment Response Letter:  
Phase II Investigation Report (Revision 0)  
Area A: Parcel A5, A9, and A13  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group LLC (ARM) is pleased to provide the following responses to comments provided by the Maryland Department of the Environment (MDE) via email on April 15, 2020 regarding the previous submission of the Phase II Investigation Report (Revision 0 dated October 9, 2019) for the combined Parcel A5, Parcel A9, and Parcel A13 (also referred to as the Greys Rail Yard) of the Tradepoint Atlantic property located in Sparrows Point, Maryland. Although the completed investigations on the three identified parcels were reported in a combined Phase II Investigation Report, the MDE's comments were applicable only to Parcel A9.

Based on the nature of the MDE's comments, the Phase II Investigation Report is not planned to be resubmitted. Any scope of supplemental investigation or remediation work required on the subject Parcel A9 will be addressed and reported outside of the scope of the Phase II Investigation (and thus should not preclude approval of the existing report). Responses to specific comments are given below; the original comments are included in italics with responses following.

1. *MDE conducted a site visit in January 2020 to the historical shooting range and trap/skeet shooting range located within Parcel A9 to observe current conditions. The source of elevated lead levels detected in the firing range berm on Parcel A9 has been identified as historically fired lead bullets and associated fragments that litter the berm. A significant amount of brush and dumped tree trunks and limbs prevent full observation or the ground surface in the berm area, but it is likely that the lead bullet fragments litter the ground in front of the berm as well. As stated in comments to the Lead Delineation Work Plan for Parcel A9, emailed on April 1, 2020, these lead bullets and fragments will need to be*

*handled in a way that protects human health and the environment. It is understood that no use of the property is currently occurring. Prior to any use or development, these issues will need to be dealt with in a Work Plan submitted to the MDE and EPA for review.*

The comment is acknowledged, and it is understood that the lead bullets and fragments will need to be handled appropriately prior to future development. As noted in the referenced comments (received April 1, 2020), MDE did not anticipate providing further comments on the previously submitted Work Plan for Delineation/Characterization of Lead Impacted Soil dated February 6, 2019 or associated Comment Response Letter dated December 11, 2019; however, MDE is not prepared to move forward with (i.e., authorize) this Work Plan based on the determination that the source of the elevated lead in Parcel A9 is spent lead bullets. As noted in the MDE's prior correspondence, additional discussion will likely be required to determine the best way to address this issue.

2. *Due to concerns of potential unidentified contamination on the historic trap/skeet area of Parcel A9, additional shallow soil sampling may be required to supplement that data collected during the initial Phase II investigation. MDE has not determined the scope of this additional work to date. Guidance will be forthcoming. It is worth noting that this area of the site is not currently in use and no visual evidence of contamination was observed during MDE's site visit.*

The comment is acknowledged, and we await receipt of this additional guidance.

3. *During our site visit, dumping from tree removal activities nearby was evident throughout the former firing range area. MDE has reached out to the Solid Waste Division to determine what the requirements are for handling this material, if any. We will provide you with additional information regarding the dumped material once received or the Solid Waste Division may reach out to Tradepoint Atlantic on its own.*

The comment is acknowledged, and we await receipt of this additional guidance.

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



Taylor R. Smith, P.E.  
Project Engineer



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

