ARM Group LLC
Engineers and Scientists

November 4, 2020

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

Re: Comment Response Letter:
Interim Measure 2019 Progress Report
Former Rod and Wire Mill
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

ARM Group LLC (ARM) is pleased to provide responses to comments received from the United States Environmental Protection Agency (USEPA) and the Maryland Department of the Environment (MDE) regarding the Interim Measure Progress Report for 2019 for a portion of the Tradepoint Atlantic property that has been designated as the Former Rod and Wire Mill (RWM, or the Site). ARM is providing responses to comments received from the USEPA and MDE via emails on July 7, 2020 for the previous version of the RWM Interim Measure 2019 Progress Report (Revision 0 dated February 14, 2020).

Responses to the USEPA and MDE comments are given below; the original comments are included in italics with responses following.

1. *Section 4.0 Summary and Conclusions, page 17 – The second paragraph describes stormwater collection and cutoff of recharge to the shallow zone resulting in a drop of water evaluations of several feet as compared to pre-trench conditions. The drop in water elevations is also due to drainage from the shallow zone to the intermediate zone through the trenches.*

   ARM acknowledges this comment. This potential mechanism will be further evaluated and discussed in the Corrective Measures Study.

2. *Section 4.0 Summary and Conclusions, page 18 – The top paragraph states that paving has reduced aquifer recharge from precipitation, causing the hydraulic gradient in the intermediate zone and therefore the groundwater velocity to decrease over time. On the contrary, although water levels in the shallow zone have declined, water elevations in the*

intermediate zone have generally increased after installation of the trenches (compare Figure 25 of the 2019 Progress Report, Intermediate Zone Groundwater Elevation Contours December 2019 to Figure 7 of the 2018 Progress Report showing pre-trench intermediate zone groundwater elevations). The increase in water elevation in the intermediate zone could be attributed to drainage of groundwater from the shallow zone through the treatment trenches into the intermediate zone.

Although it is possible that some groundwater is draining through the trenches and raising the water levels in the intermediate zone close to the trenches, the difference between the figures noted in this comment is because Figure 7 of the 2018 Progress Report shows pre-trench groundwater elevations in the intermediate zone when the pumping wells were still in operation.

3. *Section 3.2.2 Intermediate Groundwater Zone – This section indicates that wells RW18-MWI and RW19-MWI have notable higher water elevation in December 2019 than in May 2019, while other intermediate zone wells are nearly identical. What could be the cause of this increase?*

   The cause of the change in groundwater elevations in these wells is not known, but historically these wells have had significant variability in elevations. There has been grading in this area and it is possible that casing elevations may have been changed. The casing elevations will be checked within the next 30 days. We will also continue to closely monitor groundwater elevations throughout 2020 and address possible variability in the 2020 interim measure progress report.

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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