

April 4, 2017

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

Re: Proposed Modification to Area of Parcel 15
Response and Development Closure Report
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

This letter provides notification to the Maryland Department of the Environment (MDE) and United States Environmental Protection Agency (USEPA) regarding a proposed modification to the boundary of the area being developed as Parcel B15 (the Site) of the Tradepoint Atlantic property located in Sparrows Point, Maryland. At this time, the construction and development activities described in the most recent submission of the Parcel B15 Response and Development Work Plan (RADWP) Revision 1 (dated October 31, 2016) and Screening Level Risk Assessment (SLRA) excerpt and response letter (dated December 13, 2016) have been completed, and the entire parcel has been capped. The tenant has requested adjustments to the south and west boundaries of Parcel B15 to provide paving over an additional area of approximately 2.5 acres.

The addition of this paving would increase the total area of Parcel B15 from 16.5 acres to approximately 19 acres. Based on the available historical drawings for the Site (provided in the approved Phase II Investigation Work Plan Revision 2 dated September 16, 2016) there are no specific sampling plan targets or historical features of potential environmental concern within the proposed additional area. Furthermore, based on the sampling density requirements provided in the Phase II Investigation Work Plan as well as the Quality Assurance Project Plan (QAPP dated April 5, 2016) Worksheet 17 – Sampling Design and Rationale, the density requirements for the proposed enlarged parcel are still greatly exceeded. These requirements specify that 7 borings would be required in an area of 19 acres with engineered barriers. However, a total of 21 borings were completed in Parcel B15. Based on these considerations, additional sampling data is not required in the relatively narrow paving expansion to meet the density requirements or to investigate specific targets.

On April 3, 2017, the MDE requested additional information based on a review of a Parcel B15 expansion letter request dated March 10, 2017. The “Development Phase” and “Implementation Schedule” sections below provide all of the requested information which was recently exchanged in emails between EnviroAnalytics Group, LLC (EAG), Tradepoint Atlantic, and the MDE. A figure showing the currently existing monitoring wells in the vicinity of the proposed expansion is also included as **Attachment 1** to this letter.

Development Phase

1. Grading and site preparation

Site grading activities will be minimal, with no excavations planned. Development activities will be primarily limited to the placement of asphalt pavement and aggregate subbase where needed. Any material that is not suitable for compaction will be excavated and replaced with subbase material, although it is not anticipated that poor soils will be encountered. Borrow materials will be obtained from MDE-approved common borrow-site stockpiles or processed slag aggregate, if necessary, and shall be free of organic material, frozen material, or other deleterious material. In the case that there is excess material, the spoils will be stockpiled at a suitable location in accordance with the Materials Management Plan (MMP) for the Sparrows Point Facility (Papadopoulos & Associates, et al., June 17, 2015). This work will be coordinated with MDE accordingly. No excess material will leave the 3,100 acre property without prior approval from MDE.

2. Monitoring Well

Prior to the start of any work, existing permanent monitoring wells will be identified in the field (**Attachment 1**). Each well will be staked out and inspected for structural integrity, proper seal, and lock prior to the start of work. Once field verification has been completed, Construction Workers will be instructed to practice extreme caution while working in the vicinity of the existing wells to retain their integrity. Hand grading will be performed directly in the vicinity of the wells to final elevation, and manholes will be set around each existing well (reconstructed as flush-mounts) prior to any paving activities. Concrete pads will be paved around each well (if applicable).

3. Placement of subbase, asphalt paving, and fill

According to the cut/fill analysis performed by the design engineer, no cut will be required for this project. Following the completion of any preparatory work, the site will be fine-graded and subbase will be placed. An estimated 2,000 cubic yards of slag subbase will be placed over the existing grade. Hot mix asphalt (HMA) pavement will be

placed on top of the slag subbase and will extend to the existing pavement already present at the Site.

4. Fencing

New fencing will be installed around the perimeter of the extended boundary. The full extent of Parcel B15 with this additional paving is shown in the “Site Expansion” figure provided as **Attachment 2**.

Implementation Schedule

The expansion is projected to take six (6) weeks to complete with the following milestones as provided below:

- Fence installation – 3 weeks
- Fine grading and pavement subbase installation – 1 week
- Installation of HMA paving – 1 week

In previous correspondence received from the agencies, the MDE/USEPA requested that since proposed development work had been completed (at the time of comment receipt), the Response and Development Work Plan dated October 31, 2016 (and supporting revision letters) should not be revised, but instead this document should be renamed as the “Parcel B15 Response and Development Closure Report”, and the report should include the SLRA and provide documentation for the implementation of the remedy/development. Therefore, EAG requests approval from the agencies for Tradepoint Atlantic to proceed with the paving expansion and associated work, with the expectation that this additional development work will also be documented in the final Response and Development Closure Report for Parcel B15.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact me.

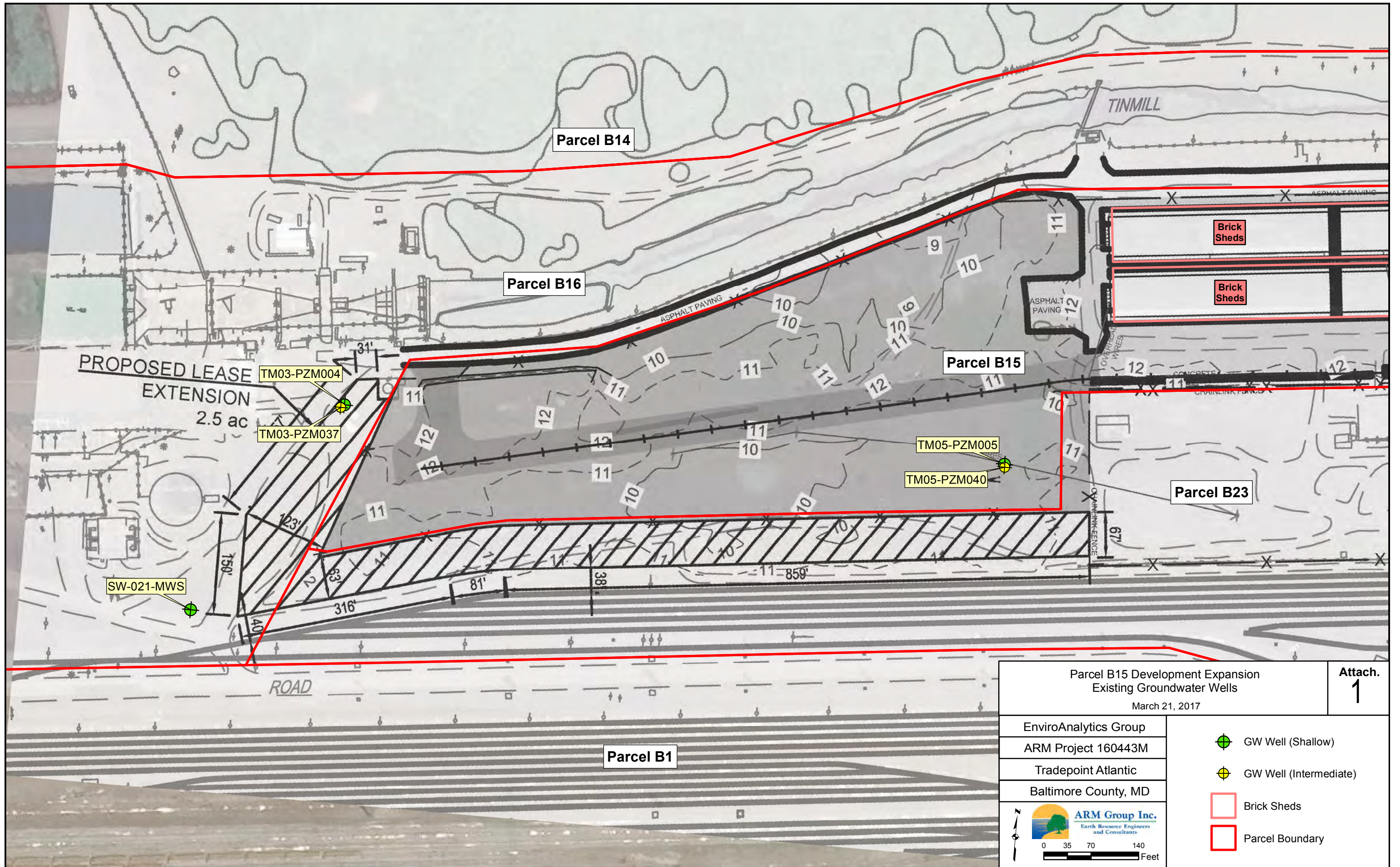
Sincerely,



James Calenda
Project Manager

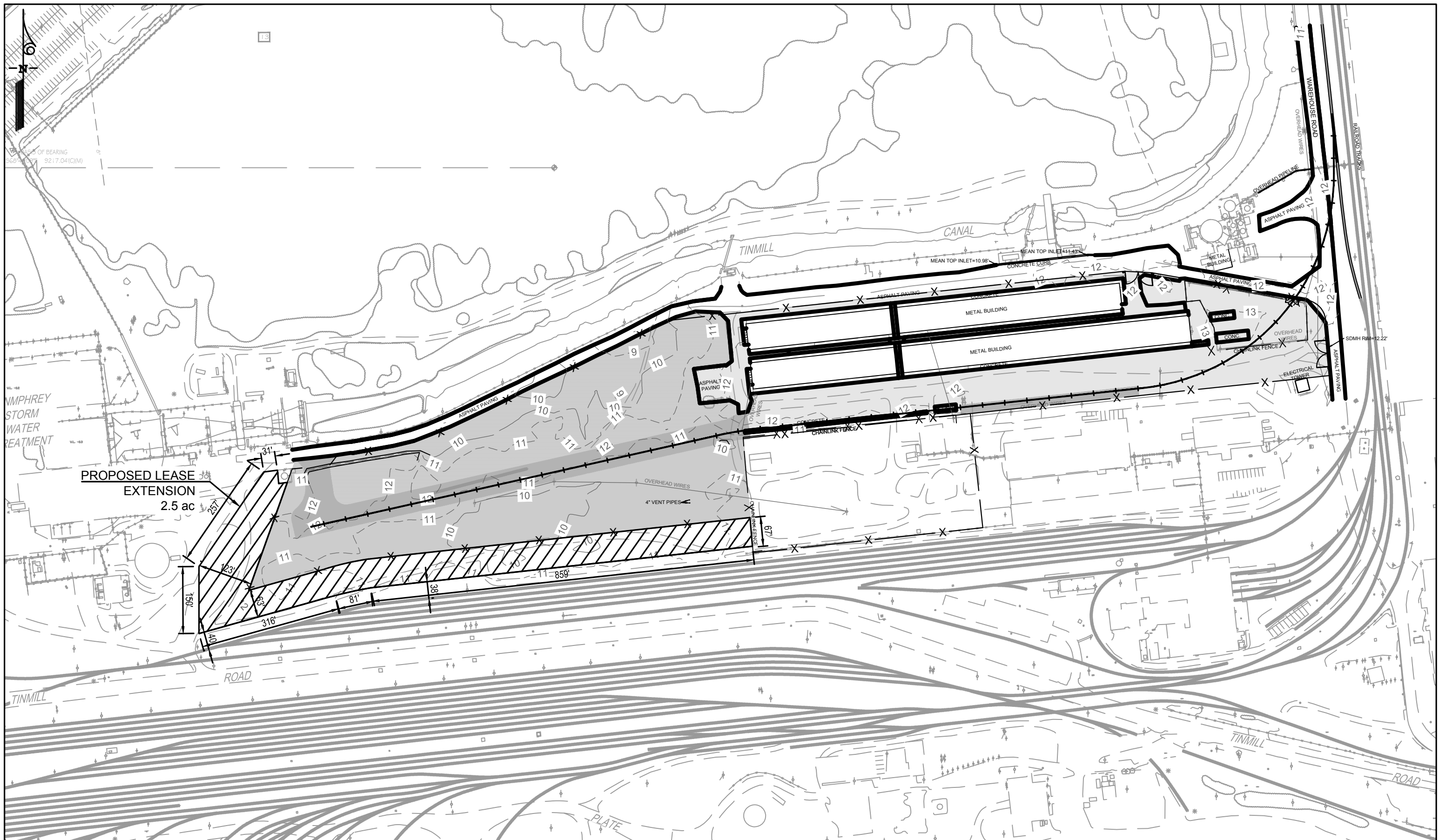
cc: Ruth Prince

Attachment 1




Parcel B15 Development Expansion Existing Groundwater Wells March 21, 2017		Attach. 1
EnviroAnalytics Group ARM Project 160443M Tradepoint Atlantic Baltimore County, MD	GW Well (Shallow) GW Well (Intermediate) Brick Sheds Parcel Boundary	
 ARM Group Inc. Earth Resource Engineers and Consultants		
 0 35 70 140 Feet		

Attachment 2



**PROPOSED LEASE
EXTENSION
2.5 ac**

 TRADEPOINT ATLANTIC	DATE 01/03/17	ATLANTIC FOREST PRODUCTS 2.5 ACRE SITE EXPANSION	DRAWING NO.
	SCALE 1"=200'		
	DESIGNED BY		
	DRAWN BY ID		
		SHEET 1 OF 1	