



ARM Group LLC

Engineers and Scientists

September 15, 2020

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

Re: Comment Response Letter:
RADWP & Addendum
Area A: Sub-Parcel A8-2
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is providing responses to comments from the United States Environmental Protection Agency (USEPA) and the Maryland Department of the Environment (MDE) received via email on July 17, 2020 regarding the planned development on the portion of the TPA property designated as Area A: Sub-Parcel A8-2 (the Site). The comments were received following agency review of the previous submission of the Sub-Parcel A8-2 Response and Development Work Plan (RADWP; Revision 0 dated March 24, 2020) and associated Addendum (dated May 22, 2020).

Responses to the comments are given below; the original comments are included in italics with the responses following. A revision of the Sub-Parcel A8-2 RADWP (Revision 1) has been updated to address the agency requests and is submitted in full with this Comment Response Letter. The revised RADWP has also been updated to include changes that were previously incorporated into the RADWP Addendum, which were outlined in the prior Comment Response Letter dated May 22, 2020.

1. *Revise all figures in both documents to show the sub-parcel boundaries of A8-1.*

The Sub-Parcel A8-1 development boundary has been added to each of the relevant figures included in the revised RADWP. The revisions reflected in the Addendum have been incorporated into this RADWP, and it will not be resubmitted separately.

2. *Section 2.1, Site Description – Revise this section to describe all A8 sub-parcels/developments.*

To be consistent with recent RADWP submissions, a description of the development associated with Sub-Parcel A8-1 has been included in the Introduction (Section 1.0), rather than Section 2.1.

3. *Sections 3.3.2, top paragraph on p. 14; 3.3.3, top paragraph and through-out as necessary; 4.0, second paragraph; 5.0, bottom paragraph; 5.4, Institutional Controls:*

- a. *The sub-surface soils for sub-parcel A8-2 pose an unacceptable risk to the Composite Worker. Therefore, a surface cap is required. Using the “existing surface soil” as a “cap” is unacceptable, because the top one foot shown to be acceptable for Composite Worker exposure does not comprise a cap. Secondly, most of the surface, as shown in Figure 2, is not soil anyway. Thus, the cap may either be 2 feet of clean soil, or 4 inches of compacted aggregate base below 4 inches of asphalt or concrete, but either way it must comply with minimum cap requirements. Revise accordingly.*

The surface of the main (southwest) area of Sub-Parcel A8-2 has been fully paved to comply with minimum cap requirements and will be maintained as the cap. This change is reflected in the updated RADWP text, and the minimum capping section details have been included as a new attachment (**Appendix E**). The prior Comment Response Letter dated May 22, 2020 noted that the existing access road to the northeast will not be milled/repaved; no additional work is proposed along the road which will also act as a cap. The shoulders of the access road (including the island at the northern end of the Site) are not occupied areas and are proposed to remain unpaved since the roads will only be used for drivers entering and leaving the Site.

The baseline Screening Level Risk Assessment (SLRA) indicated the existing surface material (0 to 1 foot only) does not present an unacceptable risk. While additional sampling would be required to show that surficial soil would be suitable as a site-wide cap, risks associated with surface soil exposure appear to be low, particularly for the limited-use access road shoulders. No additional sampling is planned for this sub-parcel; accordingly, the existing pavements will act as the cap for the main occupied area and the access road itself.

- b. *Due to the elevated contaminant concentrations in surrounding groundwater that cause elevated potential vapor intrusion risks as shown in Table 5, as well as the lack of piezometers/wells in Sub-Parcel A8-2, an institutional control must be added to require vapor barriers, and sub-slab soil gas and indoor air testing for all future buildings on Sub-Parcel A8-2. Revise accordingly.*



An additional institutional control requiring evaluation of the use of vapor barriers, and sub-slab soil gas and indoor air testing for any future buildings constructed on Sub-Parcel A8-2 has been added in Section 5.4.

- c. *The air in the ventilated crawlspace below the office trailer must be sampled and analyzed for the Table 5 VOCs and SVOCs prior to occupancy. Revise accordingly.*

The MDE provided additional input via email to TPA on September 9, 2020 indicating air testing would not be required under the open foundation trailer. The ventilated crawlspace mitigates the vapor intrusion risks. As noted in the prior comment, any future buildings would require further evaluation and testing.

4. *Section 4.0, Proposed Site Development Plan – This section does not actually describe the proposed development. Revise to describe exactly what the sub-parcel will be used for, including the trailer to be placed on site.*

Language has been added to this section to specify that the sub-parcel will be used by the Community College of Baltimore County (CCBC) as a vehicle training lot. The trailer will be used as an office.

5. *Sections 4.2.2, Grading and Site Preparation; and 4.2.4, Paving – These sections are very confusing in relation to what has been described as the purported remedy: using “...the existing surface soil as a cap.” In contrast, Section 4.2.2 states that “The Site will be paved in its entirety.” However, this paving is not intended to be equivalent to a cap. Further, the aerial in Figure 2 shows existing pavement/roadways which this RADWP never described, instead indicating that the surface was soil which is not true.*

Revise to accurately describe the existing surface. If paving is still intended for the site, then the paving must satisfy the minimum cap requirements of 4 inches of compacted aggregate base below 4 inches of asphalt or concrete, to remedy the unacceptable sub-surface risk. If existing paving is to be used to satisfy the cap, the thickness and base must be determined. Revise accordingly.

Prior to recent paving, the surface of the main (southwest) area of the Site included some areas of exposed soil/gravel but as noted in the comment consisted mainly of intermittent areas of asphalt and concrete pavement. The entirety of this area has been repaved with asphalt and a base course consisting of recycled concrete aggregate. The newly paved surface satisfies the minimum capping requirements. The prior Comment Response Letter dated May 22, 2020 noted that the existing access road to the northeast will not be milled/repaved; no additional work is proposed along the road which will also act as a cap. As specified in the revised RADWP, the pavements will be considered the caps and will be maintained by institutional controls. The shoulders of the access road (including the



island at the northern end of the Site) are not occupied areas and are proposed to remain unpaved since the roads will only be used for drivers entering and leaving the Site and the SLRA had indicated the existing surface material (0 to 1 foot only) does not present an unacceptable risk.

6. *Sections 5.1.2, Soil Excavation and Utility Trenching; and 5.1.3, Soil Sampling and Disposal:*

- a. *It is stated in Section 5.1.2 that "Any material excavated from below 1 foot bgs will need to be tested to determine suitability for replacement (unless it will be placed under a cap) as outlined in Section 5.1.3." It is stated in Section 5.1.3 that "Any material excavated from below 1 foot bgs will need to be tested to determine suitability for replacement on-site unless it will be placed under a cap (which could include replaced surface soils if approved by the MDE). As noted in other sections, soils relocated or removed during trench excavation cannot be used as backfill within the utility trenches unless such materials are approved for this use by the VCP." Any soils excavated from utility trenches or other areas more than 1' beneath the existing ground surface must either be sampled for reuse on-site (eg: trench backfill, grading) or disposed of off-site. Attempting to separate 0-1' soils from 1' and deeper soils would be difficult, at best, and would likely include subsurface soils, which failed the Composite Workers SLRA. Material proposed for reuse on-site must be approved for use as clean industrial fill.*

Since TPA has elected to maintain a cap at the Site, the comment is no longer applicable. Materials will not be segregated based on depth. Only materials approved by the MDE will be used for trench backfilling, as outlined in updated Sections 5.1.2 through 5.1.4.

- b. *If significant amounts of groundwater are encountered during utility trenching, sampling may be required prior to trucking to HCWWTP. During utility installation, MDE must be notified if groundwater is encountered in an amount that requires sustained pumping during construction activities. Notify MDE when utility installations begin.*

MDE will be notified when utility installations begin and if a significant amount of groundwater is encountered during utility trenching. The anticipated schedule of utility installations is given in Section 7.0 (within the updated schedule). The notification requirement for sustained pumping has been added to Section 5.2.2.



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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