



# ARM Group LLC

Engineers and Scientists

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November 11, 2020

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

Re: Supplemental Construction Plan Letter  
Proposed Hydrogen Storage & Re-Fueling  
Area B: Sub-Parcel B1-2  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic, ARM Group LLC (ARM) is pleased to submit the following Supplemental Construction Plan Letter to the Maryland Department of the Environment (MDE). This letter requests MDE approval to perform supplemental construction work which will include improvements limited to the installation of a hydrogen storage and distribution system to the west of the southern Logistics Center XII warehouse as shown on **Figure 1**. Logistics Center XII was previously constructed in Sub-Parcel B1-2 (the Site) of the Tradepoint Atlantic property located in Sparrows Point, Maryland.

## **Project Background**

An approved Response and Development Work Plan (RADWP) has already been implemented on Sub-Parcel B1-2. The final RADWP (Revision 3 dated August 30, 2019) and associated Comment Response Letter (dated March 16, 2020) were approved by the MDE via email on April 8, 2020. The construction drawings permit set (prepared by Plug Power) is included as an electronic attachment. As shown in the drawings, the proposed supplemental construction work will include intrusive work necessitating disturbance of existing surface engineering controls. As described below, any disturbed surface engineering controls will be repaired to meet the specifications of the approved RADWP.

## **Project Description**

The proposed work will include installation of a hydrogen storage and distribution system for Logistics Center XII. The hydrogen will be utilized for refueling equipment within the distribution center. Overall, this is a relatively minor construction project with a limited duration

and scope of disturbance. The majority of the subsurface construction work will be limited to the slag fill that extends approximately 2 to 4 feet below the cap in this area. Construction work below the cap includes conduit, bollard, and foundation installations, but is not expected to extend significantly into native soil.

### **Work Requirements**

The above-mentioned approved RADWP specifies a cap consisting of a minimum of 12 inches of compacted aggregate base and a minimum of 4 inches of overlying pavement surface (asphalt or concrete). The disturbed cap will be repaired to these specifications following the installation of the storage and distribution system.

The proposed construction will be conducted under a contractor Health and Safety Plan (HASP). Any intrusive work will be performed using Modified Level D Personal Protective Equipment (PPE) in accordance with the requirements outlined in the approved PPE Standard Operational Procedure (SOP) provided as **Attachment 1**. No dewatering is anticipated to be required.

Oversight will be conducted by an Environmental Professional (EP) during all intrusive work to ensure compliance with the PPE SOP as well as proper cap thickness and reconstruction. A pre-construction meeting shall be held to address proper operating procedures and cap reconstruction. This meeting shall consist of the EP and the construction manager.

### **Schedule & Reporting**

At this time, Tradepoint Atlantic is requesting approval for the Tenant to proceed with the proposed work. Work will commence as soon as practicable with an estimated work duration of less than 30 days. The Screening Level Risk Assessment (SLRA) completed as part of the RADWP indicates the Construction Worker maximum allowable exposure frequency for the southern portion of the Site encompassing the work area (EU2) is 85 days. A Completion Report documenting the repairs to surface engineering controls will be submitted to the MDE upon finishing the project.

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



Ryan Clancy  
Staff Engineer



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



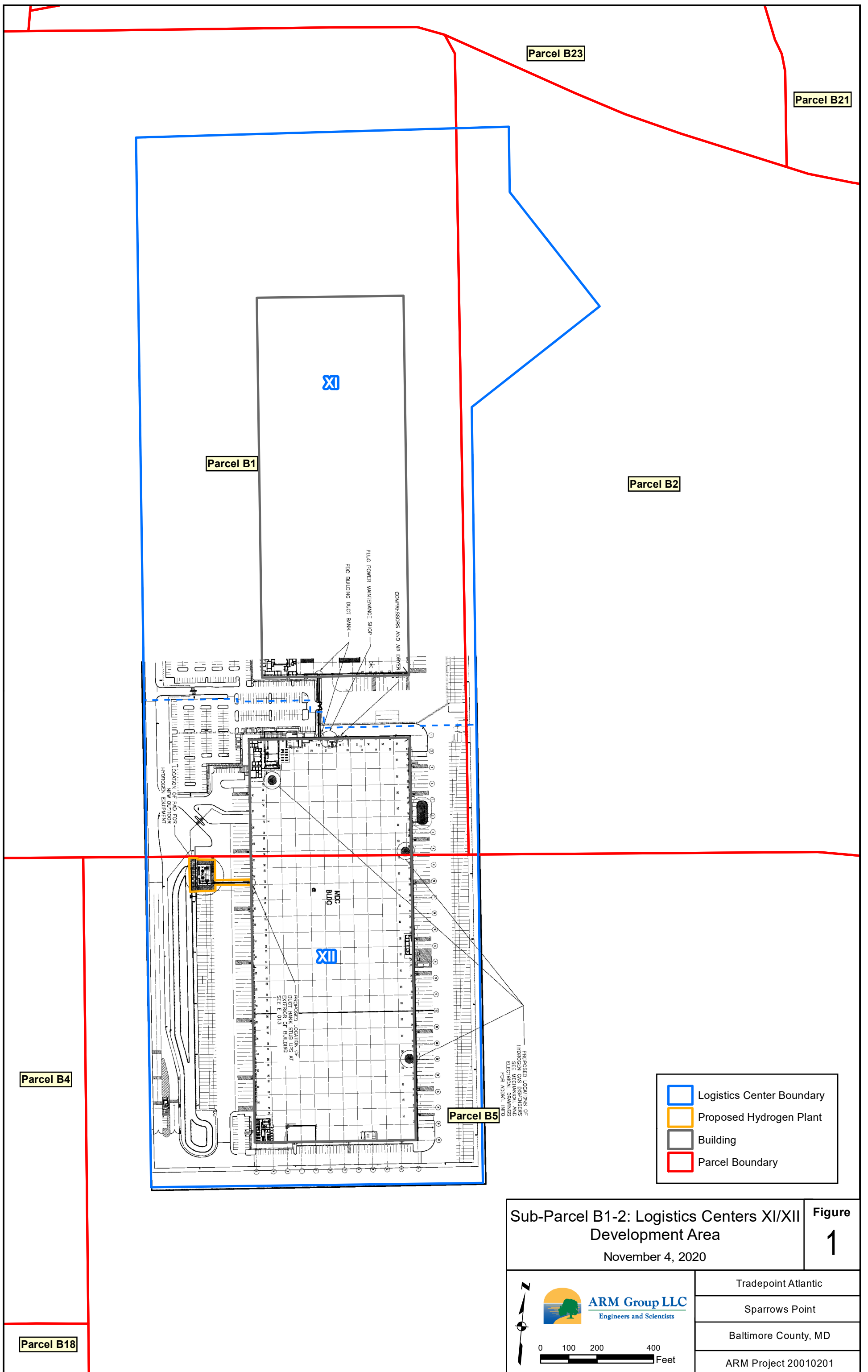
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## **FIGURES**

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Sub-Parcel B1-2: Logistics Centers XI/XII  
Development Area  
November 4, 2020

Figure  
1

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**ATTACHMENT 1**

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# **Sparrows Point Development - PPE Standard**

## **Operational Procedure, Revision 3**

### **Planning, Tracking/Supervision, Enforcement, and Documentation**

#### **Planning**

- Response and Development Work Plan (RDWP) for each individual redevelopment sub-parcel identifies and documents site conditions.
- RDWP is reviewed and approved by regulators.
- Contractor HASP to address site-specific conditions and PPE requirements:
  - Contractor H&S professional to sign-off on PPE requirements for site workers;
  - Job Safety Analysis (JSA) to be performed for ground intrusive work.
- Project Environmental Professional (EP) assigned to each construction project – monitors project during environmentally sensitive project phases and is available to construction contractor on an as needed basis. EP responsibilities include the following:
  - Dust monitoring
  - Routine ground intrusive breathing space air monitoring
  - Soil tracking
  - Water handling oversight
  - Ground intrusive work observation
  - Notification for unexpected conditions
- Pre-construction meeting identifies EP roles and responsibilities and reviews site conditions.
- Contractor to perform job-site HazCom. HazCom to be addressed in Contractor HASP and include:
  - PPE requirements,
  - Exposure time limits,
  - Identification of chemicals of concern and potential effects of over-exposure (adverse reactions),
  - Methods and routes of potential exposure.
- All personnel that will be performing ground intrusive work within impacted soils shall sign-off on HazCom.
- If, based on a thorough review of Site conditions, it is expected that construction workers will have the potential to encounter materials considered hazardous waste under RCRA or DOT regulations, HAZWOPER-trained personnel will be utilized.

#### **Tracking/Supervision**

- Contractor to record any day that there is ground intrusive work and confirm that proper PPE is being worn.
- EP will note ground intrusive work on daily work sheets and perform at least one spot check per day.
- EP will log on daily work sheets PPE compliance for all intrusive work areas at least once per day.

- EP to take example photos of Exclusion Zones/Contamination Reduction Zones periodically.

### **Work Zones Delineation**

- Exclusion Zone – The Exclusion Zones will include the areas proposed for excavation or with active trenches, excavations, or ground intrusive work, at a minimum. Personnel working within the exclusion zone will be required to wear Modified Level D PPE as described in this SOP. EP to take example photos of Exclusion Zones/Contamination Reduction Zones periodically. The Exclusion Zones will be identified each work day.
- Contamination Reduction Zone – This work zone is located outside of the exclusion zone, but inside of the limits of development (LOD). The Contamination Reduction Zone will be located adjacent to the Exclusion Zone, and all personal decontamination including removal of all disposable PPE/removal of soil from boots will be completed in the Contamination Reduction Zone.

### **Documentation**

- Contractor HASP and HazCom.
- Contractor ground intrusive tracking record.
- HASP and HazCom sign-in sheets.
- EP pre-con memos.
- EP daily work sheets.
- Records documenting intrusive work and proper PPE use to be provided in completion report.

### **Enforcement**

- Non-compliance of PPE requirements will result in disciplinary action up to and including prohibition from working on Sparrows Point.

### **Unknown and/or Unexpected Conditions**

If unknown and/or unexpected conditions are encountered during the project that the EP determines to have a reasonable potential to significantly impact construction worker health and safety, the following will be initiated:

1. Job stoppage,
2. TPA and MDE notification,
3. Re-assessment of conditions.

Work will not continue until EP has cleared the area. If hazardous waste is identified, a HAZWOPER contractor will be brought in to address. The approved contingency plan will be implemented, where appropriate.

### **Modified Level D PPE**

Modified Level D PPE will include, at a minimum, overalls such as polyethylene-coated Tyvek or clean washable cloth overalls, latex (or similar) disposable gloves (when working in wet/chemical surroundings) or work gloves, steel-toe/steel-shank high ankle work boots with taped chemical-protective over-boots (as necessary), dust mask, hard hat, safety glasses with

side shields, and hearing protection (as necessary). If chemical-protective over-boots create increased slip/trip/fall hazardous, then standard leather or rubber work boots could be used, but visible soils from the sides and bottoms of the boots must be removed upon exiting the Exclusion Zone.

SP Development PPE Procedure 4-3-19