ARM Group LLC
Engineers and Scientists

February 6, 2024

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

Re: Comment Response Letter:
Coke Point Landfill Semi-Annual (Fall 2023) Groundwater Monitoring Report
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

ARM Group LLC (ARM), on behalf of Tradepoint Atlantic (TPA), is pleased to provide the enclosed responses to comments received from the Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA) via email on January 31, 2024, regarding the Coke Point Landfill Semi-Annual (Fall 2023) Groundwater Monitoring Report (Revision 0 dated January 10, 2024). The original comments are included below, with the responses following in italics.

1. **Section 1.0 Introduction**: Field data sheets are not provided as indicated.
   Response: Field data sheets (i.e., purge logs) have not been historically included. This reference has been removed.

2. **Section 5.1.2 SVOCs**: The fourth paragraph states, "For the intermediate zone groundwater, naphthalene and benz[a]anthracene were the most widespread SVOCs detected with each parameter exceeding its PAL in five of the nine monitoring wells." According to Figure 6, either naphthalene or benzo(a)anthracene exceeded the PAL in eight monitoring wells. Please verify this statement.
   Response: Naphthalene exceeded its PAL in 5 of 9 MWs, and benz[a]anthracene exceeded in 5 of 9 MWs. When looked at overall, there were PAL exceedances in 8 of 9 MWs – since naphthalene and benz[a]anthracene did not exceed in the same MWs. The text has been revised for clarification.

3. **Section 5.2.1 Statistical Trend Test Results**: The second paragraph states that nine shallow wells had statistically significant downward trends. According to Table 3 it should be eight monitoring wells. Please verify this statement.
   Correct, should be eight. Text has been updated.

4. **Table 1**:
   a. Please include screen intervals in future reports.
      Response: Table 1 has been revised to include this information, where applicable. Table 1 has also been revised to only provide total well depth, riser length, screen length, screen interval, and diameter. Table 1 also now indicates where the well construction details were sourced from and if the well construction logs were not available for verification.
   b. The filter pack interval for CP02-PZM026 is listed from 43-55 feet bgs, but based on the well depth and screen length should this be 50 feet bgs?
      Response: For CP02-PZM026, no well construction log was available for review. The provided information, where available, was presented in Table 2.3-1 of the Site-Wide Investigation Release Site Characterization Study (CH2MHill, June 2002).
   c. Please verify the well construction details for CP20-PZM011 and CP21-PZM004. Based on the listed sand pack, the riser length, seal interval, and/or grout interval are not correct.
      Response: No well construction logs were available for CP20-PZM011 or CP21-PZM004 for review. The provided information, where available, was presented in Table 1 of the Coke Point and Greys Landfill Semi-Annual Groundwater Monitoring Report (Fall 2016) (EAG, April 2018).

5. **Table 3**: This table does not match what is shown in the "MK Upward Trends" spreadsheet. Please clarify.
   Response: The upward trends spreadsheet includes all identified upward trends. However, only upward trends where there was also a PAL exceedance for Fall 2023 are included in Table 3. No changes are needed.

If you have questions regarding any information covered in this document, please feel free to contact Peter Haid at Tradepoint Atlantic: 443-649-5055.

Respectfully Submitted,
ARM Group LLC

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