



# ARM Group LLC

Engineers and Scientists

September 28, 2023

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

Re: Comment Response Letter:  
Greys Landfill Semi-Annual (Fall 2022)  
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 September 6, 2023, regarding the Greys Landfill Semi-Annual (Fall 2022) Groundwater Monitoring Report (Revision 1 dated August 17, 2023). The original comments are included below, with the responses following in italics.

- In the last comment for Section 2.0 we asked for additional clarification on type, depth, and extent of these low permeability layers and/or provide calculations showing that there is no vertical gradient between well pairs. The response just says that the text has been updated, but it does not appear that any changes were made to the document.

*Response: This wording pertains to the Coke Point Landfill in historic reports (when the landfill reports were combined) and was incorrectly included in the Greys Report. We removed the sentence about the low permeability layers, and therefore did not make any other changes.*

- For Section 5.2.1 the Agencies asked for additional discussion/clarification on why there are changing concentrations for metals in groundwater (i.e., changing redox conditions, change of soil conditions, increased landfill leaching, etc.). The response didn't address any part of the comment.

*Response: Refer to the attachment to this CRL for a comparison of cobalt, iron and manganese to field parameters for three wells: GL-05(-7), GL-12(-3), and GL-16(-6).*

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*These are the three wells shown in Figures 11-13 in the report. There may be some correlation between cobalt and ORP, but there does not appear to be any correlation for iron or manganese, or for any other field parameters. There has been no change in the operation or maintenance of the landfill that would increase the landfill leaching. The changing concentrations are likely related to natural variability, and the results are within the historical range.*

- The fourth paragraph incorrectly states upward trends in the intermediate zone were observed at seven monitoring wells, but it should be eight (GL-08 (-36) [cobalt] is missing from the list).

*Response: The fourth paragraph addresses upward trends in the intermediate zone, and indicates 6 wells, which is correct. GL-08(-36) is mentioned in that paragraph. The fifth paragraph addresses downward trends in the intermediate zone, and indicates 7 wells, which is correct. GL-08(-36) is also mentioned in that paragraph.*

- Should the last sentence be referencing upward trends in intermediate wells?  
“Trend analysis has been completely revised. The original Fall 2022 trend analysis included several wells / parameters with no PAL exceedances. The trend analysis has been revised to include wells / parameters with PAL exceedances only, as per previous reports. Now there are only three parameters with downward trends in shallow groundwater, spread across six wells.”

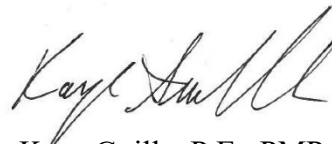
*Response: Correct sentence should read as follows: Trend analysis has been completely revised. The original Fall 2022 trend analysis included several wells / parameters with no PAL exceedances. The trend analysis has been revised to include wells / parameters with PAL exceedances only, as per previous reports. Now there are only three parameters **with upward trends in intermediate** groundwater, spread across six wells.*

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



Thomas Palank  
Project Geologist



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Senior Engineer



