

# RESPONSE AND DEVELOPMENT WORK PLAN

AREA B: SUB-PARCEL B5-3  
TRADEPOINT ATLANTIC  
SPARROWS POINT, MARYLAND

Prepared For:



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## 1.0 INTRODUCTION

ARM Group LLC (ARM), on behalf of Tradepoint Atlantic (TPA), has prepared this Response and Development Work Plan (RADWP) for a portion of the Tradepoint Atlantic property that has been designated as Area B: Sub-Parcel B5-3 (the Site). Tradepoint Atlantic submitted a letter (dated July 20, 2023; **Appendix A**) requesting an expedited plan review to achieve construction deadlines for the proposed development on this Site. As shown on **Figure 1**, Sub-Parcel B5-3 consists of approximately 72.9 acres located within Parcel B5, Parcel B9, and Parcel B19 of the approximately 3,100-acre former steel plant property.

As shown on **Figure 2**, Sub-Parcel B5-3 is slated for development and occupancy as a warehouse. Associated water lines, stormwater lines, electric lines, and sanitary sewer lines are also proposed. The planned development activities will generally include grading, paving of parking areas and roadways, installation of utilities, and construction of a 1,330,000 square foot warehouse. Preliminary grading has already been conducted at the Site as proposed in the Sub-Parcel B5-3 Grading Plan (dated January 19, 2023). Note that the proposed development area has been modified slightly from the Grading Plan Limit of Disturbance (LOD). Subsequent site use will involve workers in the on-site buildings, and truck drivers entering and leaving the Site with goods. Outside of the main development area designated as Sub-Parcel B5-3, temporary construction zones (not intended for permanent occupancy) with a total area of 2.23 acres within the LOD will be utilized for utility installation. These external construction worker areas are shown on **Figure 2**.

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (MDE), effective September 12, 2014; and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (USEPA), effective November 25, 2014.

An application to enter the full Tradepoint Atlantic property (3,100 acres) into the MDE Voluntary Cleanup Program (MDE-VCP) was submitted to the MDE on June 27, 2014. The property's current and anticipated future use is Tier 3 (Industrial) and plans for the property include demolition and redevelopment over the next several years.

Sub-Parcel B5-3 is part of the acreage that was removed (Carveout Area) from inclusion in the Multimedia Consent Decree between Bethlehem Steel Corporation, the USEPA, and the MDE

(effective October 8, 1997) as documented in correspondence received from USEPA on September 12, 2014. Based on this agreement, USEPA determined that no further investigation or corrective measures will be required under the terms of the Consent Decree for the Carveout Area. However, the SA reflects that the property within the Carveout Area will remain subject to the USEPA's Resource Conservation and Recovery Act (RCRA) Corrective Action authorities.

In consultation with the MDE, Tradepoint Atlantic affirms that it desires to accelerate the assessment, remediation, and redevelopment of certain sub-parcels within the larger site due to current market conditions. To that end, the MDE and Tradepoint Atlantic agree that the Controlled Hazardous Substance (CHS) Act (Section 7-222 of the Environment Article) and the CHS Response Plan (Code of Maryland Regulations (COMAR) 26.14.02) shall serve as the governing statutory and regulatory authority for completing the development activities on Sub-Parcel B5-3 and complement the statutory requirements of the VCP (Section 7-501 of the Environment Article). Upon submission of a RADWP and completion of any remedial activities for the sub-parcel, the MDE shall issue a No Further Action Letter (NFA) upon a recordation of an Environmental Covenant describing any necessary land use controls for the specific sub-parcel. At such time that all the sub-parcels within the larger parcel have completed remedial activities, Tradepoint Atlantic shall submit to the MDE a request for issuing a Certificate of Completion (COC) as well as all pertinent information concerning completion of remedial activities conducted on the parcel. Once the VCP has completed its review of the submitted information it shall issue a COC for the entire parcel described in Tradepoint Atlantic's VCP application.

Alternatively, Tradepoint Atlantic or other entity may elect to submit an application for a specific sub-parcel and submit it to the VCP for review and acceptance. If the application is received after the cleanup and redevelopment activities described in this RADWP are implemented and a NFA is issued by the Agencies pursuant to the CHS Act, the VCP shall prepare a No Further Requirements Determination for the sub-parcel.

If Tradepoint Atlantic or other entity has not carried out cleanup and redevelopment activities described in the RADWP, the cleanup and redevelopment activities may be conducted under the oversight authority of either the VCP or the CHS Act, so long as those activities comport with this RADWP.

This RADWP provides a site description and history; summary of environmental conditions identified by the 2014 Phase I Environmental Site Assessment (ESA); summary of relevant findings and environmental conditions identified by the relevant Phase II Investigations conducted between 2015 and 2020; a human health Screening Level Risk Assessment (SLRA) conducted for the identified conditions; and any necessary engineering and/or institutional controls to facilitate the planned development and address the impacts and potential human health exposures. These controls include work practices and applicable protocols that are submitted for approval to support the development and use of the Site. Engineering/institutional controls approved and installed for

this RADWP shall be described in closure certification documentation submitted to the Agencies demonstrating that exposure pathways on the Site are addressed in a manner that protects public health and the environment.

The remainder of Parcel B5, Parcel B9, and Parcel B19 will be addressed in separate development plans in accordance with the requirements of the ACO, which may include RADWPs, if necessary. This work will include assessments of risk and, if necessary, RADWPs to address unacceptable risks associated with future land use. As discussed below, temporary external construction worker areas with a total area of 2.23 acres will be utilized to install utility connections for the project outside of the sub-parcel. The temporary work outside of the boundary of the Site is not intended to be the basis for the issuance of a NFA or a COC, although the scope of construction is covered by this RADWP.

## 2.0 SITE DESCRIPTION AND HISTORY

### 2.1 SITE DESCRIPTION

The Sub-Parcel B5-3 development project consists of approximately 72.9 acres comprising portions of Parcel B5, Parcel B9, and Parcel B19 (**Figure 1**). The development will include completion of a 1,330,000 square foot warehouse (**Figure 2**). Outside of the main development area designated as Sub-Parcel B5-3, temporary external construction worker areas (not intended for permanent occupancy) with a total area of approximately 2.23 acres within the construction LOD will be utilized to install subgrade utility connections for the project. The Site is currently zoned Manufacturing Heavy-Industrial Major (MH-IM) and is not occupied. There is no groundwater use on-site or within the surrounding Tradepoint Atlantic property.

Ground surface elevations at the Site range from approximately 6 to 16 feet above mean sea level (amsl), with the majority of the Site being relatively flat. According to Figure B-2 of the property Stormwater Pollution Prevention Plan Revision 9 dated September 27, 2021, surface water runoff from the Site is currently conveyed to the east and is discharged into Old Road Bay through National Pollutant Discharge Elimination System (NPDES) permitted Outfall 001 and NPDES permitted Outfall 016.

### 2.2 SITE HISTORY

From the late 1800s until 2012, the production and manufacturing of steel was conducted at Sparrows Point. Iron and steel production operations and processes at Sparrows Point included raw material handling, coke production, sinter production, iron production, steel production, and semi-finished and finished product preparation. In 1970, Sparrows Point was the largest steel facility in the United States, producing hot and cold rolled sheets, coated materials, pipes, plates, and rod and wire. The steel making operations at the facility ceased in fall 2012.

Parcel B5 was formerly occupied by the Blast Furnace Area and part of the former Steel Making Area. A small portion of the former residential town was also present within Parcel B5. Several iron and steel work processes were completed within the boundary of the Site. However, the part of Parcel B5 within the Site mainly housed numerous rail lines.

Parcel B19 was formerly occupied in part by the Pennwood Storage Tank Farm and the Maryland Pig Plant. The aboveground storage tanks (ASTs) of the Pennwood Storage Tank Farm were previously demolished. A small area of private property (approximately 0.1 acres) is located in the center of Parcel B19 and is occupied by a Baltimore County Pump Station. This station is not owned by Tradepoint Atlantic and was thus excluded from the established Parcel B19 boundary.

Parcel B9 historically contained the Pennwood Power Plant, which produced electricity for the Bethlehem Steel facility. The Pennwood Canal, a man-made channel that served as a source of

cooling water for the Pennwood Power Plant, connects Old Road Bay to the former plant. During the Phase I ESA site visit completed by Weaver Boos in 2014, the Pennwood Power Plant contained large out-of-service equipment, with observed surface staining on and below the equipment. Past flooding (at least one previous incident) caused water to pool on the equipment room floor and drain to the adjacent Pennwood Canal.

### **2.3 SITE GRADING ACTIVITIES**

Preliminary grading activities, including placement of slag fill across the Site, was conducted to raise the elevation from approximately 12 feet amsl to approximately 16 feet amsl. All work was completed in accordance with the Sub-Parcel B5-3 Grading Plan (Revision 0, January 19, 2023). All Site preparation and grading activities will be included in the Development Completion Report.

### 3.0 ENVIRONMENTAL SITE ASSESSMENT RESULTS

#### 3.1 PHASE I ENVIRONMENTAL SITE ASSESSMENT RESULTS

A Phase I ESA was completed by Weaver Boos for the entire Sparrows Point property on May 19, 2014. Weaver Boos completed site visits of Sparrows Point from February 19 through 21, 2014, for the purpose of characterizing current conditions at the former steel plant. The Phase I ESA identified particular features across the Tradepoint Atlantic property which presented potential risks to the environment. These Recognized Environmental Conditions (RECs) included buildings and process areas where releases of hazardous substances and/or petroleum products potentially may have occurred. The Phase I ESA also relied upon findings identified during a previous visual site inspection (VSI) conducted in 1991 as part of the RCRA Facility Assessment prepared by A.T. Kearney, Inc. dated August 1993, for the purpose of identifying Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) on the property. This VSI is regularly cited in Description of Current Conditions (DCC) Report prepared by Rust Environment and Infrastructure (January 1998).

Weaver Boos' distinction of a REC or Non-REC was based upon the findings of the DCC Report (which was prepared when the features remained on-site in 1998) or on observations of the general area during their site visit. Weaver Boos made the determination to identify a feature as a REC based on historical information, observations during the site visit, and prior knowledge and experience with similar facilities. The following REC was identified in Sub-Parcel B5-3:

##### **Pennwood Storage Tank Farm (REC 19 Finding 266):**

Several large ASTs are located in the Pennwood Storage Tank Farm, directly north of the Pennwood Power Station (within Parcel B9). The power station operated four boilers to generate electricity and steam for general plant use and was operated on a variety of fuels including blast furnace gas, No. 6 Fuel Oil, used oil or waste combustible fluids, and natural gas. The tanks in the AST farm formerly held No. 6 Fuel Oil and recycled oil. One additional AST was formerly located directly east of the Pennwood Storage Tank Farm, but aerial images show that this tank was removed between December 2002 and September 2005.

Relevant SWMUs and AOCs were also identified as located on Figure 3-1 from the DCC Report. This figure generally shows the SWMUs, AOCs, and main facility areas within the property boundaries. There were no SWMUs or AOCs identified within the Sub-Parcel B5-3 boundary.

#### 3.2 PHASE II INVESTIGATION RESULTS – SUB-PARCEL B5-3

Phase II Investigations specific to soil and groundwater conditions were performed for the property area including Sub-Parcel B5-3 in accordance with the requirements outlined in the ACO as further described in the following agency-approved Phase II Investigation Work Plans:

- Area B: Parcel B5 (Revision 1) dated December 3, 2015
- Area B: Parcel B9 (Revision 0) dated March 25, 2020
- Area B: Parcel B19 (Revision 1) dated August 9, 2016
- Area B Groundwater (Revision 3) dated October 6, 2015

All soil samples and groundwater samples were collected and analyzed in accordance with agency-approved protocols during the Phase II Investigations, the specific details of which can be reviewed in each agency-approved Work Plan. Each Phase II Investigation was developed to target specific features which represented a potential release of hazardous substances and/or petroleum products to the environment, including RECs, SWMUs, and AOCs, as applicable, as well as numerous other targets identified from former operations that would have the potential for environmental contamination. Samples were also collected at site-wide locations to ensure full coverage of each investigation area. The full analytical results and conclusions of each investigation have been presented to the agencies in the following Phase II Investigation Reports:

- Area B: Parcel B5 (Revision 3) dated July 8, 2019
- Area B: Parcel B9 (Revision 0) dated December 17, 2020
- Area B: Parcel B19 (Revision 0) dated April 9, 2018
- Area B Groundwater (Revision 0) dated September 30, 2016

This RADWP summarizes the relevant soil and groundwater findings from these Phase II Investigations with respect to the proposed development of Sub-Parcel B5-3.

In May 2020, a Supplemental Characterization Investigation was conducted at the Parcel B19 Tank Farm. The results of this investigation are summarized in the Parcel B19 Supplemental AST Characterization Report (Revision 0 dated August 12, 2020). As part of this investigation, two soil borings and one piezometer were completed within the Site. The soil and groundwater sample results are included in this RADWP.

### 3.2.1 Soil Investigation Findings

Based on the scope of development for Sub-Parcel B5-3, 57 soil samples collected from 28 soil sample locations (including nine soil borings from the Parcel B5 Phase II Investigation, one soil boring from Parcel B9 Phase II Investigation, 14 soil borings from the Parcel B19 Phase II Investigation, 2 test pits from the Parcel B19 Phase II Investigation, and 2 soil borings from the Parcel B19 Supplemental Characterization Investigation) were included in this evaluation of Sub-Parcel B5-3. The 28 sample locations are shown on **Figure 3**, and the samples obtained from these borings and test pits provided relevant analytical data for discussion of on-site conditions.

Soil samples collected during the Phase II Investigation were analyzed for the Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs) and polynuclear aromatic hydrocarbons (PAHs), total petroleum hydrocarbon (TPH) diesel range



organics (DRO) and gasoline range organics (GRO), Target Analyte List (TAL) metals, hexavalent chromium, and cyanide. Shallow soil samples (0 to 1 foot below ground surface [bgs]) were analyzed for polychlorinated biphenyls (PCBs). Samples from Parcel B9 and Parcel B19 were also analyzed for Oil & Grease. The laboratory Certificates of Analysis (including Chains of Custody) and Data Validation Reports are included as electronic attachments. The Data Validation Reports contain qualifier keys for the flags assigned to individual results in the attached summary tables.

Soil sample results were screened against the Project Action Limits (PALs) established in the property-wide Quality Assurance Project Plan (QAPP) dated April 5, 2016, or based on other direct agency guidance. Several PALs have been adjusted based on revised toxicity data published by the USEPA (May 2021). **Table 1** and **Table 2** provide summaries of the detected organic compounds and inorganics in the soil samples collected from the soil borings and test pits relevant for this Site evaluation. **Figure S1** and **Figure S2** present the soil sample results that exceeded the TPH and inorganic PALs, respectively, among these soil borings and test pits. PAL exceedances were limited to DRO and five inorganics (arsenic, manganese, lead, thallium, and vanadium).

Non-aqueous phase liquid (NAPL) was observed at one Phase II soil sample location (B5-144-SB). A temporary NAPL screening piezometer was installed at boring location B5-144-SB. NAPL was not observed in the groundwater at this location during the 0-hour, 48-hour, and 30-day gauging events.

### 3.2.2 Groundwater Investigation Findings

Groundwater conditions were investigated as reported in the Area B Groundwater Phase II Investigation Report (Revision 0 dated September 30, 2016) and Parcel B19 Supplemental AST Characterization Report (Revision 0 dated August 12, 2020). A total of eight shallow monitoring wells and one temporary piezometer provide relevant analytical data for the proposed Sub-Parcel B5-3 development project and are shown on **Figure 4**. There is no direct exposure risk for future Composite Workers at the Site because there is no use of groundwater on the Tradepoint Atlantic property; however, groundwater may be encountered in the sub-parcel during some construction tasks. If groundwater is encountered, it will be managed to prevent exposures in accordance with the dewatering requirements outlined in Section 5.2. Additionally, vapor intrusion (VI) risks are evaluated in Section 3.2.3.

Each groundwater monitoring point was inspected for evidence of NAPL using an oil-water interface probe prior to sampling. None of the monitoring points relevant for the proposed development project showed evidence of NAPL during these checks. Area B Phase II groundwater samples were analyzed for TCL-VOCs, TCL-SVOCs, TAL metals, hexavalent chromium, total cyanide, TPH-DRO, and TPH-GRO. The supplemental piezometer B19-046-PZ was also analyzed for Oil & Grease. The laboratory Certificates of Analysis (including Chains of Custody) and Data Validation Reports are included as electronic attachments. The Data Validation Reports contain qualifier keys for the flags assigned to individual results in the attached summary tables.



The Phase II Investigation groundwater results were screened against the PALs established in the property-wide QAPP (Revision 4 dated May 31, 2022), or based on other direct agency guidance. Similar to the evaluation of soil data, several PALs have been adjusted based on revised toxicity data published by the USEPA (May 2021). **Table 3** and **Table 4** provide summaries of the detected organic compounds and inorganics in the groundwater samples, and **Figure GW1** presents groundwater results that exceeded the PALs. PAL exceedances in the Phase II Investigation and supplemental groundwater in the vicinity of the proposed development project consisted of three SVOCs (benz[a]anthracene, naphthalene, and pentachlorophenol), DRO, Oil & Grease, and five dissolved/total metals (beryllium, cobalt, iron, manganese, and vanadium). For simplicity, the inorganic PAL exceedances shown on **Figure GW1** do not include duplicate exceedances of total/dissolved metals. If both total and dissolved concentrations exceeded the PAL, the value for total metals is displayed.

### 3.2.3 Locations of Potential Concern

Groundwater data were screened to determine whether any sample results exceeded the USEPA Vapor Intrusion Target Cancer Risk (carcinogen) or Target Hazard Quotient (THQ) (non-carcinogen) Screening Levels. None of the individual sample results exceeded the cumulative VI cancer risk screening level of 1E-5 or the non-cancer VI Hazard Index (HI) value of 1. Therefore, there are no identified VI risks associated with site development. The VI risk evaluation is summarized in **Table 5**.

Lead, PCBs, and TPH/Oil & Grease are subject to special requirements as designated by the agencies: lead results above 10,000 mg/kg are subject to additional delineation (and possible excavation), PCB results above 50 mg/kg are subject to delineation and excavation, and TPH/Oil & Grease results above 6,200 mg/kg should be evaluated for the potential presence and mobility of NAPL in any future development planning:

- There were no locations where detections of lead exceeded 10,000 mg/kg.
- There were no locations where detections of PCBs exceeded 50 mg/kg.
- There were no locations where detections of TPH-GRO or Oil & Grease exceeded 6,200 mg/kg. However, there was one sample (B5-144-SB-4) with a TPH-DRO concentration of 8,430 mg/kg). Additionally, NAPL was observed in the B5-144-SB soil boring core. A NAPL screening piezometer was installed at this location and no NAPL was observed during the 0-hour, 48-hour, and 30-day gauging events.

Besides B5-144-SB, no other visual observations of NAPL were noted at any locations for the Site. Additionally, no NAPL was detected in any monitoring wells within or proximate to the proposed development area.

### 3.3 HUMAN HEALTH SCREENING LEVEL RISK ASSESSMENT

#### 3.3.1 Analysis Process

A human health SLRA has been completed based on the analytical data obtained from the characterization of surface and subsurface soils. The SLRA was conducted to evaluate the existing soil conditions to determine if any response measures are necessary.

The SLRA included the following evaluation process:

**Identification of Exposure Units (EUs):** The Composite Worker SLRA was evaluated using a single Exposure Unit (EU1) with an area of 72.9 acres. EU1 corresponds with the proposed development area. The Construction Worker SLRA was evaluated using a slightly expanded EU (EU1-EXP), covering 75.1 acres in total which includes the 2.23 acres of additional construction worker areas incorporated within the LOD to include the facility utility installation outside of the sub-parcel. Relevant soil sample data is the same for EU1 and EU1-EXP.

It should be noted that industrial fill including processed slag aggregate sourced from the Tradepoint Atlantic property will be used within the Site; therefore, regardless of the findings of the Composite Worker baseline SLRA, the Site will be subject to surface engineering controls (i.e., capping) unless separate approvals are received from the Agencies following appropriate laboratory testing of the industrial fill materials.

**Identification of Constituents of Potential Concern (COPCs):** For the project-specific SLRA, COPC screening was completed assuming a Target Risk of  $1E-6$  and THQ of 0.1. The initial screening also identified parameters detected at a frequency greater than 5%. Based on that data set, parameters were identified as COPCs if:

- The compound was detected in soil at a frequency of greater than 5%; and
- The maximum detection exceeded the USEPA's Composite Worker Soil Regional Screening Levels (RSLs).

A COPC screening analysis is provided in **Table 6** to identify all compounds above the relevant screening levels.

All aroclor mixtures (e.g., Aroclor 1248 and Aroclor 1260) are taken into account for the reported concentrations of total PCBs. The total PCBs concentrations are used to evaluate the carcinogenic risk associated with PCBs.

**Exposure Point Concentrations (EPCs):** The COPC soil datasets for each EU were divided into surface (0 to 1 feet bgs), subsurface (>1 feet bgs), and pooled depths for

estimation of potential EPCs. Thus, there are three soil datasets associated with each EU. If there were less than 10 sample results, the maximum detected value was used as the soil EPC. If there were 10 or more sample results in the dataset, then a statistical analysis was performed using the ProUCL software (version 5.0) developed by the USEPA to determine representative reasonable maximum exposure (RME) values for the EPC for each constituent. The RME value is typically the 95% Upper Confidence Limit of the mean. For lead, the arithmetic mean for each depth was calculated for comparison to the Adult Lead Model (ALM)-based values (presented in **Table 7**).

**Risk Ratios:** The surface soil EPCs, subsurface soil EPCs, and pooled soil EPCs were compared to the USEPA RSLs for the Composite Worker and to site-specific Soil Screening Levels (SSLs) for the Construction Worker based on equations derived in the USEPA Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites (OSWER 9355.4-24, December 2002). Risk ratios were calculated with a cancer risk of  $1E-6$  and a non-cancer Hazard Quotient (HQ) of 1. The risk ratios for the carcinogens were summed to develop a screening level estimate of the baseline cumulative cancer risk. The risk ratios for the non-carcinogens were segregated and summed by target organ to develop a screening level estimate of the baseline cumulative non-cancer HI.

For the Construction Worker, site-specific risk-based evaluations were completed for a range of potential exposure frequencies to determine the maximum allowable exposure frequency for the site-wide EU1-EXP that would result in risk ratios equivalent to a cumulative cancer risk of  $1E-5$  or HI of 1 for the individual target organs. This analysis indicated that the allowable exposure frequency before additional worker protections or more detailed job safety evaluations might be needed is 70 days.

There is no potential for direct human exposure to groundwater for a Composite Worker since groundwater is not used on the Tradepoint Atlantic property (and is not proposed to be utilized). In the event that construction/excavation leads to a potential Construction Worker exposure to groundwater during development, health and safety plans and management procedures shall be followed to limit exposure risk.

**Assessment of Lead:** For lead, the arithmetic mean concentrations for surface soils, subsurface soils, and pooled soils for the site-wide EU were compared to the applicable RSL (800 mg/kg) as an initial screening. If the mean concentrations for the EU were below the applicable RSL, the EU was identified as requiring no further action for lead. If a mean concentration exceeded the RSL, the mean values were compared to calculated ALM values (ALM Version dated 6/21/2009 updated with the 5/17/2017 OLEM Directive) with inputs of 1.8 for the geometric standard deviation and a blood baseline lead level of 0.6 micrograms lead per deciliter of blood (ug/dL). The ALM calculation generates a soil lead concentration of 2,518 mg/kg, which represents the concentrations such that there would

be no more than a 5% probability that fetuses exposed to lead would exceed a blood lead of 10 µg/dL. If the arithmetic mean concentrations for the EU were below 2,518 mg/kg, the EU was identified as requiring no further action for lead. The lead averages are presented for surface, subsurface, and pooled soils in **Table 7**. Neither surface, subsurface, nor pooled soils exceeded an average lead concentration of 800 mg/kg.

**Assessment of TPH/Oil & Grease:** EPCs were not calculated for TPH/Oil & Grease. Instead, the individual results were compared to the PAL set to a HQ of 1 (6,200 mg/kg). No soil sample results exceeded the PAL for TPH-GRO or Oil & Grease. TPH-DRO was observed at 8,430 mg/kg in soil sample B5-144-SB-4 and NAPL was identified in the soil boring core. Contingency measures to address the potential presence of NAPL which could be encountered during construction are addressed in subsequent sections of this RADWP.

**Risk Characterization Approach:** Generally, if the baseline risk ratio for each non-carcinogenic COPC or cumulative target organ does not exceed 1, and the sum of the risk ratios for the carcinogenic COPCs does not exceed a cumulative cancer risk of 1E-5, then a no further action determination will be recommended. If the baseline estimate of cumulative cancer risk exceeds 1E-5 but is less than or equal to 1E-4, then capping of the EU will be considered to be an acceptable remedy for the Composite Worker. The efficacy of capping for elevated non-cancer hazard will be evaluated in terms of the magnitude of exceedance and other factors such as bioavailability. For the Construction Worker, cumulative cancer risks exceeding 1E-5 (but less than or equal to 1E-4) or HI values exceeding 1 will be mitigated via site-specific health and safety requirements.

It should be noted that industrial fill including processed slag aggregate sourced from the Tradepoint Atlantic property will be used at the Site; therefore, regardless of the findings of the Composite Worker baseline assessment, the Site will be subject to surface engineering controls (i.e., capping) unless separate approvals are received from the Agencies following appropriate laboratory testing of the industrial fill materials. The goal of the SLRA is therefore to determine whether additional response actions beyond capping may be needed due to current conditions at the Site.

The USEPA's acceptable risk range is between 1E-6 and 1E-4. If the sum of the risk ratios for carcinogens exceeds a cumulative cancer risk of 1E-4, further analysis of site conditions will be required including the consideration of toxicity reduction in any proposal for a remedy. The magnitude of any non-carcinogen HI exceedances and bioavailability of the COPC will also dictate further analysis of site conditions including consideration of toxicity reduction in any proposal for a remedy.

### 3.3.2 SLRA Results and Risk Characterization

Soil data were divided into three datasets (surface, subsurface, and pooled) for Sub-Parcel B5-3 to evaluate potential exposure scenarios. Due to the grading activities including cut and fill which will be implemented during development at the Site (covered by the Sub-Parcel B5-3 Grading Plan dated January 19, 2023; which was developed for preparatory grading work associated with the project), each of these potential exposure scenarios is relevant for the SLRA.

EPCs were calculated for each soil dataset (i.e., surface, subsurface, and pooled soils) in each EU. ProUCL output tables (with computed UCLs) derived from the data for each COPC in soils are provided as electronic attachments, with computations presented and EPCs calculated for COPCs within each of the datasets. The ProUCL input tables are also included as electronic attachments. The results were evaluated to identify any samples that may require additional assessment or special management based on the risk characterization approach. The calculated EPCs for the surface, subsurface, and pooled exposure scenarios are provided in **Table 8**.

As indicated above, the EPCs for lead are the average (i.e., arithmetic mean) values for each dataset. A lead evaluation spreadsheet, providing the computations to determine lead averages for each dataset, is also included as an electronic attachment. The average and maximum lead concentrations are presented for each dataset in **Table 7**, which indicates that neither surface, subsurface, nor pooled soils exceeded an average lead concentration of 800 mg/kg.

#### Composite Worker Assessment:

Risk ratios for the estimates of potential EPCs for the Composite Worker baseline scenario prior to the placement of industrial fill at the Site are shown in **Table 9** (surface), **Table 10** (subsurface), and **Table 11** (pooled). The results are summarized as follows:

| Worker Scenario  | Exposure Unit       | Medium          | Hazard Index (>1) | Total Cancer Risk |
|------------------|---------------------|-----------------|-------------------|-------------------|
| Composite Worker | EU1<br>(72.9 acres) | Surface Soil    | none              | 4E-6              |
|                  |                     | Subsurface Soil | none              | 5E-6              |
|                  |                     | Pooled Soil     | none              | 4E-6              |

Based on the risk ratios for Sub-Parcel B5-3, capping is not necessary to be protective of future Composite Workers for the surface, subsurface, and pooled exposure scenarios. None of the cancer risk values exceeded 1E-5 and none of the non-carcinogenic HI values exceeded 1. However, slag aggregate will be used as the primary fill material and pavement subbase at the Site. Therefore, environmental capping will be required to be protective of future Composite Workers.

**Construction Worker Assessment:**

Ground intrusive activities which could result in potential Construction Worker exposures are expected to be limited primarily to utility installation tasks performed by specific work crews. Construction Worker risks were evaluated for several different exposure scenarios to determine the maximum exposure frequency for the site-wide EU1-EXP that would result in risk ratios equivalent to a cumulative cancer risk of 1E-5 or HI of 1 for any individual target organ. Risk ratios for the Construction Worker scenario using the selected duration (70 days) are shown in **Table 12** (surface), **Table 13** (subsurface), and **Table 14** (pooled). The variables entered for calculation of the site-specific Construction Worker SSLs (EU area, input assumptions, and exposure frequency) are indicated as notes on the tables. The spreadsheet used for computation of the site-specific Construction Worker SSLs is included as **Appendix B**. The results are summarized as follows:

| Worker Scenario     | Exposure Unit                                 | Medium          | Hazard Index (>1) | Total Cancer Risk |
|---------------------|---|-----------------|-------------------|-------------------|
| Construction Worker | EU1-EXP<br>(75.1 acres)<br>(70 exposure days) | Surface Soil    | none              | 2E-7              |
|                     |   | Subsurface Soil | none              | 3E-7              |
|                     |   | Pooled Soil     | none              | 2E-7              |

Using the selected exposure duration for the site-wide EU1-EXP (70 days), the carcinogenic risks were all less than 1E-5, and none of the non-carcinogens caused a cumulative HI to exceed 1 for any target organ system. These findings are below the acceptable limits for no further action established by the agencies. This evaluation indicates that additional site-specific health and safety requirements (beyond standard Level D protection) would be required only if the allowable exposure duration of 70 days were to be exceeded for an individual worker.

Development activities may exceed the allowable duration. In such an event, Construction Worker risks would be required to be mitigated, warranting additional site-specific health and safety requirements to be protective of workers. Upgraded Personal Protective Equipment (PPE) beyond standard Level D protection will be used for the entire scope of intrusive work covered by this RADWP as a protective measure to ensure that there are no unacceptable exposures for Construction Workers during project implementation. The modified Level D PPE requirements which will be applied immediately and throughout this project, including specific PPE details, planning, tracking/supervision, enforcement, and documentation, are outlined in the PPE Standard Operational Procedure (SOP) provided as **Appendix C**.

Institutional controls will be required to be established for the protection of future Construction Workers in the event of any future long-term construction projects which could include intrusive



activities. The anticipated institutional controls, including notification requirements, health and safety requirements, and materials management requirements, are specified in Section 5.4.

### 3.3.3 Evaluation of RCRA Criteria

Tradepoint Atlantic will be using industrial fill (including processed slag aggregate) throughout the Site. Therefore, environmental capping is required within the development area to mitigate potential Composite Worker risks. The entirety of the Site (72.9 acres) will therefore require a remedy of capping with institutional controls to mitigate potential Composite Worker risks.

Site-specific health and safety controls will be implemented to mitigate Construction Worker risks within the sub-parcel. This includes using modified Level D PPE. The modified Level D PPE requirements will be implemented throughout the project duration in accordance with the PPE SOP provided as **Appendix C**. Institutional controls will also be required to be established for the protection of future Construction Workers in the event of any future long-term construction projects which could include intrusive activities.

The proposed VCP capping remedy with institutional controls was evaluated for consistency with the RCRA Threshold Criteria and Balancing Criteria. The Threshold Criteria assess the overall protection of human health and the environment, as well as achievement of media cleanup objectives and control of sources of releases at the Site. The Balancing Criteria assess long-term effectiveness and permanence; reduction of toxicity, mobility or volume; short-term effectiveness; implementability; cost effectiveness; and community and State acceptance.

#### **Threshold Criteria:**

**Protect Human Health and the Environment:** The assessment against this criterion evaluates how the remedy, as a whole, protects and maintains protection of human health and the environment. This criterion is satisfied when response actions are complete. The purpose of this remedy is to provide a protective barrier between human site users and impacted materials, and to protect the environment by preventing surface water from contacting potentially impacted materials in place. The capping and institutional control remedy would eliminate risk to current and future industrial workers by preventing exposure to areas of the Site where processed slag aggregate has been placed or where soil concentrations exceed a cancer risk of  $1E-5$  or a HI of 1. Groundwater does not present a direct human health hazard since there is no groundwater use on the property. Implementation of the proposed use restrictions will address the residual risk and will also protect future workers by eliminating or controlling potential exposure pathways, thus, reducing potential intake and contact of soil/groundwater COPCs by human receptors.

**Achieve Media Cleanup Objective:** The assessment against this criterion describes how the remedy meets the cleanup objective, which is risk reduction, appropriate for the

expected current and reasonably anticipated future land use. The objective is to protect current/future Composite Workers and Construction Workers from potential exposures to COPCs present in soil or groundwater at levels that may result in risks of adverse health effects. Given the controlled access and use restrictions, the proposed remedy will attain soil and groundwater objectives. The activity use restrictions will eliminate current and future unacceptable exposures to both soil and groundwater.

**Control the Source of Releases:** In its RCRA Corrective Action proposed remedies, USEPA seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. Controlling the sources of contamination relates to the ability of the proposed remedy to reduce or eliminate, to the maximum extent practicable, further releases. Sampling results did not indicate localized, discernible source areas associated with the soil conditions observed at the Site. The control measures included in the proposed remedy, such as Materials Management Plan requirements and groundwater use restrictions, provide a mechanism to control and reduce potential further releases of COPCs. This is achieved by eliminating the potential for groundwater use and requiring proper planning for intrusive activities.

### **Balancing Criteria:**

**Long-Term Reliability and Effectiveness:** The assessment against this criterion evaluates the long-term effectiveness of the remedy in maintaining protection of human health and the environment after the response objectives have been met. The primary focus of this criterion is the extent and effectiveness of the controls that may be required to manage the risk posed by slag aggregate, treatment residuals, and/or untreated wastes. The proposed capping remedies have been proven to be effective in the long-term at similar sites with similar conditions. The capping remedy will permanently contain the slag aggregate and other potentially contaminated media in place. In order for the cap to effectively act as a barrier, regular inspections will be performed pursuant to the Institutional Control Operations and Maintenance Plan (O&M Plan).

Institutional controls will be implemented to protect future Composite and Construction Workers against inadvertent contact with potentially impacted media. The anticipated institutional controls are specified in Section 5.4. The proposed remedy will maintain protection of human health and the environment over time by controlling exposures to the hazardous constituents potentially remaining in slag aggregate or existing on-site media. The long-term effectiveness is high, as use restrictions are readily implementable and easily maintained. Given the historical, heavily industrial uses of the Site and the surrounding area, including the presence of landfills, land and groundwater use restrictions are expected to continue in the long term.



**Reduction of Toxicity, Mobility, or Volume of Waste:** The assessment against this criterion evaluates the anticipated performance of specific technologies that a remedial action alternative may employ. The capping remedy will prevent the spread of contaminants in wind-blown dust or stormwater and will prevent infiltration through the unsaturated zone from carrying contaminants to the groundwater. Thus, the mobility of contaminants will be reduced by the capping remedy.

**Short-term Effectiveness:** The assessment against this criterion examines how well the proposed remedy protects human health and the environment during the construction and implementation until response objectives have been met. This criterion also includes an estimate of the time required to achieve protection for either the entire site or individual elements associated with specific site areas or threats. The risks to the Construction Worker during remedy implementation are mitigated by executing the modified Level D PPE requirements outlined in **Appendix C**. The short-term risk to site workers following these upgraded health and safety measures during implementation of the remedy will be low, leading to a high level of short-term effectiveness for protection of future site users and the environment. Short-term effectiveness in protecting on-site workers and the environment will be achieved through establishing appropriate management, construction, health and safety, and security procedures. Proper water management protocols will be implemented to prevent discharges offsite. Security will be used to maintain controlled access during construction.

**Implementability:** The assessment against this criterion evaluates the technical and administrative feasibility, including the availability of trained and experienced personnel, materials, and equipment. Technical feasibility includes the ability to construct and operate the technology, the reliability of the technology, and the ability to effectively monitor the technology. Administrative feasibility includes the capability of obtaining permits, meeting permit requirements, and coordinating activities of governmental agencies. The proposed capping remedy for the Composite Worker area will use readily available, typically acceptable, and proven technologies.

**Cost Effectiveness:** The assessment against this criterion evaluates the capital costs, annual O&M costs, and the net present value of this remedy relative to alternatives. The capping remedy remedial costs would be incurred as part of the proposed site development, regardless of the findings of the SLRA.

**State Support / Agency Acceptance:** The Agencies have been involved throughout the Site investigation process. The proposed use restrictions included in the proposed remedy are generally recognized as commonly employed measures for long-term stewardship.

A capping remedy with institutional controls would satisfy the CERCLA Threshold Criteria and the Balancing Criteria and would do so in a manner that ensures reliable implementation and

effectiveness. The remedy is cost-effective and consistent with the proposed development plan for the Site.

## 4.0 PROPOSED SITE DEVELOPMENT PLAN

Tradepoint Atlantic is proposing the construction of a 1,330,000 square foot warehouse on Sub-Parcel B5-3. The proposed development will include permanent improvements on approximately 72.9 acres located within Parcel B5, Parcel B9, and Parcel B19. The proposed future use of Sub-Parcel B5-3 is Tier 3 – Industrial. The remainder of Parcel B5, Parcel B9, and Parcel B19 will be addressed in separate development plans in accordance with the requirements of the ACO that will include RADWPs, if necessary. Outside of the main development area, temporary external construction worker areas with a total area of approximately 2.23 acres will be utilized to install the subgrade utility connections for the project. The temporary work outside of the boundary of the Site is not intended to be the basis for the issuance of a NFA or a COC, although the scope of construction work is covered by this RADWP. The Site (72.9 acres encompassing Sub-Parcel B5-3; excluding the temporary construction worker areas) will be capped by surface engineering controls.

Certain compounds are present in the soils located near the surface and in the subsurface at concentrations in excess of the PALs. Therefore, soil is considered a potential media of concern. Potential risks to future adult workers associated with impacts to soil and groundwater exceeding the PALs will be addressed through a remedy consisting of surface engineering controls (capping) and institutional controls (deed restrictions for B5-3). The development plan provides for a containment remedy and institutional controls that will mitigate future adult workers from contacting impacted soil at the Site. In addition, Tradepoint Atlantic has proposed the use of processed slag aggregate as the primary fill material and pavement subbase. The placement of materials other than approved clean fill, such as slag aggregate, requires the installation of surface engineering controls regardless of the existing soil conditions.

Future Construction Workers may contact impacted surface and/or subsurface soil during earth movement activities associated with construction activities, including within the temporary external construction worker areas outside of the primary development area. The findings of the Construction Worker SLRA indicated that using the site-specific 70-day exposure frequency for the site-wide EU1-EXP, the screening level estimates of Construction Worker cancer risk were less than 1E-5 and no HI values above 1 were identified for any target organ system (the acceptable thresholds for no further action).

Development activities at the Site are not expected to exceed the allowable duration; however additional site-specific health and safety requirements will be implemented as a conservatism to be protective of workers. Upgraded PPE beyond standard Level D protection will be used in conjunction with the property-wide Health and Safety Plan (HASP) for the entire scope of intrusive work covered by this RADWP as a protective measure to ensure that there are no unacceptable exposures for Construction Workers during project implementation. The modified Level D PPE requirements which will be applied throughout this project, including specific PPE details,

planning, tracking/supervision, enforcement, and documentation, are outlined in the PPE SOP provided as **Appendix C**.

A restriction prohibiting the use of groundwater for any purpose at the Site will be included as an institutional control in the NFA and COC issued by the Agencies, and a deed restriction prohibiting the use of groundwater will be filed. The groundwater use restriction will protect future Composite Workers from potential direct exposures. Proper water management is required to prevent unacceptable discharges or risks to Construction Workers during development. Work practices and health and safety plans governing groundwater encountered during excavation activities will provide protection for Construction Workers involved with development at the Site.

The development plan for the Site is shown on **Figure 2**. Detailed development plan drawings are included as **Appendix D**. The process of constructing the proposed warehouse will involve the tasks listed below. Documentation of the outlined tasks and procedures will be provided in a Sub-Parcel B5-3 Development Completion Report.

#### **4.1 RESPONSE PHASE – GROUNDWATER NETWORK MODIFICATION**

As part of the B5-3 Grading Plan (Revision 0 dated January 19, 2023), existing monitoring wells located within the proposed LOD were proposed to be abandoned. Abandonment was completed on March 20, 2023 for these locations except for monitoring well SW-041-MWS, which has been buried under material piled at this location, and monitoring well SW-050-MWS, which was inaccessible due to dense vegetation. Monitoring well SW-050-MWS is now no longer within the modified development Site boundary, so will not be abandoned. When monitoring well SW-041-MWS is uncovered, it will be abandoned in accordance with COMAR 26.04.04.34 through 36.

The abandonment of any permitted groundwater wells must be reported to the Water Management Administration as per COMAR 26.04.04, and records of all groundwater well and piezometer abandonments (including abandonment forms, if available) will be included in the Development Completion Report. It is understood that the agencies may require the installation of additional permanent monitoring wells in the future following site development.

#### **4.2 DEVELOPMENT PHASE**

##### **4.2.1 Erosion and Sediment Control Installation**

Installation of erosion and sediment controls will be completed in accordance with the requirements of the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control prior to any construction at the Site. Any soils within EU1 which are disturbed during the installation of erosion and sediment controls will be placed on-site below the cap.

#### 4.2.2 Grading and Site Preparation

Grading activities including both cut and fill will occur within the Sub-Parcel B5-3 boundary. As stated above, preliminary grading has already commenced at the Site and is covered by the Sub-Parcel B5-3 Grading Plan dated January 19, 2023. 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 Agency-approved sources and will be documented prior to transport to the Site. Processed slag aggregate sourced from the Tradeport Atlantic property will be used as fill within the Site. Other materials approved by the Agencies for industrial use may also be used as fill, but the placement of materials other than approved clean fill will necessitate that the Site will be subject to surface engineering controls (i.e., capping). Fill sources shall be free of organic material, frozen material, or other deleterious material. In the case that there is excess material (not anticipated), the spoils will be stockpiled at a suitable location and dealt with in accordance with the Materials Management Plan for the Sparrows Point Facility (Jenkins Environmental, Inc., August 17, 2021). This work will be coordinated with Agencies accordingly. No excess material will leave the 3,100-acre property without prior approval from Agencies.

#### 4.2.3 Installation of Structures and Underground Utilities

The warehouse and other infrastructure associated with the development of Sub-Parcel B5-3 will be installed as shown on **Figure 2**. Soils relocated or removed during construction or utility trenches may be replaced on-site below the cap based on field observations by the Environmental Professional (EP). Additional protocols for soil monitoring during the installation of utilities at the Site are provided in Section 5.1.2. Any water removed will be sampled (if necessary) as described in Section 5.2 and (if acceptable) sent to the on-site Humphrey Creek Wastewater Treatment Plant (HCWWTP).

#### 4.2.4 Paving

As shown on **Figure 5** a significant portion of the Site will be covered with paving. The paved areas will receive a layer of subbase material which will consist of compacted aggregate base, which may include processed slag aggregate sourced from the Tradeport Atlantic property. The placement of processed slag aggregate or materials other than Agency-approved clean fill will necessitate that the Site will be subject to surface engineering controls (i.e., capping).

The required minimum thicknesses of all site-wide pavement sections which will serve as surface engineering controls are shown in the minimum capping section details provided in **Appendix E**. All paved areas at the Site will be installed with a minimum of 4 inches of compacted aggregate base and a minimum of 4 inches of overlying pavement surface (asphalt or concrete), which meet these required minimum thicknesses.

#### 4.2.5 Stormwater Management

New stormwater infrastructure will be installed throughout the Site and will discharge to the south of the Site, into the Pennwood Canal. As shown on **Figure 6**, the site-wide shallow groundwater elevations range from approximately 10 feet amsl (in the west) to 4 feet amsl (in the east). Utility excavations are expected to reach depths of approximately -2 feet amsl. Based on the shallow groundwater elevation measurements collected during the site-wide groundwater elevation investigation, excavations may encounter groundwater. Water removed for dewatering will be managed as described in Section 5.2.

The stormwater management systems for each parcel are reviewed and approved by Baltimore County for each individual development project.

## 5.0 DEVELOPMENT IMPLEMENTATION PROTOCOLS

### 5.1 DEVELOPMENT PHASE

This plan presents protocols for the handling of soils and fill materials in association with the development of Sub-Parcel B5-3. In particular, this plan highlights the minimum standards for construction practices and managing potentially contaminated materials to reduce potential risks to workers and the environment.

Several exceedances of the PALs were identified in soil samples across the Site. The PALs are set based on USEPA's RSLs for industrial soils, or other direct guidance from the MDE. Because PAL exceedances can present potential risks to human health and the environment at certain concentrations, this plan presents material management and other protocols to be followed during the work to adequately mitigate potential risks from such materials remaining on-site during the development phase. There were no locations in the proposed Site boundary with soil exceedances of the special management criteria for PCBs (50 mg/kg), lead (10,000 mg/kg), or TPH-GRO/Oil & Grease (6,200 mg/kg). DRO exceeded the criteria within soil sample B5-144-SB-4. NAPL was also observed at Phase II soil sample location B5-144-SB. A temporary NAPL screening piezometer was installed at boring location B5-144-SB. Gauging results showed that NAPL was not observed in the groundwater at this location. NAPL was not detected on the water table in any piezometers or monitoring wells within the proposed development area.

Following completion of the SLRA, the findings of the Construction Worker evaluation indicated that using the site-specific 70-day exposure frequency for the site-wide EU1-EXP, the screening level estimates of Construction Worker cancer risk were less than 1E-5 and no HI values above 1 were identified for any target organ system (the acceptable thresholds for no further action). Development activities at the Site are not expected exceed the allowable duration of 70 days, however Construction Worker risks will be mitigated to facilitate the proposed construction. Upgraded PPE beyond standard Level D protection will be used in conjunction with the HASP for the entire scope of intrusive work covered by this RADWP as a protective measure to ensure that there are no unacceptable exposures for Construction Workers during project implementation. The modified Level D PPE requirements which will be applied throughout this project, including specific PPE details, planning, tracking/supervision, enforcement, and documentation, are outlined in the PPE SOP provided as **Appendix C**.

Based on the characterization of surface and subsurface soils and the associated SLRA findings, surface engineering controls are an acceptable remedy to be protective of future adult Composite Workers. Tradeport Atlantic has proposed the use of processed slag aggregate as the primary fill material and pavement subbase within the Site. The placement of materials other than approved clean fill, such as slag aggregate, requires the installation of surface engineering controls (i.e., capping) regardless of the existing soil conditions. The proposed capping sections will meet the



required minimum thicknesses for surface engineering controls, which are provided in **Appendix E**.

### 5.1.1 Erosion/Sediment Control

Erosion and sediment controls will be installed prior to commencing work in accordance with the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. The erosion and sediment controls will be approved by the Agencies. In addition, the following measures will be taken to prevent contaminated soil from exiting the Site:

- Stabilized construction entrance will be placed at site entrance.
- A dry street sweeper will be used as necessary on adjacent roads, and the swept dust will be collected and properly managed.
- Accumulated sediment removed from silt fence, and sediment traps if applicable, shall be periodically removed and returned to the Site.

### 5.1.2 Soil Excavation and Utility Trenching

A pre-excavation meeting shall be held to address proper operating procedures for working on-site and monitoring excavations and utility trenching in potentially contaminated material. This meeting shall include the construction manager and the EP providing oversight on the project. During the meeting, the construction manager and the EP shall review the proposed excavation/trenching locations and any associated utility invert elevations. The construction manager will be responsible for conveying all relevant information regarding excavation/grading and/or utility work to the workers who will be involved with these activities. The HASP and PPE SOP for the project shall also be reviewed and discussed.

The EP will provide oversight of soil excavation/trenching activities as described in Section 5.6. Soil excavation/trenching will occur during various phases of construction. In general, and based on the existing sampling information, all excavated materials are expected to be suitable for replacement on the Site. However, the EP will monitor the soil excavation activities for signs of significantly contaminated material which may not be suitable for reuse (as described below). The EP will also be responsible for monitoring organic vapor concentrations in the worker breathing zone within utility trenches and excavations to determine whether any increased level of health and safety protection is required.

To the extent practical, all excavation activities should be conducted in a manner to minimize double or extra handling of materials. Stockpiles shall be stored in a location that is not subjected to concentrated stormwater runoff. Stockpiles shall be managed as necessary to prevent the erosion and off-site migration of stockpiled materials, and in accordance with the applicable provisions of the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. Soil designated for replacement on-site which does not otherwise exhibit evidence of contamination



(as determined by the EP) may be managed in large stockpiles (no size restriction) as long as they remain within the erosion and sediment controls.

A general utility cross section is provided as **Appendix F**. Additional preventative measures will be required if evidence of petroleum contamination is encountered, to prevent the discharge to, or migration of, petroleum product along a utility conduit. Contingency measures have been developed to ensure that utilities will be constructed in a manner that will prevent the migration of any encountered NAPL, and that excavated material will be properly managed. The Utility Excavation NAPL Contingency Plan (**Appendix G**) provides protocols to be followed if NAPL is encountered during the construction activities. Preventative measures to inhibit the spread of petroleum product will be conducted in accordance with this plan.

The EP will monitor all soil excavation and utility trenching activities for signs of potential contamination. In particular, soils will be monitored with a hand-held photoionization detector (PID) for potential VOCs and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of significant contamination. If there are no visual indications of potential contamination and no elevated PID detections, material removed from excavations/trenching can be re-used as backfill on-site. If screening of excavated materials by the EP indicates the presence of conditions of potential concern (i.e., sustained PID readings greater than 10 ppm, visual staining, unsuitable waste materials, etc.), such materials shall be segregated for additional sampling and special management.

Excavated material exhibiting evidence of significant contamination shall be placed in stockpiles (not to exceed 500 cubic yards) on polyethylene sheeting to minimize potential exposures and erosion when not in use. Materials stockpiled due to evidence of contamination will be sampled in accordance with reuse and/or waste disposal requirements and transported to an appropriate permitted disposal facility. Plans for analysis of segregated soils for any use other than disposal must be submitted to the Agencies for approval.

### 5.1.3 Soil Sampling and Disposal

Excavated materials that are determined by the EP to warrant sampling and analysis because of elevated PID readings or other indications of potential contamination shall be sampled and analyzed to determine how the materials should be managed. If excavated and stockpiled, such materials should be placed on a polyethylene or equivalent tarp to minimize potential exposures and erosion. All stockpiled soil may be considered for use as fill under surface engineering controls at this Site or on other areas of the TPA property depending on the analytical results.

Any soil that is generated from excavations/trenching that is not proposed (or suitable) for reuse within the subject parcel will be sampled to determine the suitability of the material for disposal. Soil material that is determined to be non-hazardous may be taken to an appropriate non-hazardous landfill (which may include Greys Landfill if approved by TPA) for proper disposal. Soil material

that is determined to be a hazardous waste shall be shipped off-site in accordance with applicable regulations to an appropriate and permitted RCRA disposal facility. A summary of sampling including a description of the material, estimated volume, and sampling parameters will be submitted to the Agencies. The quantities of all materials that require disposal, if any, will be recorded and identified in the Development Completion Report.

#### 5.1.4 Fill

Processed slag aggregate sourced from the Tradepoint Atlantic property will be used as the primary fill material for this project. The placement of processed slag aggregate or materials other than approved clean fill will necessitate that the Site will be subject to surface engineering controls (i.e., capping). Soil excavated on the Sub-Parcel has been determined to be suitable for re-use within the Site, unless such materials are determined by the Agencies to be unsuitable for use as outlined in Section 5.1.2 and Section 5.1.3.

All over-excavated utility trenches will be backfilled with material approved by the Agencies for industrial use. Backfill may include material removed from utility trenches unless such materials are identified by the EP as unsuitable due to elevated PID readings or other indications of potential contamination. As with structural fill, processed slag aggregate and other materials approved for industrial use can be used as backfill in utility trenches on the Site if the area will be covered by a VCP cap. Utility backfill which will extend into the cap (i.e., top 2 feet of backfill in landscaped areas) must meet the VCP clean fill requirements, and a geotextile marker fabric will be placed between the VCP clean fill and any underlying material. Materials permanently placed in areas outside of the Site boundary (i.e., within the temporary external construction worker areas outside of Sub-Parcel B5-3) must meet the VCP clean fill requirements or be otherwise approved by the Agencies prior to placement. A general utility detail drawing is provided as **Appendix F**. Material imported to the Site will be screened according to Agency guidance for suitability.

#### 5.1.5 Dust Control

General construction operations, including grading, will be performed at the Site. These activities are anticipated to be performed in areas of soil impacted with COPCs. Best management practices should be undertaken at the Tradepoint Atlantic property as a whole to prevent the generation of dust which could impact other areas of the property outside of the immediate work zone. To limit worker exposure to contaminants borne in dust and windblown particulates, dust monitoring will be performed during dust-generating activities.

The EP will be responsible for the Site dust monitoring program. This will consist of both monitoring for visible dust as well as real-time dust monitoring. If sustained visible dust is observed, the General Contractor will implement dust suppression methods to address dust levels at the Site. Such methods may include an increase in the frequency of water trucks spraying vehicle

routes, covering of material piles with plastic sheeting, or decreasing drop heights of material from excavation equipment.

Real-time dust monitoring will be implemented using Met One Instruments, Inc. E-Sampler dust monitors or equivalent real-time air monitoring devices will be utilized. Continuous dust monitoring will be performed in the work area as well as perimeter monitors at upwind and downwind locations based on the prevailing wind direction predicted for that day. The prevailing wind direction will be assessed during the day, and the positions of the perimeter monitors may be adjusted if there is a substantial shift in prevailing wind direction.

The action level for determining the need for implementing additional dust suppression methodologies is 3.0 milligrams per cubic meter ( $\text{mg}/\text{m}^3$ ). The lowest of the site-specific dust action levels, Occupational Safety and Health Administration Permissible Exposure Limit, and American Conference of Governmental Industrial Hygienists Threshold Limit Value was selected. If sustained dust concentrations exceed the action level ( $3.0 \text{ mg}/\text{m}^3$ ) at monitoring locations as a result of conditions occurring at the Site, operations will be stopped temporarily until additional dust suppression can be implemented. Operations may resume once monitoring indicates that dust concentrations are below the action level.

Once all dust-generating activities are complete, the dust monitoring program may be discontinued.

## 5.2 WATER MANAGEMENT

This plan presents the protocols for handling any groundwater or surface water that needs to be removed to facilitate construction of the proposed Sub-Parcel B5-3 development.

### 5.2.1 Groundwater PAL Exceedances

Groundwater samples were collected during the preceding Phase II Investigation and Supplemental Characterization Investigation from monitoring wells and piezometers within and surrounding the Site. Aqueous PAL exceedances in groundwater in the vicinity of the development LOD included both inorganics and organic compounds. The aqueous PAL exceedances are summarized on **Figure GW1**. There are no concerns related to potential VI risks/hazards at the Site.

While the concentrations of PAL exceedances are not deemed to be a significant human health hazard for future workers since there is no on-site groundwater use which could lead to direct exposures, proper water management is required during construction to prevent unacceptable discharges or risks to Construction Workers.

### 5.2.2 Dewatering

Dewatering may be necessary to facilitate the placement and compaction of structural fill as well as during ground intrusive work such as the installation of underground utilities or within

excavations/trenches. **Figure 6** displays the groundwater elevations underlying the Site for the shallow aquifer zone, based on prior investigation data. If dewatering is required during construction, it shall be done in accordance with all local, state, and federal regulations. Water that collects in excavations/trenches due to intrusion of groundwater, stormwater, and/or dust control waters will be managed via one of the following options:

- Transported to be treated at the HCWWTP, following any pretreatment necessary and discharged in accordance with NPDES Permit No. 90-DP-0064; Special Conditions; A.1, A.4, or A.6 (whichever is currently in effect); Effluent Limitations and Monitoring Requirements;
- Discharged to the Baltimore County sanitary sewer system;
- Discharged locally in accordance with the requirements of Special Condition AF, Section 2, Mobile Dewatering Collection and Treatment Unit of NPDES Permit No. 90-DP-0064; or
- Off-site disposal.

The Agencies will be notified which option is selected prior to the generation of groundwater. If water is sent to the HCWWTP via the Tin Mill Canal, trucking, or direct discharge to a drainage system that flows to the HCWWTP, applicable outfall dewatering fluids will be evaluated pursuant to the HCWWTP Constituent Threshold Limits for Dewatering Activities related to Remediation, Development, and Capping Protocol. Water discharged to the Tin Mill Canal (TMC) will also be pumped through a filter bag, weir frac tank, or equivalent to remove suspended solids prior to discharge.

| <u>Analysis</u>                                | <u>Threshold Levels</u> |
|--|-------------------------|
| • <u>Total metals by USEPA Method 6020A</u>    | <u>1,000 ppm</u>        |
| • <u>PCBs by USEPA Method 8082</u>             | <u>&gt;Non-Detect</u>   |
| • <u>SVOCs by USEPA Method 8270C</u>           | <u>1 ppm</u>            |
| • <u>VOCs by USEPA Method 8260B</u>            | <u>1 ppm</u>            |
| • <u>Oil &amp; Grease by USEPA Method 1664</u> | <u>200 ppm</u>          |
| • <u>TPH-DRO by USEPA Method 8015B</u>         | <u>200 ppm</u>          |
| • <u>TPH-GRO by USEPA Method 8015B</u>         | <u>200 ppm</u>          |

The EP will inspect water that collects in the excavations/trenches. If the water exhibits indications of significant contamination (e.g., sheen, odor, discoloration, presence of product), the water may also be sampled to confirm conditions. If the results of the analyses are above the threshold levels listed above, groundwater at the Site will be further evaluated to confirm acceptable treatment by the HCWWTP, or will be evaluated to design an appropriate pre-treatment option. Alternatively, the water may be disposed of at an appropriate off-site facility.

Documentation of water testing and the selected disposal option will be reported to the Agencies in the Development Completion Report. Associated permits or permit modifications related to dewatering will also be provided in the Development Completion Report.

### 5.3 HEALTH AND SAFETY

A property-wide HASP has been developed and is provided with this RADWP (as an electronic attachment) to present the minimum requirements for worker health and safety protection for all development projects. All contractors working on the Site may elect to adopt the property-wide HASP or may prepare their own HASP that provides a level of protection at least as much as that provided by the attached HASP.

General health and safety controls (level D protection) are adequate to mitigate potential risk to Construction Workers conducting ground intrusive activities for a duration of up to 70 exposure days. However, certain ground intrusive activities at the Site (utility installations for specific crews) may exceed the allowable duration. Therefore, modified Level D PPE will be used for the entire scope of intrusive work covered by this RADWP as a protective measure to ensure that there are no unacceptable exposures for Construction Workers during project implementation. Health and safety controls outlined in the HASP and PPE SOP will mitigate any potential risk to Construction Workers from contacting impacted soil and groundwater during development. The modified Level D PPE requirements planned for this development project, including specific PPE details, planning, tracking/supervision, enforcement, and documentation, are outlined in the PPE SOP provided as **Appendix C**. The EP will be responsible for monitoring organic vapor concentrations in the worker breathing zone within the utility trenches and excavations to determine whether any increased level of health and safety protection (including engineering controls and/or PPE) is required.

Prior to commencing work, the contractor must conduct an on-site safety meeting for all personnel. All personnel must be made aware of the HASP and the PPE SOP. Detailed safety information shall be provided to personnel who may be exposed to COPCs. Workers will be responsible for following established safety procedures to prevent contact with potentially contaminated material.

### 5.4 INSTITUTIONAL CONTROLS (FUTURE LAND USE CONTROLS)

Long-term conditions related to future use of the Site will be placed on the RADWP approval, NFA, and COC. These conditions are anticipated to include the following:

- A restriction prohibiting the use of groundwater for any purpose at the Site and a requirement to characterize, containerize, and properly dispose of groundwater in the event of excavations encountering groundwater.

- Notice to the Agencies at least 30 days prior to any future soil disturbances that are expected to breach the approved capping remedy (i.e., through the pavement cap or marker fabric in landscaped areas).
- Notice to the USEPA at least 30 days prior to any future soil disturbances that are expected to breach the approved capping remedy, only if the proposed duration of ground intrusive activity would exceed the allowable exposure duration determined in the SLRA and the contractor will not use the modified Level D PPE specified in the approved SOP.
- Requirement for a HASP in the event of any future excavations at the Site.
- Complete appropriate characterization and disposal of any material excavated/pumped at the Site in accordance with applicable local, state, and federal requirements.
- Implementation of inspection procedures and maintenance of the containment remedies.

The owner/operator will file the above deed restrictions as defined by the MDE-VCP in the NFA and COC.

## **5.5 POST REMEDIATION REQUIREMENTS**

Post remediation requirements will include compliance with the conditions specified in the NFA, COC, and the deed restrictions recorded for the Site. Deed restrictions will be recorded within 30 days after receipt of the final NFA. In addition, the Agencies will be provided with a written notice of any future excavations (as applicable) in accordance with the requirements given in Section 5.5. Written notice of planned excavation activities will include the proposed date(s) for the excavation, location of the excavation, health and safety protocols (as required), clean fill source (as required), and proposed characterization and disposal requirements. Written notice may consist of email correspondence and/or hard copy correspondence.

Additional requirements will include inspection procedures and maintenance of the containment remedies to minimize degradation which could lead to future exposures. An O&M Plan will be submitted for Agency approval and will include long-term inspection and maintenance requirements for the capped areas of the Site. The responsible party will perform cap inspections, perform maintenance of the cap, and retain inspection records, as required by the O&M Plan.

## **5.6 CONSTRUCTION OVERSIGHT**

Construction Oversight by an EP will ensure and document that the project is built as designed and appropriate environmental and safety protocols are followed. Upon completion, the EP will certify that the project is constructed in accordance with this RADWP.

The EP will monitor all soil excavation and utility trenching activities for signs of contamination that may indicate materials that are not suitable for reuse. In particular, soils will be monitored



with a hand-held PID for potential VOC impacts, and will also be visually inspected for staining, petroleum waste materials, or other indications of significant contamination. If screening of excavated materials by the EP indicates the presence of conditions of potential concern (i.e., sustained PID readings greater than 10 ppm, visual staining, unsuitable waste materials, etc.), such materials shall be segregated for additional sampling and special management (as described in Section 5.1.2; Soil Excavation and Utility Trenching). The EP will also perform routine periodic breathing zone monitoring and PPE spot checks during ground intrusive activities. The EP will also inspect any water that collects in the excavations/trenches on an as-needed basis to coordinate appropriate sampling prior to disposal (as described in Section 5.2.2; Dewatering).

Daily inspections, as necessary, will be performed during general site grading and cap construction activities to verify that appropriate fill materials are being used (as described in Section 5.1.4; Fill), dust monitoring and control measures are being implemented as appropriate (as described in Section 5.1.5; Dust Control), the requirements of the HASP and the PPE SOP are being enforced by the designated Site Safety Officer (as described in Section 5.4; Health and Safety), and surface engineering controls are being installed with the appropriate thicknesses (shown on the RADWP attachments). Oversight by an EP will not be required during construction activities which do not have a significant environmental component, such as above-grade construction.

Records will be developed by the EP to document:

- Compliance with soil screening requirements;
- Proper water management, including documentation of any testing and water disposal;
- Observations of construction activities during site grading and cap construction; and
- Proper cap thickness and construction.

## 6.0 PERMITS, NOTIFICATIONS AND CONTINGENCIES

The participant and their contractors will comply with all local, state, and federal laws and regulations by obtaining any necessary approvals and permits to conduct the activities contained herein. Any permits or permit modifications from State or local authorities will be provided as addenda to this RADWP.

A grading permit is required if the proposed grading disturbs over 5,000 square feet of surface area or over 100 cubic yards of earth. A grading permit is required for any grading activities in any watercourse, floodplain, wetland area, buffers (stream and within 100 feet of tidal water), habitat protection areas or forest buffer areas (includes forest conservation areas). Based on the scope of proposed earth disturbance, a grading permit is required as part of this development project. Erosion and Sediment Control Plans will be submitted to, and approved by, the Agencies prior to initiation of land disturbance for development.

Contingency measures will include the following:

1. The Agencies will be notified immediately of any previously undiscovered contamination, previously undiscovered storage tanks and other oil-related issues, and citations from regulatory entities related to health and safety practices.
2. Any significant change to the implementation schedule will be noted in the progress reports to Agencies.
3. Modified Level D PPE will be used for the entire scope of ground intrusive work covered by this RADWP as a protective measure to ensure that there are no unacceptable exposures for Construction Workers during project implementation. The modified Level D PPE requirements which will be applied during this project are outlined in the PPE SOP provided as **Appendix C**. If it is not possible to implement the PPE SOP as provided, the agencies will be notified and a RADWP Addendum will be submitted to detail any appropriate mitigative measures.



## 7.0 IMPLEMENTATION SCHEDULE

Progress reports will be submitted to the Agencies on a quarterly basis. Each quarterly progress report will include, at a minimum, a discussion of the following information regarding tasks completed during the specified quarter:

- Development Progress
- Soil Management (imported materials, screening, stockpiling)
- Soil Sampling and Disposal
- Water Management
- Dust Monitoring
- Notable Occurrences (if applicable)
- Additional Associated Work (if applicable)

The proposed implementation schedule is shown below:

| <b><u>Task</u></b>   | <b><u>Proposed Completion Date</u></b>                               |
|--|--|
| Anticipated RADWP Approval   | September 2023   |
| <b><i>Development:</i></b>   |  |
| Installation of Erosion and Sediment Controls  | Complete   |
| Slag (or Alternative Fill) Delivery and Placement  | Complete   |
| Site Preparation / Grading   | Complete   |
| Utility Installations  | September 2023 (start)   |
| Submittal of Development Completion Report/<br>Notice of Completion of Remedial Actions*   | March 2025   |
| Request for NFA from the Agencies  | March 2025   |
| Recordation of institutional controls in<br>the land records office of Baltimore<br>County | Within 30 days of receiving the<br>approval of NFA from the Agencies |

Submit proof of recordation with  
Baltimore County

Upon receipt from Baltimore County

\*Notice of Completion of Remedial Actions will be prepared by Professional Engineer registered in Maryland and submitted with the Development Completion Report to certify that the work is consistent with the requirements of this RADWP and the Site is suitable for occupancy and use.

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## **FIGURES**

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**LEGEND**

- B5-3 Site Boundary
- Site Boundary
- Parcel Boundaries
- Private Property



**Tradepoint Atlantic  
Area A and Area B Parcels**

July 20, 2023

**Figure**

**1**



**ARM Group LLC**  
Engineers and Scientists

0 500 1,000 2,000  
Feet

Tradepoint Atlantic

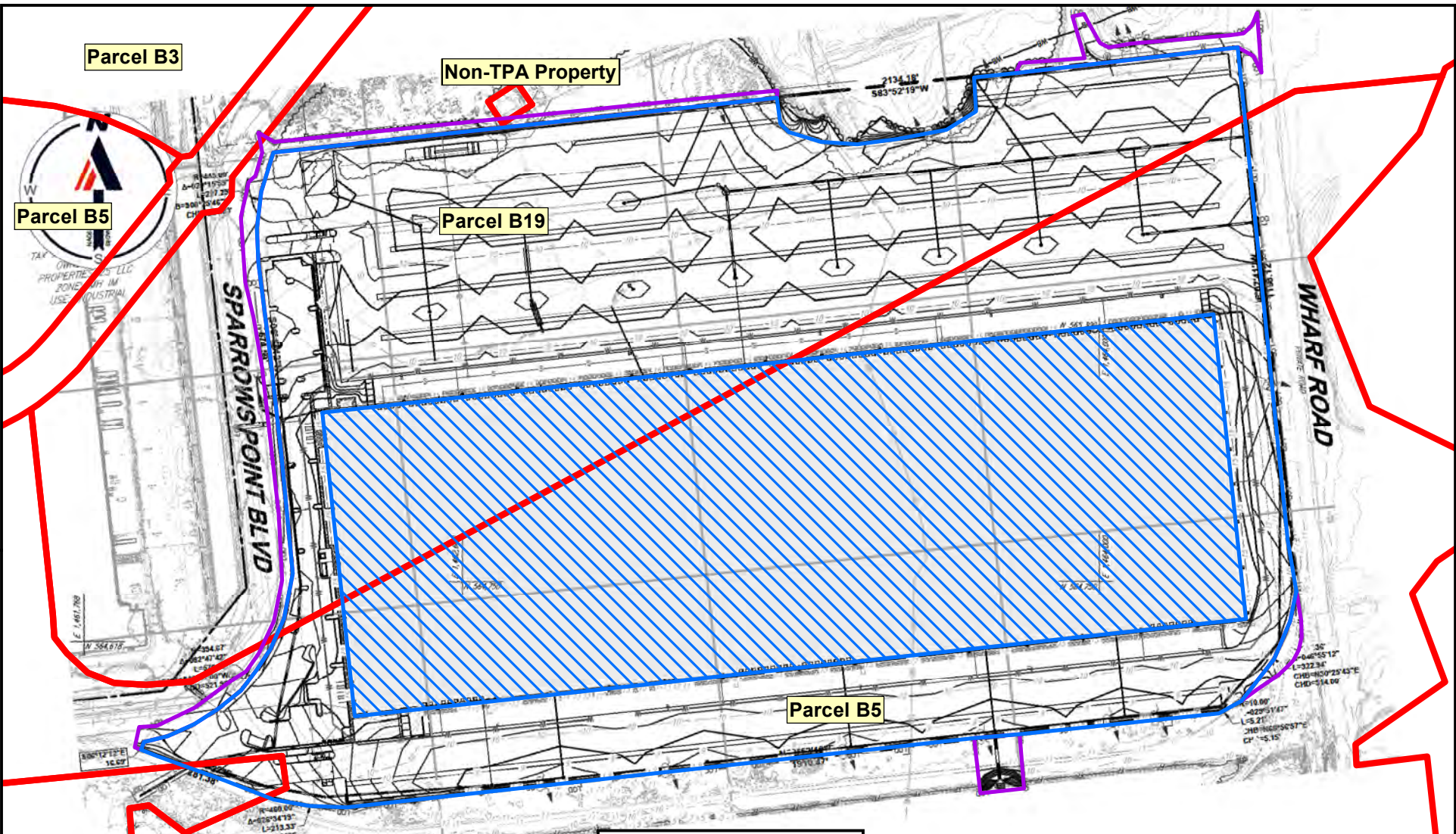
Sparrows Point

Baltimore County, MD





Area A: Project 210101  
Area B: Project 210102



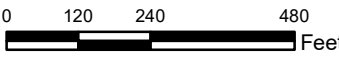


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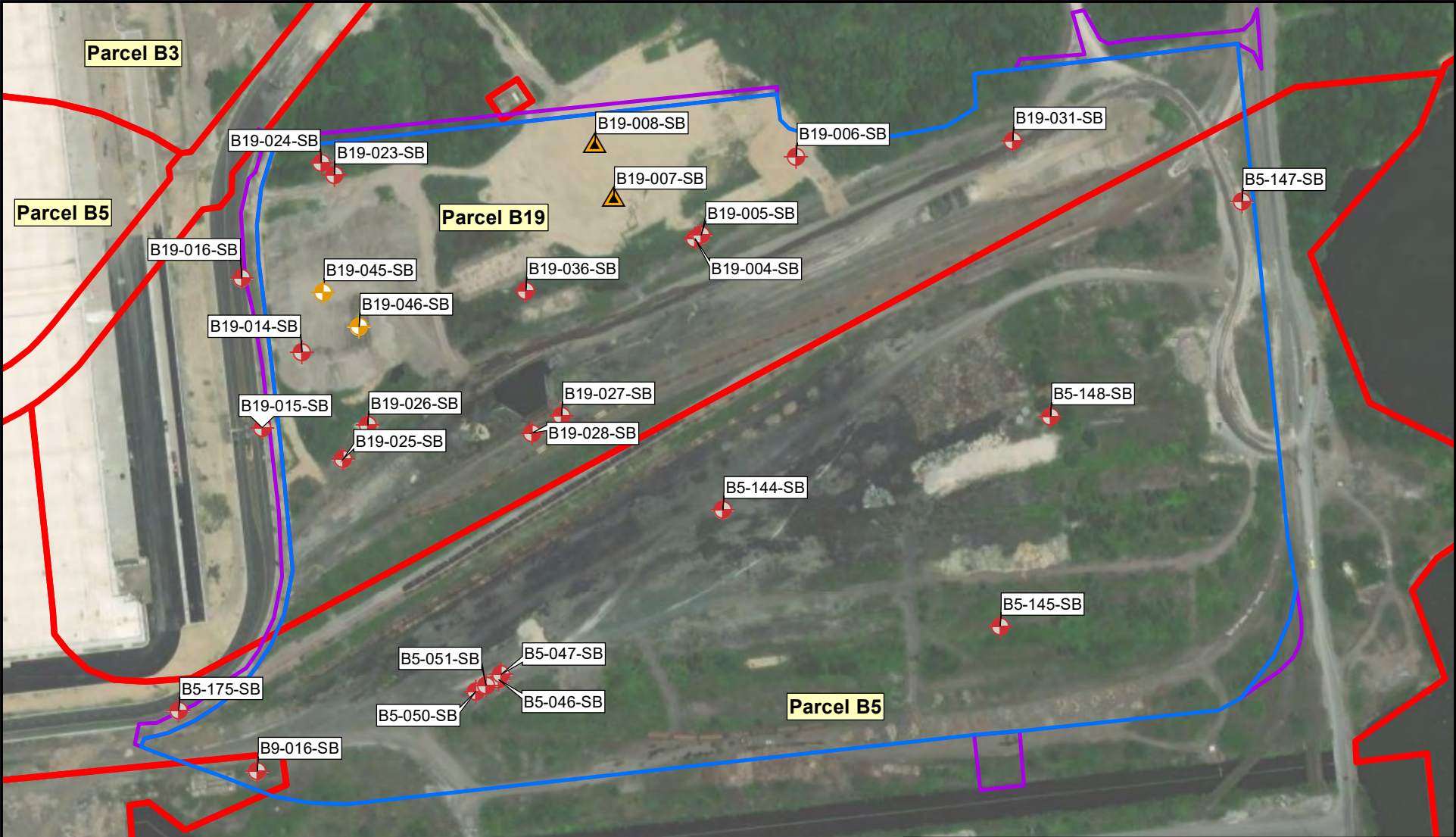
**LEGEND**

-  B5-3 Building
-  Site Boundary
-  External Construction Worker Area
-  Parcel Boundary

|   |  |                             |
|---|--|-----------------------------|
| <p>Sub-Parcel B5-3<br/>Proposed Grading Plan<br/>July 17, 2023</p>                    |  | <p>Figure<br/><b>2</b></p>  |
|  |  <p><b>ARM Group LLC</b><br/>Engineers and Scientists</p> | <p>Tradepoint Atlantic</p>  |
|   |  | <p>Sparrows Point</p>       |
|   |  | <p>Baltimore County, MD</p> |
|   |  | <p>ARM Project 21010205</p> |
|   |   |                             |



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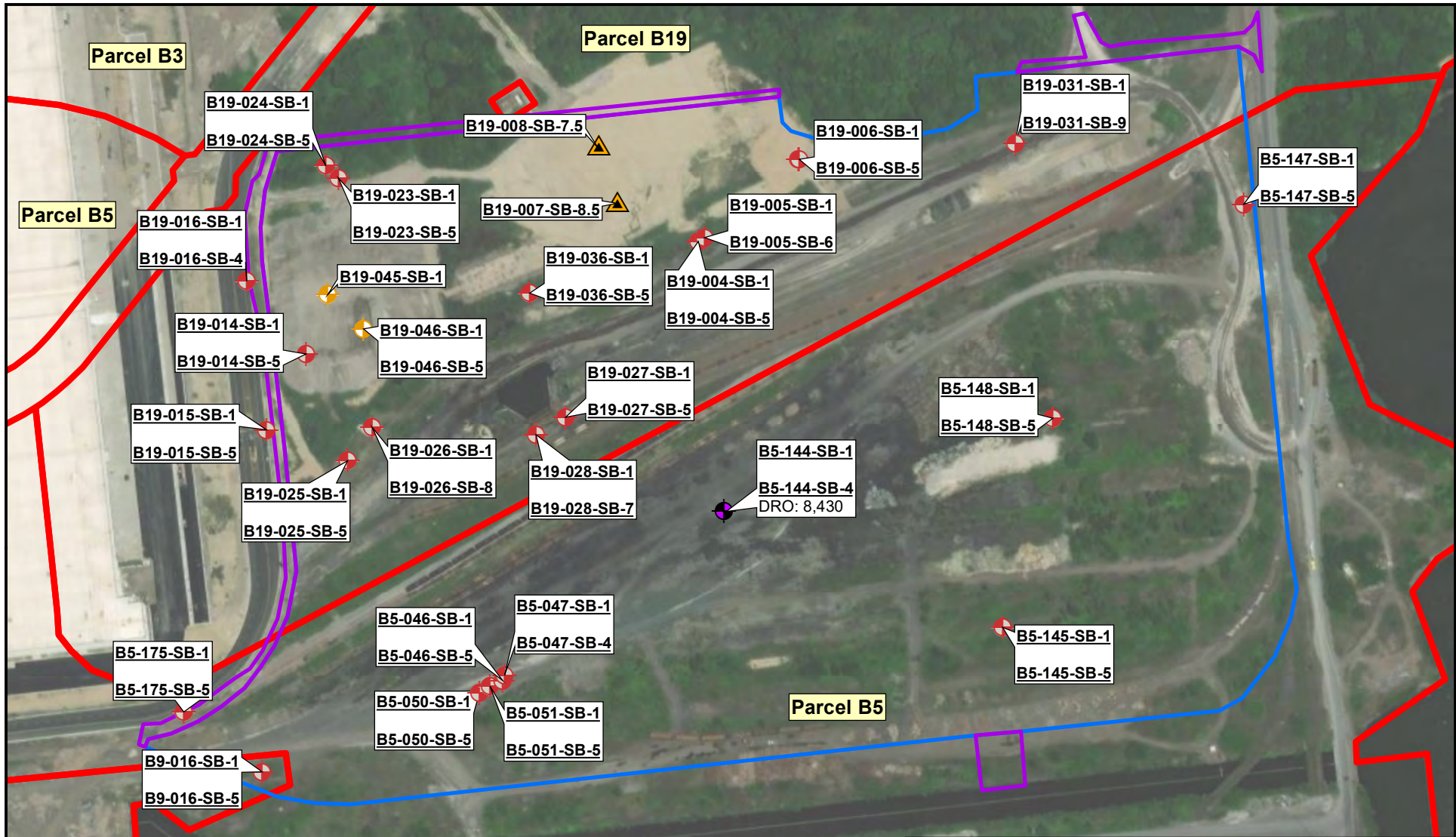
**LEGEND**

|                          |                                   |
|--------------------------|-----------------------------------|
| Phase II Soil Boring     | Site Boundary                     |
| Phase II Test Pit        | External Construction Worker Area |
| Supplemental Soil Boring | Parcel Boundary                   |

|   |                      |                     |
|---|----------------------|---------------------|
| <b>Sub-Parcel B5-3<br/>Soil Boring Locations</b><br>July 20, 2023 |                      | <b>Figure<br/>3</b> |
| <br><br><b>ARM Group LLC</b><br>Engineers and Scientists          | Tradepoint Atlantic  |                     |
|   | Sparrows Point       |                     |
|   | Baltimore County, MD |                     |
|   | ARM Project 21010205 |                     |



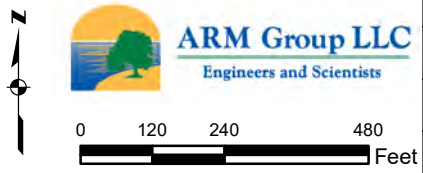
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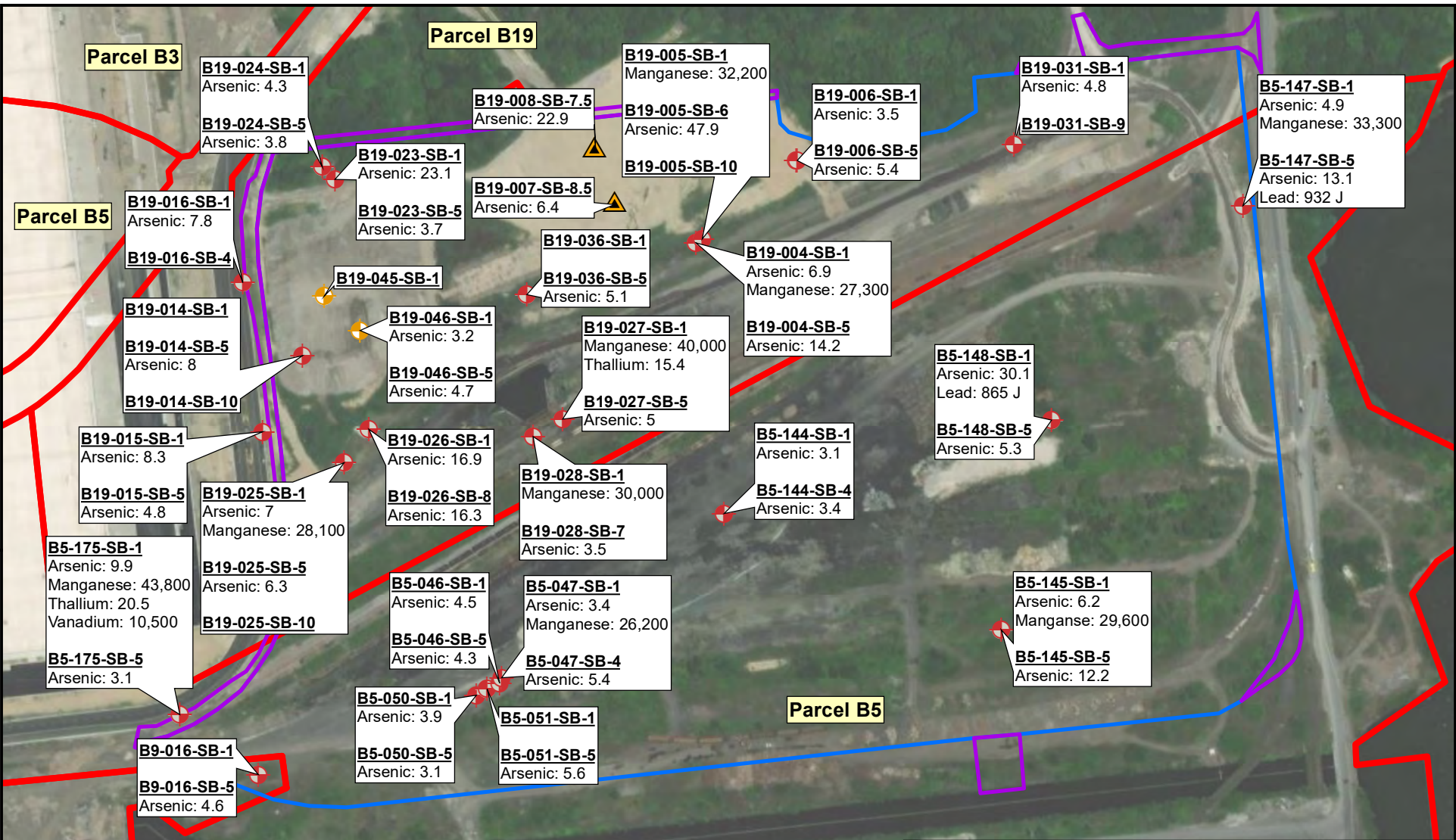
|                          |                                   |
|--------------------------|-----------------------------------|
| Phase II Soil Boring     | Site Boundary                     |
| Supplemental Soil Boring | External Construction Worker Area |
| Phase II Test Pit        | Parcel Boundary                   |
| Soil Boring (NAPL)       |                                   |

|  |  |                      |
|--|--|----------------------|
| <b>Sub-Parcel B5-3 Soil<br/>TPH PAL Exceedances (mg/kg)</b><br>July 20, 2023 |  | <b>Figure<br/>S1</b> |
| <br><b>ARM Group LLC</b><br>Engineers and Scientists                         |  |                      |
| Tradepoint Atlantic<br>Sparrows Point<br>Baltimore County, MD                |  |                      |
| ARM Project 21010205   |  |                      |



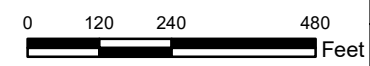


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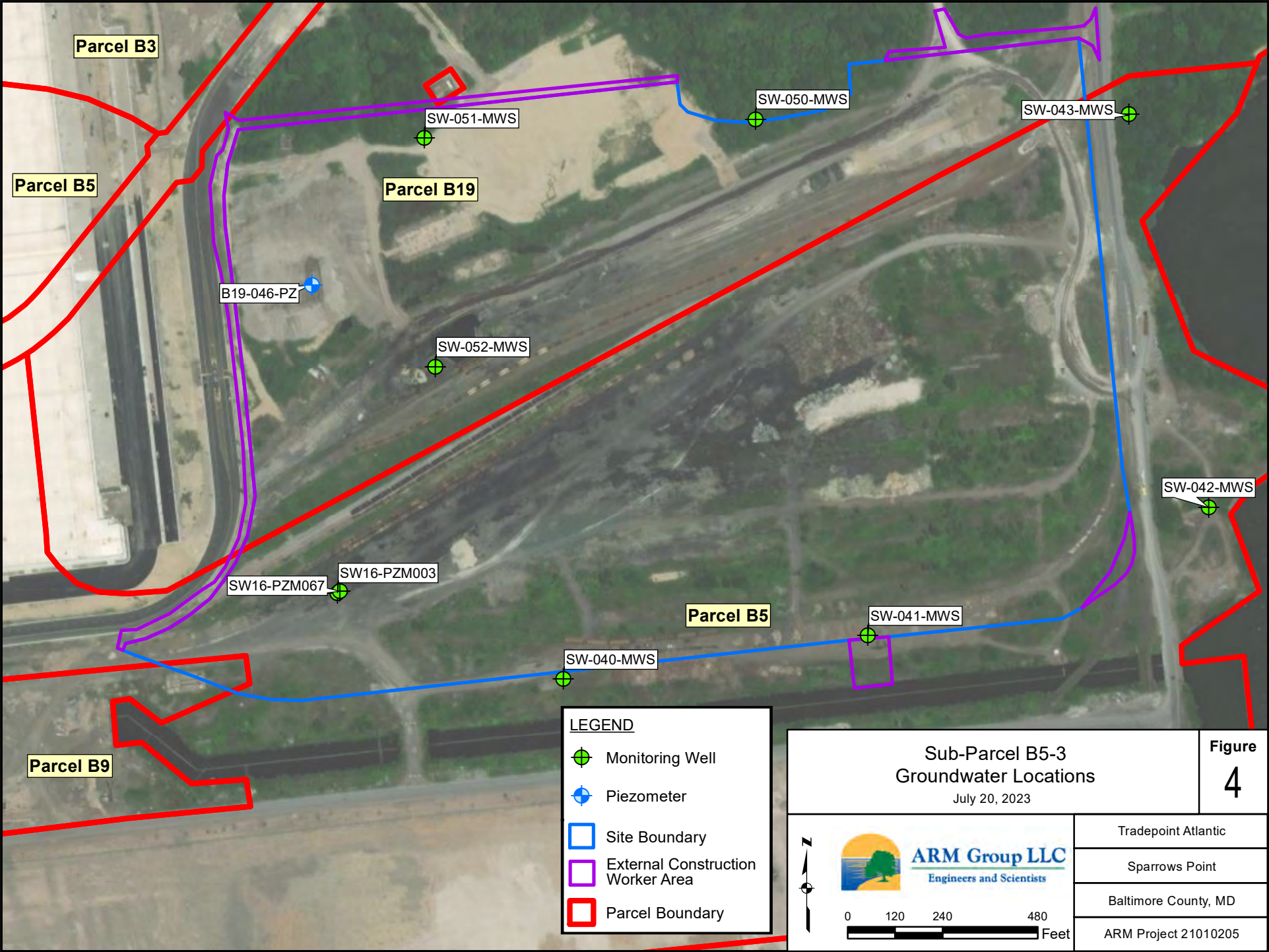
| LEGEND |                                   |
|--------|-----------------------------------|
|        | Phase II Soil Boring              |
|        | Phase II Test Pit                 |
|        | Supplemental Soil Boring          |
|        | Site Boundary                     |
|        | External Construction Worker Area |
|        | Parcel Boundary                   |

|  |  |  |
|--|--|--|
| <b>Sub-Parcel B5-3 Soil</b><br><b>Inorganic PAL Exceedances (mg/kg)</b><br>July 20, 2023 |  | <b>Figure</b><br><span style="font-size: 2em;">S2</span> |
| <b>ARM Group LLC</b><br>Engineers and Scientists   |  |  |
| Tradepoint Atlantic<br>Sparrows Point<br>Baltimore County, MD                            |  |  |
| ARM Project 21010205   |  |  |










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**LEGEND**

-  Monitoring Well
-  Piezometer
-  Site Boundary
-  External Construction Worker Area
-  Parcel Boundary

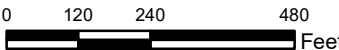
**Sub-Parcel B5-3  
Groundwater Locations**  
July 20, 2023

**Figure  
4**





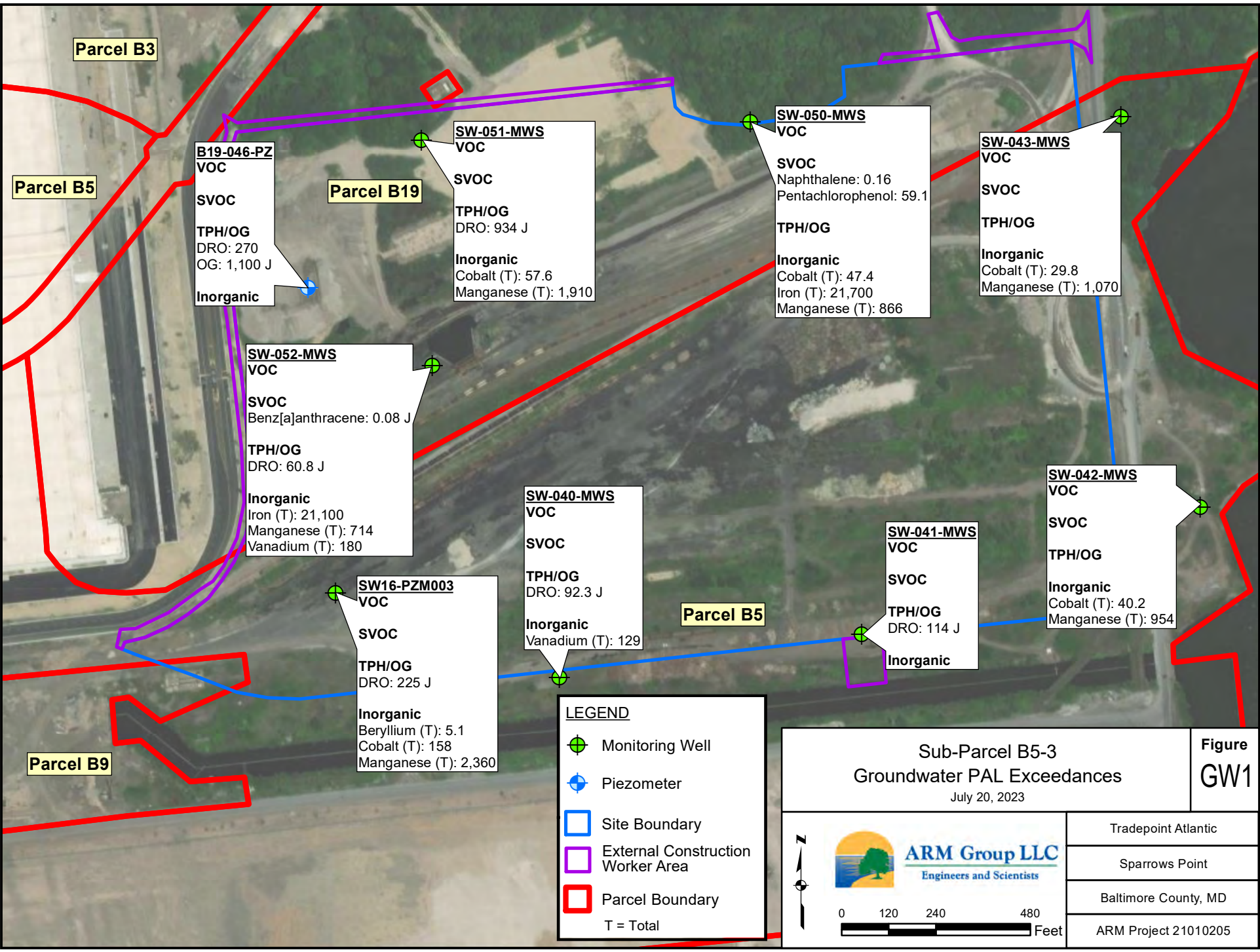
**ARM Group LLC**  
Engineers and Scientists



|                      |
|----------------------|
| Tradepoint Atlantic  |
| Sparrows Point       |
| Baltimore County, MD |
| ARM Project 21010205 |



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**B19-046-PZ**  
**VOC**  
 SVOC  
 TPH/OG  
 DRO: 270  
 OG: 1,100 J  
**Inorganic**

**SW-052-MWS**  
**VOC**  
 SVOC  
 Benz[a]anthracene: 0.08 J  
 TPH/OG  
 DRO: 60.8 J  
**Inorganic**  
 Iron (T): 21,100  
 Manganese (T): 714  
 Vanadium (T): 180

**SW16-PZM003**  
**VOC**  
 SVOC  
 TPH/OG  
 DRO: 225 J  
**Inorganic**  
 Beryllium (T): 5.1  
 Cobalt (T): 158  
 Manganese (T): 2,360

**SW-051-MWS**  
**VOC**  
 SVOC  
 TPH/OG  
 DRO: 934 J  
**Inorganic**  
 Cobalt (T): 57.6  
 Manganese (T): 1,910

**SW-040-MWS**  
**VOC**  
 SVOC  
 TPH/OG  
 DRO: 92.3 J  
**Inorganic**  
 Vanadium (T): 129

**SW-050-MWS**  
**VOC**  
 SVOC  
 Naphthalene: 0.16  
 Pentachlorophenol: 59.1  
 TPH/OG  
**Inorganic**  
 Cobalt (T): 47.4  
 Iron (T): 21,700  
 Manganese (T): 866

**SW-043-MWS**  
**VOC**  
 SVOC  
 TPH/OG  
**Inorganic**  
 Cobalt (T): 29.8  
 Manganese (T): 1,070

**SW-041-MWS**  
**VOC**  
 SVOC  
 TPH/OG  
 DRO: 114 J  
**Inorganic**

**SW-042-MWS**  
**VOC**  
 SVOC  
 TPH/OG  
**Inorganic**  
 Cobalt (T): 40.2  
 Manganese (T): 954

**LEGEND**

- Monitoring Well
- Piezometer
- Site Boundary
- External Construction Worker Area
- Parcel Boundary

T = Total

**Sub-Parcel B5-3**  
**Groundwater PAL Exceedances**  
 July 20, 2023

**Figure**  
**GW1**

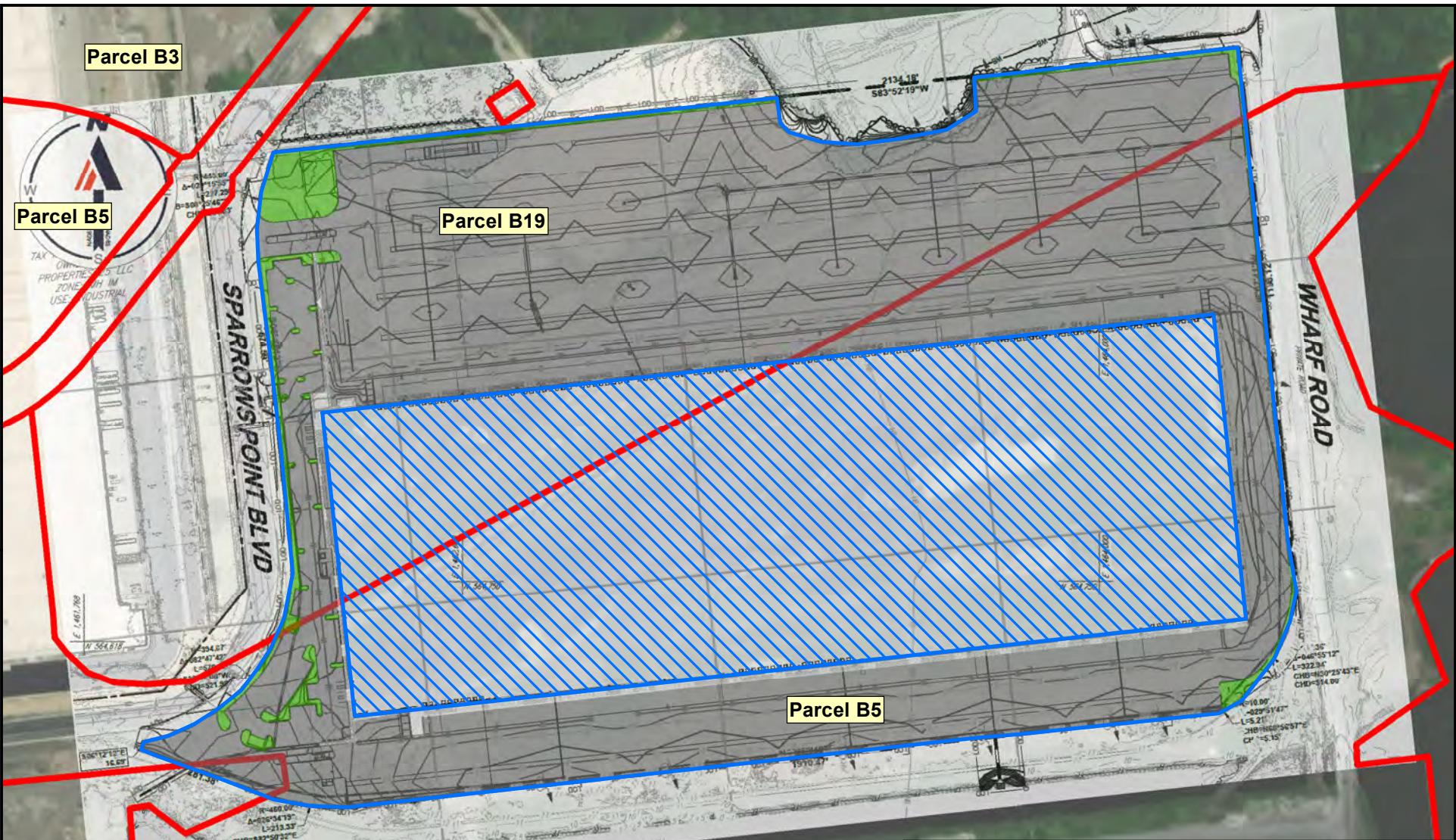
**ARM Group LLC**  
 Engineers and Scientists

0 120 240 480  
 Feet







|                      |
|----------------------|
| Tradepoint Atlantic  |
| Sparrows Point       |
| Baltimore County, MD |
| ARM Project 21010205 |


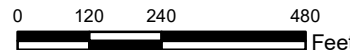



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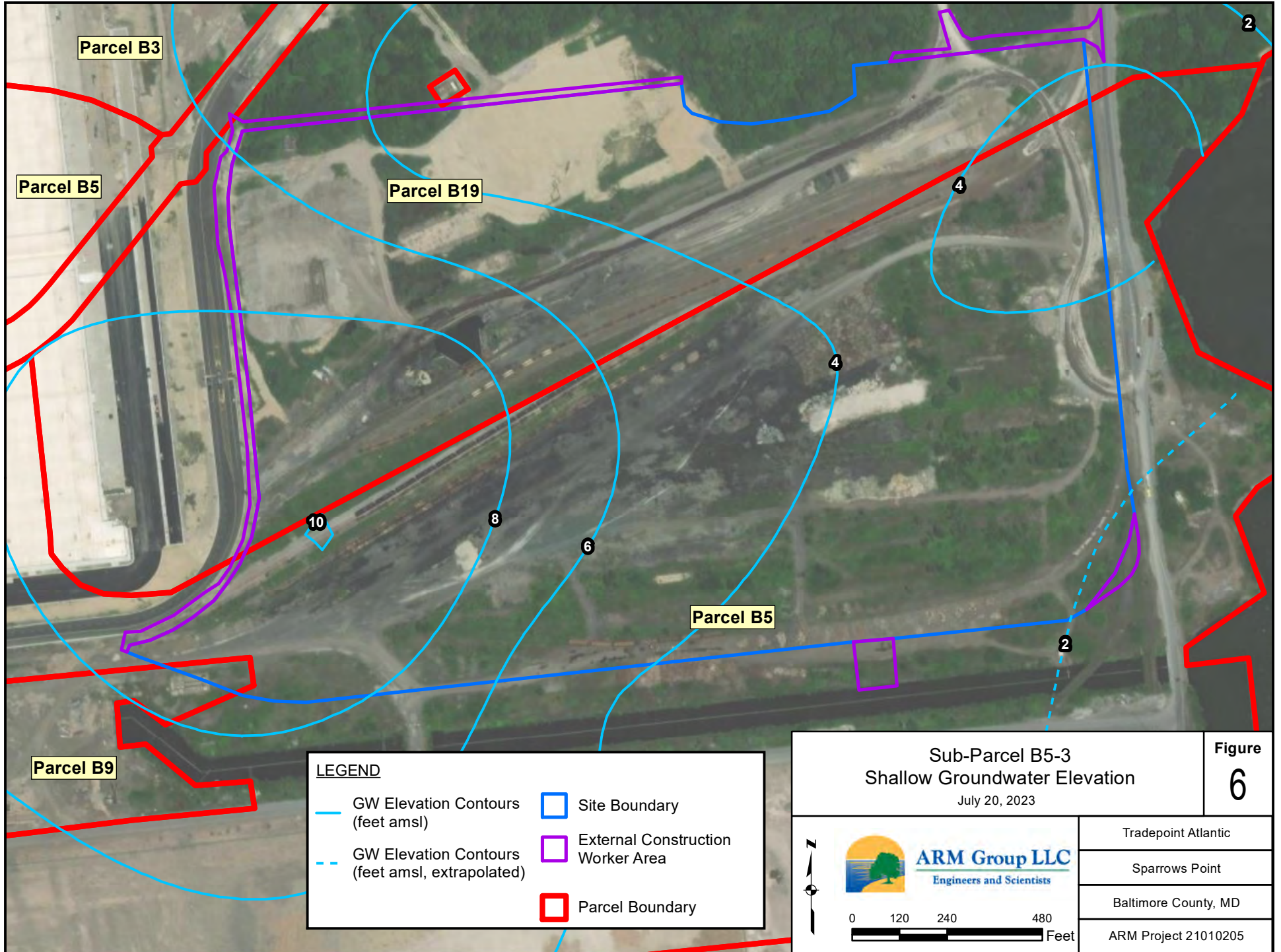
**LEGEND**

|   |                 |   |   |         |
|---|-----------------|---|---|---------|
|  | Building Cap    | <b>Cap Type</b>   |  | Asphalt |
|  | Site Boundary   |  | Concrete  |         |
|  | Parcel Boundary |  | Landscape   |         |

|  |  |   |
|--|--|---|
| <b>Sub-Parcel B5-3</b><br><b>Proposed Capping Plan</b><br>July 21, 2023  |  | <b>Figure</b><br><span style="font-size: 2em;">5</span> |
| <br> |  <b>ARM Group LLC</b><br>Engineers and Scientists |   |
|  | Tradepoint Atlantic  |   |
|  | Sparrows Point   |   |
|  | Baltimore County, MD<br>ARM Project 21010205   |   |



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**LEGEND**

- GW Elevation Contours (feet amsl)
- - - GW Elevation Contours (feet amsl, extrapolated)
- Site Boundary
- External Construction Worker Area
- Parcel Boundary

|  |   |  |
|--|---|--|
| <p><b>Sub-Parcel B5-3</b><br/> <b>Shallow Groundwater Elevation</b><br/>         July 20, 2023</p> |   | <p><b>Figure</b><br/> <span style="font-size: 2em;">6</span></p> |
|  | <p><b>ARM Group LLC</b><br/>         Engineers and Scientists</p> |  |
|  | <p>Tradepoint Atlantic</p>  |  |
|  | <p>Sparrows Point</p>   |  |
|  | <p>Baltimore County, MD</p>                                       |  |
| <p>ARM Project 21010205</p>  |   |  |

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## **TABLES**

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**Table 1 - Sub-Parcel B5-3  
Summary of Organics Detected in Soil**

| Parameter  | Units | PAL     | B19-004-SB-1    | B19-004-SB-5     | B19-005-SB-1    | B19-005-SB-6    | B19-006-SB-1*   | B19-006-SB-5*    | B19-007-SB-8.5* | B19-008-SB-7.5* | B19-014-SB-1    | B19-014-SB-5 | B19-015-SB-1    | B19-015-SB-5     | B19-016-SB-1    | B19-016-SB-4    |
|--|-------|---------|-----------------|------------------|-----------------|-----------------|-----------------|------------------|-----------------|-----------------|-----------------|--------------|-----------------|------------------|-----------------|-----------------|
|  |       |         | 10/13/2016      | 10/13/2016       | 10/13/2016      | 10/13/2016      | 1/9/2017        | 1/9/2017         | 1/18/2017       | 1/18/2017       | 9/22/2016       | 9/22/2016    | 9/22/2016       | 9/22/2016        | 9/22/2016       | 9/22/2016       |
| <b>Volatile Organic Compounds</b>                  |       |         |                 |                  |                 |                 |                 |                  |                 |                 |                 |              |                 |                  |                 |                 |
| 2-Butanone (MEK)                                   | mg/kg | 190,000 | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Acetone  | mg/kg | 670,000 | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Benzene  | mg/kg | 5.1     | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Ethylbenzene                                       | mg/kg | 25      | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Isopropylbenzene                                   | mg/kg | 9,900   | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Toluene  | mg/kg | 47,000  | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| Xylenes  | mg/kg | 2800    | N/A             | N/A              | N/A             | N/A             | N/A             | N/A              | N/A             | N/A             | N/A             | N/A          | N/A             | N/A              | N/A             | N/A             |
| <b>Semi-Volatile Organic Compounds<sup>^</sup></b> |       |         |                 |                  |                 |                 |                 |                  |                 |                 |                 |              |                 |                  |                 |                 |
| 1,1-Biphenyl                                       | mg/kg | 200     | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 U         | 0.083 U      | 0.078 U         | 0.079 U          | 0.072 U         | 0.077 U         |
| 2,4-Dimethylphenol                                 | mg/kg | 16,000  | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | <b>0.022 J</b>  | 0.076 U         | 0.083 U      | 0.078 R         | 0.079 U          | 0.072 U         | 0.077 UJ        |
| 2,4-Dinitrophenol                                  | mg/kg | 1,600   | 0.18 UJ         | 0.21 UJ          | 0.17 UJ         | 0.22 UJ         | 0.2 U           | 0.2 U            | 0.19 U          | 0.21 U          | 0.19 UJ         | 0.21 UJ      | 0.2 R           | 0.2 UJ           | 0.18 UJ         | 0.19 UJ         |
| 2,6-Dinitrotoluene                                 | mg/kg | 1.5     | 0.072 U         | 0.082 U          | 0.07 U          | <b>0.13</b>     | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 U         | 0.083 U      | 0.078 U         | 0.079 U          | 0.072 U         | 0.077 U         |
| 2-Chloronaphthalene                                | mg/kg | 60,000  | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 U         | 0.083 U      | 0.078 U         | 0.079 U          | 0.072 U         | 0.077 U         |
| 2-Methylnaphthalene                                | mg/kg | 3,000   | <b>0.0095</b>   | <b>0.0059 J</b>  | <b>0.012</b>    | <b>0.025</b>    | <b>0.0027 J</b> | 0.0082 U         | 0.0076 U        | <b>0.003 J</b>  | 0.076 U         | 0.0084 U     | <b>0.0058 J</b> | 0.008 U          | <b>0.0099</b>   | <b>0.0069 J</b> |
| Acenaphthene                                       | mg/kg | 45,000  | <b>0.0022 J</b> | <b>0.0016 J</b>  | <b>0.003 J</b>  | <b>0.0036 J</b> | 0.0079 U        | 0.0082 U         | 0.0076 U        | <b>0.0014 J</b> | 0.076 U         | 0.0084 U     | <b>0.0031 J</b> | 0.008 U          | <b>0.0035 J</b> | <b>0.0018 J</b> |
| Acenaphthylene                                     | mg/kg | 45,000  | <b>0.0029 J</b> | <b>0.00078 J</b> | <b>0.0045 J</b> | <b>0.0058 J</b> | <b>0.001 J</b>  | 0.0082 U         | 0.0076 U        | <b>0.0018 J</b> | 0.076 U         | 0.0084 U     | <b>0.0025 J</b> | 0.008 U          | <b>0.014</b>    | <b>0.0018 J</b> |
| Anthracene   | mg/kg | 230,000 | <b>0.0059 J</b> | <b>0.0017 J</b>  | <b>0.0093</b>   | <b>0.013</b>    | <b>0.0018 J</b> | 0.0082 U         | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.0088</b>   | 0.008 U          | <b>0.03</b>     | <b>0.002 J</b>  |
| Benz[a]anthracene                                  | mg/kg | 21      | <b>0.021</b>    | <b>0.0072 J</b>  | <b>0.033</b>    | <b>0.039</b>    | <b>0.0071 J</b> | <b>0.0013 J</b>  | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.029</b>    | 0.008 U          | <b>0.12</b>     | <b>0.0072 J</b> |
| Benzaldehyde                                       | mg/kg | 120,000 | 0.072 R         | 0.082 R          | <b>0.019 J</b>  | <b>0.026 J</b>  | <b>0.047 J</b>  | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 R         | 0.083 R      | 0.078 R         | 0.079 R          | 0.072 R         | 0.077 R         |
| Benzo[a]pyrene                                     | mg/kg | 2.1     | <b>0.023 J</b>  | 0.0054 B         | <b>0.035</b>    | <b>0.044</b>    | <b>0.0058 J</b> | 0.0082 U         | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.024</b>    | 0.008 U          | <b>0.11</b>     | <b>0.0064 J</b> |
| Benzo[b]fluoranthene                               | mg/kg | 21      | <b>0.056 J</b>  | <b>0.011</b>     | <b>0.077</b>    | <b>0.078</b>    | <b>0.0086</b>   | 0.0082 U         | 0.0076 U        | 0.0085 U        | <b>0.018 J</b>  | 0.0084 U     | <b>0.045</b>    | 0.008 U          | <b>0.32</b>     | <b>0.015</b>    |
| Benzo[g,h,i]perylene                               | mg/kg |         | <b>0.02 J</b>   | <b>0.0041 J</b>  | <b>0.033</b>    | <b>0.031</b>    | <b>0.0053 J</b> | 0.0082 U         | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.01</b>     | 0.008 U          | <b>0.045</b>    | <b>0.0026 J</b> |
| Benzo[k]fluoranthene                               | mg/kg | 210     | <b>0.054 J</b>  | <b>0.011</b>     | <b>0.074</b>    | <b>0.075</b>    | <b>0.0043 J</b> | 0.0082 U         | 0.0076 U        | 0.0085 U        | <b>0.014 J</b>  | 0.0084 U     | <b>0.036</b>    | 0.008 U          | <b>0.26</b>     | <b>0.012</b>    |
| bis(2-Ethylhexyl)phthalate                         | mg/kg | 160     | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 UJ        | 0.083 UJ     | 0.078 UJ        | 0.079 UJ         | 0.072 UJ        | 0.077 UJ        |
| Carbazole  | mg/kg |         | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 UJ        | 0.083 UJ     | 0.078 UJ        | 0.079 UJ         | <b>0.023 J</b>  | 0.077 UJ        |
| Chrysene   | mg/kg | 2,100   | <b>0.036</b>    | 0.0061 B         | <b>0.049</b>    | <b>0.053</b>    | <b>0.007 J</b>  | 0.0082 U         | 0.0076 U        | 0.0085 U        | <b>0.0082 J</b> | 0.0084 U     | <b>0.039</b>    | 0.008 U          | <b>0.17</b>     | <b>0.0062 J</b> |
| Dibenz[a,h]anthracene                              | mg/kg | 2.1     | <b>0.006 J</b>  | 0.0081 U         | <b>0.0093</b>   | <b>0.0097</b>   | 0.0079 U        | 0.0082 U         | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.004 J</b>  | 0.008 U          | <b>0.019</b>    | 0.0076 U        |
| Diethylphthalate                                   | mg/kg | 660,000 | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | <b>0.2</b>      | 0.076 U         | 0.083 U      | 0.078 U         | 0.079 U          | 0.072 U         | 0.077 U         |
| Di-n-butylphthalate                                | mg/kg | 82,000  | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 UJ        | 0.083 UJ     | 0.078 UJ        | 0.079 UJ         | 0.072 UJ        | 0.077 UJ        |
| Fluoranthene                                       | mg/kg | 30,000  | <b>0.03</b>     | <b>0.011</b>     | <b>0.074</b>    | <b>0.077</b>    | <b>0.014</b>    | <b>0.00099 J</b> | 0.0076 U        | 0.0085 U        | <b>0.011 J</b>  | 0.0084 U     | <b>0.058</b>    | <b>0.00084 J</b> | <b>0.26</b>     | <b>0.013</b>    |
| Fluorene   | mg/kg | 30,000  | <b>0.001 J</b>  | <b>0.0013 J</b>  | <b>0.0017 J</b> | <b>0.0052 J</b> | 0.0079 U        | 0.0082 U         | 0.0076 U        | <b>0.001 J</b>  | 0.076 U         | 0.0084 U     | <b>0.0039 J</b> | 0.008 U          | <b>0.0041 J</b> | <b>0.004 J</b>  |
| Indeno[1,2,3-c,d]pyrene                            | mg/kg | 21      | <b>0.016 J</b>  | <b>0.0033 J</b>  | <b>0.028</b>    | <b>0.025</b>    | <b>0.0032 J</b> | 0.0082 U         | 0.0076 U        | 0.0085 U        | 0.076 U         | 0.0084 U     | <b>0.0088</b>   | 0.008 U          | <b>0.045</b>    | <b>0.0025 J</b> |
| Naphthalene  | mg/kg | 8.6     | <b>0.01</b>     | <b>0.012</b>     | <b>0.013</b>    | <b>0.037</b>    | <b>0.006 J</b>  | 0.0082 U         | 0.0076 U        | <b>0.0041 J</b> | 0.076 U         | 0.0084 U     | 0.0045 B        | 0.008 U          | <b>0.0098</b>   | <b>0.033</b>    |
| N-Nitroso-di-n-propylamine                         | mg/kg | 0.33    | 0.072 U         | 0.082 U          | 0.07 U          | 0.089 U         | 0.079 U         | 0.081 U          | 0.075 U         | 0.085 U         | 0.076 U         | 0.083 U      | 0.078 U         | 0.079 U          | 0.072 U         | 0.077 U         |
| Phenanthrene                                       | mg/kg |         | <b>0.02</b>     | <b>0.009</b>     | <b>0.039</b>    | <b>0.06</b>     | <b>0.011</b>    | <b>0.0011 J</b>  | 0.0076 U        | 0.0085 U        | <b>0.0074 J</b> | 0.0084 U     | <b>0.05</b>     | <b>0.0011 J</b>  | <b>0.085</b>    | <b>0.012</b>    |
| Pyrene   | mg/kg | 23,000  | <b>0.026</b>    | <b>0.0088</b>    | <b>0.065</b>    | <b>0.067</b>    | <b>0.011</b>    | <b>0.001 J</b>   | 0.0076 U        | 0.0085 U        | <b>0.0097 J</b> | 0.0084 U     | <b>0.062</b>    | 0.008 U          | <b>0.22</b>     | <b>0.01</b>     |
| <b>PCBs</b>  |       |         |                 |                  |                 |                 |                 |                  |                 |                 |                 |              |                 |                  |                 |                 |
| Aroclor 1254                                       | mg/kg | 0.97    | <b>0.035 J</b>  | N/A              | <b>0.19</b>     | N/A             | 0.02 U          | N/A              | N/A             | N/A             | 0.0662 U        | N/A          | 0.0769 U        | N/A              | 0.0552 U        | N/A             |
| Aroclor 1260                                       | mg/kg | 0.99    | 0.0546 U        | N/A              | <b>0.0627</b>   | N/A             | <b>0.0079 J</b> | N/A              | N/A             | N/A             | 0.0662 U        | N/A          | 0.0769 U        | N/A              | 0.0552 U        | N/A             |
| Aroclor 1262                                       | mg/kg |         | 0.0546 U        | N/A              | 0.058 U         | N/A             | 0.02 U          | N/A              | N/A             | N/A             | 0.0662 U        | N/A          | 0.0769 U        | N/A              | 0.0552 U        | N/A             |
| PCBs (total)                                       | mg/kg | 0.97    | <b>0.035 J</b>  | N/A              | <b>0.2527</b>   | N/A             | 0.14 U          | N/A              | N/A             | N/A             | 0.0662 U        | N/A          | 0.0769 U        | N/A              | 0.0552 U        | N/A             |
| <b>TPH/Oil &amp; Grease</b>                        |       |         |                 |                  |                 |                 |                 |                  |                 |                 |                 |              |                 |                  |                 |                 |
| Diesel Range Organics                              | mg/kg | 6,200   | <b>22.3 J</b>   | <b>16.3</b>      | <b>29.2</b>     | <b>23.9</b>     | 13.8 B          | 4.4 B            | 3.2 B           | <b>39.2</b>     | <b>15.8 J</b>   | <b>5.6 J</b> | <b>47.5 J</b>   | 8 UJ             | <b>11.1 J</b>   | <b>26.2 J</b>   |
| Gasoline Range Organics                            | mg/kg | 6,200   | 11.2 U          | 9.5 U            | 11.1 U          | 11.1 U          | 14.6 U          | 9.5 U            | 8.7 U           | 11.1 U          | 9.5 B           | 10.8 B       | 11.8 U          | 10.2 U           | 9 B             | <b>11.7</b>     |
| Oil & Grease                                       | mg/kg | 6,200   | <b>344</b>      | <b>750</b>       | <b>342</b>      | <b>957</b>      | <b>720</b>      | <b>626</b>       | <b>238</b>      | <b>533</b>      | <b>803</b>      | <b>541</b>   | <b>450</b>      | <b>384</b>       | <b>379</b>      | <b>608</b>      |

**Detections in bold**

Values in red indicate an exceedance of the Project Action Limit (PAL)

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

<sup>^</sup>PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this analyte in the sample.



**Table 1 - Sub-Parcel B5-3  
Summary of Organics Detected in Soil**

| Parameter  | Units | PAL     | B19-023-SB-1   | B19-023-SB-5    | B19-024-SB-1    | B19-024-SB-5     | B19-025-SB-1    | B19-025-SB-5     | B19-026-SB-1    | B19-026-SB-8    | B19-027-SB-1    | B19-027-SB-5    | B19-028-SB-1    | B19-028-SB-7     | B19-031-SB-1*   | B19-031-SB-9*   |
|--|-------|---------|----------------|-----------------|-----------------|------------------|-----------------|------------------|-----------------|-----------------|-----------------|-----------------|-----------------|------------------|-----------------|-----------------|
|  |       |         | 9/22/2016      | 9/22/2016       | 9/22/2016       | 9/22/2016        | 9/21/2016       | 9/21/2016        | 10/13/2016      | 10/13/2016      | 10/13/2016      | 10/13/2016      | 10/13/2016      | 10/13/2016       | 10/13/2016      | 9/23/2016       |
| <b>Volatile Organic Compounds</b>                  |       |         |                |                 |                 |                  |                 |                  |                 |                 |                 |                 |                 |                  |                 |                 |
| 2-Butanone (MEK)                                   | mg/kg | 190,000 | N/A            | N/A             | N/A             | N/A              | <b>0.0039 J</b> | 0.0089 UJ        | 0.0087 U        | N/A             | 0.01 U          | 0.01 U          | <b>0.0027 J</b> | 0.0094 U         | 0.013 U         | 0.0097 U        |
| Acetone  | mg/kg | 670,000 | N/A            | N/A             | N/A             | N/A              | <b>0.015 J</b>  | 0.0089 UJ        | 0.0087 U        | N/A             | <b>0.0066 J</b> | <b>0.0056 J</b> | <b>0.011</b>    | <b>0.0084 J</b>  | <b>0.024</b>    | <b>0.014</b>    |
| Benzene  | mg/kg | 5.1     | N/A            | N/A             | N/A             | N/A              | 0.0053 U        | 0.0044 U         | 0.0043 U        | N/A             | 0.0052 U        | <b>0.0017 J</b> | 0.0046 U        | <b>0.0019 J</b>  | 0.0067 U        | 0.0048 U        |
| Ethylbenzene                                       | mg/kg | 25      | N/A            | N/A             | N/A             | N/A              | 0.0053 U        | 0.0044 U         | 0.0043 U        | N/A             | 0.0052 U        | 0.0052 U        | 0.0046 U        | 0.0047 U         | <b>0.13</b>     | <b>0.0021 J</b> |
| Isopropylbenzene                                   | mg/kg | 9,900   | N/A            | N/A             | N/A             | N/A              | 0.0053 U        | 0.0044 U         | 0.0043 U        | N/A             | 0.0052 U        | 0.0052 U        | 0.0046 U        | 0.0047 U         | <b>0.0028 J</b> | 0.0048 U        |
| Toluene  | mg/kg | 47,000  | N/A            | N/A             | N/A             | N/A              | 0.0053 U        | 0.0044 U         | 0.0043 U        | N/A             | 0.0052 U        | 0.0052 U        | 0.0046 U        | 0.0047 U         | <b>0.0022 J</b> | 0.0048 U        |
| Xylenes  | mg/kg | 2800    | N/A            | N/A             | N/A             | N/A              | 0.016 U         | 0.013 U          | 0.013 U         | N/A             | 0.016 U         | 0.016 U         | 0.014 U         | 0.014 U          | <b>1</b>        | <b>0.014 J</b>  |
| <b>Semi-Volatile Organic Compounds<sup>^</sup></b> |       |         |                |                 |                 |                  |                 |                  |                 |                 |                 |                 |                 |                  |                 |                 |
| 1,1-Biphenyl                                       | mg/kg | 200     | 0.071 U        | 0.079 U         | 0.078 U         | 0.076 U          | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | <b>0.02 J</b>   | 0.08 U          |
| 2,4-Dimethylphenol                                 | mg/kg | 16,000  | 0.071 UJ       | 0.079 U         | 0.078 U         | 0.076 U          | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 R         | 0.075 U         | 0.073 R         | 0.07 U           | 0.072 U         | 0.08 U          |
| 2,4-Dinitrophenol                                  | mg/kg | 1,600   | 0.18 UJ        | 0.2 UJ          | 0.19 UJ         | 0.19 UJ          | <b>0.051 J</b>  | 0.2 UJ           | 0.17 UJ         | 0.2 UJ          | 0.19 R          | 0.19 UJ         | 0.18 R          | 0.18 UJ          | 0.18 U          | 0.2 U           |
| 2,6-Dinitrotoluene                                 | mg/kg | 1.5     | 0.071 U        | 0.079 U         | 0.078 U         | 0.076 U          | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | 0.072 U         | 0.08 U          |
| 2-Chloronaphthalene                                | mg/kg | 60,000  | 0.071 U        | 0.079 U         | 0.078 U         | 0.076 U          | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | <b>0.089</b>    | 0.08 U          |
| 2-Methylnaphthalene                                | mg/kg | 3,000   | 0.073 U        | 0.008 U         | <b>0.0022 J</b> | 0.0078 U         | <b>0.41</b>     | 0.0079 U         | <b>0.007</b>    | 0.078 U         | 0.0079 U        | <b>0.014</b>    | 0.0074 U        | <b>0.0047 J</b>  | <b>0.064</b>    | 0.0079 U        |
| Acenaphthene                                       | mg/kg | 45,000  | 0.073 U        | 0.008 U         | 0.0078 U        | 0.0078 U         | <b>0.013 J</b>  | 0.0079 U         | <b>0.0013 J</b> | 0.078 U         | 0.0079 U        | <b>0.0098</b>   | 0.0074 U        | <b>0.00098 J</b> | <b>0.0076</b>   | 0.0079 U        |
| Acenaphthylene                                     | mg/kg | 45,000  | 0.073 U        | <b>0.0011 J</b> | <b>0.0022 J</b> | 0.0078 U         | <b>0.012 J</b>  | <b>0.00081 J</b> | <b>0.0016 J</b> | 0.078 U         | 0.0079 U        | <b>0.1</b>      | 0.0074 U        | <b>0.01</b>      | <b>0.042</b>    | 0.0079 U        |
| Anthracene   | mg/kg | 230,000 | <b>0.01 J</b>  | <b>0.0027 J</b> | <b>0.0026 J</b> | 0.0078 U         | <b>0.03 J</b>   | <b>0.00067 J</b> | <b>0.003 J</b>  | <b>0.0087 J</b> | 0.0079 U        | <b>0.086</b>    | 0.0074 U        | <b>0.012</b>     | <b>0.041</b>    | 0.0079 U        |
| Benz[a]anthracene                                  | mg/kg | 21      | <b>0.036 J</b> | <b>0.014</b>    | <b>0.024</b>    | 0.0078 U         | <b>0.077</b>    | <b>0.0027 J</b>  | <b>0.0035 J</b> | <b>0.03 J</b>   | <b>0.0019 J</b> | <b>0.51</b>     | <b>0.0017 J</b> | <b>0.038</b>     | <b>0.1</b>      | 0.0079 U        |
| Benzaldehyde                                       | mg/kg | 120,000 | <b>0.039 J</b> | 0.079 R         | <b>0.046 J</b>  | 0.076 R          | <b>0.02 J</b>   | 0.079 R          | 0.069 R         | 0.078 R         | 0.077 R         | 0.075 R         | 0.073 R         | 0.07 R           | 0.072 U         | 0.08 U          |
| Benzo[a]pyrene                                     | mg/kg | 2.1     | <b>0.027 J</b> | <b>0.01 J</b>   | <b>0.027</b>    | 0.0078 UJ        | <b>0.092</b>    | <b>0.003 J</b>   | 0.0016 B        | 0.018 B         | 0.0079 U        | <b>0.54</b>     | 0.0074 U        | <b>0.031</b>     | <b>0.075</b>    | 0.0079 U        |
| Benzo[b]fluoranthene                               | mg/kg | 21      | <b>0.065 J</b> | <b>0.022 J</b>  | <b>0.055</b>    | <b>0.00069 J</b> | <b>0.18</b>     | <b>0.0052 J</b>  | 0.0061 B        | 0.04 B          | 0.0018 B        | <b>1</b>        | 0.0011 B        | <b>0.077</b>     | <b>0.24</b>     | 0.0079 U        |
| Benzo[g,h,i]perylene                               | mg/kg |         | <b>0.016 J</b> | <b>0.003 J</b>  | <b>0.01</b>     | 0.0078 UJ        | <b>0.16</b>     | <b>0.0033 J</b>  | <b>0.0018 J</b> | <b>0.014 J</b>  | 0.0079 U        | <b>0.29</b>     | 0.0074 U        | <b>0.021</b>     | <b>0.072</b>    | 0.0079 U        |
| Benzo[k]fluoranthene                               | mg/kg | 210     | <b>0.051 J</b> | <b>0.017 J</b>  | <b>0.044</b>    | 0.0078 UJ        | <b>0.14</b>     | <b>0.0019 J</b>  | <b>0.0059 J</b> | <b>0.038 J</b>  | 0.0079 U        | <b>0.99</b>     | 0.0074 U        | <b>0.074</b>     | <b>0.2</b>      | 0.0079 U        |
| bis(2-Ethylhexyl)phthalate                         | mg/kg | 160     | 0.015 B        | 0.079 UJ        | 0.078 UJ        | 0.076 UJ         | <b>0.032 J</b>  | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | <b>0.022 J</b>  | 0.073 U         | 0.07 U           | <b>0.038 J</b>  | 0.08 U          |
| Carbazole  | mg/kg |         | 0.071 UJ       | 0.079 UJ        | 0.078 UJ        | 0.076 UJ         | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | 0.072 U         | 0.08 U          |
| Chrysene   | mg/kg | 2,100   | <b>0.039 J</b> | <b>0.012</b>    | <b>0.021</b>    | 0.0078 U         | <b>0.11</b>     | <b>0.0043 J</b>  | 0.0059 B        | 0.021 B         | 0.0012 B        | <b>0.5</b>      | 0.0011 B        | <b>0.045</b>     | <b>0.13</b>     | 0.0079 U        |
| Dibenz[a,h]anthracene                              | mg/kg | 2.1     | 0.073 U        | <b>0.0013 J</b> | <b>0.0042 J</b> | 0.0078 UJ        | <b>0.038 J</b>  | <b>0.0012 J</b>  | 0.0068 U        | 0.078 U         | 0.0079 U        | <b>0.12</b>     | 0.0074 U        | <b>0.0064 J</b>  | <b>0.022</b>    | 0.0079 U        |
| Diethylphthalate                                   | mg/kg | 660,000 | 0.071 U        | 0.079 U         | 0.078 U         | 0.076 U          | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | 0.072 U         | 0.08 U          |
| Di-n-butylphthalate                                | mg/kg | 82,000  | 0.071 UJ       | 0.079 UJ        | 0.078 UJ        | 0.076 UJ         | 0.076 U         | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | 0.072 U         | 0.08 U          |
| Fluoranthene                                       | mg/kg | 30,000  | <b>0.04 J</b>  | <b>0.025</b>    | <b>0.02</b>     | 0.0078 U         | <b>0.085</b>    | <b>0.0046 J</b>  | 0.0066 B        | 0.032 B         | 0.002 B         | <b>0.44</b>     | 0.0017 B        | <b>0.056</b>     | <b>0.26</b>     | 0.0079 U        |
| Fluorene   | mg/kg | 30,000  | 0.073 U        | 0.008 U         | 0.0078 U        | 0.0078 U         | <b>0.0079 J</b> | 0.0079 U         | <b>0.0016 J</b> | 0.078 U         | 0.0079 U        | <b>0.0071 J</b> | 0.0074 U        | <b>0.0015 J</b>  | <b>0.0074</b>   | 0.0079 U        |
| Indeno[1,2,3-c,d]pyrene                            | mg/kg | 21      | <b>0.011 J</b> | <b>0.0032 J</b> | <b>0.011</b>    | 0.0078 UJ        | <b>0.057 J</b>  | <b>0.0021 J</b>  | <b>0.0012 J</b> | <b>0.011 J</b>  | 0.0079 U        | <b>0.31</b>     | 0.0074 U        | <b>0.02</b>      | <b>0.058</b>    | 0.0079 U        |
| Naphthalene  | mg/kg | 8.6     | 0.019 B        | 0.0031 B        | 0.0027 B        | 0.0078 U         | <b>0.3</b>      | <b>0.022</b>     | <b>0.0094</b>   | 0.078 U         | 0.0079 U        | <b>0.026</b>    | 0.0074 U        | 0.0065 B         | <b>0.11</b>     | 0.0079 U        |
| N-Nitroso-di-n-propylamine                         | mg/kg | 0.33    | 0.071 U        | 0.079 U         | 0.078 U         | 0.076 U          | <b>0.068 J</b>  | 0.079 U          | 0.069 U         | 0.078 U         | 0.077 U         | 0.075 U         | 0.073 U         | 0.07 U           | 0.072 U         | 0.08 U          |
| Phenanthrene                                       | mg/kg |         | <b>0.037 J</b> | <b>0.011</b>    | <b>0.0061 J</b> | 0.0078 U         | <b>0.11</b>     | <b>0.0035 J</b>  | <b>0.0084</b>   | <b>0.023 J</b>  | <b>0.0015 J</b> | <b>0.074</b>    | <b>0.0016 J</b> | <b>0.011</b>     | <b>0.19</b>     | 0.0079 U        |
| Pyrene   | mg/kg | 23,000  | <b>0.036 J</b> | <b>0.02</b>     | <b>0.018</b>    | 0.0078 U         | <b>0.091</b>    | <b>0.0042 J</b>  | <b>0.005 J</b>  | <b>0.026 J</b>  | <b>0.0019 J</b> | <b>0.46</b>     | <b>0.0016 J</b> | <b>0.063</b>     | <b>0.2</b>      | 0.0079 U        |
| <b>PCBs</b>  |       |         |                |                 |                 |                  |                 |                  |                 |                 |                 |                 |                 |                  |                 |                 |
| Aroclor 1254                                       | mg/kg | 0.97    | 0.0541 U       | N/A             | 0.0565 U        | N/A              | 0.0554 U        | N/A              | 0.0509 U        | N/A             | 0.0525 U        | N/A             | 0.0552 U        | N/A              | <b>0.0983</b>   | N/A             |
| Aroclor 1260                                       | mg/kg | 0.99    | 0.0541 U       | N/A             | 0.0565 U        | N/A              | <b>0.0526 J</b> | N/A              | 0.0509 U        | N/A             | 0.0525 U        | N/A             | 0.0552 U        | N/A              | <b>0.0471 J</b> | N/A             |
| Aroclor 1262                                       | mg/kg |         | 0.0541 U       | N/A             | 0.0565 U        | N/A              | 0.0554 U        | N/A              | 0.0509 U        | N/A             | 0.0525 U        | N/A             | 0.0552 U        | N/A              | 0.0544 U        | N/A             |
| PCBs (total)                                       | mg/kg | 0.97    | 0.0541 U       | N/A             | 0.0565 U        | N/A              | <b>0.0526 J</b> | N/A              | 0.0509 U        | N/A             | 0.0525 U        | N/A             | 0.0552 U        | N/A              | <b>0.1454</b>   | N/A             |
| <b>TPH/Oil &amp; Grease</b>                        |       |         |                |                 |                 |                  |                 |                  |                 |                 |                 |                 |                 |                  |                 |                 |
| Diesel Range Organics                              | mg/kg | 6,200   | <b>56.4 J</b>  | <b>5 J</b>      | <b>5.5 J</b>    | 7.8 UJ           | <b>32.4 J</b>   | <b>12.8 J</b>    | <b>55.6</b>     | <b>27.2</b>     | <b>29.4</b>     | <b>146</b>      | <b>22.6</b>     | <b>10.6</b>      | <b>55.1</b>     | <b>7 J</b>      |
| Gasoline Range Organics                            | mg/kg | 6,200   | 9 B            | 11.2 B          | 10.5 B          | 9.9 B            | 14.8 U          | 7.8 U            | 8.7 U           | 9.1 U           | 12.8 U          | 9.7 U           | 8 U             | 9.4 U            | 22.2 B          | <b>10 J</b>     |
| Oil & Grease                                       | mg/kg | 6,200   | <b>606</b>     | <b>581</b>      | <b>382</b>      | <b>258</b>       | <b>1,320</b>    | <b>657</b>       | <b>300</b>      | <b>665</b>      | <b>365</b>      | <b>586</b>      | <b>262</b>      | <b>233</b>       | <b>320</b>      | <b>368</b>      |

**Detections in bold**

Values in red indicate an exceedance of the Project Action Limit (PAL)

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

<sup>^</sup>PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this analyte in the sample.

**Table 1 - Sub-Parcel B5-3  
Summary of Organics Detected in Soil**

| Parameter                               | Units | PAL     | B19-036-SB-1*    | B19-036-SB-5* | B19-045-SB-1    | B19-046-SB-1    | B19-046-SB-5     | B5-046-SB-1     | B5-046-SB-5     | B5-047-SB-1     | B5-047-SB-4    | B5-050-SB-1  | B5-050-SB-5     | B5-051-SB-1     |
|---|-------|---------|------------------|---------------|-----------------|-----------------|------------------|-----------------|-----------------|-----------------|----------------|--------------|-----------------|-----------------|
|   |       |         | 9/23/2016        | 9/23/2016     | 5/20/2020       | 5/20/2020       | 5/20/2020        | 1/5/2016        | 1/5/2016        | 1/5/2016        | 1/5/2016       | 1/5/2016     | 1/5/2016        | 1/5/2016        |
| <b>Volatile Organic Compounds</b>       |       |         |                  |               |                 |                 |                  |                 |                 |                 |                |              |                 |                 |
| 2-Butanone (MEK)                        | mg/kg | 190,000 | N/A              | N/A           | N/A             | N/A             | N/A              | 0.01 U          | 0.009 U         | 0.0098 U        | 0.59 U         | 0.0098 U     | 0.66 U          | 0.01 U          |
| Acetone                                 | mg/kg | 670,000 | N/A              | N/A           | N/A             | N/A             | N/A              | 0.01 UJ         | 0.009 UJ        | <b>0.073 J</b>  | 0.59 UJ        | <b>0.055</b> | 0.66 UJ         | 0.01 UJ         |
| Benzene                                 | mg/kg | 5.1     | N/A              | N/A           | N/A             | N/A             | N/A              | 0.0052 U        | 0.0045 U        | 0.0049 U        | 0.29 U         | 0.0049 U     | 0.33 U          | 0.0051 U        |
| Ethylbenzene                            | mg/kg | 25      | N/A              | N/A           | N/A             | N/A             | N/A              | 0.0052 U        | 0.0045 U        | 0.0049 U        | 0.29 U         | 0.0049 U     | 0.33 U          | 0.0051 U        |
| Isopropylbenzene                        | mg/kg | 9,900   | N/A              | N/A           | N/A             | N/A             | N/A              | 0.0052 U        | 0.0045 U        | 0.0049 U        | 0.29 U         | 0.0049 U     | 0.33 U          | 0.0051 U        |
| Toluene                                 | mg/kg | 47,000  | N/A              | N/A           | N/A             | N/A             | N/A              | 0.0052 U        | 0.0045 U        | 0.0049 U        | 0.29 U         | 0.0049 U     | 0.33 U          | 0.0051 U        |
| Xylenes                                 | mg/kg | 2800    | N/A              | N/A           | N/A             | N/A             | N/A              | 0.016 U         | 0.013 U         | 0.015 U         | 0.88 U         | 0.015 U      | 0.99 U          | 0.015 U         |
| <b>Semi-Volatile Organic Compounds^</b> |       |         |                  |               |                 |                 |                  |                 |                 |                 |                |              |                 |                 |
| 1,1-Biphenyl                            | mg/kg | 200     | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| 2,4-Dimethylphenol                      | mg/kg | 16,000  | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| 2,4-Dinitrophenol                       | mg/kg | 1,600   | 0.19 U           | 0.2 U         | 0.18 U          | 0.18 U          | 0.2 U            | 18.3 U          | 19.7 U          | 18.5 U          | 20.8 U         | 18.5 U       | 19.7 U          | 18.4 U          |
| 2,6-Dinitrotoluene                      | mg/kg | 1.5     | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| 2-Chloronaphthalene                     | mg/kg | 60,000  | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| 2-Methylnaphthalene                     | mg/kg | 3,000   | <b>0.0035 J</b>  | 0.0083 U      | <b>0.0082</b>   | 0.0078 U        | 0.0082 U         | <b>0.014</b>    | 0.0078 U        | <b>0.095</b>    | <b>0.08</b>    | <b>0.11</b>  | <b>0.0065 J</b> | <b>0.051</b>    |
| Acenaphthene                            | mg/kg | 45,000  | <b>0.00079 J</b> | 0.0083 U      | 0.0075 U        | 0.0078 U        | 0.0082 U         | <b>0.0015 J</b> | <b>0.0027 J</b> | <b>0.028</b>    | <b>0.048</b>   | <b>0.024</b> | <b>0.65</b>     | <b>0.0051 J</b> |
| Acenaphthylene                          | mg/kg | 45,000  | <b>0.0015 J</b>  | 0.0083 U      | <b>0.0012 J</b> | 0.0078 U        | 0.0082 U         | <b>0.0014 J</b> | 0.0078 U        | <b>0.0015 J</b> | <b>0.02</b>    | <b>0.095</b> | <b>0.15</b>     | <b>0.0083</b>   |
| Anthracene                              | mg/kg | 230,000 | <b>0.0025 J</b>  | 0.0083 U      | <b>0.0018 J</b> | <b>0.0007 J</b> | 0.0082 U         | <b>0.0045 J</b> | 0.0078 U        | <b>0.0092</b>   | <b>0.051</b>   | <b>0.18</b>  | <b>0.52</b>     | <b>0.019</b>    |
| Benz[a]anthracene                       | mg/kg | 21      | <b>0.013</b>     | 0.0083 U      | <b>0.013</b>    | <b>0.0017 J</b> | <b>0.0013 J</b>  | <b>0.013</b>    | 0.0078 U        | <b>0.0039 J</b> | <b>0.13</b>    | <b>0.44</b>  | <b>0.0068 J</b> | <b>0.058</b>    |
| Benzaldehyde                            | mg/kg | 120,000 | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| Benzo[a]pyrene                          | mg/kg | 2.1     | <b>0.013</b>     | 0.0083 U      | <b>0.013</b>    | <b>0.002 J</b>  | <b>0.0011 J</b>  | <b>0.011</b>    | 0.0078 U        | <b>0.011 J</b>  | <b>0.095</b>   | <b>0.46</b>  | <b>0.005 J</b>  | <b>0.053</b>    |
| Benzo[b]fluoranthene                    | mg/kg | 21      | <b>0.03</b>      | 0.0083 U      | <b>0.011</b>    | <b>0.0024 J</b> | <b>0.0012 J</b>  | <b>0.026</b>    | 0.0078 U        | <b>0.026 J</b>  | <b>0.15</b>    | <b>0.77</b>  | <b>0.008</b>    | <b>0.15</b>     |
| Benzo[g,h,i]perylene                    | mg/kg |         | <b>0.011</b>     | 0.0083 U      | <b>0.0095</b>   | <b>0.0015 J</b> | <b>0.00074 J</b> | <b>0.0091</b>   | 0.0078 U        | 0.074 U         | <b>0.052 J</b> | <b>0.16</b>  | <b>0.002 J</b>  | <b>0.029</b>    |
| Benzo[k]fluoranthene                    | mg/kg | 210     | <b>0.024</b>     | 0.0083 U      | <b>0.0023 J</b> | <b>0.0007 J</b> | 0.0082 U         | <b>0.011</b>    | 0.0078 U        | <b>0.021 J</b>  | <b>0.064 J</b> | <b>0.3</b>   | <b>0.0035 J</b> | <b>0.12</b>     |
| bis(2-Ethylhexyl)phthalate              | mg/kg | 160     | <b>0.018 J</b>   | 0.081 U       | <b>0.032 J</b>  | <b>0.026 J</b>  | <b>0.03 J</b>    | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| Carbazole                               | mg/kg |         | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| Chrysene                                | mg/kg | 2,100   | <b>0.013</b>     | 0.0083 U      | <b>0.032</b>    | <b>0.0013 J</b> | <b>0.00082 J</b> | <b>0.02</b>     | 0.0078 U        | <b>0.0061 J</b> | <b>0.095</b>   | <b>0.43</b>  | <b>0.016</b>    | <b>0.086</b>    |
| Dibenz[a,h]anthracene                   | mg/kg | 2.1     | <b>0.0031 J</b>  | 0.0083 U      | <b>0.0033 J</b> | 0.0078 U        | 0.0082 U         | <b>0.0025 J</b> | 0.0078 U        | 0.074 U         | <b>0.014 J</b> | <b>0.065</b> | 0.0079 U        | <b>0.01</b>     |
| Diethylphthalate                        | mg/kg | 660,000 | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| Di-n-butylphthalate                     | mg/kg | 82,000  | 0.077 U          | 0.081 U       | <b>0.2</b>      | <b>0.17</b>     | <b>0.23</b>      | 7.3 U           | 7.9 U           | 7.4 U           | 8.3 U          | 7.4 U        | 7.9 U           | 7.4 U           |
| Fluoranthene                            | mg/kg | 30,000  | <b>0.019</b>     | 0.0083 U      | <b>0.0098</b>   | <b>0.0031 J</b> | <b>0.0012 J</b>  | <b>0.034</b>    | <b>0.0064 J</b> | <b>0.024</b>    | <b>0.19</b>    | <b>1.4</b>   | <b>0.059</b>    | <b>0.15</b>     |
| Fluorene                                | mg/kg | 30,000  | 0.077 U          | 0.0083 U      | 0.0075 U        | 0.0078 U        | 0.0082 U         | <b>0.0016 J</b> | <b>0.0015 J</b> | <b>0.0021 J</b> | <b>0.061</b>   | <b>0.059</b> | <b>0.42</b>     | <b>0.0069 J</b> |
| Indeno[1,2,3-c,d]pyrene                 | mg/kg | 21      | <b>0.0086</b>    | 0.0083 U      | <b>0.0071 J</b> | <b>0.0018 J</b> | 0.0082 U         | <b>0.0074</b>   | 0.0078 U        | 0.074 U         | <b>0.044 J</b> | <b>0.17</b>  | <b>0.0015 J</b> | <b>0.025</b>    |
| Naphthalene                             | mg/kg | 8.6     | <b>0.0036 J</b>  | 0.0083 U      | <b>0.0046 J</b> | <b>0.0037 J</b> | 0.0082 U         | <b>0.011</b>    | 0.0078 U        | <b>0.17</b>     | <b>0.075</b>   | <b>0.23</b>  | <b>0.094</b>    | <b>0.046</b>    |
| N-Nitroso-di-n-propylamine              | mg/kg | 0.33    | 0.077 U          | 0.081 U       | 0.073 U         | 0.073 U         | 0.081 U          | 0.073 UJ        | 0.079 UJ        | 0.074 UJ        | 0.083 UJ       | 0.074 UJ     | 0.079 UJ        | 0.074 UJ        |
| Phenanthrene                            | mg/kg |         | <b>0.01</b>      | 0.0083 U      | <b>0.011</b>    | <b>0.0041 J</b> | <b>0.00086 J</b> | <b>0.036</b>    | <b>0.012</b>    | <b>0.052</b>    | <b>0.12</b>    | <b>1</b>     | <b>0.68</b>     | <b>0.13</b>     |
| Pyrene                                  | mg/kg | 23,000  | <b>0.018</b>     | 0.0083 U      | <b>0.054</b>    | <b>0.0024 J</b> | <b>0.0011 J</b>  | <b>0.03</b>     | <b>0.0067 J</b> | <b>0.015</b>    | <b>0.18</b>    | <b>1</b>     | <b>0.24</b>     | <b>0.12</b>     |
| <b>PCBs</b>                             |       |         |                  |               |                 |                 |                  |                 |                 |                 |                |              |                 |                 |
| Aroclor 1254                            | mg/kg | 0.97    | 0.0571 U         | N/A           | 0.018 U         | 0.018 U         | N/A              | 0.018 U         | N/A             | 0.018 U         | N/A            | 0.018 U      | N/A             | 0.019 U         |
| Aroclor 1260                            | mg/kg | 0.99    | 0.0571 U         | N/A           | 0.018 U         | 0.018 U         | N/A              | 0.018 U         | N/A             | 0.018 U         | N/A            | 0.018 U      | N/A             | 0.019 U         |
| Aroclor 1262                            | mg/kg |         | 0.0571 U         | N/A           | 0.018 U         | 0.018 U         | N/A              | N/A             | N/A             | N/A             | N/A            | N/A          | N/A             | N/A             |
| PCBs (total)                            | mg/kg | 0.97    | 0.0571 U         | N/A           | 0.17 U          | 0.17 U          | N/A              | 0.13 U          | N/A             | 0.13 U          | N/A            | 0.13 U       | N/A             | 0.13 U          |
| <b>TPH/Oil &amp; Grease</b>             |       |         |                  |               |                 |                 |                  |                 |                 |                 |                |              |                 |                 |
| Diesel Range Organics                   | mg/kg | 6,200   | 8.8 B            | <b>3.8 J</b>  | <b>34.9</b>     | <b>8.2</b>      | <b>8.9</b>       | <b>49.2</b>     | <b>13.7</b>     | <b>12.8</b>     | <b>791</b>     | <b>47.8</b>  | <b>2,060</b>    | <b>38.1</b>     |
| Gasoline Range Organics                 | mg/kg | 6,200   | <b>10.3 J</b>    | <b>10.1 J</b> | 10.7 U          | 12.1 U          | 11.5 U           | 9.5 U           | 9.5 U           | 10.9 U          | 12.3 U         | 10 U         | 13.6 U          | 9.4 U           |
| Oil & Grease                            | mg/kg | 6,200   | <b>237</b>       | <b>256</b>    | <b>62.2</b>     | <b>90.2 J</b>   | <b>101 J</b>     | N/A             | N/A             | N/A             | N/A            | N/A          | N/A             | N/A             |

**Detections in bold**

Values in red indicate an exceedance of the Project Action Limit (PAL)

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

^PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this analyte in the sample.

**Table 1 - Sub-Parcel B5-3  
Summary of Organics Detected in Soil**

| Parameter  | Units | PAL     | B5-051-SB-5 | B5-144-SB-1 | B5-144-SB-4 | B5-145-SB-1 | B5-145-SB-5 | B5-147-SB-1 | B5-147-SB-5 | B5-148-SB-1 | B5-148-SB-5 | B5-175-SB-1* | B5-175-SB-5* | B9-016-SB-1* | B9-016-SB-5* |
|--|-------|---------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--------------|--------------|--------------|--------------|
|  |       |         | 1/5/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016    | 1/6/2016     | 1/6/2016     | 1/19/2016    | 1/19/2016    |
| <b>Volatile Organic Compounds</b>                  |       |         |             |             |             |             |             |             |             |             |             |              |              |              |              |
| 2-Butanone (MEK)                                   | mg/kg | 190,000 | 0.46 U      | 0.0088 U    | 0.49 U      | 0.0099 U    | 0.01 U      | 0.013 U     | 0.011 U     | 0.023       | 0.0099 U    | 0.0091 U     | 0.011 U      | N/A          | N/A          |
| Acetone  | mg/kg | 670,000 | 0.46 UJ     | 0.094 J     | 0.49 U      | 0.074 J     | 0.044 J     | 0.068 J     | 0.075 J     | 0.33 J      | 0.074 J     | 0.043        | 0.011 U      | N/A          | N/A          |
| Benzene  | mg/kg | 5.1     | 0.23 U      | 0.0044 U    | 0.24 U      | 0.005 U     | 0.0052 U    | 0.0066 U    | 0.0056 U    | 0.0068 U    | 0.0049 U    | 0.0045 U     | 0.0054 U     | N/A          | N/A          |
| Ethylbenzene                                       | mg/kg | 25      | 0.58        | 0.0044 U    | 0.24 U      | 0.005 U     | 0.0052 U    | 0.0066 U    | 0.0056 U    | 0.0068 U    | 0.0049 U    | 0.0045 U     | 0.0054 U     | N/A          | N/A          |
| Isopropylbenzene                                   | mg/kg | 9,900   | 0.71        | 0.0044 U    | 0.24 U      | 0.005 U     | 0.0052 U    | 0.0066 U    | 0.0056 U    | 0.0068 U    | 0.0049 U    | 0.0045 U     | 0.0054 U     | N/A          | N/A          |
| Toluene  | mg/kg | 47,000  | 0.23 U      | 0.0044 U    | 0.24 U      | 0.005 U     | 0.0052 U    | 0.0066 U    | 0.0056 U    | 0.0022 J    | 0.0049 U    | 0.0018 J     | 0.0054 U     | N/A          | N/A          |
| Xylenes  | mg/kg | 2800    | 1.7         | 0.013 U     | 0.73 U      | 0.015 U     | 0.016 U     | 0.02 U      | 0.017 U     | 0.02 U      | 0.015 U     | 0.014 U      | 0.016 U      | N/A          | N/A          |
| <b>Semi-Volatile Organic Compounds<sup>^</sup></b> |       |         |             |             |             |             |             |             |             |             |             |              |              |              |              |
| 1,1-Biphenyl                                       | mg/kg | 200     | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| 2,4-Dimethylphenol                                 | mg/kg | 16,000  | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| 2,4-Dinitrophenol                                  | mg/kg | 1,600   | 19.8 U      | 17 U        | 20.3 U      | 19.7 U      | 20.7 U      | 17.4 U      | 18.3 U      | 19.1 U      | 20.5 U      | 18.6 U       | 19.8 U       | 2.4 U        | 0.2 U        |
| 2,6-Dinitrotoluene                                 | mg/kg | 1.5     | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| 2-Chloronaphthalene                                | mg/kg | 60,000  | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| 2-Methylnaphthalene                                | mg/kg | 3,000   | 3.2         | 0.072 J     | 0.24        | 0.013       | 0.0083 U    | 0.03        | 0.53        | 0.072 J     | 0.0083 U    | 0.011        | 0.008 U      | 0.083        | 0.0055 J     |
| Acenaphthene                                       | mg/kg | 45,000  | 3.3         | 0.14 U      | 0.036 J     | 0.0035 J    | 0.0083 U    | 0.12        | 0.028       | 0.15 U      | 0.0083 U    | 0.013        | 0.008 U      | 0.007 J      | 0.0083 U     |
| Acenaphthylene                                     | mg/kg | 45,000  | 0.78        | 0.021 J     | 0.014 J     | 0.005 J     | 0.0083 U    | 0.014       | 0.22        | 0.12 J      | 0.0083 U    | 0.02         | 0.008 U      | 0.026        | 0.0041 J     |
| Anthracene   | mg/kg | 230,000 | 0.6         | 0.047 J     | 0.066 J     | 0.0098 J    | 0.0083 U    | 0.043       | 0.27        | 0.11 J      | 0.0083 U    | 0.067        | 0.00084 J    | 0.027        | 0.0034 J     |
| Benz[a]anthracene                                  | mg/kg | 21      | 0.4 U       | 0.17        | 0.043 J     | 0.071 J     | 0.0083 U    | 0.3         | 1.2         | 0.42        | 0.022 J     | 0.22         | 0.008 U      | 0.11         | 0.02         |
| Benzaldehyde                                       | mg/kg | 120,000 | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| Benzo[a]pyrene                                     | mg/kg | 2.1     | 0.4 U       | 0.19        | 0.071 J     | 0.064       | 0.0083 U    | 0.7         | 1.4         | 0.51        | 0.0083 U    | 0.18         | 0.008 U      | 0.17         | 0.018        |
| Benzo[b]fluoranthene                               | mg/kg | 21      | 0.4 U       | 0.29        | 0.25        | 0.12        | 0.0083 U    | 1.2         | 1.8         | 1.1         | 0.0083 U    | 0.33         | 0.008 U      | 0.2          | 0.025        |
| Benzo[g,h,i]perylene                               | mg/kg |         | 0.4 U       | 0.084 J     | 0.023 J     | 0.021       | 0.0083 U    | 0.47        | 0.49        | 0.2         | 0.0083 U    | 0.085        | 0.008 U      | 0.15         | 0.013        |
| Benzo[k]fluoranthene                               | mg/kg | 210     | 0.4 U       | 0.1 J       | 0.21        | 0.049       | 0.0083 U    | 0.98        | 0.65        | 0.35        | 0.0083 U    | 0.17         | 0.008 U      | 0.059        | 0.0086       |
| bis(2-Ethylhexyl)phthalate                         | mg/kg | 160     | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| Carbazole  | mg/kg |         | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| Chrysene   | mg/kg | 2,100   | 0.4 U       | 0.29        | 0.13        | 0.077 J     | 0.0083 U    | 0.34        | 1.2         | 0.58        | 0.012 J     | 0.41         | 0.008 U      | 0.11         | 0.016        |
| Dibenz[a,h]anthracene                              | mg/kg | 2.1     | 0.4 U       | 0.029 J     | 0.081 U     | 0.0087      | 0.0083 U    | 0.18        | 0.26        | 0.082 J     | 0.0083 U    | 0.033        | 0.008 U      | 0.031        | 0.0037 J     |
| Diethylphthalate                                   | mg/kg | 660,000 | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.081 U      |
| Di-n-butylphthalate                                | mg/kg | 82,000  | 7.9 U       | 6.8 U       | 8.1 U       | 7.9 U       | 8.3 U       | 6.9 U       | 7.3 U       | 7.6 U       | 8.2 U       | 7.4 U        | 7.9 U        | 0.95 U       | 0.071 J      |
| Fluoranthene                                       | mg/kg | 30,000  | 0.15 J      | 0.37        | 0.12        | 0.1         | 0.0083 U    | 0.37        | 1.6         | 0.69        | 0.0083 U    | 0.6          | 0.001 J      | 0.13         | 0.032        |
| Fluorene   | mg/kg | 30,000  | 3.3         | 0.14 U      | 0.061 J     | 0.0024 J    | 0.0011 J    | 0.019       | 0.039       | 0.026 J     | 0.0083 U    | 0.013        | 0.008 U      | 0.0046 J     | 0.0013 J     |
| Indeno[1,2,3-c,d]pyrene                            | mg/kg | 21      | 0.4 U       | 0.057 J     | 0.019 J     | 0.02        | 0.0083 U    | 0.47        | 0.65        | 0.23        | 0.0083 U    | 0.086        | 0.008 U      | 0.16         | 0.015        |
| Naphthalene  | mg/kg | 8.6     | 1.2         | 0.16        | 0.11        | 0.016       | 0.0023 J    | 0.032       | 4.3         | 0.066 J     | 0.0083 U    | 0.032        | 0.008 U      | 0.08         | 0.007 J      |
| N-Nitroso-di-n-propylamine                         | mg/kg | 0.33    | 0.079 UJ    | 0.068 UJ    | 0.081 UJ    | 0.079 UJ    | 0.083 UJ    | 0.069 UJ    | 0.073 UJ    | 0.076 UJ    | 0.082 UJ    | 0.074 U      | 0.079 U      | 0.95 U       | 0.081 U      |
| Phenanthrene                                       | mg/kg |         | 5           | 0.32        | 0.14        | 0.075 J     | 0.0011 J    | 0.15        | 0.71        | 0.39        | 0.0083 U    | 0.076        | 0.0014 J     | 0.12         | 0.013        |
| Pyrene   | mg/kg | 23,000  | 0.83        | 0.34        | 0.18        | 0.097       | 0.0083 U    | 0.35        | 1.8         | 0.67        | 0.0083 U    | 0.58         | 0.00074 J    | 0.13         | 0.026        |
| <b>PCBs</b>  |       |         |             |             |             |             |             |             |             |             |             |              |              |              |              |
| Aroclor 1254                                       | mg/kg | 0.97    | N/A         | 0.17 U      | N/A         | 0.097 U     | N/A         | 0.018       | N/A         | 0.16        | N/A         | 0.019 U      | N/A          | 0.12 U       | N/A          |
| Aroclor 1260                                       | mg/kg | 0.99    | N/A         | 0.21        | N/A         | 0.097 U     | N/A         | 0.017 U     | N/A         | 0.2         | N/A         | 0.019 U      | N/A          | 0.12 U       | N/A          |
| Aroclor 1262                                       | mg/kg |         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A          | N/A          | 0.091 J      | N/A          |
| PCBs (total)                                       | mg/kg | 0.97    | N/A         | 1.2 U       | N/A         | 0.68 U      | N/A         | 0.12 U      | N/A         | 0.37 J      | N/A         | 0.13 U       | N/A          | 1.1 U        | N/A          |
| <b>TPH/Oil &amp; Grease</b>                        |       |         |             |             |             |             |             |             |             |             |             |              |              |              |              |
| Diesel Range Organics                              | mg/kg | 6,200   | 4,060       | 155 J       | 8,430       | 62.8        | 6.2 J       | 38.5        | 292         | 103         | 5.8 J       | 23.9         | 8 U          | 108          | 16           |
| Gasoline Range Organics                            | mg/kg | 6,200   | 74.6        | 8.9 U       | 9.9 U       | 9.8 U       | 10.2 U      | 11.1 U      | 53 U        | 13.4 U      | 10.3 U      | 16.3 U       | 10.9 U       | 14.2 U       | 9.8 U        |
| Oil & Grease                                       | mg/kg | 6,200   | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         | N/A          | N/A          | 199          | 451          |

**Detections in bold**

Values in red indicate an exceedance of the Project Action Limit (PAL)

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

<sup>^</sup>PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this analyte in the sample.

**Table 2 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Soil**

| Parameter    | Units | PAL       | B19-004-SB-1   | B19-004-SB-5   | B19-005-SB-1   | B19-005-SB-6   | B19-005-SB-10* | B19-006-SB-1*  | B19-006-SB-5*   | B19-007-SB-8.5* | B19-008-SB-7.5* | B19-014-SB-1   | B19-014-SB-5  |
|--------------|-------|-----------|----------------|----------------|----------------|----------------|----------------|----------------|-----------------|-----------------|-----------------|----------------|---------------|
|              |       |           | 10/13/2016     | 10/13/2016     | 10/13/2016     | 10/13/2016     | 10/13/2016     | 1/9/2017       | 1/9/2017        | 1/18/2017       | 1/18/2017       | 9/22/2016      | 9/22/2016     |
| <b>Metal</b> |       |           |                |                |                |                |                |                |                 |                 |                 |                |               |
| Aluminum     | mg/kg | 1,100,000 | <b>10,500</b>  | <b>16,100</b>  | <b>13,500</b>  | <b>12,400</b>  | N/A            | <b>16,200</b>  | <b>18,100</b>   | <b>10,300</b>   | <b>19,100</b>   | <b>39,500</b>  | <b>20,200</b> |
| Antimony     | mg/kg | 470       | 2.5 UJ         | 2.7 UJ         | <b>14.9 J</b>  | 2.9 UJ         | N/A            | 2.8 U          | 2.6 U           | 2.6 U           | 2.8 U           | 2.3 UJ         | 2.8 UJ        |
| Arsenic      | mg/kg | 3         | <b>6.9</b>     | <b>14.2</b>    | 2 U            | <b>47.9</b>    | 2.4 U          | <b>3.5</b>     | <b>5.4</b>      | <b>6.4</b>      | <b>22.9</b>     | 1.9 U          | <b>8</b>      |
| Barium       | mg/kg | 220,000   | <b>146</b>     | <b>136</b>     | <b>120</b>     | <b>129</b>     | N/A            | <b>152</b>     | <b>17.2</b>     | <b>37.2</b>     | <b>34.4</b>     | <b>538 J</b>   | <b>74.9 J</b> |
| Beryllium    | mg/kg | 2,300     | <b>0.74 J</b>  | <b>1.4</b>     | <b>1.3</b>     | <b>0.67 J</b>  | N/A            | <b>1.6</b>     | <b>0.69 J</b>   | <b>0.52 J</b>   | <b>0.85 J</b>   | <b>5.8</b>     | <b>0.66 J</b> |
| Cadmium      | mg/kg | 980       | 0.77 B         | 0.69 B         | 0.86 B         | 1.1 B          | N/A            | <b>0.39 J</b>  | 1.3 U           | 1.3 U           | 1.4 U           | 0.45 B         | 1.4 U         |
| Chromium^    | mg/kg | 1,800,000 | <b>881</b>     | <b>36.9</b>    | <b>981</b>     | <b>74.7</b>    | N/A            | <b>513</b>     | <b>18.4</b>     | <b>17.5</b>     | <b>49.4</b>     | <b>89.3 J</b>  | <b>25.5 J</b> |
| Chromium VI  | mg/kg | 6.3       | 0.99 B         | 0.45 B         | 0.28 B         | 0.37 B         | N/A            | 0.35 B         | 1.1 B           | 0.49 B          | 1.2 B           | 0.32 B         | 0.3 B         |
| Cobalt       | mg/kg | 350       | <b>0.29 J</b>  | <b>4.5 J</b>   | <b>4 J</b>     | <b>5.9</b>     | N/A            | <b>2.7 J</b>   | <b>3 J</b>      | <b>2.3 J</b>    | <b>2.9 J</b>    | <b>6</b>       | <b>5</b>      |
| Copper       | mg/kg | 47,000    | <b>27.9 J+</b> | <b>26.9 J+</b> | <b>20.6 J+</b> | <b>43.4 J+</b> | N/A            | <b>12.5</b>    | <b>8.4</b>      | <b>4.8</b>      | <b>15.2</b>     | <b>98.2</b>    | <b>9</b>      |
| Iron         | mg/kg | 820,000   | <b>182,000</b> | <b>24,500</b>  | <b>170,000</b> | <b>30,200</b>  | N/A            | <b>96,200</b>  | <b>11,900</b>   | <b>11,800</b>   | <b>64,200</b>   | <b>36,200</b>  | <b>26,100</b> |
| Lead         | mg/kg | 800       | <b>32.5</b>    | <b>87.5</b>    | <b>30.2</b>    | <b>143</b>     | N/A            | <b>17.2</b>    | <b>13.2</b>     | <b>8.5</b>      | <b>16.6</b>     | <b>120 J</b>   | <b>11.5 J</b> |
| Manganese    | mg/kg | 26,000    | <b>27,300</b>  | <b>825</b>     | <b>32,200</b>  | <b>1,370</b>   | N/A            | <b>14,100</b>  | <b>25.9</b>     | <b>25.8</b>     | <b>60.8</b>     | <b>3,920 J</b> | <b>390 J</b>  |
| Mercury      | mg/kg | 350       | <b>0.04 J</b>  | 0.12 U         | 0.098 U        | <b>0.2</b>     | N/A            | <b>0.018 J</b> | <b>0.0047 J</b> | 0.11 U          | <b>0.024 J</b>  | 0.0049 B       | 0.044 B       |
| Nickel       | mg/kg | 22,000    | <b>17.9</b>    | <b>10.9</b>    | <b>15.2</b>    | <b>16.5</b>    | N/A            | <b>7.1 J</b>   | <b>7.7 J</b>    | <b>7.4 J</b>    | <b>11.6</b>     | <b>53.3</b>    | <b>11.6</b>   |
| Selenium     | mg/kg | 5,800     | 3.3 U          | 3.6 U          | <b>2.4 J</b>   | 3.9 U          | N/A            | 3.8 U          | 3.4 U           | 3.5 U           | 3.7 U           | <b>2.1 J</b>   | 3.7 U         |
| Silver       | mg/kg | 5,800     | 2.5 U          | 2.7 U          | 2.5 U          | 2.9 U          | N/A            | 2.8 U          | 2.6 U           | 2.6 U           | <b>0.41 J</b>   | 2.3 U          | 2.8 U         |
| Thallium     | mg/kg | 12        | <b>10.2</b>    | 9.1 U          | 8.2 U          | 9.8 U          | N/A            | 9.4 U          | 8.5 U           | 8.7 U           | 9.3 U           | 7.5 U          | 9.3 U         |
| Vanadium     | mg/kg | 5,800     | <b>577</b>     | <b>85.9</b>    | <b>546</b>     | <b>185</b>     | N/A            | <b>543</b>     | <b>27.9</b>     | <b>19</b>       | <b>61.1</b>     | <b>45.9 J</b>  | <b>46.3 J</b> |
| Zinc         | mg/kg | 350,000   | <b>263</b>     | <b>190</b>     | <b>209</b>     | <b>348</b>     | N/A            | <b>103</b>     | <b>13.2</b>     | <b>21.6</b>     | <b>43.6</b>     | <b>379 J</b>   | <b>48.7 J</b> |
| <b>Other</b> |       |           |                |                |                |                |                |                |                 |                 |                 |                |               |
| Cyanide      | mg/kg | 150       | <b>0.32 J-</b> | <b>0.19 J-</b> | <b>0.2 J-</b>  | <b>0.33 J-</b> | N/A            | <b>0.48 J</b>  | 1.2 U           | 0.92 U          | 1 U             | <b>0.88</b>    | 0.76 U        |

**Detections above reporting limit in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

^The industrial soil RSL for Chromium (III) insoluble salts has been utilized as the PAL for Total Chromium.

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

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B: This analyte was not detected substantially above the level of the associated method or field blank.

**Table 2 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Soil**

| Parameter    | Units | PAL       | B19-014-SB-10* | B19-015-SB-1    | B19-015-SB-5  | B19-016-SB-1    | B19-016-SB-4   | B19-023-SB-1    | B19-023-SB-5  | B19-024-SB-1  | B19-024-SB-5  | B19-025-SB-1    | B19-025-SB-5    |
|--------------|-------|-----------|----------------|-----------------|---------------|-----------------|----------------|-----------------|---------------|---------------|---------------|-----------------|-----------------|
|              |       |           | 9/22/2016      | 9/22/2016       | 9/22/2016     | 9/22/2016       | 9/22/2016      | 9/22/2016       | 9/22/2016     | 9/22/2016     | 9/22/2016     | 9/22/2016       | 9/22/2016       |
| <b>Metal</b> |       |           |                |                 |               |                 |                |                 |               |               |               |                 |                 |
| Aluminum     | mg/kg | 1,100,000 | N/A            | <b>11,300</b>   | <b>10,700</b> | <b>22,700</b>   | <b>45,800</b>  | <b>12,300</b>   | <b>10,600</b> | <b>16,200</b> | <b>14,900</b> | <b>18,300</b>   | <b>12,600</b>   |
| Antimony     | mg/kg | 470       | N/A            | 2.9 UJ          | 2.9 UJ        | 2.4 UJ          | 3.1 UJ         | 2.4 UJ          | 2.9 UJ        | 2.6 UJ        | 2.8 UJ        | 2.9 U           | 3.1 U           |
| Arsenic      | mg/kg | 3         | <b>2.4</b>     | <b>8.3</b>      | <b>4.8</b>    | <b>7.8</b>      | <b>2.8</b>     | <b>23.1</b>     | <b>3.7</b>    | <b>4.3</b>    | <b>3.8</b>    | <b>7</b>        | <b>6.3</b>      |
| Barium       | mg/kg | 220,000   | N/A            | <b>54.2 J</b>   | <b>33.5 J</b> | <b>368 J</b>    | <b>590 J</b>   | <b>186 J</b>    | <b>49.4 J</b> | <b>65.4 J</b> | <b>120 J</b>  | <b>142</b>      | <b>289</b>      |
| Beryllium    | mg/kg | 2,300     | N/A            | <b>0.26 J</b>   | <b>0.37 J</b> | <b>2.9</b>      | <b>5.9</b>     | <b>1</b>        | <b>0.42 J</b> | <b>0.45 J</b> | <b>0.83 J</b> | <b>1.1</b>      | <b>0.64 J</b>   |
| Cadmium      | mg/kg | 980       | N/A            | 0.57 B          | 1.4 U         | 0.51 B          | 0.19 B         | 0.68 B          | 0.37 B        | 0.15 B        | 1.4 U         | 0.72 B          | 0.33 B          |
| Chromium^    | mg/kg | 1,800,000 | N/A            | <b>805 J</b>    | <b>16.5 J</b> | <b>181 J</b>    | <b>29.1 J</b>  | <b>520 J</b>    | <b>19.9 J</b> | <b>22.9 J</b> | <b>20.5 J</b> | <b>822</b>      | <b>31.4</b>     |
| Chromium VI  | mg/kg | 6.3       | N/A            | <b>3.3 J-</b>   | 0.84 B        | 0.4 B           | 0.36 B         | 0.3 B           | 0.32 B        | 0.76 B        | <b>1.1 J-</b> | 0.37 B          | 0.42 B          |
| Cobalt       | mg/kg | 350       | N/A            | <b>2 J</b>      | <b>2.8 J</b>  | <b>7.7</b>      | <b>0.98 J</b>  | <b>3.8 J</b>    | <b>5.4</b>    | <b>6.8</b>    | <b>5.2</b>    | <b>4.1 J</b>    | <b>4.7 J</b>    |
| Copper       | mg/kg | 47,000    | N/A            | <b>16.1</b>     | <b>5.9</b>    | <b>56</b>       | <b>2.8 J</b>   | <b>66.1</b>     | <b>11.4</b>   | <b>12.8</b>   | <b>9.2</b>    | <b>60.4</b>     | <b>26.8</b>     |
| Iron         | mg/kg | 820,000   | N/A            | <b>123,000</b>  | <b>14,900</b> | <b>110,000</b>  | <b>6,300</b>   | <b>153,000</b>  | <b>13,300</b> | <b>14,000</b> | <b>13,300</b> | <b>97,400</b>   | <b>52,100</b>   |
| Lead         | mg/kg | 800       | N/A            | <b>37.5 J</b>   | <b>10.1 J</b> | <b>74.1 J</b>   | <b>9.2 J</b>   | <b>169 J</b>    | <b>28.9 J</b> | <b>19.8 J</b> | <b>10.7 J</b> | <b>37.7</b>     | <b>45.2</b>     |
| Manganese    | mg/kg | 26,000    | N/A            | <b>18,500 J</b> | <b>112 J</b>  | <b>16,700 J</b> | <b>2,270 J</b> | <b>13,500 J</b> | <b>200 J</b>  | <b>129 J</b>  | <b>67.1 J</b> | <b>28,100</b>   | <b>816</b>      |
| Mercury      | mg/kg | 350       | N/A            | 0.013 B         | 0.0029 B      | 0.0028 B        | 0.0053 B       | 0.017 B         | 0.032 B       | 0.015 B       | 0.0042 B      | <b>0.025 J-</b> | <b>0.052 J-</b> |
| Nickel       | mg/kg | 22,000    | N/A            | <b>15.2</b>     | <b>9.1 J</b>  | <b>28.6</b>     | <b>4.8 J</b>   | <b>18.5</b>     | <b>9.1 J</b>  | <b>8.4 J</b>  | <b>11.2</b>   | <b>27.1</b>     | <b>10.8</b>     |
| Selenium     | mg/kg | 5,800     | N/A            | 3.9 U           | 3.8 U         | 3.1 U           | <b>2.7 J</b>   | 3.2 U           | 3.8 U         | 3.4 U         | 3.7 U         | 3.9 U           | 4.1 U           |
| Silver       | mg/kg | 5,800     | N/A            | 2.9 U           | 2.9 U         | 2.4 U           | 3.1 U          | 2.4 U           | 2.9 U         | 2.6 U         | 2.8 U         | <b>0.74 J</b>   | 3.1 U           |
| Thallium     | mg/kg | 12        | N/A            | 9.6 U           | 9.5 U         | 7.9 U           | 10.2 U         | 8.1 U           | 9.6 U         | 8.6 U         | 9.3 U         | 9.8 U           | 10.2 U          |
| Vanadium     | mg/kg | 5,800     | N/A            | <b>484 J</b>    | <b>22.7 J</b> | <b>1,370 J</b>  | <b>143 J</b>   | <b>406 J</b>    | <b>36.6 J</b> | <b>38.5 J</b> | <b>27.8 J</b> | <b>1,090</b>    | <b>38.8</b>     |
| Zinc         | mg/kg | 350,000   | N/A            | <b>131 J</b>    | <b>25.7 J</b> | <b>244 J</b>    | <b>15.9 J</b>  | <b>229 J</b>    | <b>116 J</b>  | <b>53.7 J</b> | <b>32.3 J</b> | <b>128</b>      | <b>91.5</b>     |
| <b>Other</b> |       |           |                |                 |               |                 |                |                 |               |               |               |                 |                 |
| Cyanide      | mg/kg | 150       | N/A            | <b>0.6 J</b>    | 0.72 U        | <b>0.61</b>     | <b>0.85</b>    | <b>0.53 J</b>   | <b>0.2 J</b>  | 0.71 U        | 0.7 U         | <b>0.92</b>     | <b>0.13 J</b>   |

**Detections above reporting limit in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

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\*indicates non-validated data

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**Table 2 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Soil**

| Parameter    | Units | PAL       | B19-025-SB-10 | B19-026-SB-1   | B19-026-SB-8    | B19-027-SB-1   | B19-027-SB-5   | B19-028-SB-1   | B19-028-SB-7   | B19-031-SB-1*  | B19-031-SB-9*  | B19-036-SB-1*   | B19-036-SB-5*  | B19-045-SB-1  |
|--------------|-------|-----------|---------------|----------------|-----------------|----------------|----------------|----------------|----------------|----------------|----------------|-----------------|----------------|---------------|
|              |       |           | 9/21/2016     | 10/13/2016     | 10/13/2016      | 10/13/2016     | 10/13/2016     | 10/13/2016     | 10/13/2016     | 10/13/2016     | 10/13/2016     | 9/23/2016       | 9/23/2016      | 9/23/2016     |
| <b>Metal</b> |       |           |               |                |                 |                |                |                |                |                |                |                 |                |               |
| Aluminum     | mg/kg | 1,100,000 | <b>5,980</b>  | <b>2,380</b>   | <b>14,100</b>   | <b>11,100</b>  | <b>28,900</b>  | <b>6,250</b>   | <b>14,900</b>  | <b>11,900</b>  | <b>16,100</b>  | <b>48,500</b>   | <b>19,600</b>  | <b>37,900</b> |
| Antimony     | mg/kg | 470       | 2.7 U         | <b>5.2 J</b>   | 2.4 UJ          | 2.5 UJ         | 2.5 UJ         | 2.8 UJ         | 2.2 UJ         | 2.5 U          | 3.1 U          | 2.8 U           | 2.6 U          | 2.7 U         |
| Arsenic      | mg/kg | 3         | 2.2 U         | <b>16.9</b>    | <b>16.3</b>     | 2.1 U          | <b>5</b>       | 2.3 U          | <b>3.5</b>     | <b>4.8</b>     | <b>2.3 J</b>   | 2.3 U           | <b>5.1</b>     | <b>2.5</b>    |
| Barium       | mg/kg | 220,000   | <b>14.8</b>   | <b>18.4</b>    | <b>67.4</b>     | <b>42.1</b>    | <b>410</b>     | <b>22.7</b>    | <b>98.4</b>    | <b>107</b>     | <b>29.9</b>    | <b>428</b>      | <b>79.8</b>    | <b>418</b>    |
| Beryllium    | mg/kg | 2,300     | 0.9 U         | <b>0.24 J</b>  | <b>0.54 J</b>   | <b>0.36 J</b>  | <b>2.2</b>     | 0.92 U         | <b>0.99</b>    | <b>0.87</b>    | <b>0.57 J</b>  | <b>5</b>        | <b>0.84 J</b>  | <b>6.4</b>    |
| Cadmium      | mg/kg | 980       | 1.3 U         | 0.2 B          | 0.43 B          | 0.44 B         | 0.74 B         | 0.5 B          | 0.24 B         | 0.95 B         | 1.5 U          | 0.56 B          | 1.3 U          | 1.3 U         |
| Chromium^    | mg/kg | 1,800,000 | <b>9.3</b>    | <b>9.2</b>     | <b>40.3</b>     | <b>1,840</b>   | <b>311</b>     | <b>1,390</b>   | <b>66.8</b>    | <b>1,090</b>   | <b>18</b>      | <b>26.4</b>     | <b>23.8</b>    | <b>7.7</b>    |
| Chromium VI  | mg/kg | 6.3       | N/A           | 0.29 B         | 0.37 B          | <b>3.5 J-</b>  | 0.41 B         | <b>4.2 J-</b>  | 0.26 B         | 0.62 B         | 0.91 B         | 0.27 B          | 0.39 B         | 1.1 U         |
| Cobalt       | mg/kg | 350       | <b>1.2 J</b>  | <b>27.6</b>    | <b>5.6</b>      | 4.2 U          | <b>8.8</b>     | 4.6 U          | <b>3.3 J</b>   | <b>1.7 J</b>   | <b>3.9 J</b>   | <b>1.3 J</b>    | <b>3.2 J</b>   | <b>0.58</b>   |
| Copper       | mg/kg | 47,000    | <b>3.1 J</b>  | <b>608 J+</b>  | <b>37.5 J+</b>  | <b>20.8 J+</b> | <b>37.2 J+</b> | <b>23.4 J+</b> | <b>15.6 J+</b> | <b>47.7</b>    | <b>11.1</b>    | <b>8.7</b>      | <b>18.2</b>    | <b>4.5</b>    |
| Iron         | mg/kg | 820,000   | <b>6,540</b>  | <b>175,000</b> | <b>28,800</b>   | <b>195,000</b> | <b>107,000</b> | <b>227,000</b> | <b>32,700</b>  | <b>154,000</b> | <b>7,650</b>   | <b>30,600</b>   | <b>17,400</b>  | <b>12,300</b> |
| Lead         | mg/kg | 800       | <b>5.2</b>    | <b>3.4</b>     | <b>41.2</b>     | <b>3.4</b>     | <b>42.4</b>    | 2.3 U          | <b>17</b>      | <b>104</b>     | <b>10.2</b>    | <b>8.4</b>      | <b>12</b>      | <b>27.8</b>   |
| Manganese    | mg/kg | 26,000    | <b>17.2</b>   | <b>876</b>     | <b>512</b>      | <b>40,000</b>  | <b>9,930</b>   | <b>30,000</b>  | <b>2,120</b>   | <b>20,600</b>  | <b>37.7</b>    | <b>5,680</b>    | <b>95.5</b>    | <b>1,750</b>  |
| Mercury      | mg/kg | 350       | N/A           | <b>0.064 J</b> | <b>0.023 J</b>  | 0.11 U         | 0.11 U         | 0.11 U         | 0.1 U          | <b>0.082 J</b> | <b>0.004 J</b> | <b>0.0028 J</b> | <b>0.011 J</b> | 0.1 U         |
| Nickel       | mg/kg | 22,000    | <b>4.2 J</b>  | <b>43</b>      | <b>11.6</b>     | <b>15</b>      | <b>23.7</b>    | <b>24.2</b>    | <b>9.3</b>     | <b>26.8</b>    | <b>10.1 J</b>  | <b>3.5 J</b>    | <b>12</b>      | <b>1.5 J</b>  |
| Selenium     | mg/kg | 5,800     | 3.6 U         | 2.7 U          | 3.2 U           | 3.4 U          | <b>2.6 J</b>   | 3.7 U          | 2.9 U          | 3.4 U          | 4.1 U          | <b>5.5</b>      | 3.5 U          | <b>3.6 J</b>  |
| Silver       | mg/kg | 5,800     | 2.7 U         | <b>1.7 J</b>   | 2.4 U           | 2.5 U          | 2.5 U          | <b>0.93 J</b>  | 2.2 U          | 2.5 U          | 3.1 U          | 2.8 U           | 2.6 U          | 2.7 U         |
| Thallium     | mg/kg | 12        | 9 U           | 6.7 U          | 8.1 U           | <b>15.4</b>    | <b>8.3 J</b>   | <b>11</b>      | 7.2 U          | 8.5 U          | 10.3 U         | 9.2 U           | 8.8 U          | 9 U           |
| Vanadium     | mg/kg | 5,800     | <b>9.5</b>    | <b>263</b>     | <b>137</b>      | <b>936</b>     | <b>669</b>     | <b>623</b>     | <b>204</b>     | <b>444</b>     | <b>18.2</b>    | <b>41.4</b>     | <b>28.5</b>    | <b>12.2</b>   |
| Zinc         | mg/kg | 350,000   | <b>13.6</b>   | <b>18.8</b>    | <b>121</b>      | <b>11</b>      | <b>118</b>     | <b>10.4</b>    | <b>48</b>      | <b>213</b>     | <b>25.7</b>    | <b>34.8</b>     | <b>32.5</b>    | <b>1.6 J</b>  |
| <b>Other</b> |       |           |               |                |                 |                |                |                |                |                |                |                 |                |               |
| Cyanide      | mg/kg | 150       | N/A           | 0.62 UJ        | <b>0.078 J-</b> | <b>0.18 J-</b> | <b>0.38 J-</b> | <b>0.17 J-</b> | <b>0.29 J-</b> | <b>0.78</b>    | <b>0.037 J</b> | <b>0.36 J</b>   | 0.75 U         | <b>0.28 J</b> |

**Detections above reporting limit in bold**

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**Table 2 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Soil**

| Parameter    | Units | PAL       | B19-046-SB-1  | B19-046-SB-5   | B5-046-SB-1    | B5-046-SB-5     | B5-047-SB-1    | B5-047-SB-4     | B5-050-SB-1    | B5-050-SB-5    | B5-051-SB-1    | B5-051-SB-5    |
|--------------|-------|-----------|---------------|----------------|----------------|-----------------|----------------|-----------------|----------------|----------------|----------------|----------------|
|              |       |           | 5/20/2020     | 5/20/2020      | 1/5/2016       | 1/5/2016        | 1/5/2016       | 1/5/2016        | 1/5/2016       | 1/5/2016       | 1/5/2016       | 1/5/2016       |
| <b>Metal</b> |       |           |               |                |                |                 |                |                 |                |                |                |                |
| Aluminum     | mg/kg | 1,100,000 | <b>50,700</b> | <b>21,100</b>  | <b>14,200</b>  | <b>16,300</b>   | <b>16,500</b>  | <b>20,700</b>   | <b>16,200</b>  | <b>14,600</b>  | <b>16,000</b>  | <b>18,000</b>  |
| Antimony     | mg/kg | 470       | 2.7 U         | 2.9 U          | 2.9 UJ         | 3.2 UJ          | 2.9 UJ         | 3.5 UJ          | 2.4 UJ         | 3.2 UJ         | 3 UJ           | 2.2 UJ         |
| Arsenic      | mg/kg | 3         | <b>3.2</b>    | <b>4.7</b>     | <b>4.5</b>     | <b>4.3</b>      | <b>3.4</b>     | <b>5.4</b>      | <b>3.9</b>     | <b>3.1</b>     | <b>2.9</b>     | <b>5.6</b>     |
| Barium       | mg/kg | 220,000   | <b>705</b>    | <b>117</b>     | <b>75.5</b>    | <b>31.6</b>     | <b>74</b>      | <b>79.6</b>     | <b>157</b>     | <b>45.5</b>    | <b>158</b>     | <b>68</b>      |
| Beryllium    | mg/kg | 2,300     | <b>7</b>      | <b>1.4</b>     | <b>0.42 J</b>  | <b>0.62 J</b>   | 0.98 U         | <b>1.2</b>      | <b>1.6</b>     | <b>0.54 J</b>  | <b>1</b>       | <b>0.92</b>    |
| Cadmium      | mg/kg | 980       | 1.3 U         | 1.5 U          | 0.6 B          | 1.6 U           | 0.46 B         | 0.2 B           | 0.63 B         | 1.6 U          | 0.68 B         | 0.21 B         |
| Chromium^    | mg/kg | 1,800,000 | <b>45.7</b>   | <b>29.7</b>    | <b>1,040 J</b> | <b>19.9 J</b>   | <b>1,220 J</b> | <b>39.7 J</b>   | <b>661 J</b>   | <b>16.4 J</b>  | <b>697 J</b>   | <b>119 J</b>   |
| Chromium VI  | mg/kg | 6.3       | 1.1 U         | 1.2 U          | <b>3.8 J-</b>  | <b>0.71 J-</b>  | <b>4.3 J-</b>  | <b>0.25 J-</b>  | <b>0.18 J-</b> | 1.2 U          | <b>0.32 J-</b> | 1.2 UJ         |
| Cobalt       | mg/kg | 350       | <b>0.56 J</b> | <b>10.4</b>    | <b>1.3 J</b>   | <b>5.7</b>      | <b>2.6 J</b>   | <b>7.8</b>      | 3.2 B          | <b>7.2</b>     | <b>3.1 J</b>   | <b>10.5</b>    |
| Copper       | mg/kg | 47,000    | 4.5 U         | <b>12.9</b>    | <b>41.1</b>    | <b>6.5</b>      | <b>42.9</b>    | <b>12.1</b>     | <b>52.4</b>    | <b>8</b>       | <b>41.3</b>    | <b>11.2</b>    |
| Iron         | mg/kg | 820,000   | <b>7,160</b>  | <b>24,900</b>  | <b>182,000</b> | <b>20,800</b>   | <b>184,000</b> | <b>27,100</b>   | <b>127,000</b> | <b>18,100</b>  | <b>128,000</b> | <b>36,200</b>  |
| Lead         | mg/kg | 800       | <b>3.8</b>    | <b>10.6</b>    | <b>8.6 J</b>   | <b>7.3 J</b>    | <b>15.8 J</b>  | <b>16.2 J</b>   | <b>55.6 J</b>  | <b>7.2 J</b>   | <b>48.9 J</b>  | <b>16.9 J</b>  |
| Manganese    | mg/kg | 26,000    | <b>4,270</b>  | <b>166</b>     | <b>24,100</b>  | <b>96.4</b>     | <b>26,200</b>  | <b>637</b>      | <b>16,800</b>  | <b>108</b>     | <b>16,000</b>  | <b>2,450</b>   |
| Mercury      | mg/kg | 350       | 0.11 U        | <b>0.033 J</b> | <b>0.015 J</b> | <b>0.0028 J</b> | 0.11 U         | <b>0.0044 J</b> | <b>0.027 J</b> | <b>0.013 J</b> | <b>0.025 J</b> | <b>0.003 J</b> |
| Nickel       | mg/kg | 22,000    | 8.9 U         | <b>17.4</b>    | <b>20.6</b>    | <b>13</b>       | <b>22.4</b>    | <b>17.1</b>     | <b>28.5</b>    | <b>13.1</b>    | <b>27.4</b>    | <b>16.1</b>    |
| Selenium     | mg/kg | 5,800     | 3.6 U         | 3.9 U          | 3.9 U          | 4.3 U           | 3.9 U          | 4.7 U           | 3.2 U          | 4.3 U          | 4 U            | 3 U            |
| Silver       | mg/kg | 5,800     | 2.7 U         | 2.9 U          | <b>1.2 J</b>   | 3.2 U           | 2.9 U          | 3.5 U           | <b>0.77 J</b>  | 3.2 U          | 3 U            | 2.2 U          |
| Thallium     | mg/kg | 12        | 8.9 U         | 9.8 U          | 9.7 U          | 10.6 U          | 9.8 U          | 11.8 U          | 8 U            | 10.7 U         | 9.9 U          | 7.4 U          |
| Vanadium     | mg/kg | 5,800     | <b>72.8</b>   | <b>39</b>      | <b>586 J</b>   | <b>25.6 J</b>   | <b>746 J</b>   | <b>55.9 J</b>   | <b>415 J</b>   | <b>21.9 J</b>  | <b>403 J</b>   | <b>81.9 J</b>  |
| Zinc         | mg/kg | 350,000   | <b>3.4 J</b>  | <b>77.2</b>    | <b>135</b>     | <b>34.1</b>     | <b>85.5</b>    | <b>54.2</b>     | <b>213</b>     | <b>31.9</b>    | <b>157</b>     | <b>50.1</b>    |
| <b>Other</b> |       |           |               |                |                |                 |                |                 |                |                |                |                |
| Cyanide      | mg/kg | 150       | <b>0.54 J</b> | <b>0.23 J</b>  | <b>0.23 J</b>  | 0.72 U          | <b>0.16 J</b>  | <b>0.089 J</b>  | <b>0.77</b>    | 0.65 U         | <b>1.3</b>     | 0.58 U         |

**Detections above reporting limit in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

^The industrial soil RSL for Chromium (III) insoluble salts has been utilized as the PAL for Total Chromium.

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

J+: The positive result reported for this analyte is a quantitative estimate, but may be biased high.

B: This analyte was not detected substantially above the level of the associated method or field blank.



**Table 2 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Soil**

| Parameter    | Units | PAL       | B5-144-SB-1    | B5-144-SB-4     | B5-145-SB-1     | B5-145-SB-5      | B5-147-SB-1    | B5-147-SB-5    | B5-148-SB-1    | B5-148-SB-5     | B5-175-SB-1*    | B5-175-SB-5*  | B9-016-SB-1*   | B9-016-SB-5*  |
|--------------|-------|-----------|----------------|-----------------|-----------------|------------------|----------------|----------------|----------------|-----------------|-----------------|---------------|----------------|---------------|
|              |       |           | 1/6/2016       | 1/6/2016        | 1/6/2016        | 1/6/2016         | 1/6/2016       | 1/6/2016       | 1/6/2016       | 1/6/2016        | 1/6/2016        | 1/6/2016      | 1/19/2016      | 1/19/2016     |
| <b>Metal</b> |       |           |                |                 |                 |                  |                |                |                |                 |                 |               |                |               |
| Aluminum     | mg/kg | 1,100,000 | <b>12,600</b>  | <b>18,100</b>   | <b>7,930</b>    | <b>25,800</b>    | <b>25,800</b>  | <b>8,820</b>   | <b>16,100</b>  | <b>18,800</b>   | <b>18,200</b>   | <b>19,400</b> | <b>33,300</b>  | <b>24,600</b> |
| Antimony     | mg/kg | 470       | <i>2.6 UJ</i>  | <i>3.4 UJ</i>   | <i>3.5 UJ</i>   | <i>2.4 UJ</i>    | <i>2.5 UJ</i>  | <i>2.4 UJ</i>  | <b>16.4 J</b>  | <i>2.6 UJ</i>   | <i>2.8 U</i>    | <i>2.4 U</i>  | <i>3.6 U</i>   | <i>3 U</i>    |
| Arsenic      | mg/kg | 3         | <b>3.1</b>     | <b>3.4</b>      | <b>6.2</b>      | <b>12.2</b>      | <b>4.9</b>     | <b>13.1</b>    | <b>30.1</b>    | <b>5.3</b>      | <b>9.9</b>      | <b>3.1</b>    | <i>3 U</i>     | <b>4.6</b>    |
| Barium       | mg/kg | 220,000   | <b>68.8 J</b>  | <b>147 J</b>    | <b>220 J</b>    | <b>127 J</b>     | <b>354 J</b>   | <b>106 J</b>   | <b>333 J</b>   | <b>60.9 J</b>   | <b>372</b>      | <b>80.3</b>   | <b>323</b>     | <b>138</b>    |
| Beryllium    | mg/kg | 2,300     | <b>0.56 J</b>  | <i>0.9 B</i>    | <i>1.2 U</i>    | <i>0.6 B</i>     | <b>3.6</b>     | <i>0.43 B</i>  | <i>0.95 B</i>  | <i>0.62 B</i>   | <i>0.92 U</i>   | <b>0.81 J</b> | <b>5.1</b>     | <b>2.7</b>    |
| Cadmium      | mg/kg | 980       | <i>0.76 B</i>  | <i>0.28 B</i>   | <i>1.6 B</i>    | <i>1.2 U</i>     | <i>0.67 B</i>  | <b>2.8</b>     | <b>6.6</b>     | <i>1.3 U</i>    | <i>0.48 B</i>   | <i>1.2 U</i>  | <b>0.88 J</b>  | <i>1.5 U</i>  |
| Chromium^    | mg/kg | 1,800,000 | <b>680</b>     | <b>49.3</b>     | <b>1,450</b>    | <b>37.1</b>      | <b>428</b>     | <b>249</b>     | <b>298</b>     | <b>33.5</b>     | <b>3,190</b>    | <b>17.1</b>   | <b>367</b>     | <b>30.5</b>   |
| Chromium VI  | mg/kg | 6.3       | <b>0.24 J-</b> | <b>0.29 J-</b>  | <b>2 J-</b>     | <b>0.34 J-</b>   | <b>0.17 J-</b> | <i>1.1 UJ</i>  | <i>1.2 UJ</i>  | <b>0.25 J-</b>  | <i>1.2 B</i>    | <i>0.58 B</i> | <i>1.4 U</i>   | <i>1.2 U</i>  |
| Cobalt       | mg/kg | 350       | <i>4 B</i>     | <i>4.6 B</i>    | <b>7.5</b>      | <b>4.7</b>       | <b>5</b>       | <b>12.4</b>    | <b>27.1</b>    | <b>6.1</b>      | <b>1.7 J</b>    | <b>2.9 J</b>  | <b>5.3 J</b>   | <b>5.7</b>    |
| Copper       | mg/kg | 47,000    | <b>51.8 J</b>  | <b>10.8 J</b>   | <b>127 J</b>    | <b>33.1 J</b>    | <b>57.6 J</b>  | <b>167 J</b>   | <b>243 J</b>   | <b>10.5 J</b>   | <b>31.1</b>     | <b>6.9</b>    | <b>32.3</b>    | <b>11.5</b>   |
| Iron         | mg/kg | 820,000   | <b>185,000</b> | <b>12,800</b>   | <b>153,000</b>  | <b>33,400</b>    | <b>104,000</b> | <b>97,600</b>  | <b>132,000</b> | <b>21,700</b>   | <b>112,000</b>  | <b>13,800</b> | <b>67,900</b>  | <b>17,900</b> |
| Lead         | mg/kg | 800       | <b>33.1 J</b>  | <b>27.9 J</b>   | <b>378 J</b>    | <b>16.9 J</b>    | <b>31 J</b>    | <b>932 J</b>   | <b>865 J</b>   | <b>10.9 J</b>   | <b>12</b>       | <b>12.4</b>   | <b>69.7</b>    | <b>26.6</b>   |
| Manganese    | mg/kg | 26,000    | <b>17,200</b>  | <b>1,440</b>    | <b>29,600</b>   | <b>115</b>       | <b>33,300</b>  | <b>8,550</b>   | <b>5,940</b>   | <b>224</b>      | <b>43,800</b>   | <b>43.8</b>   | <b>8,980</b>   | <b>968</b>    |
| Mercury      | mg/kg | 350       | <b>0.21 J-</b> | <b>0.059 J-</b> | <b>0.046 J-</b> | <b>0.0086 J-</b> | <i>0.1 UJ</i>  | <b>0.32 J-</b> | <b>1.2 J-</b>  | <b>0.015 J-</b> | <b>0.0033 J</b> | <i>0.11 U</i> | <b>0.056 J</b> | <i>0.11 U</i> |
| Nickel       | mg/kg | 22,000    | <b>34.3 J</b>  | <b>24.9 J</b>   | <b>33.3 J</b>   | <b>14.5 J</b>    | <b>19.5 J</b>  | <b>27.1 J</b>  | <b>170 J</b>   | <b>14.3 J</b>   | <b>11.9</b>     | <i>8.2 B</i>  | <b>22.6</b>    | <b>12.2</b>   |
| Selenium     | mg/kg | 5,800     | <i>3.5 U</i>   | <i>4.5 U</i>    | <i>4.7 U</i>    | <b>2.3 J</b>     | <i>3.4 U</i>   | <i>3.2 U</i>   | <i>4.4 U</i>   | <i>3.5 U</i>    | <i>3.7 U</i>    | <i>3.3 U</i>  | <i>4.8 U</i>   | <i>4 U</i>    |
| Silver       | mg/kg | 5,800     | <b>0.8 J</b>   | <i>3.4 U</i>    | <i>3.5 U</i>    | <i>2.4 U</i>     | <i>2.5 U</i>   | <i>2.4 U</i>   | <b>1 J</b>     | <i>2.6 U</i>    | <i>2.8 U</i>    | <i>2.4 U</i>  | <i>3.6 U</i>   | <i>3 U</i>    |
| Thallium     | mg/kg | 12        | <i>8.8 UJ</i>  | <i>11.2 UJ</i>  | <i>9.3 B</i>    | <i>8.1 UJ</i>    | <i>8.4 UJ</i>  | <i>7.9 UJ</i>  | <i>11.1 UJ</i> | <i>8.7 UJ</i>   | <b>20.5</b>     | <i>8.1 U</i>  | <i>11.9 U</i>  | <i>10 U</i>   |
| Vanadium     | mg/kg | 5,800     | <b>964</b>     | <b>68.3</b>     | <b>4,400</b>    | <b>40.1</b>      | <b>1,710</b>   | <b>554</b>     | <b>464</b>     | <b>45.8</b>     | <b>10,500</b>   | <b>30.2</b>   | <b>251</b>     | <b>88.4</b>   |
| Zinc         | mg/kg | 350,000   | <b>358 J</b>   | <b>47.8 J</b>   | <b>257 J</b>    | <b>40.5 J</b>    | <b>147 J</b>   | <b>1,950 J</b> | <b>5,620 J</b> | <b>38.2 J</b>   | <b>25.9</b>     | <b>23.2</b>   | <b>135</b>     | <b>112</b>    |
| <b>Other</b> |       |           |                |                 |                 |                  |                |                |                |                 |                 |               |                |               |
| Cyanide      | mg/kg | 150       | <b>0.74</b>    | <b>0.1 J</b>    | <b>0.38 J</b>   | <i>0.76 UJ</i>   | <b>0.24 J-</b> | <b>1.1 J-</b>  | <b>2</b>       | <i>0.63 U</i>   | <b>0.17 J</b>   | <i>0.7 U</i>  | <b>0.7 J</b>   | <b>0.28 J</b> |

**Detections above reporting limit in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

^The industrial soil RSL for Chromium (III) insoluble salts has been utilized as the PAL for Total Chromium.

\*indicates non-validated data

N/A indicates that the parameter was not analyzed for this sample

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B: This analyte was not detected substantially above the level of the associated method or field blank.

**Table 3 - Sub-Parcel B5-3  
Summary of Organics Detected in Groundwater**

| Parameter  | Units | PAL   | B19-046-PZ      | SW-040-MWS     | SW-041-MWS    | SW-042-MWS | SW-043-MWS    | SW-050-MWS     | SW-051-MWS     | SW-052-MWS     | SW16-PZM003    |
|--|-------|-------|-----------------|----------------|---------------|------------|---------------|----------------|----------------|----------------|----------------|
|  |       |       | 5/28/2020       | 1/22/2016      | 1/19/2016     | 1/20/2016  | 12/14/2015    | 1/20/2016      | 2/8/2016       | 1/22/2016      | 12/9/2015      |
| <b>Volatile Organic Compounds</b>                  |       |       |                 |                |               |            |               |                |                |                |                |
| 1,1-Dichloroethane                                 | µg/L  | 2.7   | 1 U             | 1 U            | 1 U           | 1 U        | 1 U           | 1 U            | 1 U            | 1 U            | <b>0.38 J</b>  |
| cis-1,2-Dichloroethene                             | µg/L  | 70    | 1 U             | 1 U            | 1 U           | 1 U        | <b>0.42 J</b> | 1 U            | <b>0.44 J</b>  | 1 U            | 1 U            |
| Methyl tert-butyl ether (MTBE)                     | µg/L  | 14    | 1 U             | 1 U            | <b>2.9</b>    | 1 U        | 1 U           | 1 U            | 1 U            | 1 U            | 1 U            |
| Trichloroethene                                    | µg/L  | 5     | 1 U             | 1 U            | 1 U           | 1 U        | <b>0.47 J</b> | 1 U            | 1 U            | 1 U            | 1 U            |
| <b>Semi-Volatile Organic Compounds<sup>^</sup></b> |       |       |                 |                |               |            |               |                |                |                |                |
| 1,4-Dioxane  | µg/L  | 0.46  | 0.1 U           | 0.1 U          | <b>0.04 J</b> | 0.1 U      | 0.1 U         | <b>0.1 J</b>   | <b>0.044 J</b> | 0.1 U          | <b>0.36</b>    |
| 2,3,4,6-Tetrachlorophenol                          | µg/L  | 240   | 1 U             | 1 U            | 1.2 U         | 1.2 U      | 1 U           | <b>11.9</b>    | 1 U            | 1 U            | 1 U            |
| 2,4,5-Trichlorophenol                              | µg/L  | 1,200 | 2.5 U           | 2.5 U          | 3 U           | 3 U        | 2.6 U         | <b>0.9 J</b>   | 2.5 U          | 2.5 U          | 2.5 U          |
| 2-Chloronaphthalene                                | µg/L  | 750   | 1 U             | 1 U            | 1.2 U         | 1.2 U      | 1 U           | <b>0.83 J</b>  | 1 U            | 1 U            | 1 U            |
| 2-Methylnaphthalene                                | µg/L  | 36    | <b>0.016 J</b>  | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | <b>0.086 J</b> | 0.1 U          | <b>0.031 J</b> | 0.1 U          |
| Anthracene   | µg/L  | 1,800 | <b>0.013 J</b>  | <b>0.019 J</b> | 0.1 U         | 0.1 U      | 0.1 U         | <b>0.014 J</b> | 0.1 U          | <b>0.062 J</b> | <b>0.034 J</b> |
| Benz[a]anthracene                                  | µg/L  | 0.03  | 0.1 U           | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.08 J</b>  | 0.1 U          |
| Benzo[a]pyrene                                     | µg/L  | 0.2   | <b>0.0034 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.07 J</b>  | 0.1 U          |
| Benzo[b]fluoranthene                               | µg/L  | 0.25  | 0.1 U           | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.097 J</b> | 0.1 U          |
| Benzo[g,h,i]perylene                               | µg/L  |       | 0.1 U           | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.058 J</b> | 0.1 U          |
| Benzo[k]fluoranthene                               | µg/L  | 2.5   | 0.1 U           | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.057 J</b> | 0.1 U          |
| Chrysene   | µg/L  | 25    | <b>0.0041 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.076 J</b> | 0.1 U          |
| Fluoranthene                                       | µg/L  | 800   | <b>0.0097 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.1 J</b>   | <b>0.052 J</b> |
| Fluorene   | µg/L  | 290   | <b>0.0063 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | <b>0.024 J</b> | 0.1 U          | <b>0.061 J</b> |
| Indeno[1,2,3-c,d]pyrene                            | µg/L  | 0.25  | <b>0.0038 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.039 J</b> | 0.1 U          |
| Naphthalene  | µg/L  | 0.12  | <b>0.029 J</b>  | 0.033 B        | 0.029 B       | 0.061 B    | 0.044 B       | <b>0.16</b>    | 0.024 B        | 0.068 B        | 0.027 B        |
| Pentachlorophenol                                  | µg/L  | 1     | 2.5 U           | 2.5 U          | 3 U           | 3 U        | 2.6 U         | <b>59.1</b>    | 2.5 U          | 2.5 U          | 2.5 U          |
| Phenanthrene                                       | µg/L  |       | <b>0.016 J</b>  | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.067 J</b> | <b>0.21</b>    |
| Pyrene   | µg/L  | 120   | <b>0.0034 J</b> | 0.1 U          | 0.1 U         | 0.1 U      | 0.1 U         | 0.11 U         | 0.1 U          | <b>0.1 J</b>   | <b>0.038 J</b> |
| <b>TPH/Oil &amp; Grease</b>                        |       |       |                 |                |               |            |               |                |                |                |                |
| Diesel Range Organics                              | µg/L  | 47    | <b>270</b>      | <b>92.3 J</b>  | <b>114 J</b>  | 103 UJ     | 55 B          | 118 UJ         | <b>934 J</b>   | <b>60.8 J</b>  | <b>225 J</b>   |
| Oil & Grease                                       | µg/L  | 47    | <b>1,100</b>    | N/A            | N/A           | N/A        | N/A           | N/A            | N/A            | N/A            | N/A            |

**Detections in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

N/A indicates that the parameter was not analyzed for this sample

<sup>^</sup>PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

**Table 4 - Sub-Parcel B5-3  
Summary of Inorganics Detected in Groundwater**

| Parameter                | Units | PAL    | B19-046-PZ    | SW-040-MWS     | SW-041-MWS    | SW-042-MWS    | SW-043-MWS     | SW-050-MWS    | SW-051-MWS    | SW-052-MWS      | SW16-PZM003    |
|--------------------------|-------|--------|---------------|----------------|---------------|---------------|----------------|---------------|---------------|-----------------|----------------|
|                          |       |        | 5/28/2020     | 1/22/2016      | 1/19/2016     | 1/20/2016     | 12/14/2015     | 1/20/2016     | 2/8/2016      | 1/22/2016       | 12/9/2015      |
| <b>Metals, Total</b>     |       |        |               |                |               |               |                |               |               |                 |                |
| Aluminum                 | µg/L  | 20,000 | N/A           | <b>1,150 J</b> | <b>60</b>     | <b>1,200</b>  | <b>1,560</b>   | <b>575</b>    | <b>2,340</b>  | <b>12,300 J</b> | <b>4,370</b>   |
| Barium                   | µg/L  | 2,000  | N/A           | <b>18.1</b>    | <b>18.7</b>   | <b>16.4</b>   | <b>21.7</b>    | <b>18.5</b>   | <b>13</b>     | <b>109</b>      | <b>13.1</b>    |
| Beryllium                | µg/L  | 4      | N/A           | <i>1 U</i>     | <i>1 U</i>    | <b>2.2</b>    | <b>2.7</b>     | <b>1.6</b>    | <b>1.8</b>    | <b>0.46 J</b>   | <b>5.1</b>     |
| Cadmium                  | µg/L  | 5      | N/A           | <i>3 U</i>     | <i>3 U</i>    | <i>0.61 B</i> | <i>0.79 B</i>  | <i>3 U</i>    | <b>0.69 J</b> | <i>0.71 B</i>   | <b>1.8 J</b>   |
| Chromium                 | µg/L  | 100    | N/A           | <b>10.7</b>    | <i>5 U</i>    | <i>5 U</i>    | <i>1.1 B</i>   | <i>0.97 B</i> | <i>1.4 B</i>  | <b>59.9</b>     | <b>1.7 J</b>   |
| Cobalt                   | µg/L  | 6      | N/A           | <i>5 U</i>     | <b>5.9</b>    | <b>40.2</b>   | <b>29.8</b>    | <b>47.4</b>   | <b>57.6</b>   | <b>2.3 J</b>    | <b>158</b>     |
| Copper                   | µg/L  | 1,300  | N/A           | <b>1.8 J</b>   | <i>5 U</i>    | <b>3.2 J</b>  | <b>7.2</b>     | <b>1.8 J</b>  | <i>5 U</i>    | <b>9.9</b>      | <b>22.6</b>    |
| Iron                     | µg/L  | 14,000 | N/A           | <b>1,500</b>   | <b>12,600</b> | <b>4,110</b>  | <b>10,700</b>  | <b>21,700</b> | <b>9,350</b>  | <b>21,100</b>   | <b>8,680</b>   |
| Lead                     | µg/L  | 15     | N/A           | <i>5 U</i>     | <i>5 U</i>    | <i>5 U</i>    | <i>5 U</i>     | <i>5 U</i>    | <i>5 U</i>    | <b>42.2</b>     | <i>5 U</i>     |
| Manganese                | µg/L  | 430    | N/A           | <b>71.2</b>    | <b>362</b>    | <b>954</b>    | <b>1,070</b>   | <b>866</b>    | <b>1,910</b>  | <b>714</b>      | <b>2,360</b>   |
| Nickel                   | µg/L  | 390    | N/A           | <i>0.78 B</i>  | <i>6.7 B</i>  | <b>31.2</b>   | <b>30.3 J</b>  | <b>57.8</b>   | <b>90.3</b>   | <i>9.2 B</i>    | <b>220 J</b>   |
| Vanadium                 | µg/L  | 86     | N/A           | <b>155</b>     | <b>0.58 J</b> | <b>0.82 J</b> | <i>1.1 B</i>   | <b>0.82 J</b> | <i>5 U</i>    | <b>180</b>      | <i>1.6 B</i>   |
| Zinc                     | µg/L  | 6,000  | N/A           | <b>1.9 J</b>   | <b>20.7</b>   | <b>127</b>    | <b>160</b>     | <b>109</b>    | <b>189</b>    | <b>145</b>      | <b>403</b>     |
| <b>Metals, Dissolved</b> |       |        |               |                |               |               |                |               |               |                 |                |
| Aluminum, Dissolved      | µg/L  | 20,000 | <b>316</b>    | <b>453</b>     | <b>42.2 J</b> | <b>1,220</b>  | <b>1,540</b>   | <b>558</b>    | <b>1,730</b>  | <b>53.2</b>     | <b>4,260</b>   |
| Arsenic, Dissolved       | µg/L  | 10     | <b>2.2 J</b>  | <i>4 B</i>     | <i>5 U</i>    | <i>5 U</i>    | <i>5 U</i>     | <i>5 U</i>    | <i>5 U</i>    | <i>5 U</i>      | <i>5 U</i>     |
| Barium, Dissolved        | µg/L  | 2,000  | <b>48.4</b>   | <b>16</b>      | <b>19.4</b>   | <b>16.9</b>   | <b>22.1</b>    | <b>19</b>     | <b>10.4</b>   | <b>42.3</b>     | <b>13</b>      |
| Beryllium, Dissolved     | µg/L  | 4      | <i>1 U</i>    | <i>1 U</i>     | <i>1 U</i>    | <b>2.3</b>    | <b>2.7</b>     | <b>1.7</b>    | <b>1.6</b>    | <i>1 U</i>      | <b>5.2</b>     |
| Cadmium, Dissolved       | µg/L  | 5      | <i>3 U</i>    | <i>3 U</i>     | <i>3 U</i>    | <i>0.54 B</i> | <b>0.79 J</b>  | <i>0.57 B</i> | <i>0.71 B</i> | <i>3 U</i>      | <b>1.6 J</b>   |
| Chromium, Dissolved      | µg/L  | 100    | <b>0.81 J</b> | <i>3.3 B</i>   | <i>5 U</i>    | <i>5 U</i>    | <b>1.1 J</b>   | <i>0.93 B</i> | <i>0.8 B</i>  | <b>27.4</b>     | <i>1.8 B</i>   |
| Cobalt, Dissolved        | µg/L  | 6      | <i>5 U</i>    | <i>5 U</i>     | <b>5.6</b>    | <b>41.6</b>   | <b>30.9</b>    | <b>48.2</b>   | <b>49.8</b>   | <i>5 U</i>      | <b>153</b>     |
| Copper, Dissolved        | µg/L  | 1,300  | <i>5 U</i>    | <i>5 U</i>     | <i>5 U</i>    | <b>2.8 J</b>  | <i>7.4 B</i>   | <b>2 J</b>    | <i>3.1 B</i>  | <i>5 U</i>      | <b>18.8</b>    |
| Iron, Dissolved          | µg/L  | 14,000 | <i>70 U</i>   | <b>127</b>     | <b>13,400</b> | <b>4,360</b>  | <b>11,100</b>  | <b>24,400</b> | <b>7,700</b>  | <i>52.4 B</i>   | <b>8,840</b>   |
| Manganese, Dissolved     | µg/L  | 430    | <b>17.7</b>   | <b>62.4</b>    | <b>362</b>    | <b>982</b>    | <b>1,170 J</b> | <b>868</b>    | <b>1,700</b>  | <b>3.1 J</b>    | <b>2,280 J</b> |
| Nickel, Dissolved        | µg/L  | 390    | <i>10 U</i>   | <i>0.82 B</i>  | <i>6.3 B</i>  | <b>32.7</b>   | <b>30.3 J</b>  | <b>60.7</b>   | <b>83.5</b>   | <i>10 U</i>     | <b>212 J</b>   |
| Vanadium, Dissolved      | µg/L  | 86     | <b>61.5</b>   | <b>129</b>     | <i>5 U</i>    | <b>0.61 J</b> | <b>0.85 J</b>  | <b>1.1 J</b>  | <i>5 U</i>    | <b>81.9</b>     | <i>1.4 B</i>   |
| Zinc, Dissolved          | µg/L  | 6,000  | <i>10 U</i>   | <b>0.73 J</b>  | <b>20</b>     | <b>137</b>    | <b>162</b>     | <b>115</b>    | <b>173</b>    | <b>0.71 J</b>   | <b>388 J</b>   |

**Detections above reporting limit in bold**

**Values in red indicate an exceedance of the Project Action Limit (PAL)**

N/A indicates that the parameter was not analyzed for this sample

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

**Table 5 - Sub-Parcel B5-3  
Cumulative Vapor Intrusion Comparison**

|  |      |                               |                              | B19-046-PZ   |             | SW-040-MWS   |             | SW-041-MWS   |             | SW-042-MWS   |             | SW-043-MWS   |             | SW-050-MWS   |             | SW-051-MWS   |             | SW-052-MWS   |             | SW16-PZM003  |             |
|--|------|-------------------------------|------------------------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|
|  |      |                               |                              | 5/28/2020    |             | 1/22/2016    |             | 1/19/2016    |             | 1/20/2016    |             | 12/14/2015   |             | 1/20/2016    |             | 2/8/2016     |             | 1/22/2016    |             | 12/9/2015    |             |
| Parameter                                    | Type | Organ Systems                 | VI Screening Criteria (ug/L) | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard | Conc. (ug/L) | Risk/Hazard |
| <b>Cancer Risk</b>                           |      |                               |                              |              |             |              |             |              |             |              |             |              |             |              |             |              |             |              |             |              |             |
| 1,4-Dioxane                                  | SVOC | Hepatic                       | 130,000                      | 0.1 U        | 0           | 0.1 U        | 0           | 0.04 J       | 3.12E-12    | 0.1 U        | 0           | 0.1 U        | 0           | 0.1 J        | 7.70E-12    | 0.044 J      | 3.40E-12    | 0.1 U        | 0           | 0.36         | 2.80E-11    |
| Naphthalene                                  | SVOC | Nervous; Respiratory          | 200                          | 0.029 J      | 1.5E-09     | 0.033 B      | 1.7E-09     | 0.029 B      | 1.5E-09     | 0.061 B      | 3.1E-09     | 0.044 B      | 2.2E-09     | 0.16         | 8.0E-09     | 0.024 B      | 1.2E-09     | 0.068 B      | 3.4E-09     | 0.027 B      | 1.4E-09     |
| 1,1-Dichloroethane                           | VOC  | None Specified                | 330                          | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 0.38 J       | 1.2E-08     |
| Methyl tert-butyl ether (MTBE)               | VOC  | Hepatic; Ocular; Urinary      | 20,000                       | 1 U          | 0           | 1 U          | 0           | 2.9          | 1.5E-09     | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 0            | 0           |
| Cumulative Vapor Intrusion Cancer Risk       |      |                               |                              | 2E-09        |             | 2E-09        |             | 3E-09        |             |              |             | 2E-09        |             | 8E-09        |             | 1E-09        |             | 3E-09        |             | 1E-08        |             |
| <b>Non-Cancer Risk</b>                       |      |                               |                              |              |             |              |             |              |             |              |             |              |             |              |             |              |             |              |             |              |             |
| Trichloroethene                              | VOC  | Cardiovascular; Developmental | 22                           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 0.47 J       | 2.1E-02     | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           | 1 U          | 0           |
| Cumulative Vapor Intrusion Non-Cancer Hazard |      |                               |                              | 0            |             | 0            |             | 0            |             |              |             | 0            |             | 0            |             | 0            |             | 0            |             | 0            |             |

Yellow highlighted values indicate exceedances of the cumulative vapor intrusion criteria: TCR>1E-05 or THI>1

Conc. = Concentration

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method or field blank.

**Table 6 - Sub-Parcel B5-3  
COPC Screening Analysis**

| Parameter                  | CAS#       | Location of Max Result | Max Detection (mg/kg) | Final Flag | Min Detection (mg/kg) | Average Detection (mg/kg) | Total Samples | Frequency of Detection (%) | Cancer TR=1E-06 (mg/kg) | Non-Cancer HQ=0.1 (mg/kg) | COPC?   |
|----------------------------|------------|------------------------|-----------------------|------------|-----------------------|---------------------------|---------------|----------------------------|-------------------------|---------------------------|---------|
| 1,1-Biphenyl               | 92-52-4    | B19-031-SB-1           | 0.02                  | J          | 0.02                  | 0.02                      | 53            | 1.89                       | 410                     | 20                        | no      |
| 2,4-Dimethylphenol         | 105-67-9   | B19-008-SB-7.5         | 0.022                 | J          | 0.022                 | 0.02                      | 50            | 2.00                       |                         | 1,600                     | no      |
| 2,4-Dinitrophenol          | 51-28-5    | B19-025-SB-1           | 0.051                 | J          | 0.051                 | 0.05                      | 50            | 2.00                       |                         | 160                       | no      |
| 2,6-Dinitrotoluene         | 606-20-2   | B19-005-SB-6           | 0.13                  |            | 0.13                  | 0.13                      | 53            | 1.89                       | 1.5                     | 25                        | no      |
| 2-Butanone (MEK)           | 78-93-3    | B5-148-SB-1            | 0.023                 |            | 0.0027                | 0.01                      | 27            | 11.11                      |                         | 19,000                    | no      |
| 2-Chloronaphthalene        | 91-58-7    | B19-031-SB-1           | 0.089                 |            | 0.089                 | 0.09                      | 53            | 1.89                       |                         | 6,000                     | no      |
| 2-Methylnaphthalene        | 91-57-6    | B5-051-SB-5            | 3.2                   |            | 0.0022                | 0.16                      | 53            | 62.26                      |                         | 300                       | no      |
| Acenaphthene               | 83-32-9    | B5-051-SB-5            | 3.3                   |            | 0.00079               | 0.15                      | 53            | 52.83                      |                         | 4,500                     | no      |
| Acenaphthylene             | 208-96-8   | B5-051-SB-5            | 0.78                  |            | 0.00078               | 0.05                      | 53            | 66.04                      |                         |                           | no      |
| Acetone                    | 67-64-1    | B5-148-SB-1            | 0.33                  | J          | 0.0056                | 0.06                      | 27            | 62.96                      |                         | 67,000                    | no      |
| Aluminum                   | 7429-90-5  | B19-046-SB-1           | 50,700                |            | 2,380                 | 18,568                    | 54            | 100.00                     |                         | 110,000                   | no      |
| Anthracene                 | 120-12-7   | B5-051-SB-5            | 0.6                   |            | 0.00067               | 0.06                      | 53            | 71.70                      |                         | 23,000                    | no      |
| Antimony                   | 7440-36-0  | B5-148-SB-1            | 16.4                  | J          | 5.2                   | 12.2                      | 54            | 5.56                       |                         | 47                        | no      |
| Aroclor 1254               | 11097-69-1 | B19-005-SB-1           | 0.19                  |            | 0.018                 | 0.10                      | 26            | 19.23                      | 0.97                    | 1.5                       | no      |
| Aroclor 1260               | 11096-82-5 | B5-144-SB-1            | 0.21                  |            | 0.0079                | 0.10                      | 26            | 23.08                      | 0.99                    |                           | no      |
| Arsenic                    | 7440-38-2  | B19-005-SB-6           | 47.9                  |            | 2.3                   | 7.98                      | 56            | 85.71                      | 3                       | 48                        | YES (C) |
| Barium                     | 7440-39-3  | B19-046-SB-1           | 705                   |            | 14.8                  | 164                       | 54            | 100.00                     |                         | 22,000                    | no      |
| Benz[a]anthracene          | 56-55-3    | B5-147-SB-5            | 1.2                   |            | 0.0013                | 0.11                      | 53            | 77.36                      | 21                      |                           | no      |
| Benzaldehyde               | 100-52-7   | B19-006-SB-1           | 0.047                 | J          | 0.019                 | 0.03                      | 36            | 16.67                      | 820                     | 12,000                    | no      |
| Benzene                    | 71-43-2    | B19-028-SB-7           | 0.0019                | J          | 0.0017                | 0.00                      | 27            | 7.41                       | 5.1                     | 42                        | no      |
| Benzo[a]pyrene             | 50-32-8    | B5-147-SB-5            | 1.4                   |            | 0.0011                | 0.15                      | 53            | 64.15                      | 2.1                     | 22                        | no      |
| Benzo[b]fluoranthene       | 205-99-2   | B5-147-SB-5            | 1.8                   |            | 0.00069               | 0.24                      | 53            | 69.81                      | 21                      |                           | no      |
| Benzo[g,h,i]perylene       | 191-24-2   | B5-147-SB-5            | 0.49                  |            | 0.00074               | 0.07                      | 53            | 67.92                      |                         |                           | no      |
| Benzo[k]fluoranthene       | 207-08-9   | B19-027-SB-5           | 0.99                  |            | 0.0007                | 0.14                      | 53            | 69.81                      | 210                     |                           | no      |
| Beryllium                  | 7440-41-7  | B19-046-SB-1           | 7                     |            | 0.24                  | 1.67                      | 54            | 81.48                      | 6,900                   | 230                       | no      |
| bis(2-Ethylhexyl)phthalate | 117-81-7   | B19-031-SB-1           | 0.038                 | J          | 0.018                 | 0.03                      | 53            | 13.21                      | 160                     | 1,600                     | no      |
| Cadmium                    | 7440-43-9  | B5-148-SB-1            | 6.6                   |            | 0.39                  | 2.67                      | 54            | 7.41                       | 9,300                   | 10                        | no      |
| Caprolactam                | 105-60-2   | B19-045-SB-1           | 0.023                 | J          | 0.023                 | 0.02                      | 53            | 1.89                       |                         | 40,000                    | no      |
| Carbazole                  | 86-74-8    | B19-016-SB-1           | 0.023                 | J          | 0.023                 | 0.02                      | 53            | 1.89                       |                         |                           | no      |
| Chromium†                  | 7440-47-3  | B5-175-SB-1            | 3,190                 |            | 7.7                   | 383                       | 54            | 100.00                     |                         | 180,000                   | no      |
| Chromium VI                | 18540-29-9 | B5-047-SB-1            | 4.3                   | J-         | 0.17                  | 1.56                      | 53            | 30.19                      | 6.3                     | 350                       | no      |

**Table 6 - Sub-Parcel B5-3  
COPC Screening Analysis**

| Parameter                  | CAS#      | Location of Max Result | Max Detection (mg/kg) | Final Flag | Min Detection (mg/kg) | Average Detection (mg/kg) | Total Samples | Frequency of Detection (%) | Cancer TR=1E-06 (mg/kg) | Non-Cancer HQ=0.1 (mg/kg) | COPC?    |
|----------------------------|-----------|------------------------|-----------------------|------------|-----------------------|---------------------------|---------------|----------------------------|-------------------------|---------------------------|----------|
| Chrysene                   | 218-01-9  | B5-147-SB-5            | 1.2                   |            | 0.00082               | 0.14                      | 53            | 67.92                      | 2,100                   |                           | no       |
| Cobalt                     | 7440-48-4 | B19-026-SB-1           | 27.6                  |            | 0.29                  | 5.40                      | 54            | 90.74                      | 1,900                   | 35                        | no       |
| Copper                     | 7440-50-8 | B19-026-SB-1           | 608                   | J+         | 2.8                   | 45.7                      | 54            | 96.30                      |                         | 4,700                     | no       |
| Cyanide                    | 57-12-5   | B5-148-SB-1            | 2                     |            | 0.037                 | 0.47                      | 53            | 71.70                      |                         | 120                       | no       |
| Dibenz[a,h]anthracene      | 53-70-3   | B5-147-SB-5            | 0.26                  |            | 0.0012                | 0.04                      | 53            | 49.06                      | 2.1                     |                           | no       |
| Diethylphthalate           | 84-66-2   | B19-008-SB-7.5         | 0.2                   |            | 0.2                   | 0.20                      | 53            | 1.89                       |                         | 66,000                    | no       |
| Di-n-butylphthalate        | 84-74-2   | B19-046-SB-5           | 0.23                  |            | 0.071                 | 0.17                      | 53            | 7.55                       |                         | 8,200                     | no       |
| Ethylbenzene               | 100-41-4  | B5-051-SB-5            | 0.58                  |            | 0.0021                | 0.24                      | 27            | 11.11                      | 25                      | 2,000                     | no       |
| Fluoranthene               | 206-44-0  | B5-147-SB-5            | 1.6                   |            | 0.00084               | 0.18                      | 53            | 77.36                      |                         | 3,000                     | no       |
| Fluorene                   | 86-73-7   | B5-051-SB-5            | 3.3                   |            | 0.001                 | 0.14                      | 53            | 56.60                      |                         | 3,000                     | no       |
| Indeno[1,2,3-c,d]pyrene    | 193-39-5  | B5-147-SB-5            | 0.65                  |            | 0.0012                | 0.07                      | 53            | 66.04                      | 21                      |                           | no       |
| Iron                       | 7439-89-6 | B19-028-SB-1           | 227,000               |            | 6,300                 | 73,162                    | 54            | 100.00                     |                         | 82,000                    | YES (NC) |
| Isopropylbenzene           | 98-82-8   | B5-051-SB-5            | 0.71                  |            | 0.0028                | 0.36                      | 27            | 7.41                       |                         | 990                       | no       |
| Lead <sup>^</sup>          | 7439-92-1 | B5-147-SB-5            | 932                   | J          | 3.4                   | 71.8                      | 54            | 98.15                      |                         | 800                       | YES (NC) |
| Manganese                  | 7439-96-5 | B5-175-SB-1            | 43,800                |            | 17.2                  | 9,504                     | 54            | 100.00                     |                         | 2,600                     | YES (NC) |
| Mercury                    | 7439-97-6 | B5-148-SB-1            | 1.2                   | J-         | 0.0028                | 0.09                      | 53            | 56.60                      |                         | 35                        | no       |
| Naphthalene                | 91-20-3   | B5-147-SB-5            | 4.3                   |            | 0.0023                | 0.22                      | 53            | 62.26                      | 8.6                     | 59                        | no       |
| Nickel                     | 7440-02-0 | B5-148-SB-1            | 170                   | J          | 1.5                   | 20.1                      | 54            | 96.30                      | 64,000                  | 2,200                     | no       |
| N-Nitroso-di-n-propylamine | 621-64-7  | B19-025-SB-1           | 0.068                 | J          | 0.068                 | 0.07                      | 53            | 1.89                       | 0.33                    |                           | no       |
| PCBs (total)*              | 1336-36-3 | B5-148-SB-1            | 0.37                  | J          | 0.035                 | 0.17                      | 26            | 19.23                      | 0.94                    |                           | no       |
| Phenanthrene               | 85-01-8   | B5-051-SB-5            | 5                     |            | 0.00086               | 0.21                      | 53            | 86.79                      |                         |                           | no       |
| Pyrene                     | 129-00-0  | B5-147-SB-5            | 1.8                   |            | 0.00074               | 0.18                      | 53            | 83.02                      |                         | 2,300                     | no       |
| Selenium                   | 7782-49-2 | B19-036-SB-1           | 5.5                   |            | 2.1                   | 3.03                      | 54            | 12.96                      |                         | 580                       | no       |
| Silver                     | 7440-22-4 | B19-026-SB-1           | 1.7                   | J          | 0.41                  | 0.94                      | 54            | 14.81                      |                         | 580                       | no       |
| Thallium                   | 7440-28-0 | B5-175-SB-1            | 20.5                  |            | 8.3                   | 13.1                      | 54            | 9.26                       |                         | 1.2                       | YES (NC) |
| Toluene                    | 108-88-3  | B5-148-SB-1            | 0.0022                | J          | 0.0018                | 0.002                     | 27            | 11.11                      |                         | 4,700                     | no       |
| Vanadium                   | 7440-62-2 | B5-175-SB-1            | 10,500                |            | 9.5                   | 569                       | 54            | 100.00                     |                         | 580                       | YES (NC) |
| Xylenes                    | 1330-20-7 | B5-051-SB-5            | 1.7                   |            | 0.014                 | 0.90                      | 27            | 11.11                      |                         | 250                       | no       |
| Zinc                       | 7440-66-6 | B5-148-SB-1            | 5,620                 | J          | 1.6                   | 239                       | 54            | 100.00                     |                         | 35,000                    | no       |

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

J+: The positive result reported for this analyte is a quantitative estimate, but may be biased high.

COPC = Constituent of Potential Concern

C = Compound was identified as a cancer COPC

TR = Target Risk

NC = Compound was identified as a non-cancer COPC

HQ = Hazard Quotient

\*PCBs (total) include the sum of all detected aroclor mixtures, including those without RSLs (e.g. Aroclor 1262, Aroclor 1268) which are not displayed.

<sup>^</sup>Lead is assessed separately through the ALM and IEUBK models.

<sup>†</sup>Chromium was evaluated against the RSL for chromium (III) insoluble salts

**Table 7 - Sub-Parcel B5-3  
Assessment of Lead**

| <b>Exposure Unit</b> | <b>Surface/Sub-Surface</b> | <b>Maximum Concentration<br/>(mg/kg)</b> | <b>Arithmetic Mean<br/>(mg/kg)</b> |
|----------------------|----------------------------|--|------------------------------------|
| EU1<br>(72.9 ac.)    | Surface                    | 865                                      | 85.0                               |
|                      | Sub-Surface                | 932                                      | 57.0                               |
|                      | Pooled                     | 932                                      | 70.5                               |



**Table 8 - Sub-Parcel B5-3  
Soil Exposure Point Concentrations**

| Parameter | EU1 (72.9 ac.) / EU1-EXP (75.1 ac.) |             |                              |             |                              |             |
|-----------|-------------------------------------|-------------|------------------------------|-------------|------------------------------|-------------|
|           | EPCs - Surface Soils                |             | EPCs - Sub-Surface Soils     |             | EPCs - Pooled Soils          |             |
|           | EPC Type                            | EPC (mg/kg) | EPC Type                     | EPC (mg/kg) | EPC Type                     | EPC (mg/kg) |
| Arsenic   | 95% GROS Adjusted Gamma UCL         | 11.3        | 95% KM (Chebyshev) UCL       | 14.8        | 95% KM (Chebyshev) UCL       | 11.8        |
| Iron      | 95% Student's-t UCL                 | 142,313     | 95% Adjusted Gamma UCL       | 36,751      | 95% Chebyshev (Mean, Sd) UCL | 112,264     |
| Manganese | 95% Student's-t UCL                 | 22,598      | 95% Chebyshev (Mean, Sd) UCL | 3,171       | 95% Adjusted Gamma UCL       | 14,436      |
| Thallium  | 95% KM (t) UCL                      | 9.13        | <b>Maximum Value</b>         | <b>8.30</b> | 95% KM (t) UCL               | 8.01        |
| Vanadium  | 95% H-UCL                           | 3,173       | 95% H-UCL                    | 146         | 95% Chebyshev (Mean, Sd) UCL | 1,478       |

**Bold indicates maximum value used as the EPC**

**Table 9 - Sub-Parcel B5-3  
Surface Soils  
Composite Worker Risk Ratios**

| Parameter | Target Organs          | EU1 (72.9 ac.) |                  |            |              |          |
|-----------|------------------------|----------------|------------------|------------|--------------|----------|
|           |                        | EPC (mg/kg)    | Composite Worker |            |              |          |
|           |                        |                | RSLs (mg/kg)     |            | Risk Ratios  |          |
|           |                        |                | Cancer           | Non-Cancer | Risk         | HQ       |
| Arsenic   | Cardiovascular; Dermal | 11.3           | 3.00             | 480        | 3.8E-06      | 0.02     |
| Iron      | Gastrointestinal       | 142,313        |                  | 820,000    |              | 0.2      |
| Manganese | Nervous                | 22,598         |                  | 26,000     |              | 0.9      |
| Thallium  | Dermal                 | 9.13           |                  | 12.0       |              | 0.8      |
| Vanadium  | Dermal                 | 3,173          |                  | 5,800      |              | 0.5      |
|           |                        |                |                  |            | <b>4E-06</b> | <b>↓</b> |

RSLs were obtained from the EPA Regional Screening Levels at [https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)  
 EPC: Exposure Point Concentration  
 HQ: Hazard Quotient  
 HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 1 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 1 |

**Table 10 - Sub-Parcel B5-3  
Subsurface Soils  
Composite Worker Risk Ratios**

| Parameter | Target Organs          | EU1 (72.9 ac.) |                  |            |              |          |
|-----------|------------------------|----------------|------------------|------------|--------------|----------|
|           |                        | EPC<br>(mg/kg) | Composite Worker |            |              |          |
|           |                        |                | RSLs (mg/kg)     |            | Risk Ratios  |          |
|           |                        |                | Cancer           | Non-Cancer | Risk         | HQ       |
| Arsenic   | Cardiovascular; Dermal | 14.8           | 3.00             | 480        | 4.9E-06      | 0.03     |
| Iron      | Gastrointestinal       | 36,751         |                  | 820,000    |              | 0.04     |
| Manganese | Nervous                | 3,171          |                  | 26,000     |              | 0.1      |
| Thallium  | Dermal                 | <b>8.30</b>    |                  | 12.0       |              | 0.7      |
| Vanadium  | Dermal                 | 146            |                  | 5,800      |              | 0.03     |
|           |                        |                |                  |            | <b>5E-06</b> | <b>↓</b> |

RSLs were obtained from the EPA Regional Screening Levels at [https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)

**Bold indicates maximum value used as the EPC**

EPC: Exposure Point Concentration

HQ: Hazard Quotient

HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 1 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 0 |

**Table 11 - Sub-Parcel B5-3  
Pooled Soils  
Composite Worker Risk Ratios**

| Parameter | Target Organs          | EU1 (72.9 ac.) |                  |            |              |          |
|-----------|------------------------|----------------|------------------|------------|--------------|----------|
|           |                        | EPC<br>(mg/kg) | Composite Worker |            |              |          |
|           |                        |                | RSLs (mg/kg)     |            | Risk Ratios  |          |
|           |                        |                | Cancer           | Non-Cancer | Risk         | HQ       |
| Arsenic   | Cardiovascular; Dermal | 11.8           | 3.00             | 480        | 3.9E-06      | 0.02     |
| Iron      | Gastrointestinal       | 112,264        |                  | 820,000    |              | 0.1      |
| Manganese | Nervous                | 14,436         |                  | 26,000     |              | 0.6      |
| Thallium  | Dermal                 | 8.01           |                  | 12.0       |              | 0.7      |
| Vanadium  | Dermal                 | 1,478          |                  | 5,800      |              | 0.3      |
|           |                        |                |                  |            | <b>4E-06</b> | <b>↓</b> |

RSLs were obtained from the EPA Regional Screening Levels at [https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)  
 EPC: Exposure Point Concentration  
 HQ: Hazard Quotient  
 HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 1 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 1 |

**Table 12 - Sub-Parcel B5-3  
Surface Soils  
Construction Worker Risk Ratios**

| <b>70 Day</b>    |                               | <b>EU1-EXP (75.1 ac.)</b> |                            |                   |                    |           |
|------------------|-------------------------------|---------------------------|----------------------------|-------------------|--------------------|-----------|
|                  |                               |                           | <b>Construction Worker</b> |                   |                    |           |
|                  |                               |                           | <b>SSLs (mg/kg)</b>        |                   | <b>Risk Ratios</b> |           |
| <b>Parameter</b> | <b>Target Organs</b>          | <b>EPC (mg/kg)</b>        | <b>Cancer</b>              | <b>Non-Cancer</b> | <b>Risk</b>        | <b>HQ</b> |
| <b>Arsenic</b>   | <b>Cardiovascular; Dermal</b> | 11.3                      | 54.1                       | 345               | 2.1E-07            | 0.03      |
| <b>Iron</b>      | <b>Gastrointestinal</b>       | 142,313                   |                            | 859,076           |                    | 0.2       |
| <b>Manganese</b> | <b>Nervous</b>                | 22,598                    |                            | 15,522            |                    | 1         |
| <b>Thallium</b>  | <b>Dermal</b>                 | 9.13                      |                            | 49.1              |                    | 0.2       |
| <b>Vanadium</b>  | <b>Dermal</b>                 | 3,173                     |                            | 5,755             |                    | 0.6       |
|                  |                               |                           |                            |                   | <b>2E-07</b>       | <b>↓</b>  |

SSLs calculated using equations in 2002 EPA Supplemental Guidance

Guidance Equation Input Assumptions:

5 cars/day (2 tons/car)

5 trucks/day (20 tons/truck)

3 meter source depth thickness

EPC: Exposure Point Concentration

HQ: Hazard Quotient

HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 1 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 1 |



**Table 13 - Sub-Parcel B5-3  
Subsurface Soils  
Construction Worker Risk Ratios**

| <b>70 Day</b>    |                        | <b>EU1-EXP (75.1 ac.)</b> |                            |                   |                    |           |
|------------------|------------------------|---------------------------|----------------------------|-------------------|--------------------|-----------|
|                  |                        |                           | <b>Construction Worker</b> |                   |                    |           |
|                  |                        |                           | <b>SSLs (mg/kg)</b>        |                   | <b>Risk Ratios</b> |           |
| <b>Parameter</b> | <b>Target Organs</b>   | <b>EPC (mg/kg)</b>        | <b>Cancer</b>              | <b>Non-Cancer</b> | <b>Risk</b>        | <b>HQ</b> |
| Arsenic          | Cardiovascular; Dermal | 14.8                      | 54.1                       | 345               | 2.7E-07            | 0.04      |
| Iron             | Gastrointestinal       | 36,751                    |                            | 859,076           |                    | 0.04      |
| Manganese        | Nervous                | 3,171                     |                            | 15,522            |                    | 0.2       |
| Thallium         | Dermal                 | <b>8.30</b>               |                            | 49.1              |                    | 0.2       |
| Vanadium         | Dermal                 | 146                       |                            | 5,755             |                    | 0.03      |
|                  |                        |                           |                            |                   | <b>3E-07</b>       | <b>↓</b>  |

SSLs calculated using equations in 2002 EPA Supplemental Guidance

Guidance Equation Input Assumptions:

5 cars/day (2 tons/car)

5 trucks/day (20 tons/truck)

3 meter source depth thickness

**Bold indicates maximum value used as the EPC**

EPC: Exposure Point Concentration

HQ: Hazard Quotient

HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 0 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 0 |

**Table 14 - Sub-Parcel B5-3  
Pooled Soils  
Construction Worker Risk Ratios**

| <b>70 Day</b>    |                               | <b>EU1-EXP (75.1 ac.)</b> |                            |                   |                    |           |
|------------------|-------------------------------|---------------------------|----------------------------|-------------------|--------------------|-----------|
|                  |                               |                           | <b>Construction Worker</b> |                   |                    |           |
|                  |                               |                           | <b>SSLs (mg/kg)</b>        |                   | <b>Risk Ratios</b> |           |
| <b>Parameter</b> | <b>Target Organs</b>          | <b>EPC (mg/kg)</b>        | <b>Cancer</b>              | <b>Non-Cancer</b> | <b>Risk</b>        | <b>HQ</b> |
| <b>Arsenic</b>   | <b>Cardiovascular; Dermal</b> | 11.8                      | 54.1                       | 345               | 2.2E-07            | 0.03      |
| <b>Iron</b>      | <b>Gastrointestinal</b>       | 112,264                   |                            | 859,076           |                    | 0.1       |
| <b>Manganese</b> | <b>Nervous</b>                | 14,436                    |                            | 15,522            |                    | 0.9       |
| <b>Thallium</b>  | <b>Dermal</b>                 | 8.01                      |                            | 49.1              |                    | 0.2       |
| <b>Vanadium</b>  | <b>Dermal</b>                 | 1,478                     |                            | 5,755             |                    | 0.3       |
|                  |                               |                           |                            |                   | <b>2E-07</b>       | <b>↓</b>  |

SSLs calculated using equations in 2002 EPA Supplemental Guidance

Guidance Equation Input Assumptions:

5 cars/day (2 tons/car)

5 trucks/day (20 tons/truck)

3 meter source depth thickness

EPC: Exposure Point Concentration

HQ: Hazard Quotient

HI: Hazard Index

|          |                  |   |
|----------|------------------|---|
| Total HI | Cardiovascular   | 0 |
|          | Dermal           | 0 |
|          | Gastrointestinal | 0 |
|          | Nervous          | 1 |

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## **APPENDIX A**

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July 20, 2023

Maryland Department of Environment  
1800 Washington Boulevard  
Baltimore MD, 21230  
Attention: Ms. Barbara Brown

**Subject: Request to Enter Temporary CHS Review  
Tradepoint Atlantic Sub-Parcel B5-3**

Dear Ms. Brown:

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (effective September 12, 2014); and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (effective November 25, 2014).

On September 11, 2014, Tradepoint Atlantic submitted an application to the Maryland Department of the Environment's (Department) Voluntary Cleanup Program (VCP).

In consultation with the Department, Tradepoint Atlantic affirms that it desires to accelerate the assessment, remediation, and redevelopment of certain sub-parcels within the larger site due to current market conditions. To that end, the Department and Tradepoint Atlantic agree that the Controlled Hazardous Substance (CHS) Act (Section 7-222 of the Environment Article) and the CHS Response Plan (COMAR 26.14.02) shall serve as the governing statutory and regulatory authority for completing the development activities on Sub-Parcel B5-3 and complement the statutory requirements of the Voluntary Cleanup Program (Section 7-501 of the Environment Article). Upon submission of a Site Response and Development Work Plan and completion of the remedial activities for the sub-parcel, the Department shall issue a "No Further Action" letter upon a recordation of an environmental covenant describing any necessary land use controls for the specific sub-parcel. At such time that all the sub-parcels within the larger parcel have completed remedial activities, Tradepoint Atlantic shall submit to the Department a request for issuing a Certificate of Completion (COC) as well as all pertinent information concerning completion of remedial activities conducted on the parcel. Once the VCP has completed its review of the



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submitted information it shall issue a COC for the entire parcel described in TradePoint Atlantic's VCP application.

Alternatively, TradePoint Atlantic, or other entity may elect to submit an application for a specific sub-parcel and submit it to the VCP for review and acceptance. If the application is received after the cleanup and redevelopment activities described in this work plan are implemented and a No Further Action letter is issued by the Department pursuant to the CHS Act, the VCP shall prepare a No Further Requirements Determination for the sub-parcel.

If TradePoint Atlantic or other entity has not carried out cleanup and redevelopment activities described in the work plan, the cleanup and redevelopment activities may be conducted under the oversight authority of either the VCP or the CHS Act, so long as those activities comport with this work plan.

Engineering and institutional controls approved as part of this Site Response and Development Work Plan shall be described in documentation submitted to the Department demonstrating that the exposure pathways on the sub-parcel are addressed in a manner that protects public health and the environment. This information shall support TradePoint Atlantic's request for the issuance of a COC for the larger parcel.

Please do not hesitate to contact TradePoint Atlantic for further information.

Thank you,

Matthew Newman

Environmental Manager  
TRADEPOINT ATLANTIC  
6995 Bethlehem Boulevard, Suite 100  
Baltimore, Maryland 21219  
T 443.649.5063 C 443.791.9046  
mnewman@tradepointatlantic.com



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## **APPENDIX B**

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**Construction Worker Soil Screening Levels  
Maximum Allowable Work Day Exposure  
Calculation Spreadsheet - Sub-Parcel B5-3**

| Description   | Variable    | Value    |
|---|-------------|----------|
| Days worked per week                                | DW          | 5        |
| Exposure duration (yr)                              | ED          | 1        |
| Hours worked per day                                | ET          | 8        |
| A/constant (unitless) - particulate emission factor | Aconst      | 12.9351  |
| B/constant (unitless) - particulate emission factor | Bconst      | 5.7383   |
| C/constant (unitless) - particulate emission factor | Cconst      | 71.7711  |
| Dispersion correction factor (unitless)             | FD          | 0.185    |
| Days per year with at least .01" precipitation      | P           | 130      |
| Target hazard quotient (unitless)                   | THQ         | 1        |
| Body weight (kg)                                    | BW          | 80       |
| Averaging time - noncancer (yr)                     | ATnc        | 1        |
| Soil ingestion rate (mg/d)                          | IR          | 330      |
| Skin-soil adherence factor (mg/cm <sup>2</sup> )    | AF          | 0.3      |
| Skin surface exposed (cm <sup>2</sup> )             | SA          | 3300     |
| Event frequency (ev/day)                            | EV          | 1        |
| Target cancer risk (unitless)                       | TR          | 01E-06   |
| Averaging time - cancer (yr)                        | ATc         | 70       |
| A/constant (unitless) - volatilization              | Aconstv     | 2.4538   |
| B/constant (unitless) - volatilization              | Bconstv     | 17.566   |
| C/constant (unitless) - volatilization              | Cconstv     | 189.0426 |
| Dry soil bulk density (kg/L)                        | Pb          | 1.5      |
| Average source depth (m)                            | ds          | 3        |
| Soil particle density (g/cm <sup>3</sup> )          | Ps          | 2.65     |
| Total soil porosity                                 | Lpore/Lsoil | 0.43     |
| Air-filled soil porosity                            | Lair/Lsoil  | 0.28     |

**Construction Worker Soil Screening Levels  
Maximum Allowable Work Day Exposure  
Calculation Spreadsheet - Sub-Parcel B5-3**

|  |       |             |         |
|--|-------|-------------|---------|
| Area of site (ac)  | Ac    | 75.1        | EU1-EXP |
| Overall duration of construction (wk/yr)   | EW    | 14          |         |
| Exposure frequency (day/yr)  | EF    | 70          |         |
| Cars per day   | Ca    | 5           |         |
| Tons per car   | CaT   | 2           |         |
| Trucks per day   | Tru   | 5           |         |
| Tons per truck   | TrT   | 20          |         |
| Mean vehicle weight (tons)   | w     | 11          |         |
| Derivation of dispersion factor - particulate emission factor (g/m <sup>2</sup> -s per kg/m <sup>3</sup> ) | Q/Csr | 13.3        |         |
| Overall duration of construction (hr)  | tc    | 2,352       |         |
| Overall duration of traffic (s)  | Tt    | 2,016,000   |         |
| Surface area (m <sup>2</sup> )   | AR    | 303,919     |         |
| Length (m)   | LR    | 551         |         |
| Distance traveled (km)   | ΣVKT  | 386         |         |
| Particulate emission factor (m <sup>3</sup> /kg)   | PEFsc | 189,672,231 |         |
| Derivation of dispersion factor - volatilization (g/m <sup>2</sup> -s per kg/m <sup>3</sup> )              | Q/Csa | 6.21        |         |
| Total time of construction (s)   | Tcv   | 2,016,000   |         |

|             |
|-------------|
| Input       |
| Calculation |

| Chemical                 | RfD & RfC Sources | <sup>^</sup> Ingestion SF (mg/kg-day) <sub>1</sub> | <sup>^</sup> Inhalation Unit Risk (ug/m <sup>3</sup> ) <sup>-1</sup> | <sup>^</sup> Subchronic RfD (mg/kg-day) | <sup>^</sup> Subchronic RfC (mg/m <sup>3</sup> ) | <sup>^</sup> GIABS | Dermally Adjusted RfD (mg/kg-day) | <sup>^</sup> ABS | <sup>^</sup> RBA | *Dia | *Diw | *Henry's Law Constant (unitless) | *Kd      | *Koc | DA | Volatilization Factor - Unlimited Reservoir (m <sup>3</sup> /kg) | Carcinogenic Ingestion/ Dermal SL (SLing/der) | Carcinogenic Inhalation SL (SLinh) | Carcinogenic SL (mg/kg) | Non-Carcinogenic Ingestion/ Dermal SL (SLing/der) | Non-Carcinogenic Inhalation SL (SLinh) | Non-Carcinogenic SL (mg/kg) |
|--------------------------|-------------------|--|--|---|--|--------------------|-----------------------------------|------------------|------------------|------|------|----------------------------------|----------|------|----|--|---|------------------------------------|-------------------------|---|--|-----------------------------|
| Arsenic, Inorganic       | I/C               | 1.50E+00   | 4.30E-03   | 3.00E-04                                | 1.50E-05   | 1                  | 3.00E-04                          | 0.03             | 0.6              |      |      | -                                | 2.90E+01 |      |    |  | 54.1  | 48,300                             | 54.1                    | 348   | 44,505                                 | 345                         |
| Iron                     | P                 | -  | -  | 7.00E-01                                | -  | 1                  | 7.00E-01                          | 0.01             | 1                |      |      | -                                | 2.50E+01 |      |    |  |   |                                    |                         | 859,076   |  | 859,076                     |
| Manganese (Non-diet)     | I                 | -  | -  | 2.40E-02                                | 5.00E-05   | 0.04               | 9.60E-04                          | 0.01             | 1                |      |      | -                                | 6.50E+01 |      |    |  |   |                                    |                         | 17,336  | 148,351                                | 15,522                      |
| Thallium (Soluble Salts) | P                 | -  | -  | 4.00E-05                                | -  | 1                  | 4.00E-05                          | 0.01             | 1                |      |      | -                                | 7.10E+01 |      |    |  |   |                                    |                         | 49.1  |  | 49.1                        |
| Vanadium and Compounds   | A                 | -  | -  | 1.00E-02                                | 1.00E-04   | 0.026              | 2.60E-04                          | 0.01             | 1                |      |      | -                                | 1.00E+03 |      |    |  |   |                                    |                         | 5,869   | 296,702                                | 5,755                       |

\*chemical specific parameters found in Chemical Specific Parameters Spreadsheet at <https://www.epa.gov/risk/regional-screening-levels-rsls>  
<sup>^</sup>chemical specific parameters found in Unpaved Road Traffic calculator at [https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)  
I: chemical specific parameters found in the IRIS at <https://www.epa.gov/iris>  
C: chemical specific parameters found in Cal EPA at <https://www.dtsc.ca.gov/AssessingRisk>  
A: chemical specific parameters found in Agency for Toxic Substances and Disease Registry Minimal Risk Levels (MRLs) at <https://wwwn.cdc.gov/TSP/MRLs/mrlsListing.aspx>  
P: chemical specific parameters found in the Database of EPA PPRTVs at <https://hhprrtv.ornl.gov/quickview/pprtv.php>

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## **APPENDIX C**

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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

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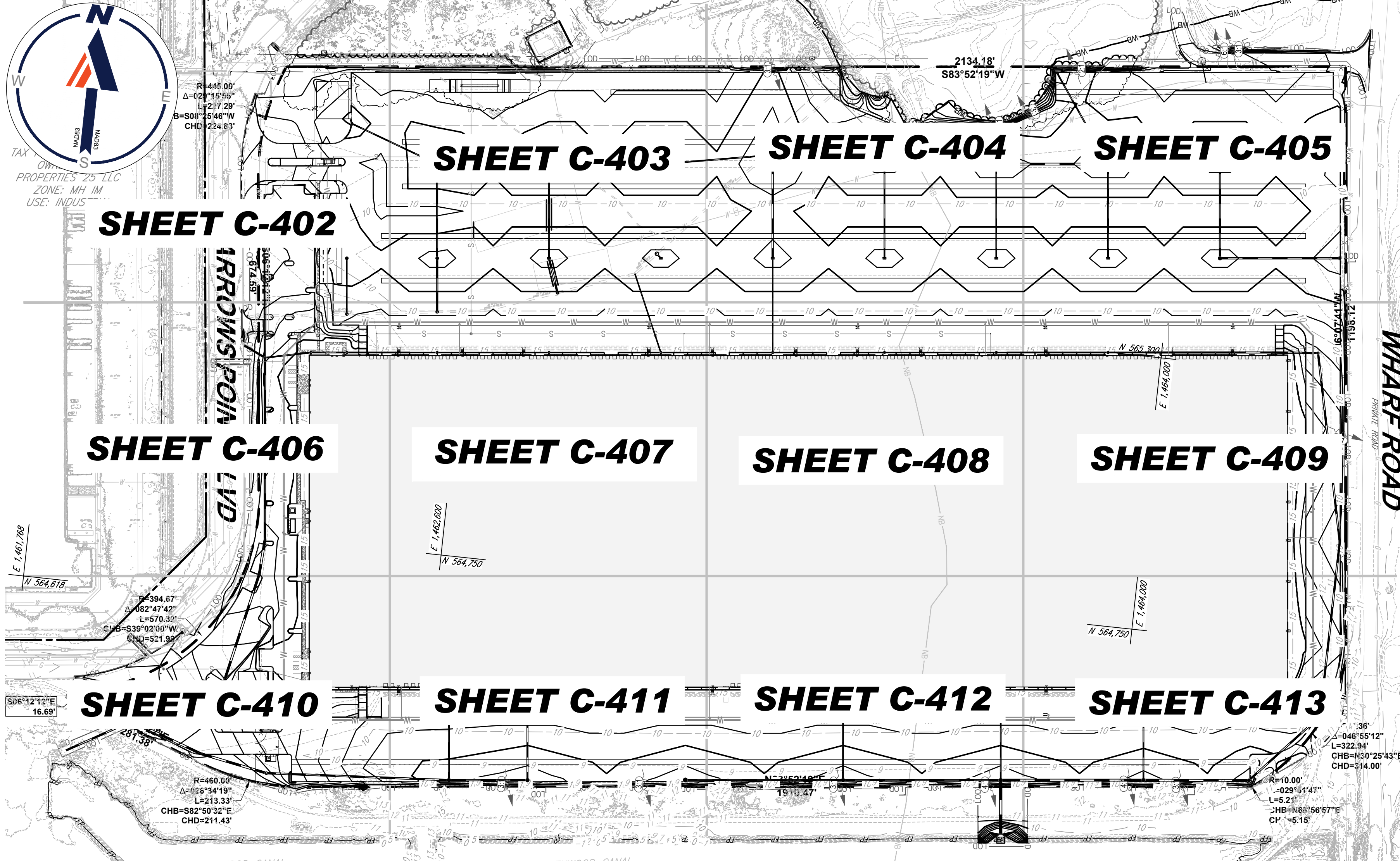
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## **APPENDIX D**

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SHEET C-403

SHEET C-404

SHEET C-405

SHEET C-402

SHEET C-406

SHEET C-407

SHEET C-408

SHEET C-409

SHEET C-410

SHEET C-411

SHEET C-412

SHEET C-413

**SITE SPECIFIC GRADING NOTES**

1. ALL UTILITIES SHOWN ARE PRIVATE UNLESS OTHERWISE NOTED.
2. THE SUBJECT DEVELOPMENT AREA IS LOCATED IN FLOOD ZONE 'X' (AREAS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN) PER MAP ENTITLED "NATIONAL FLOOD INSURANCE PROGRAM, FIRM FLOOD INSURANCE RATE MAP, BALTIMORE COUNTY, MARYLAND (UNINCORPORATED AREAS) PANEL 555 OF 580", MAP NUMBER 240010555G, MAP REVISED MAY 5, 2014, AND PLAN PREPARED BY PAI, DEV. PLANS REVIEW, DATED SEPTEMBER 21, 2016, PER MAP 0555F, DATED SEPTEMBER 28, 2008.
3. ADDITIONAL EXISTING UTILITIES AND SITE FEATURES LOCATED WITHIN THE LIMIT OF DISTURBANCE NOT IDENTIFIED AS "TO BE REMOVED" OR "TO BE RELOCATED" MAY REQUIRE REMOVAL, TO BE FILLED WITH GROUT, OR RELOCATION AS DIRECTED BY THE GEOTECHNICAL ENGINEER OR CRISTED CONTRACTOR TO REFER TO THE GEOTECHNICAL REPORT AND COORDINATE WITH THE GEOTECHNICAL ENGINEER TO DETERMINE WHICH EXISTING UTILITIES SHOULD BE GROUDED.
4. EXISTING UTILITIES NOTED AS "TO REMAIN" WITHIN THE LIMIT OF DISTURBANCE MUST BE MAINTAINED TO PROVIDE SERVICE FOR THE PROPOSED DEVELOPMENT.
5. ANY BENCHMARK THAT IS LOCATED WITHIN THE LOD AND WILL BE DISTURBED DURING CONSTRUCTION IS TO BE RESET PRIOR TO BEGINNING CONSTRUCTION.
6. EXISTING GRADES WERE TAKEN FROM TRIMBLE STRATUS (TPA'S AERIAL SURVEY) ON 5/10/23. CONTRACTOR SHALL VERIFY EXISTING GRADES PRIOR TO START OF CONSTRUCTION.
7. EXISTING MANHOLE, CLEANOUT, AND VALVE COVERS WITHIN THE LIMIT OF DISTURBANCE NOT IDENTIFIED AS "TO BE REMOVED" ARE TO BE ADJUSTED TO MEET FINAL GRADES.
8. LOCATION OF ALL UNDERGROUND UTILITIES ARE APPROXIMATE. SOURCE INFORMATION FROM PLANS AND MARKINGS HAS BEEN COMBINED WITH OBSERVED EVIDENCE OF UTILITIES TO DEVELOP A VIEW OF THOSE UNDERGROUND UTILITIES. HOWEVER, LACKING EXCAVATION, THE EXACT LOCATION OF UNDERGROUND FEATURES CANNOT BE ACCURATELY, COMPLETELY AND RELIABLY DEPICTED. WHERE ADDITIONAL OR MORE DETAILED INFORMATION IS REQUIRED, THE CLIENT IS ADVISED THAT EXCAVATION MAY BE NECESSARY.

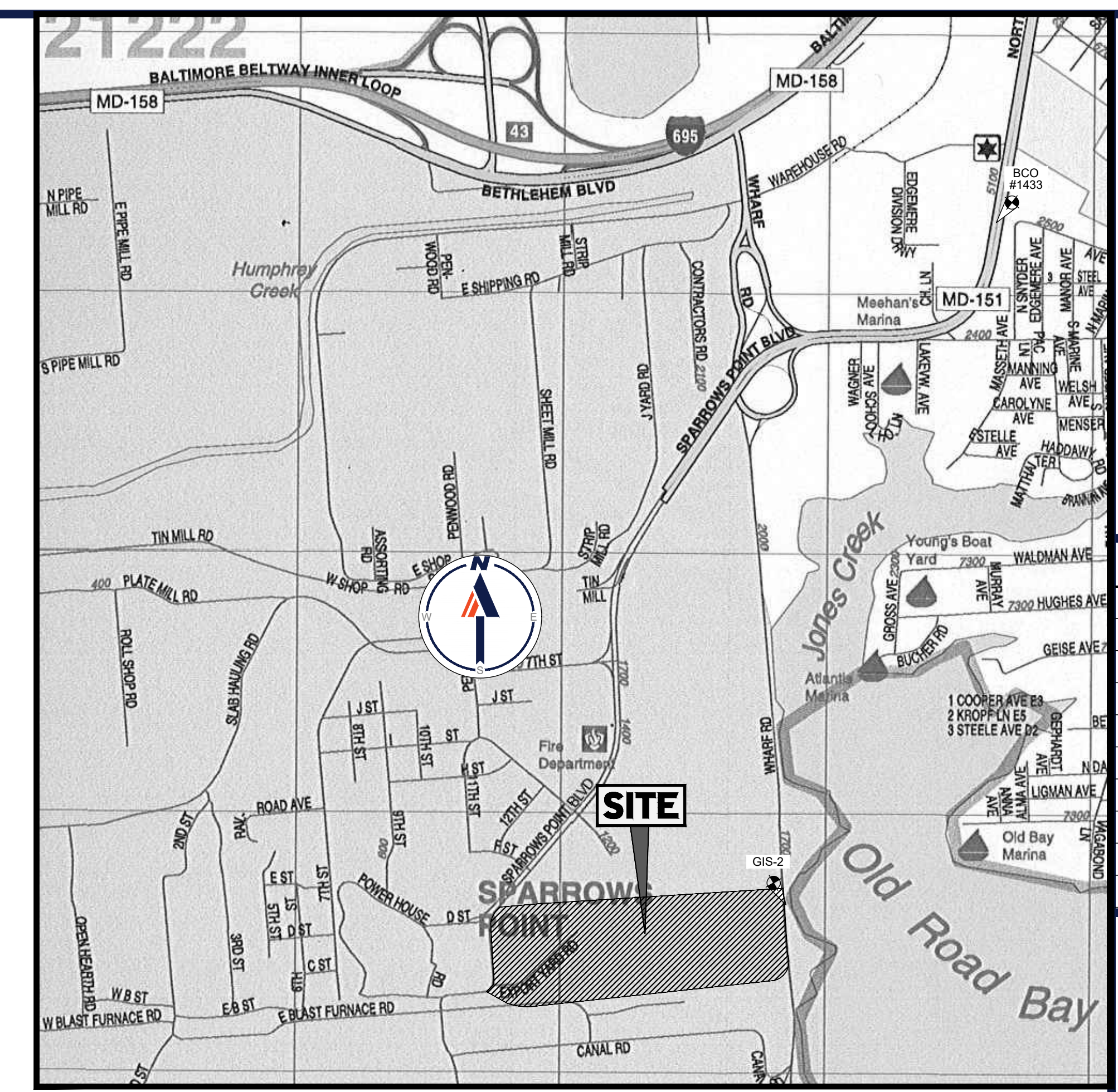
**OWNER/SIDEVELOPER'S CERTIFICATION - GRADING**

I/WE CERTIFY THAT ALL GRADING ON THIS SITE WILL BE DONE IN ACCORDANCE WITH THE CURRENT GRADING REQUIREMENTS AS SET FORTH BY THE BALTIMORE COUNTY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND SUSTAINABILITY AND WITH THE REQUIREMENTS SPECIFIED IN ARTICLE 33, TITLE 5 OF THE BALTIMORE COUNTY CODE.

|                              |       |      |
|------------------------------|-------|------|
| SIGNATURE OF OWNER/DEVELOPER | TITLE | DATE |
| PRINT NAME                   |       |      |

LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

GRADING 1 OF 13



**LOCATION MAP**

COPYRIGHT ADC THE MAP PEOPLE  
PERMIT USE NO. 20602153-5  
SCALE: 1"=1,000'

**GENERAL GRADING NOTES**

1. IT IS THE CONTRACTOR'S RESPONSIBILITY TO REVIEW ALL CONSTRUCTION CONTRACT DOCUMENTS INCLUDING, BUT NOT LIMITED TO, ALL OF THE DRAWINGS AND SPECIFICATIONS ASSOCIATED WITH THE PROJECT WORK SCOPE PRIOR TO THE INITIATION AND COMMENCEMENT OF CONSTRUCTION. SHOULD THE CONTRACTOR FIND A CONFLICT AND/OR DISCREPANCY BETWEEN THE DOCUMENTS RELATIVE TO THE SPECIFICATIONS OR THE RELATIVE OR APPLICABLE CODES, REGULATIONS, LAWS, RULES, STATUTES AND/OR ORDINANCES, IT IS THE CONTRACTOR'S SOLE RESPONSIBILITY TO NOTIFY THE PROJECT ENGINEER OF RECORD. IN WRITING, OF SAID CONFLICT AND/OR DISCREPANCY PRIOR TO THE START OF CONSTRUCTION. CONTRACTOR'S FAILURE TO NOTIFY THE PROJECT ENGINEER SHALL CONSTITUTE CONTRACTOR'S FULL AND COMPLETE ACCEPTANCE OF ALL RESPONSIBILITY TO COMPLETE THE SCOPE OF WORK AS DEFINED BY THE DRAWINGS AND IN FULL COMPLIANCE WITH ALL FEDERAL, STATE AND LOCAL REGULATIONS, LAWS, STATUTES, ORDINANCES AND CODES AND, FURTHER, CONTRACTOR SHALL BE RESPONSIBLE FOR ALL COSTS ASSOCIATED WITH SAME.
2. SITE GRADING MUST BE PERFORMED IN ACCORDANCE WITH THESE PLANS AND SPECIFICATIONS AND THE RECOMMENDATIONS SET FORTH IN THE GEOTECHNICAL REPORT REFERENCED IN THIS PLAN SET. THE CONTRACTOR IS RESPONSIBLE FOR REMOVING AND REPLACING UNSUITABLE MATERIALS WITH SUITABLE MATERIALS AS SPECIFIED IN THE GEOTECHNICAL REPORT. ALL EXCAVATED OR FILLED AREAS MUST BE COMPACTED AS OUTLINED IN THE GEOTECHNICAL REPORT. MOISTURE CONTENT AT TIME OF PLACEMENT MUST BE SUBMITTED IN A COMPACTION REPORT PREPARED BY A QUALIFIED GEOTECHNICAL ENGINEER, REGISTERED WITH THE STATE WHERE THE WORK IS PERFORMED, VERIFYING THAT ALL FILLED AREAS AND SURGRADE AREAS WITHIN THE BUILDING PAD AREA AND AREAS TO BE PAVED HAVE BEEN COMPACTED IN ACCORDANCE WITH THESE PLANS, SPECIFICATIONS AND THE RECOMMENDATIONS SET FORTH IN THE GEOTECHNICAL REPORT AND ALL APPLICABLE REQUIREMENTS, RULES, STATUTES, LAWS, ORDINANCES AND CODES. SUBBASE MATERIAL FOR SIDEWALKS, CURB, OR ASPHALT MUST BE FREE OF ORGANICS AND OTHER UNSUITABLE MATERIALS. SHOULD SUBBASE BE DEEMED UNSUITABLE BY OWNER/DEVELOPER, OR OWNER/DEVELOPER'S REPRESENTATIVE, SUBBASE IS TO BE REMOVED AND FILLED WITH APPROVED FILL MATERIAL COMPACTED AS DIRECTED BY THE GEOTECHNICAL REPORT. EARTHWORK ACTIVITIES INCLUDING, BUT NOT LIMITED TO, EXCAVATION, BACKFILL, AND COMPACTING MUST COMPLY WITH THE RECOMMENDATIONS IN THE GEOTECHNICAL REPORT AND ALL APPLICABLE REQUIREMENTS, RULES, STATUTES, LAWS, ORDINANCES AND CODES. EARTHWORK ACTIVITIES MUST COMPLY WITH THE STANDARD STATE DOT SPECIFICATIONS FOR ROADWAY CONSTRUCTION (LATEST EDITION) AND ANY AMENDMENTS OR REVISIONS THERETO.
3. THE CONTRACTOR MUST COMPLY TO THE FULLEST EXTENT, WITH THE LATEST OSHA STANDARDS AND REGULATIONS, AND/OR ANY OTHER AGENCY WITH JURISDICTION FOR EXCAVATION AND TRENCHING PROCEDURES. THE CONTRACTOR IS RESPONSIBLE FOR DETERMINING THE MEANS AND METHODS REQUIRED TO MEET THE INTENT AND PERFORMANCE CRITERIA OF OSHA, AS WELL AS ANY OTHER ENTITY THAT HAS JURISDICTION FOR EXCAVATION AND/OR TRENCHING PROCEDURES AND CONSULTANT SHALL HAVE NO RESPONSIBILITY FOR OR AS RELATED TO EXCAVATION AND TRENCHING PROCEDURES.
4. PAVEMENT MUST BE SAW CUT IN STRAIGHT LINES, AND EXCEPT FOR EDGE OF BUILT JOINTS, MUST EXTEND TO THE FULL DEPTH OF THE EXISTING PAVEMENT. ALL DEBRIS FROM REMOVAL OPERATIONS MUST BE REMOVED FROM THE SITE AT THE TIME OF EXCAVATION. STOCKPILING OF DEBRIS WILL NOT BE PERMITTED.
5. THE TOPS OF EXISTING MANHOLES, INLET STRUCTURES, AND SANITARY CLEANOUT TOPS MUST BE ADJUSTED, AS NECESSARY, TO MATCH PROPOSED GRADES IN ACCORDANCE WITH ALL APPLICABLE STANDARDS, REQUIREMENTS, RULES, STATUTES, LAWS, ORDINANCES AND CODES.
6. THE CONTRACTOR IS FULLY RESPONSIBLE FOR VERIFICATION OF EXISTING TOPOGRAPHIC INFORMATION AND UTILITY INVERT ELEVATIONS PRIOR TO COMMENCING ANY CONSTRUCTION. CONTRACTOR MUST CONFIRM AND ENSURE 0.75% MINIMUM SLOPE AGAINST ALL ISLANDS, GUTTERS, AND CURBS, 1.0% ON ALL CONCRETE SURFACES, AND 1.0% MINIMUM ON ASPHALT (EXCEPT WHERE ADA REQUIREMENTS LIMIT GRADES), TO PREVENT PONDING. CONTRACTOR MUST IMMEDIATELY IDENTIFY, IN WRITING TO THE ENGINEER, ANY DISCREPANCIES THAT MAY OR COULD AFFECT THE PUBLIC SAFETY, HEALTH OR GENERAL WELFARE, OR PROJECT COST. IF CONTRACTOR PROCEEDS WITH CONSTRUCTION WITHOUT PROVIDING PROPER NOTIFICATION, MUST BE AT THE CONTRACTOR'S OWN RISK AND, FURTHER, CONTRACTOR SHALL, INDISTINGUISH, DEFEND AND HOLD HARMLESS THE DESIGN ENGINEER FOR ANY DAMAGES, COSTS, INJURIES, ATTORNEY'S FEES AND THE LIKE WHICH RESULT FROM SAME.
7. PROPOSED TOP OF CURB ELEVATIONS ARE GENERALLY 6" ABOVE EXISTING LOCAL ASPHALT GRADE UNLESS OTHERWISE NOTED. FIELD ADJUST TO CREATE A MINIMUM OF 0.75% GUTTER GRADE ALONG CURB FACE. IT IS CONTRACTOR'S OBLIGATION TO ENSURE THAT DESIGN ENGINEER APPROVES FINAL CURBING CUT SHEETS PRIOR TO INSTALLATION OF SAME.
8. REFER TO SITE PLAN FOR ADDITIONAL NOTES.
9. IN THE EVENT OF DISCREPANCIES AND/OR CONFLICTS BETWEEN PLANS OR RELATIVE TO OTHER PLANS, THE SITE PLAN WILL TAKE PRECEDENCE AND CONTROL. CONTRACTOR MUST IMMEDIATELY NOTIFY THE DESIGN ENGINEER, IN WRITING, OF ANY DISCREPANCIES AND/OR CONFLICTS.
10. CONTRACTOR IS REQUIRED TO SECURE ALL NECESSARY AND/OR REQUIRED PERMITS AND APPROVALS FOR ALL OFF SITE MATERIAL SOURCES AND DISPOSAL FACILITIES. CONTRACTOR MUST SUPPLY A COPY OF APPROVALS TO ENGINEER AND OWNER PRIOR TO INITIATING ANY WORK.
11. WHERE RETAINING WALLS (WHETHER OR NOT THEY MEET THE JURISDICTIONAL DEFINITION) ARE IDENTIFIED ON PLANS, ELEVATIONS IDENTIFIED ARE FOR THE EXPOSED PORTION OF THE WALL. WALL FOOTING/S FOUNDATION ELEVATIONS ARE NOT IDENTIFIED HEREIN AND ARE TO BE SET/DETERMINED BY THE CONTRACTOR BASED ON FINAL STRUCTURAL DESIGN SHOP DRAWINGS PREPARED BY THE APPROPRIATE PROFESSIONAL LICENSED IN THE STATE WHERE THE CONSTRUCTION OCCURS.
12. CONSULTANT IS NEITHER LIABLE NOR RESPONSIBLE FOR ANY SUBSURFACE CONDITIONS AND FURTHER, SHALL HAVE NO LIABILITY FOR ANY HAZARDOUS MATERIALS, HAZARDOUS SUBSTANCES, OR POLLUTANTS ON, ABOUT OR UNDER THE PROPERTY.

**BENCHMARK INFORMATION**

ELEVATIONS ARE BASED ON NAVD 88; COORDINATES AND MERIDIAN ARE BASED ON THE MARYLAND COORDINATE SYSTEM (MCS) PER THE FOLLOWING MONUMENTS:  
 BOON# 1433 (CAPPED REBAR)  
 N 571.833.79, E 1.466.230.69, ELEV. 16.59  
 IN MEDIAN OF NORTH POINT BLVD SOUTH OF NORTH SNYDER AVE.  
 GIS #2 (BRASS DISK)  
 N 565.182.39, E 1.464.480.72, ELEV. 9.95  
 EAST SIDE OF WHARF ROAD 420' S NORTH OF LIGHT TOWER

**BALTIMORE COUNTY STANDARD GRADING PLAN NOTES**

1. THE PROPOSED GRADING SHOWN ON THIS PLAN MEETS THE REQUIREMENTS SET FORTH BY BALTIMORE COUNTY DEPARTMENT ON ENVIRONMENTAL PROTECTION AND SUSTAINABILITY AND COMPLIES WITH ARTICLE 33, TITLE 5 OF THE BALTIMORE COUNTY CODE. HOWEVER, DUE TO BUILDING TYPES AND LAYOUT, SOME FIELD ADJUSTMENTS MAY BE REQUIRED. ALL CHANGES MUST COMPLY WITH THE ABOVE MENTIONED REQUIREMENTS.
2. ALL SWALES HAVE BEEN DESIGNED BY THE ENGINEER TO CONVEY RUNOFF ACCORDING TO BALTIMORE COUNTY DEPARTMENT OF PUBLIC WORKS DESIGN STANDARDS.
3. THERE SHALL BE NO CLEARING, GRADING, CONSTRUCTION OR DISTURBANCE OF VEGETATION IN THE FOREST BUFFER EASEMENT OR OTHER FOREST RETENTION AREAS, EXCEPT AS PERMITTED BY THE BALTIMORE COUNTY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND SUSTAINABILITY.
4. STORMWATER MANAGEMENT WILL BE PROVIDED VIA A TIMING VARIANCE AND POSTING OF A SURETY IN THE AMOUNT OF \$2,308,500 FOR 42.75 ACRES OF IMPERVIOUS AREA.
5. THE 10% POLLUTANT CALCULATIONS WILL BE ADDRESSED AT THE REGIONAL FACILITY.

**OWNER/DEVELOPER**

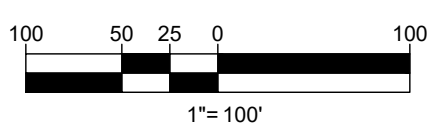
TRADEPOINT DEVELOPMENT, LLC  
609 BELTLINE BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLUTZ  
PHONE: 443-909-9817

STORMWATER MANAGEMENT PERMIT NOT REQUIRED

BALTIMORE COUNTY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AND SUSTAINABILITY

APPROVED FOR GRADING

DATE



MARYLAND COORDINATE SYSTEM (MCS)

**BOHLER**

SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY |
|-----|------|---------|----------|
|     |      |         |          |
|     |      |         |          |

**811**

Know what's below.  
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|              |              |
|--------------|--------------|
| PROJECT No.: | MDA230002.00 |
| DRAWN BY:    | RLB          |
| CHECKED BY:  | MJG          |
| DATE:        | 6/15/23      |
| CAD ID:      | MD-0         |

PROJECT:

**CONSTRUCTION DOCUMENTS**

FOR

**TRADEPOINT ATLANTIC**

PROJECT  
FLYWHEEL

SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**

901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21284  
Phone: (410) 821-7900  
Fax: (410) 821-7987  
MGESELL@BOHLERENG.COM

**M.J. GESELL**

PROFESSIONAL ENGINEER  
WHY US? WE ARE  
PROFESSIONAL CERTIFICATION  
I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND. LICENSE NO. 44097, EXPIRATION DATE: 6/30/25

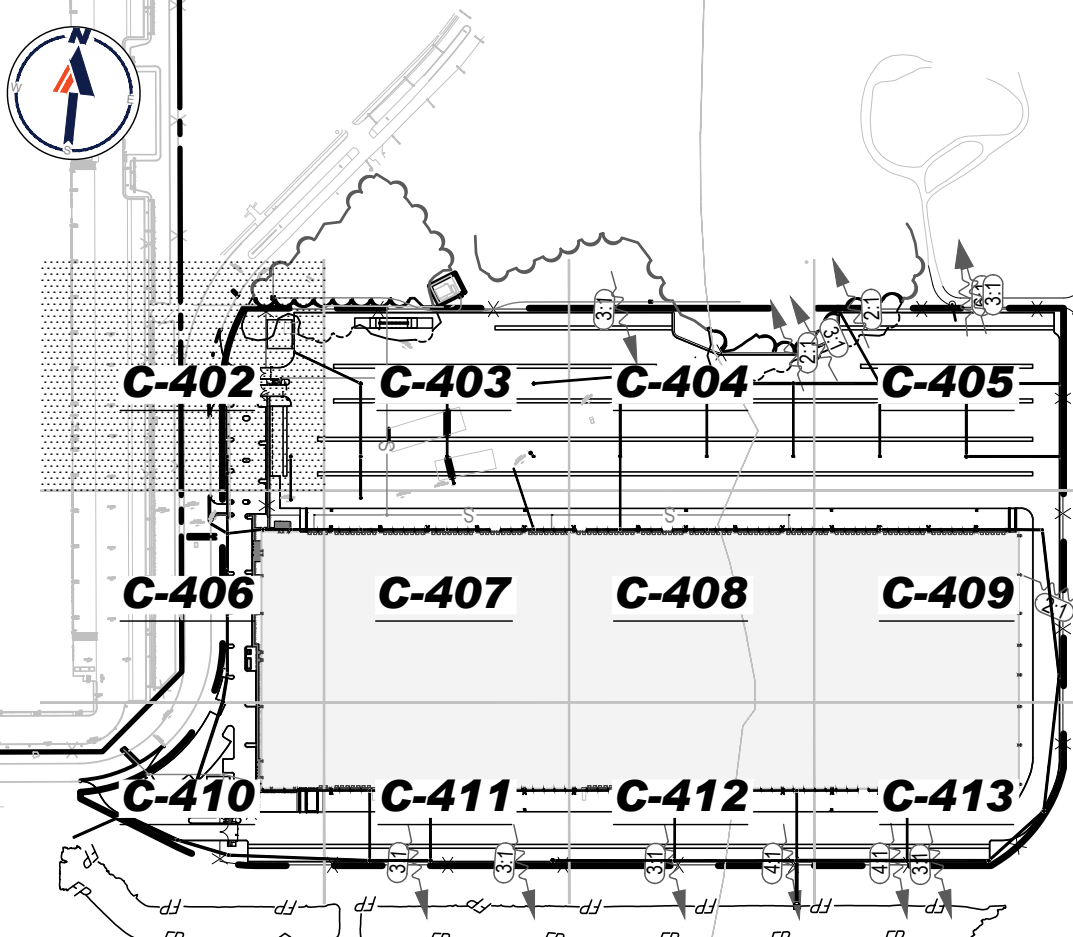
SHEET TITLE:

**OVERALL FINAL GRADING PLAN**

SHEET NUMBER:  
**C-401**

ORG. DATE - 06/15/2023





**BOHLER**  
 SITE CIVIL AND CONSULTING ENGINEERING  
 PROGRAM MANAGEMENT  
 LANDSCAPE ARCHITECTURE  
 SUSTAINABLE DESIGN  
 PERMITTING SERVICES  
 TRANSPORTATION SERVICES

| REVISIONS |      |         |                       |
|-----------|------|---------|-----------------------|
| REV       | DATE | COMMENT | DRAWN BY / CHECKED BY |
|           |      |         |                       |
|           |      |         |                       |
|           |      |         |                       |

**KEY MAP**  
 NOT TO SCALE

**LEGEND**

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|-------------------|--------------------------------------|-------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---               | CONTOUR LINE                         | ---                     |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                     |
| ---               | UNDERGROUND WATER LINE               | ---                     |
| ---               | INDUSTRIAL WATER LINE                | ---                     |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---               | UNDERGROUND GAS LINE                 | ---                     |
| ---               | OVERHEAD WIRE                        | ---                     |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---               | STORM SEWER                          | ---                     |
| ---               | LIMIT OF DISTURBANCE                 | ---                     |
| ---               | SAWCUT                               | ---                     |
| ---               | CONCRETE CURB & GUTTER               | ---                     |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |



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PROJECT No.: MDA23002.00  
 DRAWN BY: RLB  
 CHECKED BY: MUG  
 DATE: 6/15/23  
 CAD ID: GRAD-0

**CONSTRUCTION DOCUMENTS**



**PROJECT FLYWHEEL**  
 SPARROWS POINT BOULEVARD  
 BALTIMORE, MD 21219  
 ELECTION DISTRICT 15  
 COUNCILMANIC DISTRICT 7  
 BALTIMORE COUNTY



901 DULANEY VALLEY ROAD, SUITE 801  
 TOWSON, MARYLAND 21204  
 Phone: (410) 821-7900  
 Fax: (410) 821-7987  
 MD@BohlerEng.com

**M.J. GESELL**

PROFESSIONAL ENGINEER  
 MARYLAND LICENSE NO. 44097  
 PROFESSIONAL CERTIFICATION  
 I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND. LICENSE NO. 44097, EXPIRATION DATE: 6/30/25

SHEET TITLE:

**FINAL GRADING PLAN**

SHEET NUMBER:  
**C-402**

ORG. DATE - 06/15/2023

MATCHLINE - SHEET C-406

MATCHLINE - SHEET C-403

GRADING 2 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

**OWNER/DEVELOPER**  
 TRADEPOINT DEVELOPMENT, LLC  
 6995 BETHLEHEM BOULEVARD  
 SPARROWS POINT, MD 21219  
 CONTACT: LUKE KLITZ  
 PHONE: 443-909-9617



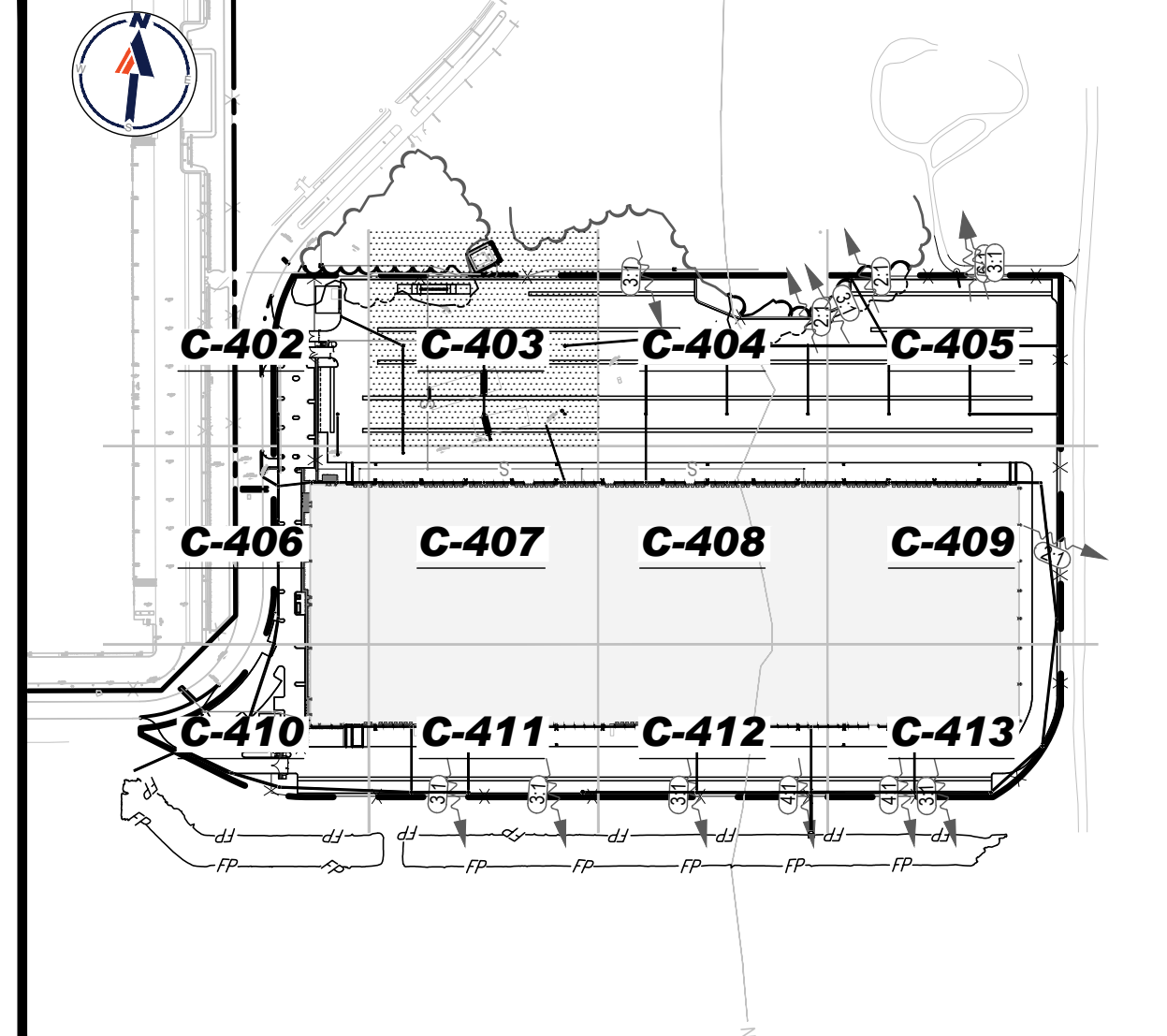
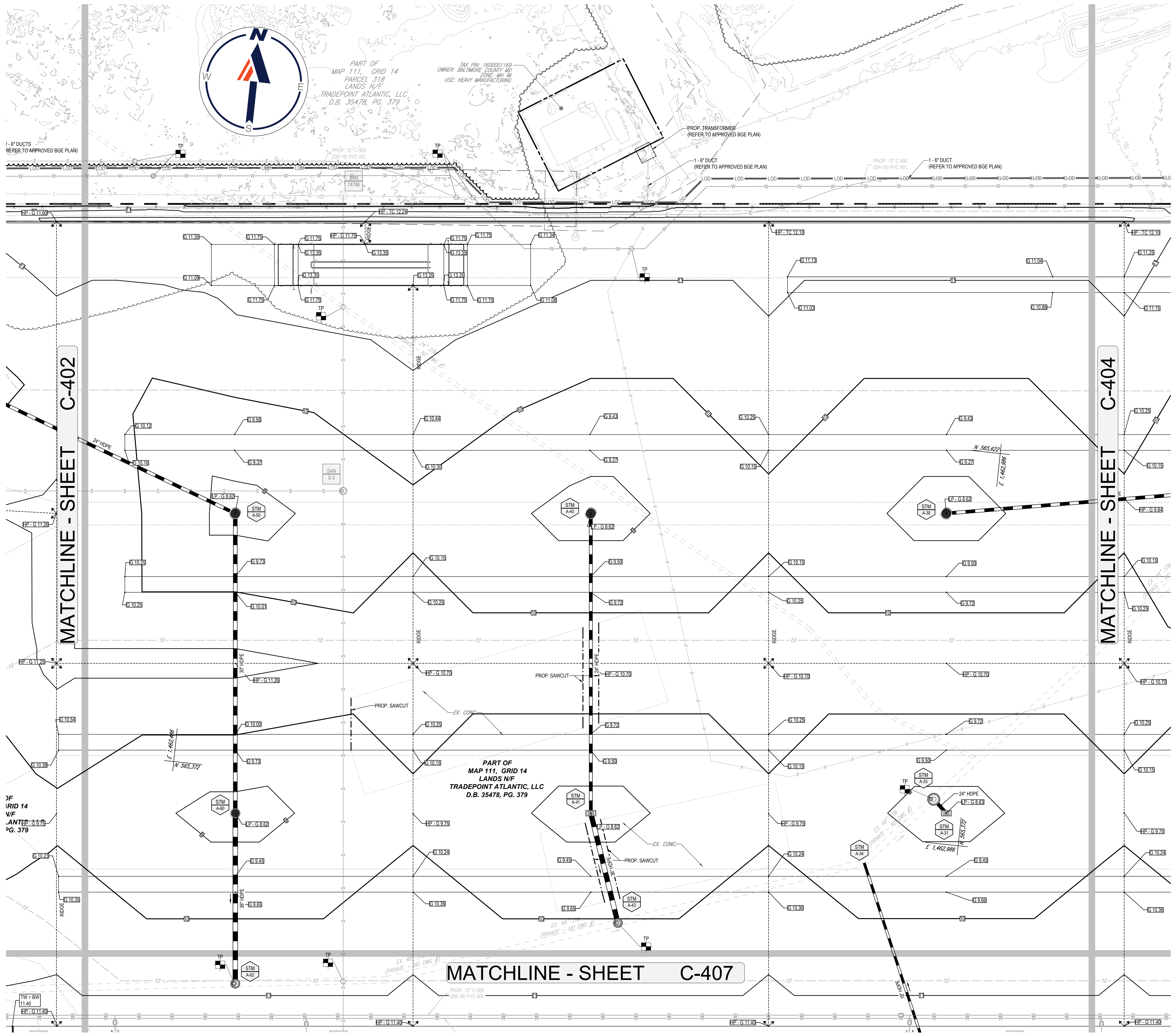
JUL 10, 2023  
 H:\2023\MDA23002\00\CADD\DRAWINGS\PLAN SET\PHASE II PLANS\MDA23002.00\GRAD-0001-LAYOUT-C-402 - GRADING PLAN

MCCORMICK  
 MARYLAND LOGISTICS  
 CENTER  
 TAX PIN: 2500016874  
 OWNER: TRA  
 PROPERTIES 25 LLC  
 ZONE: MH IM  
 USE: INDUSTRIAL

SPARROWS POINT BLVD  
 FUTURE ROAD

PART OF  
 MAP 111, GRID 14  
 LANDS N/F  
 TRADEPOINT ATLANTIC  
 D.B. 35478, PG. 379





**KEY MAP**  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|---------------|--------------------------------------|-------------------------|
| ---           | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---           | CONTOUR LINE                         | ---                     |
| ---           | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---           | SANITARY SEWER LINE                  | ---                     |
| ---           | UNDERGROUND WATER LINE               | ---                     |
| ---           | INDUSTRIAL WATER LINE                | ---                     |
| ---           | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---           | UNDERGROUND GAS LINE                 | ---                     |
| ---           | OVERHEAD WIRE                        | ---                     |
| ---           | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---           | STORM SEWER                          | ---                     |
| ---           | LIMIT OF DISTURBANCE                 | ---                     |
| ---           | SAWCUT                               | ---                     |
| ---           | CONCRETE CURB & GUTTER               | ---                     |
| ---           | SPILL CURB                           | ---                     |
| ---           | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---           | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |

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PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY |
|-----|------|---------|----------|
|     |      |         |          |
|     |      |         |          |
|     |      |         |          |

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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT  
FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21204  
Phone: (410) 821-7900  
Fax: (410) 821-7987  
MD@BohlerEng.com

**M.J. GESELL**  
PROFESSIONAL ENGINEER  
MARYLAND LICENSE NO. 44097  
PROFESSIONAL CERTIFICATION  
I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND. LICENSE NO. 44097, EXPIRATION DATE: 6/30/25

SHEET TITLE:  
**FINAL GRADING PLAN**

SHEET NUMBER:  
**C-403**  
ORG. DATE - 06/15/2023

JUL 10, 2023  
H:\2023\MDA230002\00\CAD\DRAWINGS\PLAN SET\PHASE 1 PLAN\PHASE 1 LAYOUT - C-403 - GRADING PLAN

GRADING 3 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

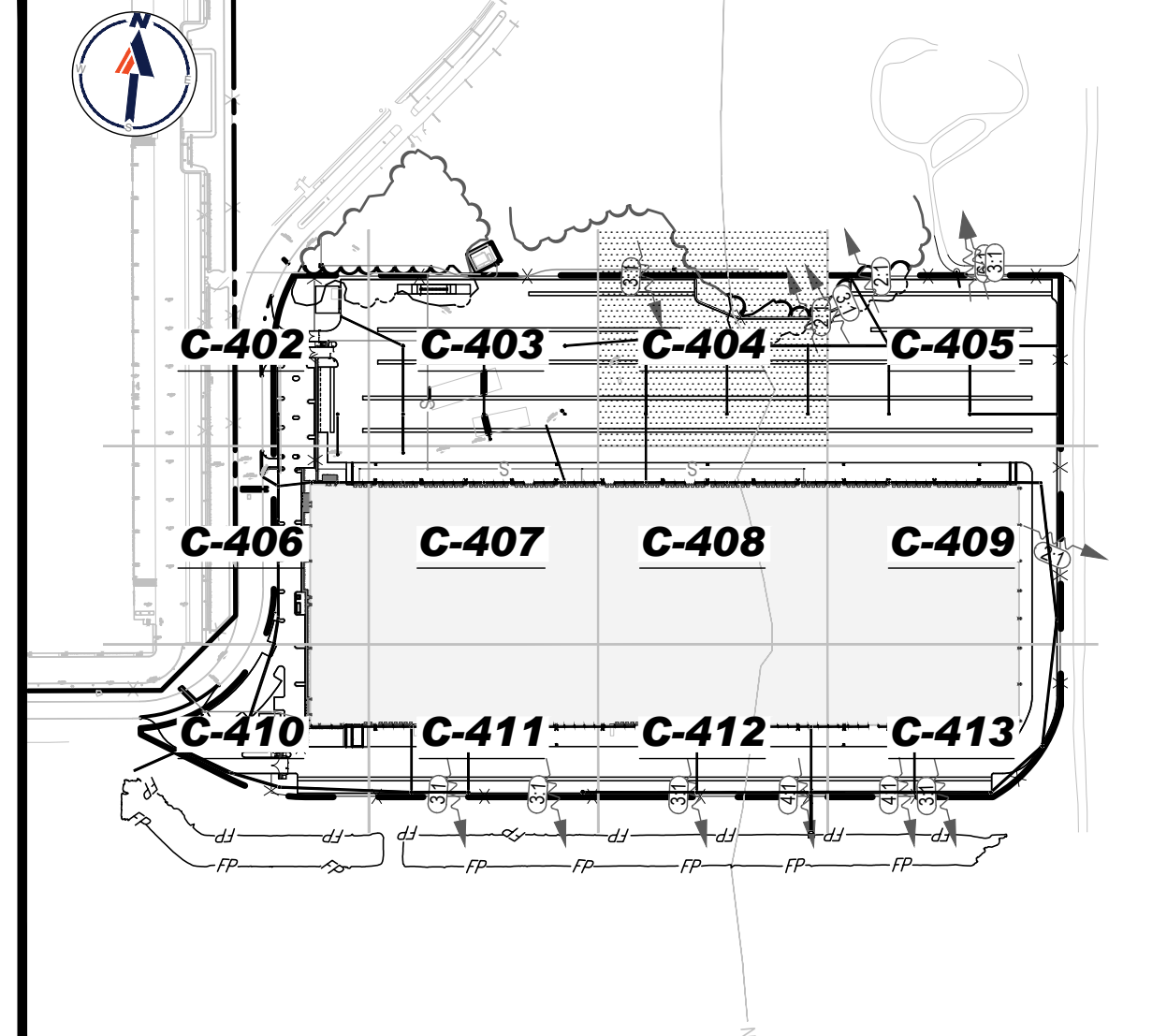
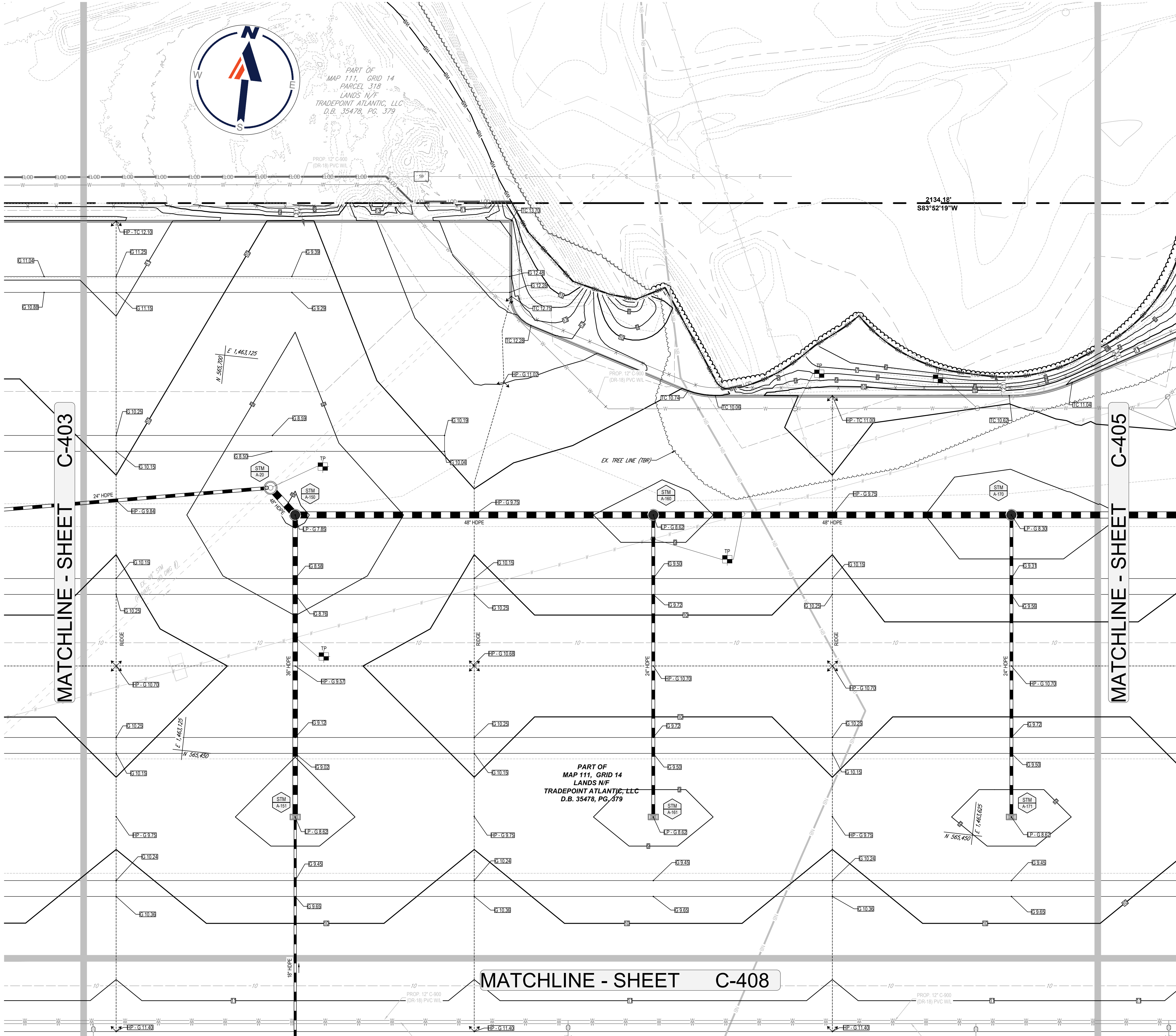
OWNER/DEVELOPER  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZT  
PHONE: 443-909-9617

MARYLAND COORDINATE SYSTEM (MCS)





PART OF  
MAP 111, GRID 14  
PARCEL 318  
LANDS W/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379



**KEY MAP**  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|---------------|--------------------------------------|-------------------------|
| ---           | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---           | CONTOUR LINE                         | ---                     |
| ---           | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---           | SANITARY SEWER LINE                  | ---                     |
| ---           | UNDERGROUND WATER LINE               | ---                     |
| ---           | INDUSTRIAL WATER LINE                | ---                     |
| ---           | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---           | UNDERGROUND GAS LINE                 | ---                     |
| ---           | OVERHEAD WIRE                        | ---                     |
| ---           | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---           | STORM SEWER                          | ---                     |
| ---           | LIMIT OF DISTURBANCE                 | ---                     |
| ---           | SAWCUT                               | ---                     |
| ---           | CONCRETE CURB & GUTTER               | ---                     |
| ---           | SPILL CURB                           | ---                     |
| ---           | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---           | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |

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SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
|-----|------|---------|----------|------------|
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

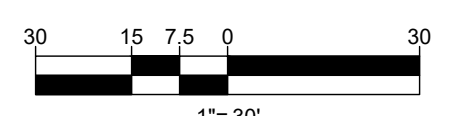
**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT  
FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21204  
Phone: (410) 821-7900  
Fax: (410) 821-7987  
MD@BohlerEng.com

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MARYLAND LICENSE No. 44097  
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SHEET TITLE:  
**FINAL GRADING PLAN**  
SHEET NUMBER:  
**C-404**  
ORG. DATE - 06/15/2023

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLUITZ  
PHONE: 443-909-9617

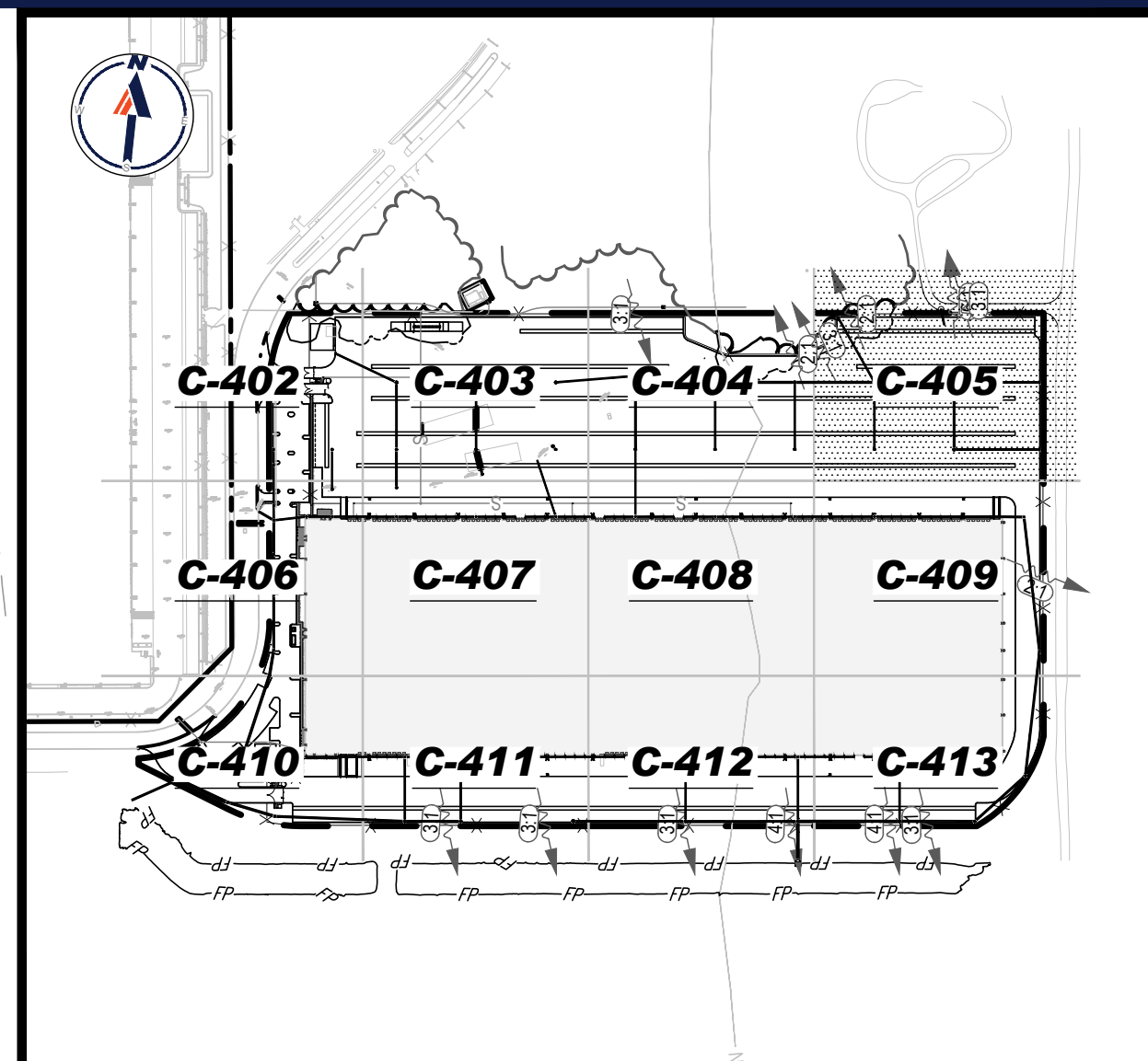
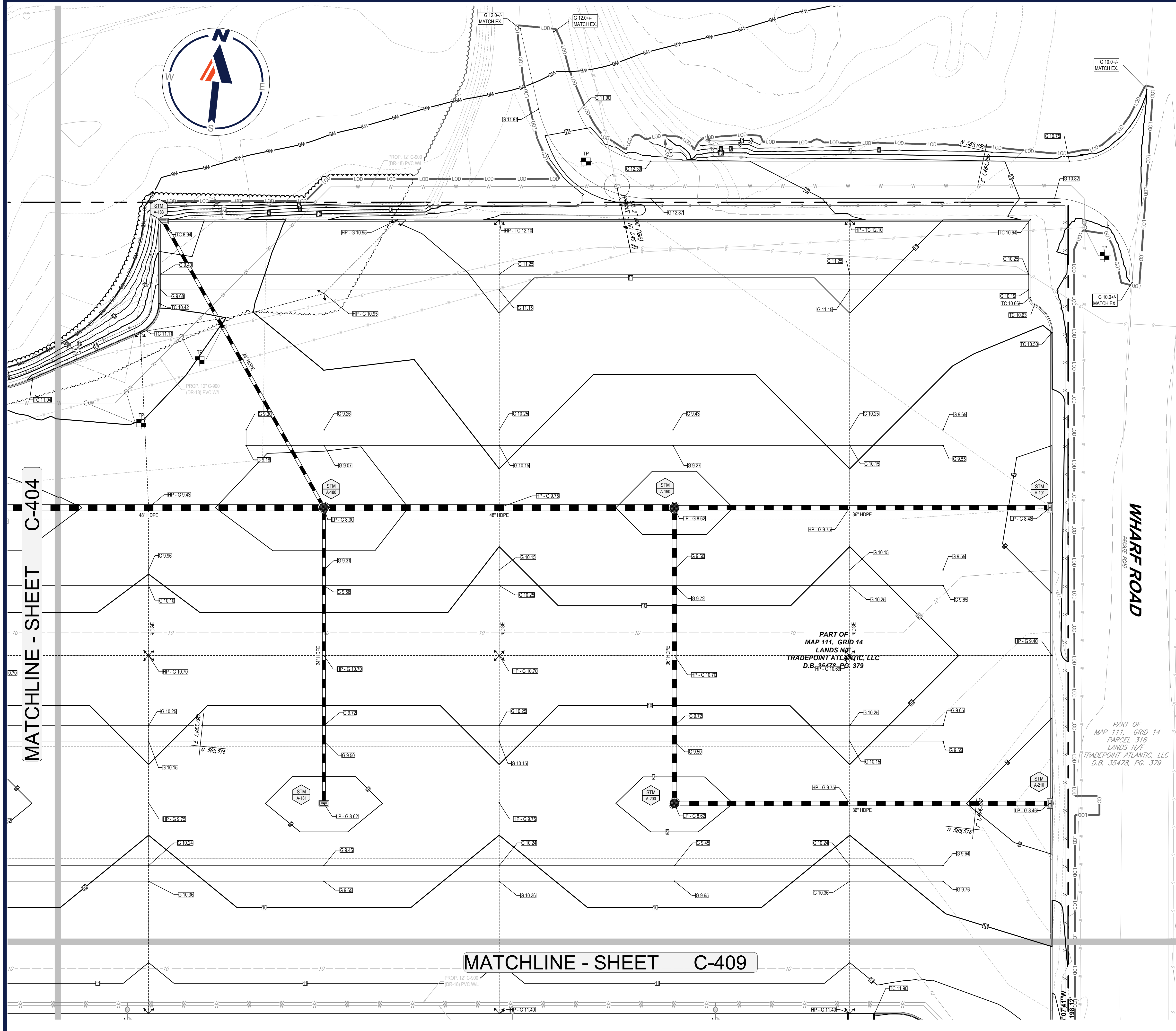


MARYLAND COORDINATE SYSTEM (MCS)

GRADING 4 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

JUL 10, 2023  
H:\2023\MDA230002.00\CADD\DRAWINGS\PLAN SET\PHASE 1\PLANS\MDA230002.00\GRAD-04-LAYOUT\_C-404\_Grading.Plan





**KEY MAP**  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE               |
|-------------------|--------------------------------------|-----------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                         |
| -120-<br>-121-    | CONTOUR LINE                         | 120<br>121                  |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • T.C. 516.00 • B.C. 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                         |
| ---               | UNDERGROUND WATER LINE               | ---                         |
| ---               | INDUSTRIAL WATER LINE                | ---                         |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                         |
| ---               | UNDERGROUND GAS LINE                 | ---                         |
| ---               | OVERHEAD WIRE                        | ---                         |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                         |
| ---               | STORM SEWER                          | ---                         |
| ---               | LIMIT OF DISTURBANCE                 | ---                         |
| ---               | SAWCUT                               | ---                         |
| ---               | CONCRETE CURB & GUTTER               | ---                         |
| ---               | SPILL CURB                           | ---                         |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                         |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                         |

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**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

PROJECT:  
**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21204  
Phone: (410) 821-7900  
Fax: (410) 821-7987  
MD@BohlerEng.com

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MARYLAND LICENSE NO. 44097  
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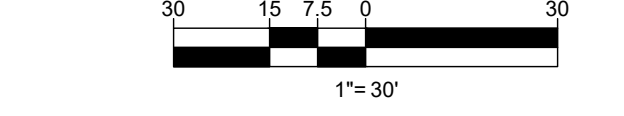
SHEET TITLE:  
**FINAL GRADING PLAN**

SHEET NUMBER:  
**C-405**

ORG. DATE - 06/15/2023

GRADING 5 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

OWNER/DEVELOPER  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

JUL 10, 2023 11:02:23 MDA230002.00 CAD DRAWINGS PHASE II PLANS MDA230002.00 GRAD-0 LAYOUT C-405 GRADING PLAN





MATCHLINE - SHEET C-402

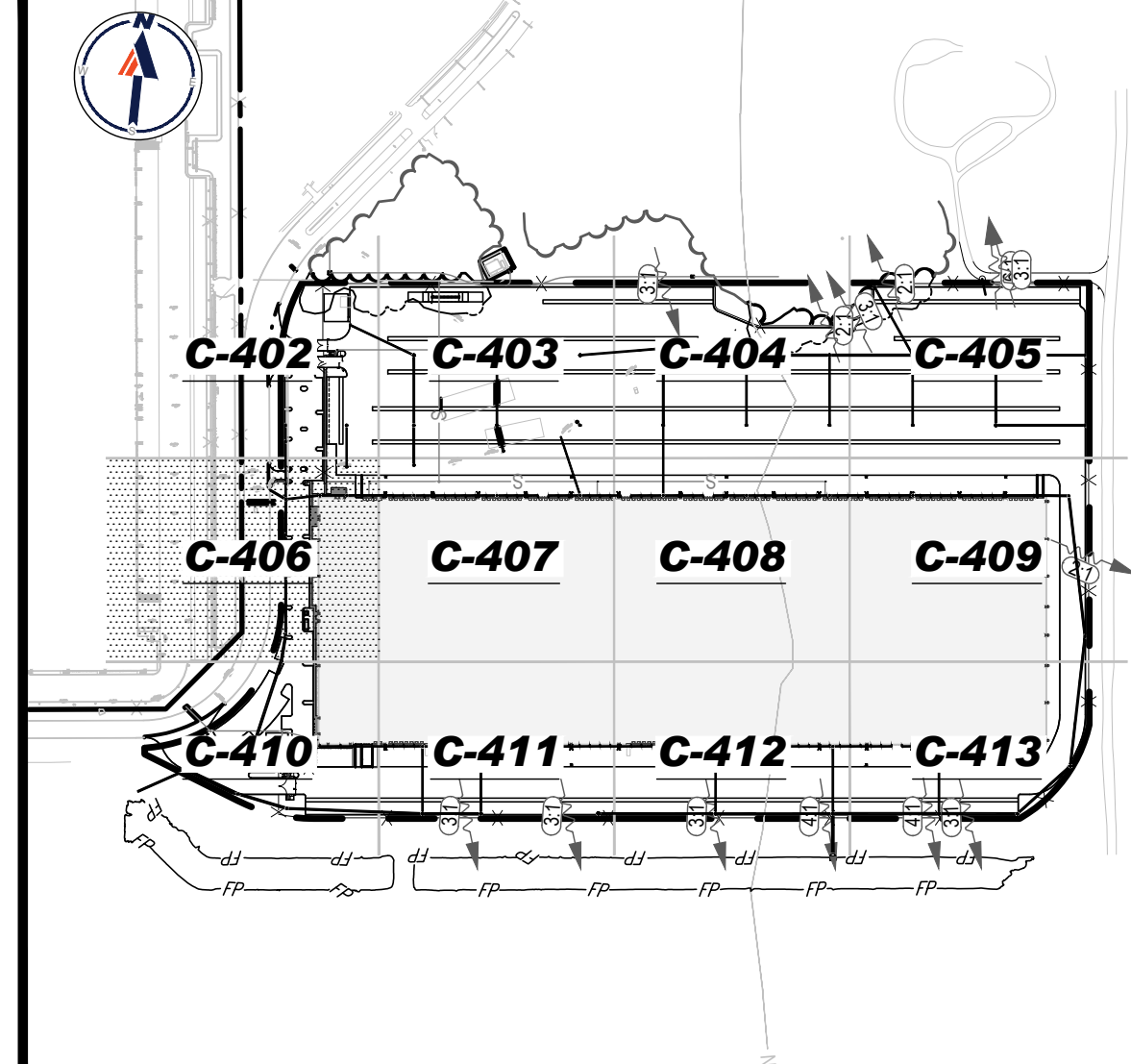
MATCHLINE - SHEET C-410

SPARROWS POINT BLVD

MATCHLINE - SHEET C-407

PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379

MCCORMICK  
MARYLAND LOGISTICS CENTER  
TAX PIN: 2500016874  
OWNER: TPA  
PROPERTIES 25 LLC  
ZONE: MH IM  
USE: INDUSTRIAL



KEY MAP  
NOT TO SCALE

LEGEND

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE               |
|-------------------|--------------------------------------|-----------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                         |
| ---               | CONTOUR LINE                         | ---                         |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • T.C. 516.00 • B.C. 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                         |
| ---               | UNDERGROUND WATER LINE               | ---                         |
| ---               | INDUSTRIAL WATER LINE                | ---                         |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                         |
| ---               | UNDERGROUND GAS LINE                 | ---                         |
| ---               | OVERHEAD WIRE                        | ---                         |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                         |
| ---               | STORM SEWER                          | ---                         |
| ---               | LIMIT OF DISTURBANCE                 | ---                         |
| ---               | SAWCUT                               | ---                         |
| ---               | CONCRETE CURB & GUTTER               | ---                         |
| ---               | SPILL CURB                           | ---                         |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                         |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                         |

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TRANSPORTATION SERVICES

REVISIONS

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

CONSTRUCTION DOCUMENTS

FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21204  
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MD@BohlerEng.com

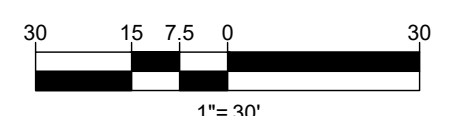
M.J. GESELL  
PROFESSIONAL ENGINEER  
MARYLAND LICENSE NO. 44097  
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FINAL GRADING PLAN

SHEET NUMBER: C-406

ORG. DATE - 06/15/2023

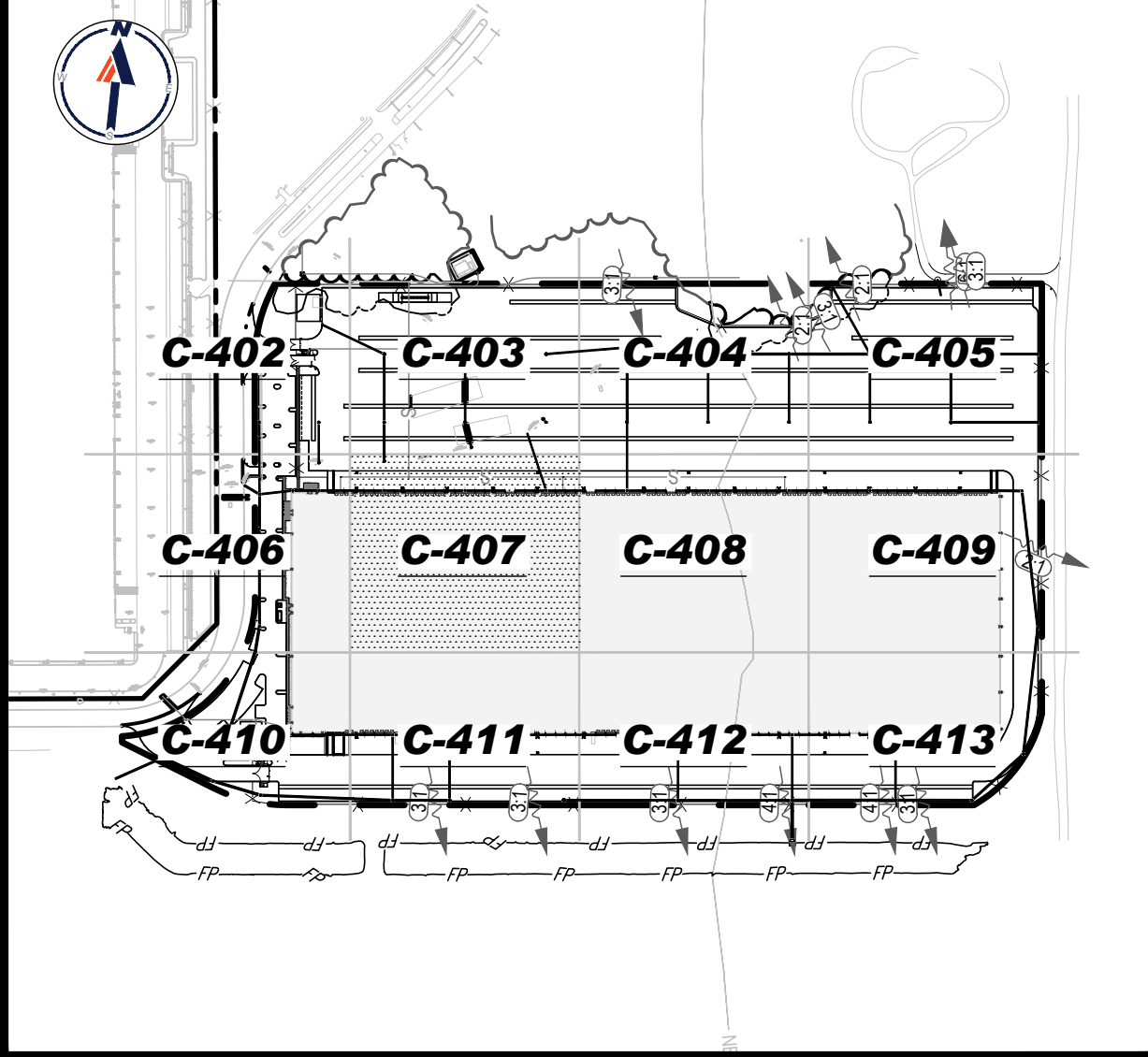
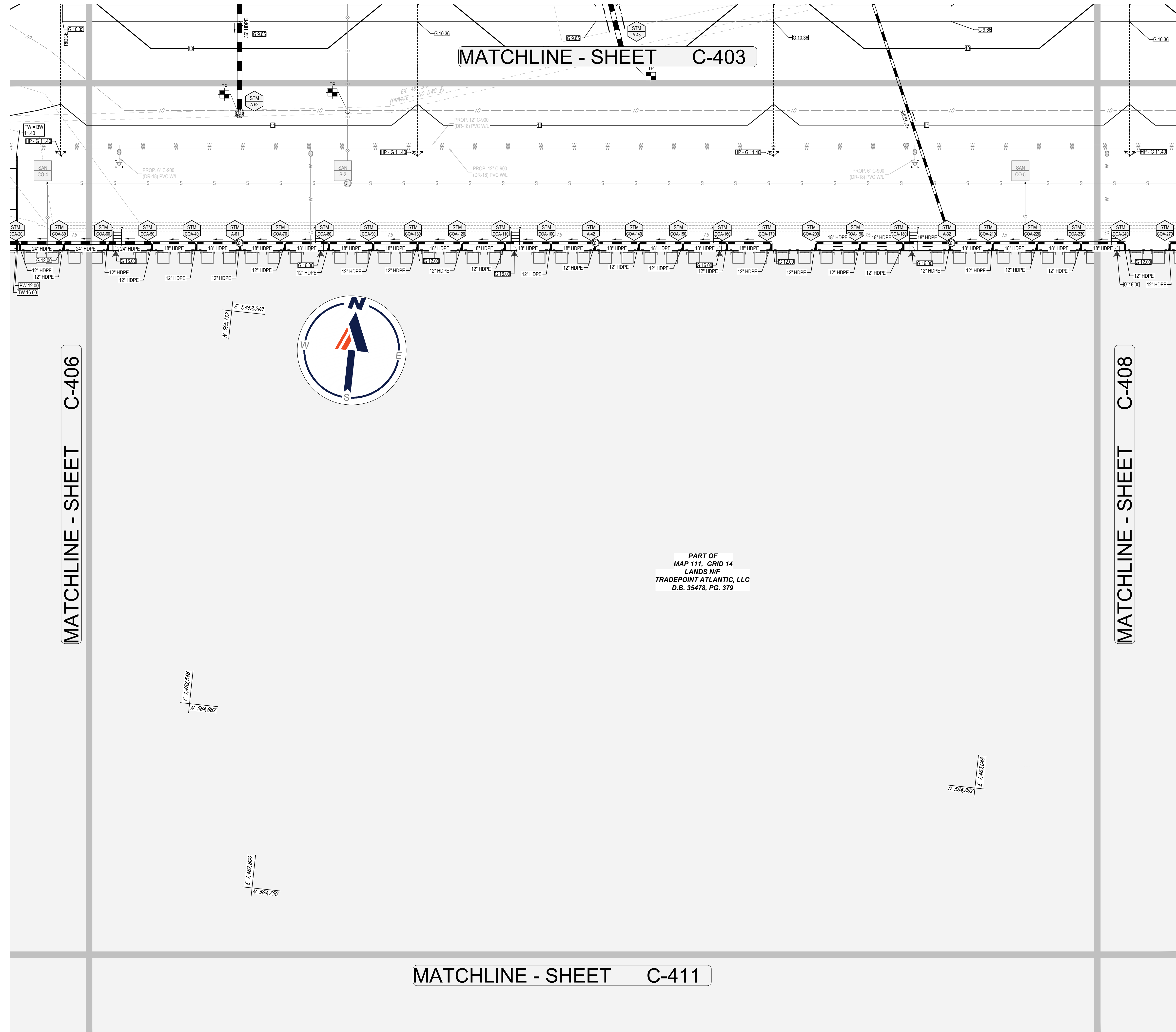
OWNER/DEVELOPER  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

GRADING 6 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.





**KEY MAP**  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE               |
|-------------------|--------------------------------------|-----------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                         |
| ---               | CONTOUR LINE                         | ---                         |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • T.C. 516.00 • B.C. 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                         |
| ---               | UNDERGROUND WATER LINE               | ---                         |
| ---               | INDUSTRIAL WATER LINE                | ---                         |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                         |
| ---               | UNDERGROUND GAS LINE                 | ---                         |
| ---               | OVERHEAD WIRE                        | ---                         |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                         |
| ---               | STORM SEWER                          | ---                         |
| ---               | LIMIT OF DISTURBANCE                 | ---                         |
| ---               | SAWCUT                               | ---                         |
| ---               | CONCRETE CURB & GUTTER               | ---                         |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                         |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                         |

PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379

**BOHLER**  
SITE CIVIL AND CONSULTING ENGINEERING  
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PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID.: GRAD-0

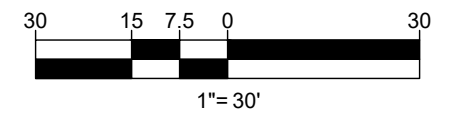
PROJECT:  
**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
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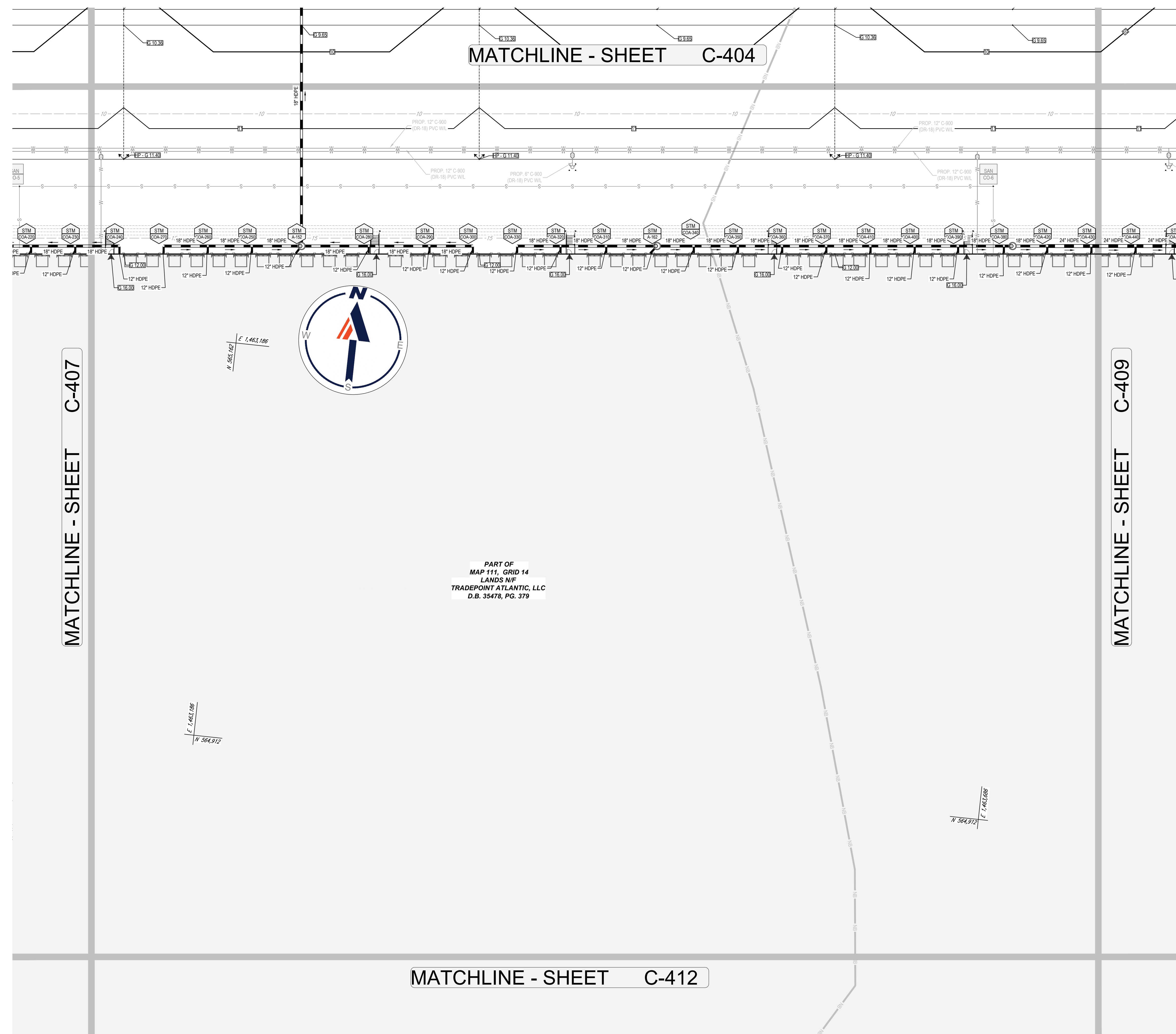
SHEET TITLE:  
**FINAL GRADING PLAN**  
SHEET NUMBER:  
**C-407**  
ORG. DATE - 06/15/2023

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

GRADING 7 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.



MATCHLINE - SHEET C-404

MATCHLINE - SHEET C-407

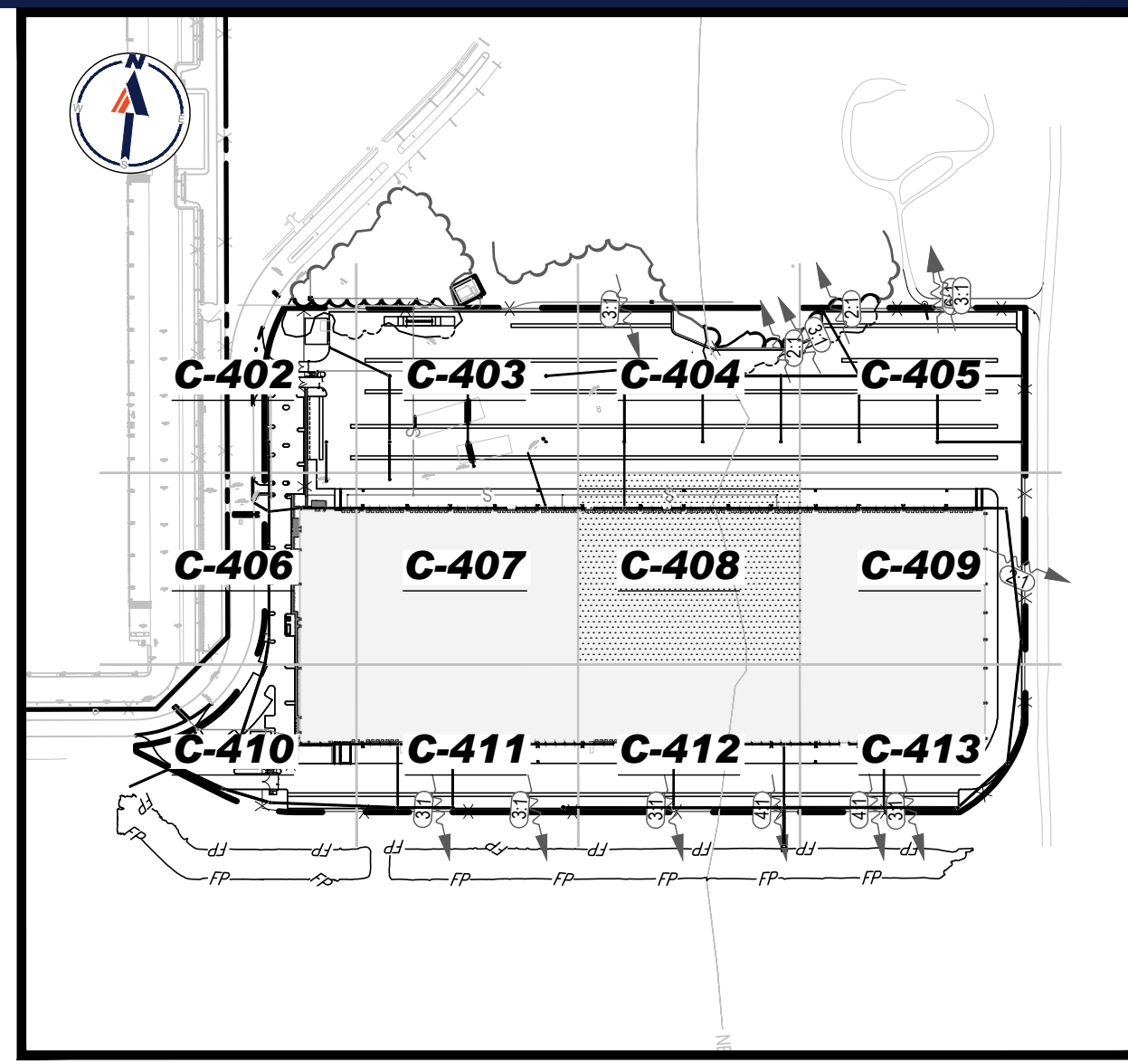
MATCHLINE - SHEET C-409

MATCHLINE - SHEET C-412

PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, Pg. 379



JUL 10, 2023  
H:\2023\MDA230002\00\CADD\DRAWINGS\PLAN SET\PHASE 8 PLAN SET\PHASE 8 LAYOUT\11-C-408-GRADING.PLAN



KEY MAP  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE            |
|-------------------|--------------------------------------|--------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                      |
| ---               | CONTOUR LINE                         | ---                      |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • ITC 516.00 • BC 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                      |
| ---               | UNDERGROUND WATER LINE               | ---                      |
| ---               | INDUSTRIAL WATER LINE                | ---                      |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                      |
| ---               | UNDERGROUND GAS LINE                 | ---                      |
| ---               | OVERHEAD WIRE                        | ---                      |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                      |
| ---               | STORM SEWER                          | ---                      |
| ---               | LIMIT OF DISTURBANCE                 | ---                      |
| ---               | SAWCUT                               | ---                      |
| ---               | CONCRETE CURB & GUTTER               | ---                      |
| ---               | SPILL CURB                           | ---                      |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                      |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                      |

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SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY |
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|     |      |         |          |
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
TOWSON, MARYLAND 21204  
Phone: (410) 821-7900  
Fax: (410) 821-7987  
MD@BohlerEng.com

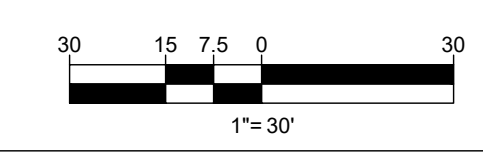
**M.J. GESELL**  
PROFESSIONAL ENGINEER  
MARYLAND LICENSE No. 4409  
PROFESSIONAL CERTIFICATION  
I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND. LICENSE NO. 4409, EXPIRATION DATE: 6/30/25

SHEET TITLE:  
**FINAL GRADING PLAN**

SHEET NUMBER:  
**C-408**  
ORG. DATE - 06/15/2023

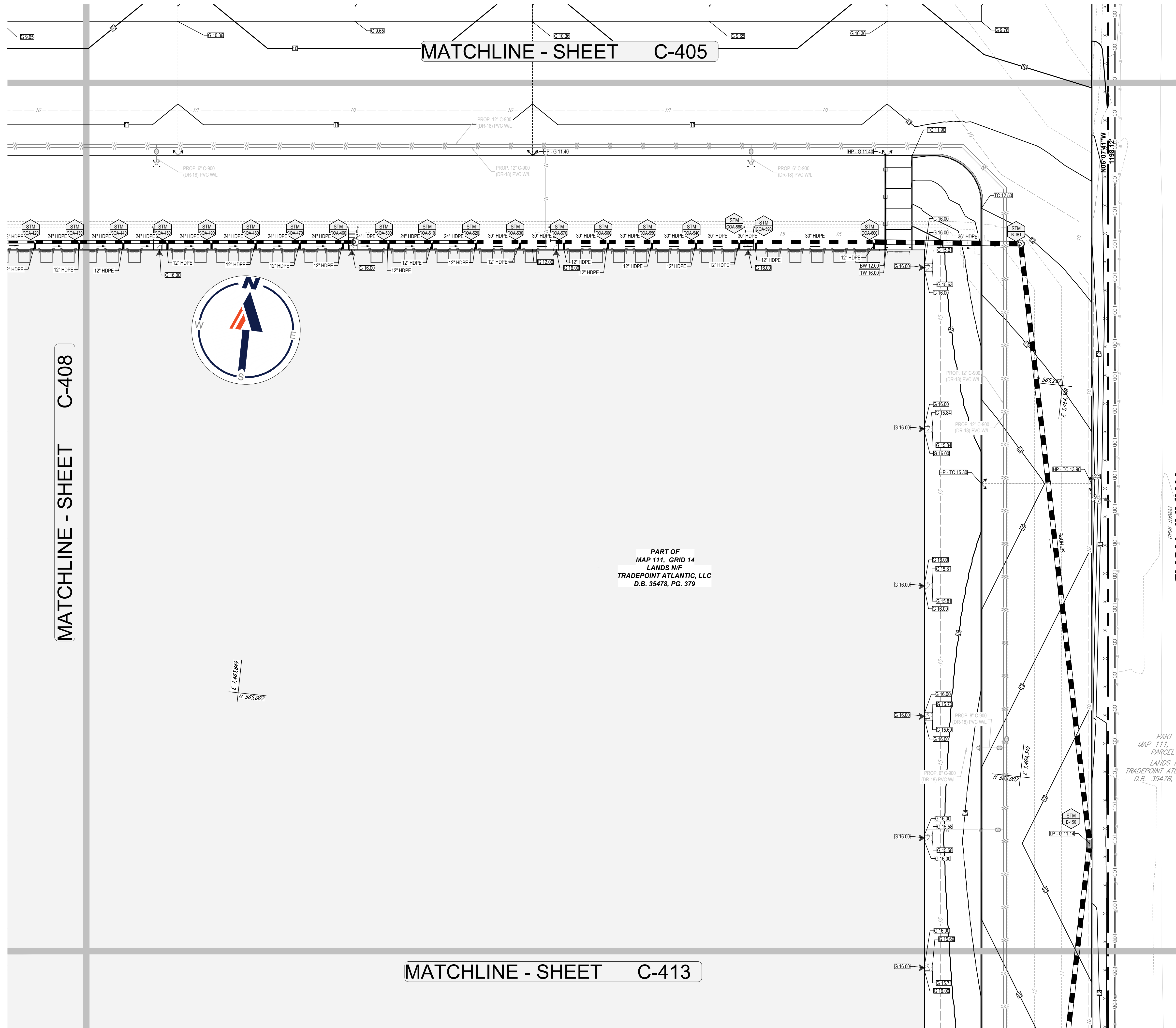
GRADING 8 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)



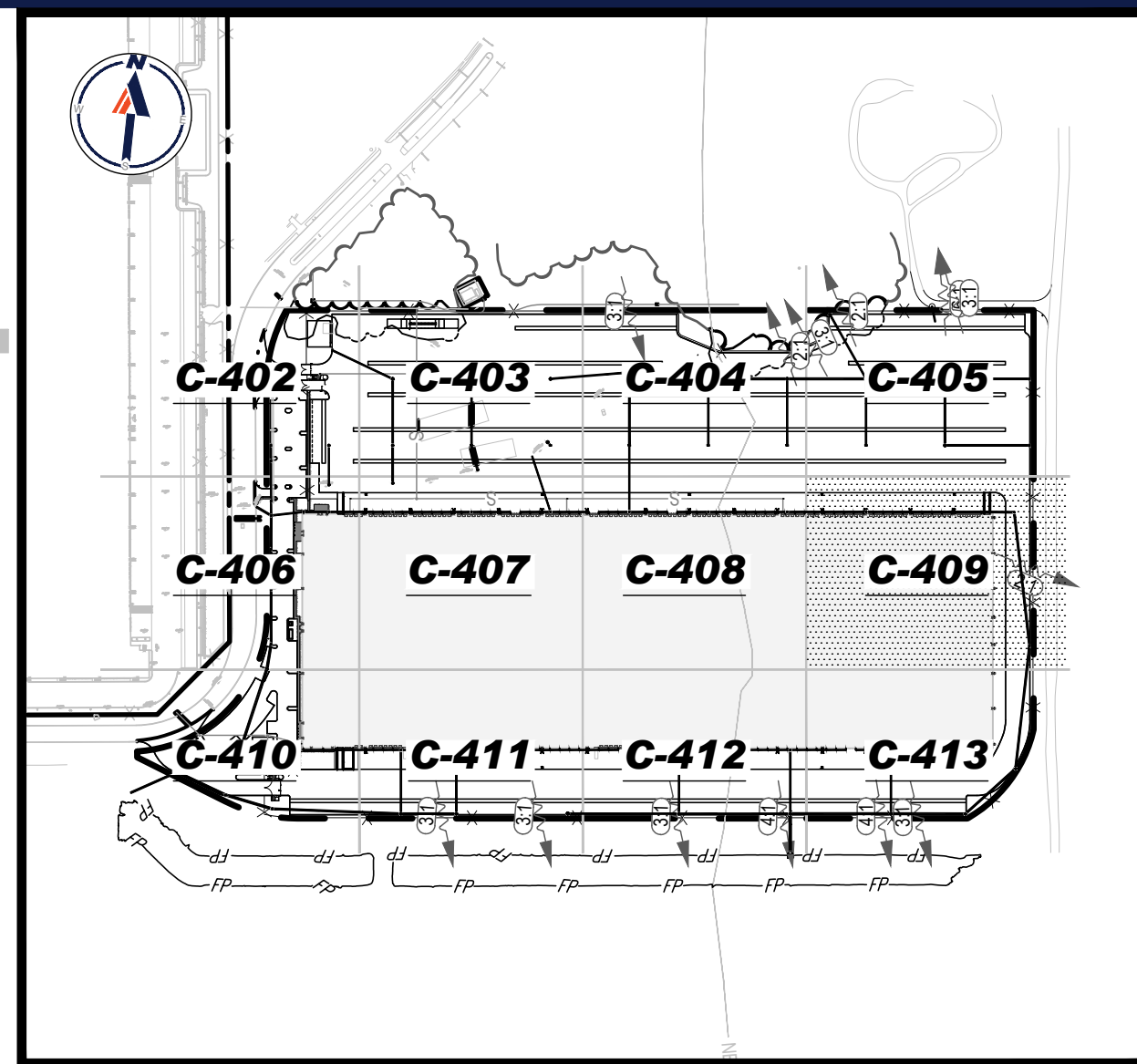


MATCHLINE - SHEET C-408

MATCHLINE - SHEET C-405

MATCHLINE - SHEET C-413

PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379



**KEY MAP**  
NOT TO SCALE

**LEGEND**

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|-------------------|--------------------------------------|-------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---               | CONTOUR LINE                         | ---                     |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                     |
| ---               | UNDERGROUND WATER LINE               | ---                     |
| ---               | INDUSTRIAL WATER LINE                | ---                     |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---               | UNDERGROUND GAS LINE                 | ---                     |
| ---               | OVERHEAD WIRE                        | ---                     |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---               | STORM SEWER                          | ---                     |
| ---               | LIMIT OF DISTURBANCE                 | ---                     |
| ---               | SAWCUT                               | ---                     |
| ---               | CONCRETE CURB & GUTTER               | ---                     |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |

**BOHLER**  
SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

**REVISIONS**

| REV | DATE | COMMENT | DRAWN BY |
|-----|------|---------|----------|
|     |      |         |          |

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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID.: GRAD-D

PROJECT:  
**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
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SHEET TITLE:  
**FINAL GRADING PLAN**  
SHEET NUMBER:  
**C-409**  
ORG. DATE - 06/15/2023

GRADING 9 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

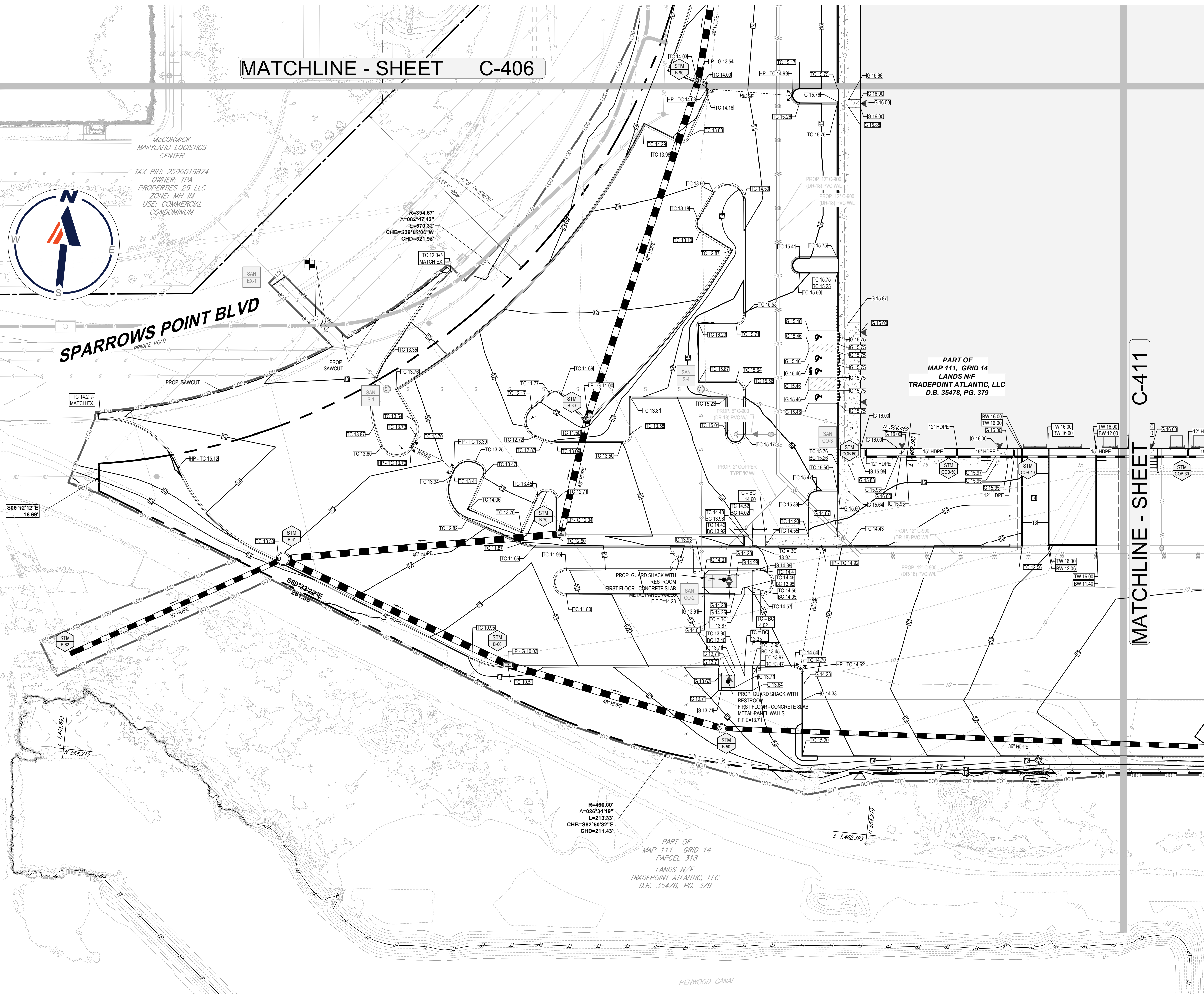


MATCHLINE - SHEET C-406



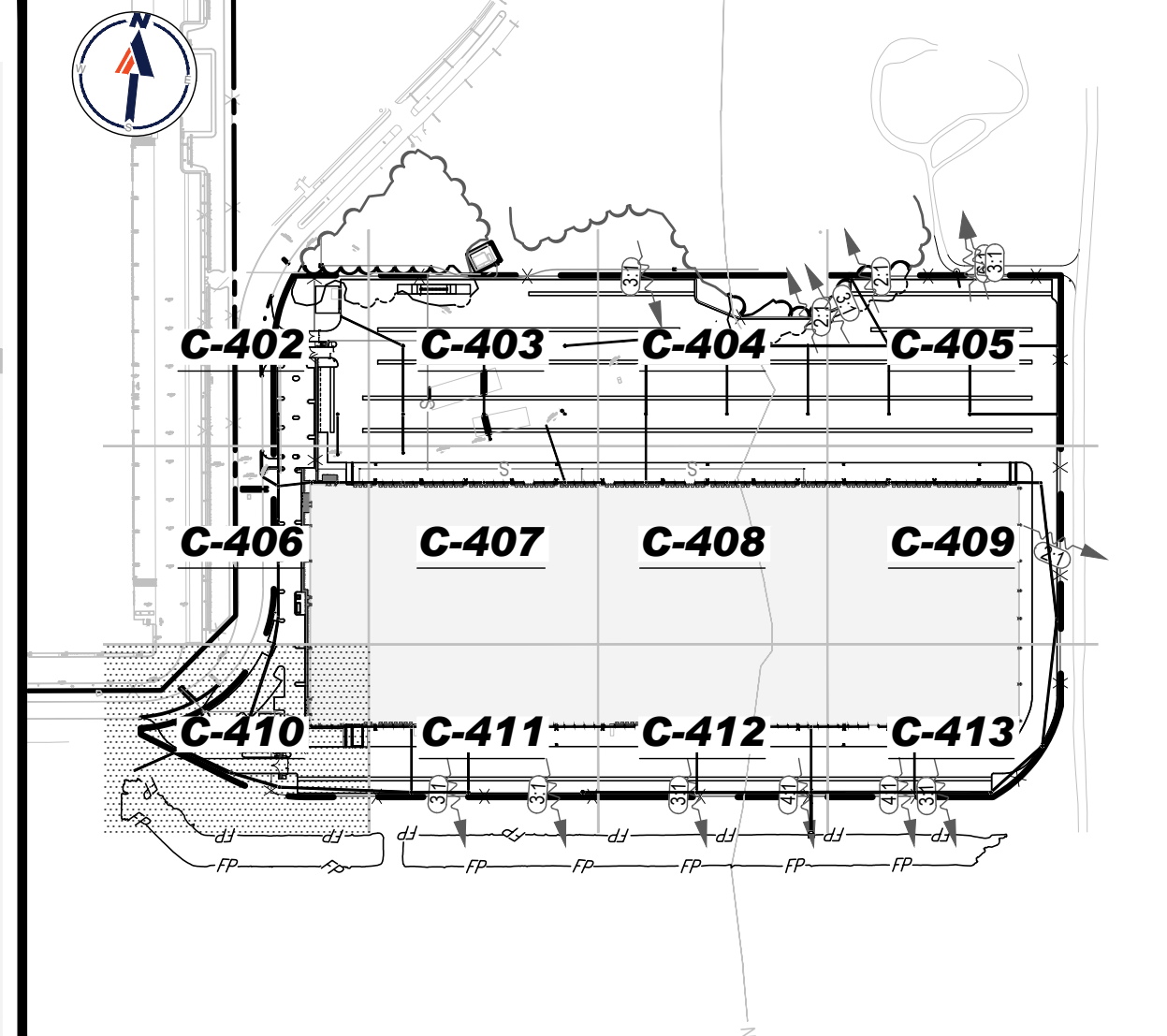
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 TAX PIN: 2500016874  
 OWNER: TPA PROPERTIES 25 LLC  
 ZONE: MH 1M  
 USE: COMMERCIAL CONDOMINIUM

**SPARROWS POINT BLVD**  
 PRIVATE ROAD



PART OF MAP 111, GRID 14  
 LANDS N/F TRADEPOINT ATLANTIC, LLC  
 D.B. 35478, PG. 379

MATCHLINE - SHEET C-411



KEY MAP  
 NOT TO SCALE

LEGEND

| EXISTING NOTE | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|---------------|--------------------------------------|-------------------------|
| ---           | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---           | CONTOUR LINE                         | ---                     |
| ---           | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---           | SANITARY SEWER LINE                  | ---                     |
| ---           | UNDERGROUND WATER LINE               | ---                     |
| ---           | INDUSTRIAL WATER LINE                | ---                     |
| ---           | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---           | UNDERGROUND GAS LINE                 | ---                     |
| ---           | OVERHEAD WIRE                        | ---                     |
| ---           | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---           | STORM SEWER                          | ---                     |
| ---           | LIMIT OF DISTURBANCE                 | ---                     |
| ---           | SAWCUT                               | ---                     |
| ---           | CONCRETE CURB & GUTTER               | ---                     |
| ---           | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---           | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |

**BOHLER**  
 SITE CIVIL AND CONSULTING ENGINEERING  
 PROGRAM MANAGEMENT  
 LANDSCAPE ARCHITECTURE  
 SUSTAINABLE DESIGN  
 PERMITTING SERVICES  
 TRANSPORTATION SERVICES

REVISIONS

| REV | DATE | COMMENT | DRAWN BY |
|-----|------|---------|----------|
|     |      |         |          |
|     |      |         |          |
|     |      |         |          |
|     |      |         |          |

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PROJECT No.: MDA230002.00  
 DRAWN BY: RLB  
 CHECKED BY: MUG  
 DATE: 6/15/23  
 CAD ID: GRAD-0

CONSTRUCTION DOCUMENTS  
 FOR

**TRADEPOINT ATLANTIC**  
 PROJECT FLYWHEEL  
 SPARROWS POINT BOULEVARD  
 BALTIMORE, MD 21219  
 ELECTION DISTRICT 15  
 COUNCILMANIC DISTRICT 7  
 BALTIMORE COUNTY

**BOHLER**  
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**M.J. GESELL**  
 PROFESSIONAL ENGINEER  
 MARYLAND LICENSE NO. 44097  
 I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND. LICENSE NO. 44097, EXPIRATION DATE: 6/30/25

SHEET TITLE:  
**FINAL GRADING PLAN**

SHEET NUMBER:  
**C-410**

ORG. DATE - 06/15/2023

GRADING 10 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

OWNER/DEVELOPER  
 TRADEPOINT DEVELOPMENT, LLC  
 6995 BETHLEHEM BOULEVARD  
 SPARROWS POINT, MD 21219  
 CONTACT: LUKE KLITZ  
 PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

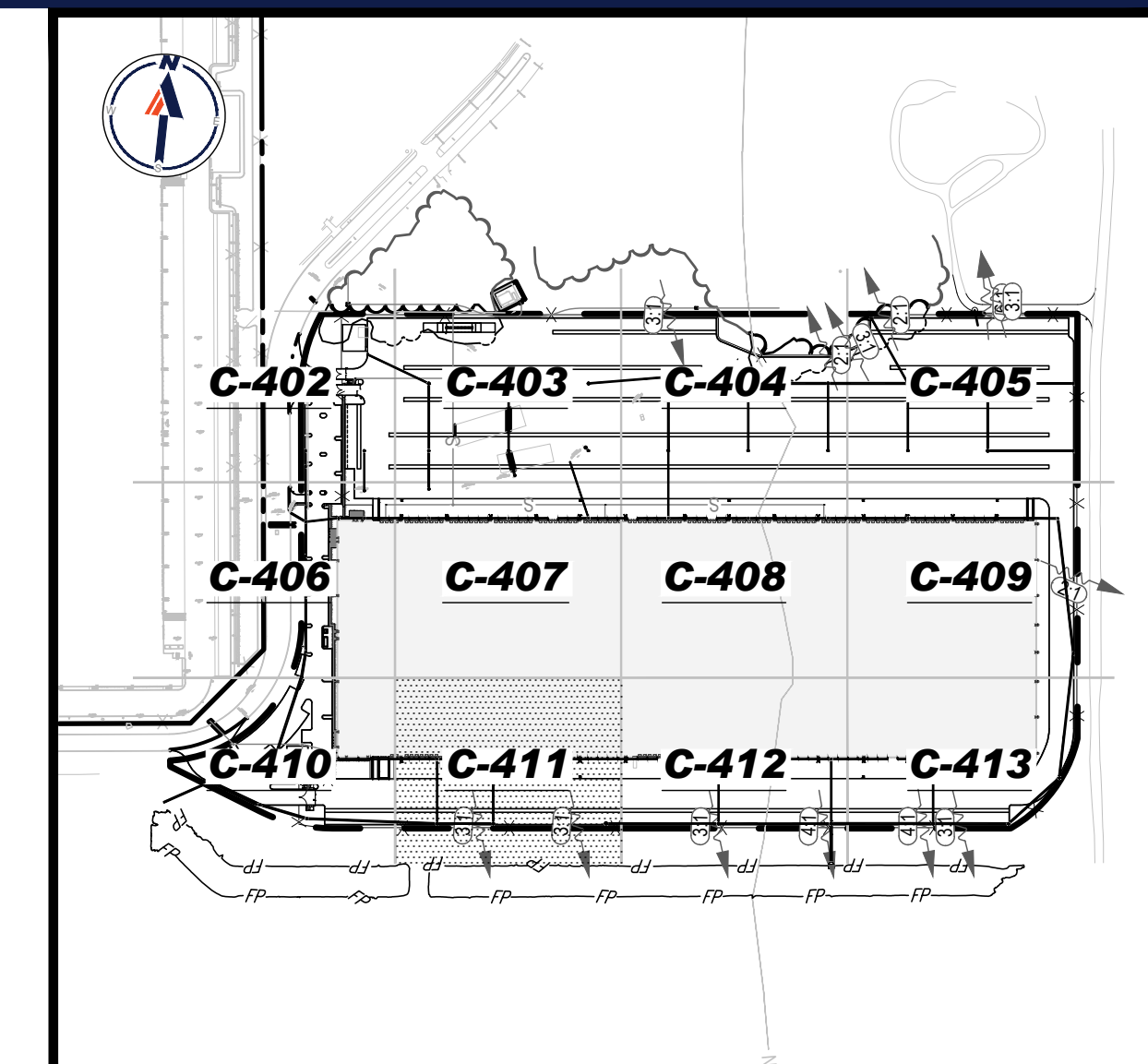
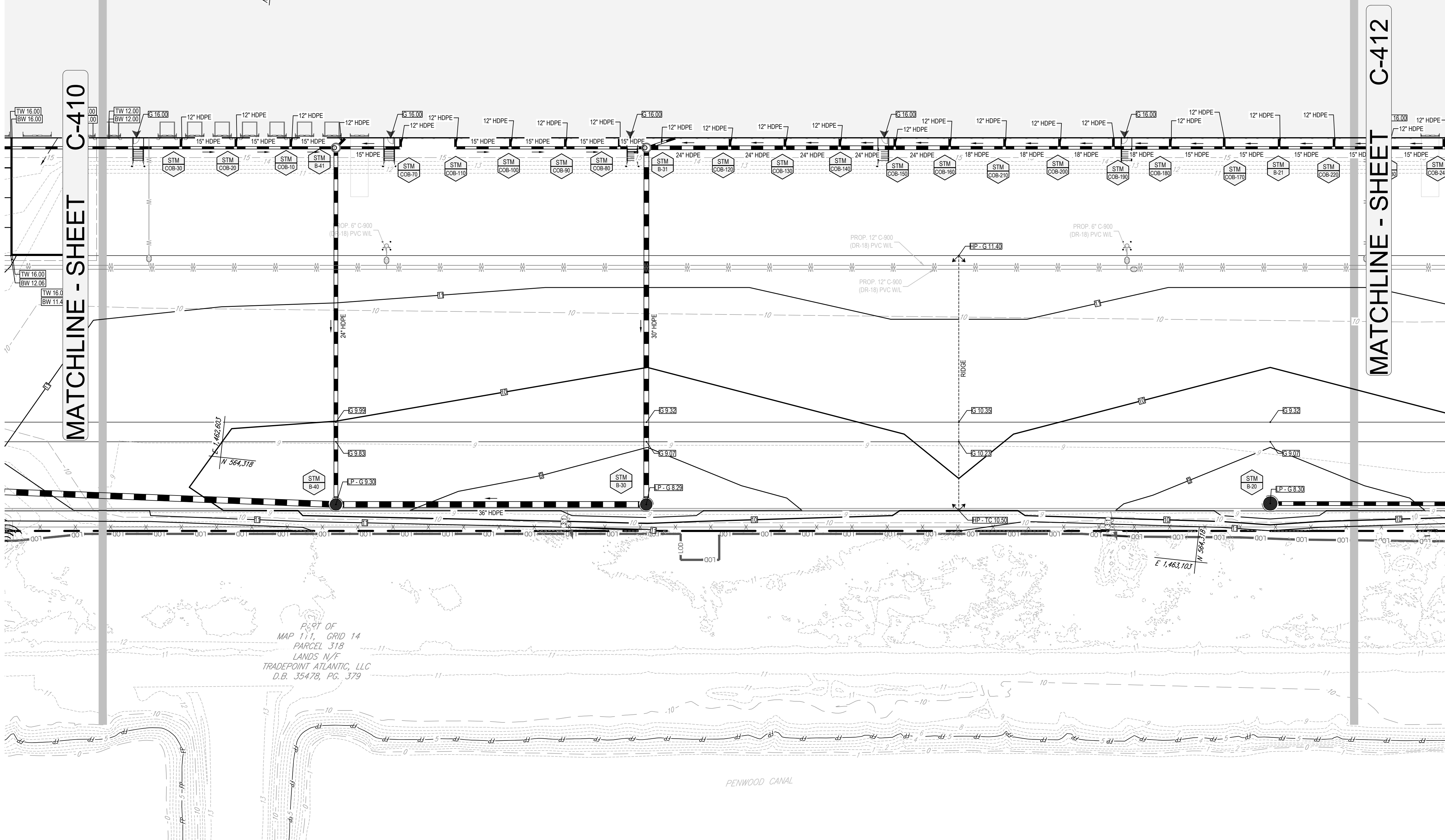
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MATCHLINE - SHEET C-407



PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379



KEY MAP  
NOT TO SCALE

LEGEND

| EXISTING NOTE | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|---------------|--------------------------------------|-------------------------|
| ---           | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---           | CONTOUR LINE                         | ---                     |
| ---           | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---           | SANITARY SEWER LINE                  | ---                     |
| ---           | UNDERGROUND WATER LINE               | ---                     |
| ---           | INDUSTRIAL WATER LINE                | ---                     |
| ---           | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---           | UNDERGROUND GAS LINE                 | ---                     |
| ---           | OVERHEAD WIRE                        | ---                     |
| ---           | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---           | STORM SEWER                          | ---                     |
| ---           | LIMIT OF DISTURBANCE                 | ---                     |
| ---           | SAWCUT                               | ---                     |
| ---           | CONCRETE CURB & GUTTER               | ---                     |
| ---           | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---           | FEMA FLOOD ZONE AE (ELEV 9) BOUNDARY | ---                     |

**BOHLER**  
SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

REVISIONS

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
|-----|------|---------|----------|------------|
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

PROJECT:

CONSTRUCTION DOCUMENTS

FOR

**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

**BOHLER**  
901 DULANEY VALLEY ROAD, SUITE 801  
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MARYLAND LICENSE NO. 44097  
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SHEET TITLE:  
**FINAL GRADING PLAN**  
SHEET NUMBER:  
**C-411**  
ORG. DATE - 06/15/2023

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

GRADING 11 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

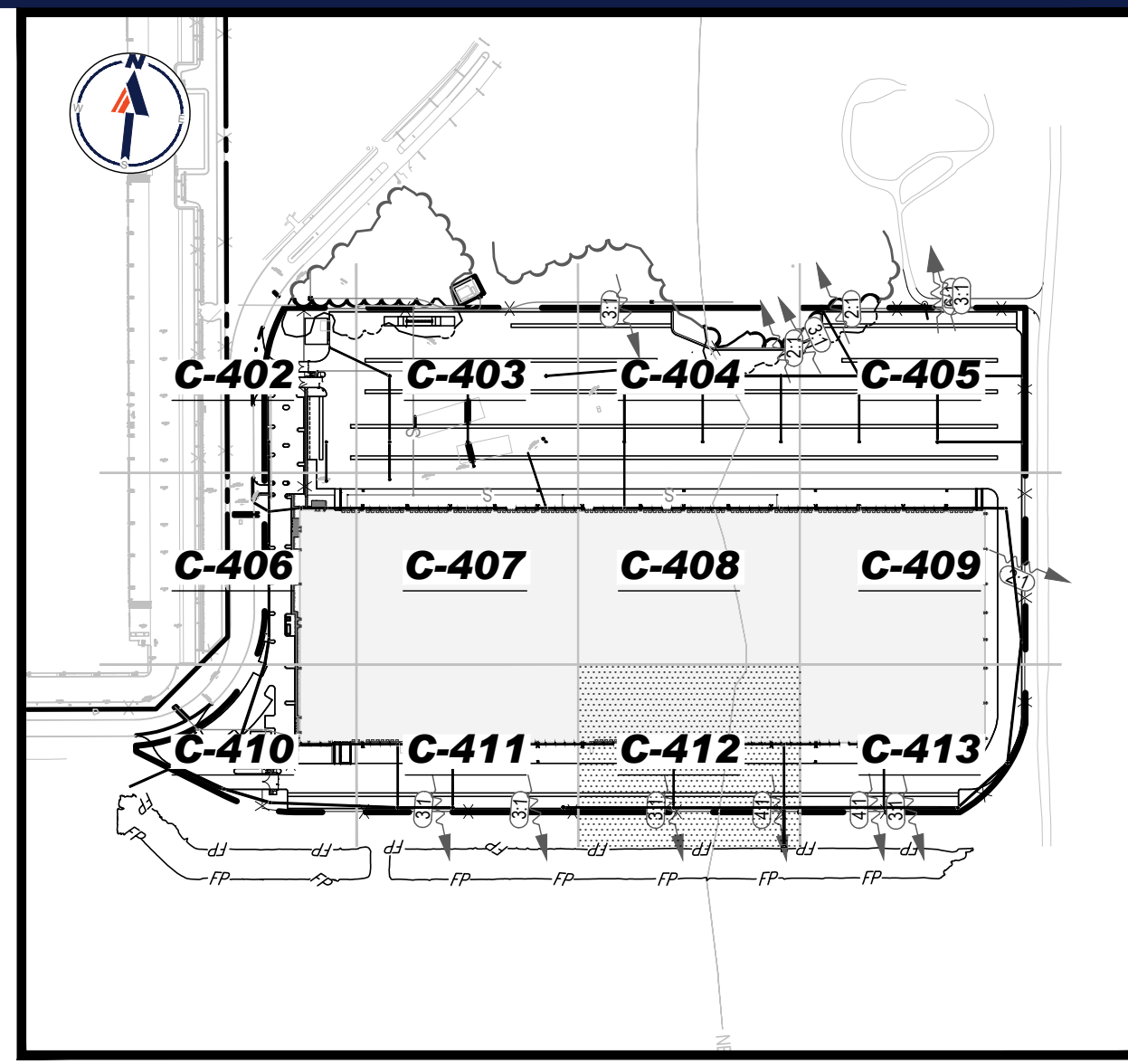
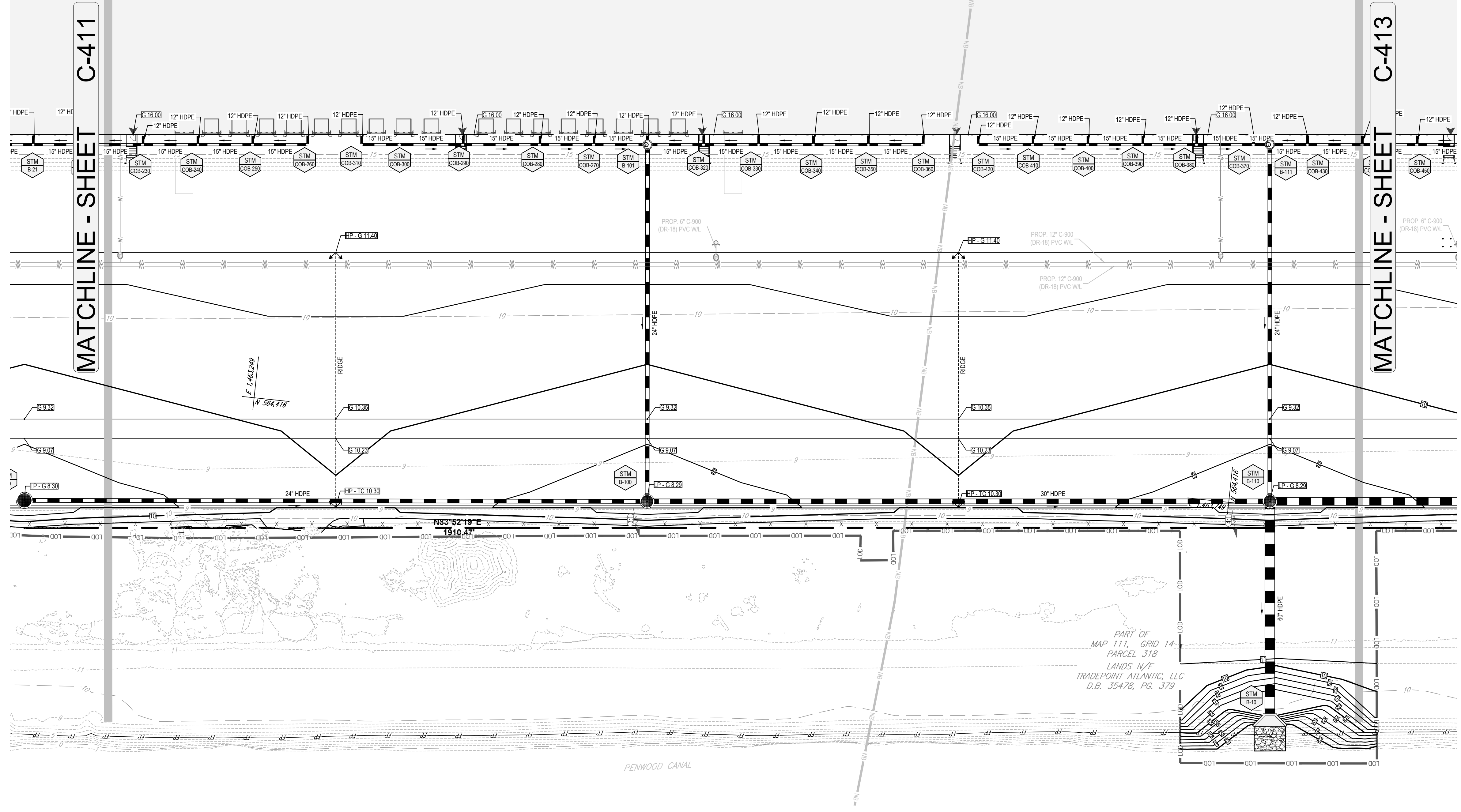
JUL 10, 2023  
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MATCHLINE - SHEET C-408



PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379



KEY MAP  
NOT TO SCALE

LEGEND

| EXISTING NOTE | TYPICAL NOTE TEXT                    | PROPOSED NOTE              |
|---------------|--------------------------------------|----------------------------|
| ---           | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                        |
| ---           | CONTOUR LINE                         | ---                        |
| •             | SPOT ELEVATIONS                      | • TC 516.00<br>• BC 515.50 |
| ---           | SANITARY SEWER LINE                  | ---                        |
| ---           | UNDERGROUND WATER LINE               | ---                        |
| ---           | INDUSTRIAL WATER LINE                | ---                        |
| ---           | UNDERGROUND ELECTRIC LINE            | ---                        |
| ---           | UNDERGROUND GAS LINE                 | ---                        |
| ---           | OVERHEAD WIRE                        | ---                        |
| ---           | UNDERGROUND TELEPHONE LINE           | ---                        |
| ---           | STORM SEWER                          | ---                        |
| ---           | LIMIT OF DISTURBANCE                 | ---                        |
| ---           | SAWCUT                               | ---                        |
| ---           | CONCRETE CURB & GUTTER               | ---                        |
| ---           | IDA CRITICAL AREA BOUNDARY           | ---                        |
| ---           | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                        |

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SITE CIVIL AND CONSULTING ENGINEERING  
PROGRAM MANAGEMENT  
LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

REVISIONS

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
|-----|------|---------|----------|------------|
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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

CONSTRUCTION DOCUMENTS

FOR  
**TRADEPOINT ATLANTIC**  
PROJECT FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

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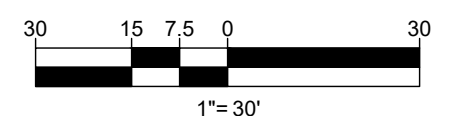
FINAL GRADING PLAN

SHEET NUMBER: C-412

ORG. DATE - 06/15/2023

GRADING 12 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

JUL 10, 2023  
H:\2023\MDA230002\_00\CAD\DRAWINGS\PLAN SET\PHASE 1 PLAN\MDA230002\_00\GRAD-001-LAYOUT: C-412 - GRADING PLAN



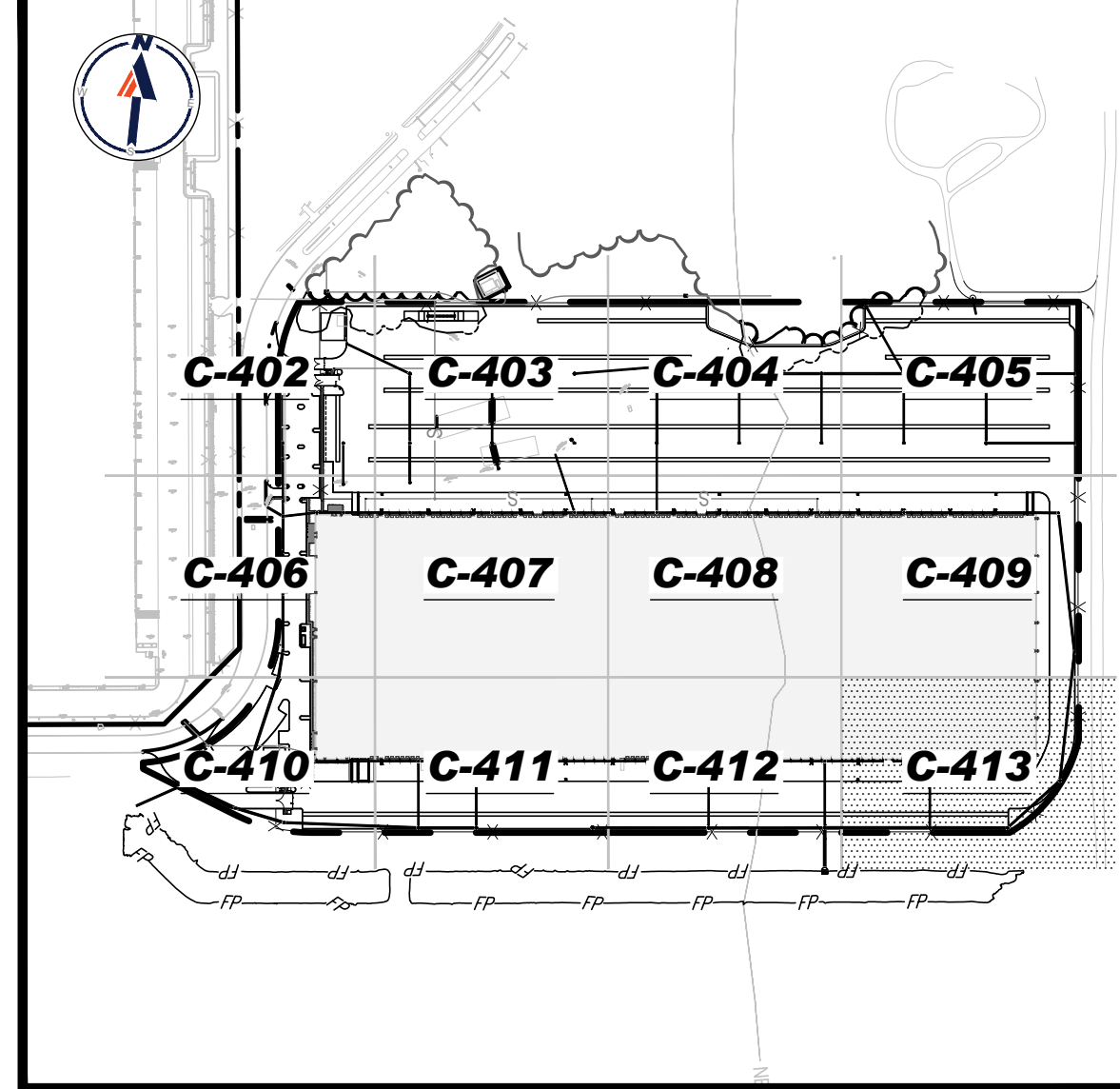
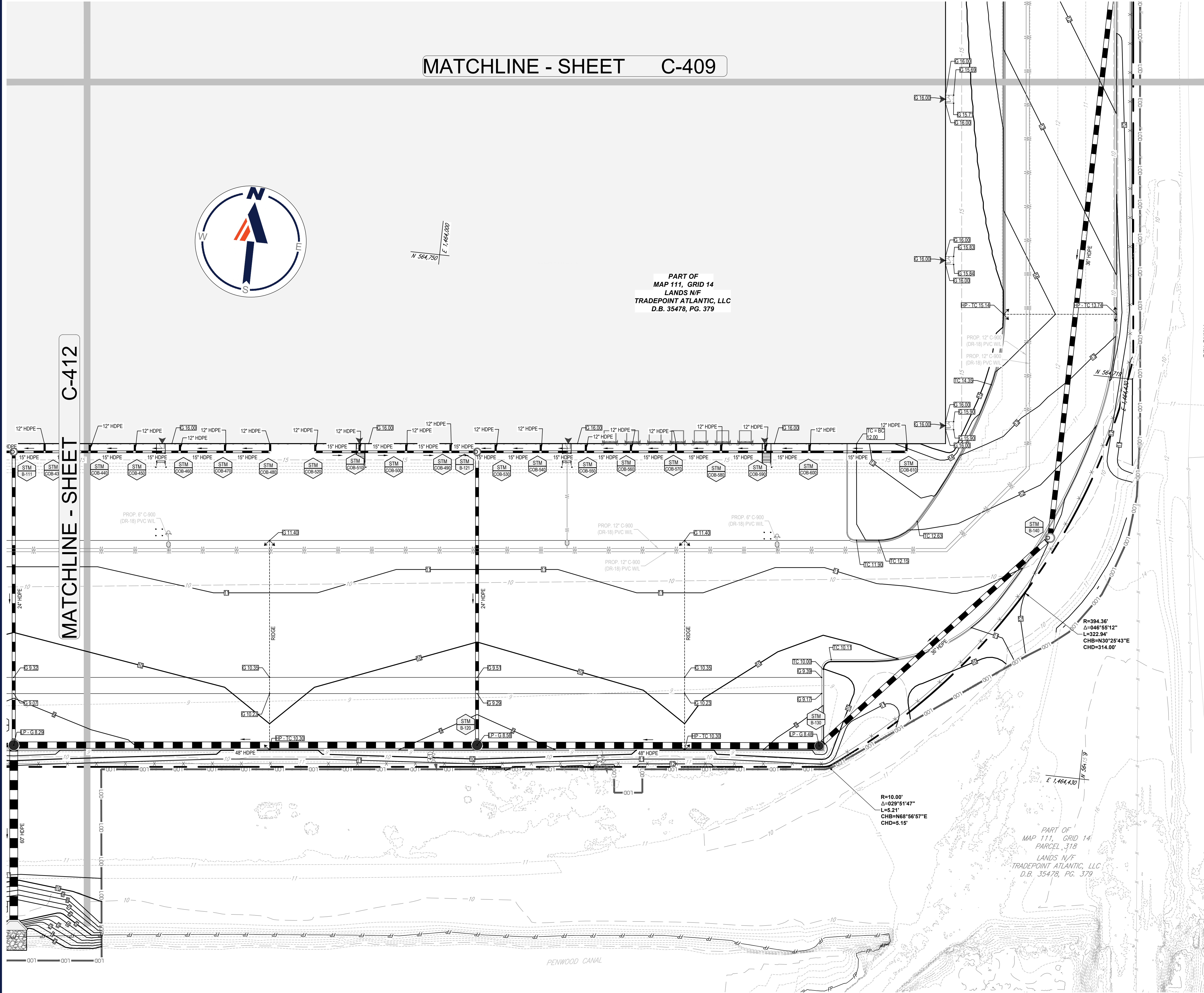
MATCHLINE - SHEET C-409



N 564.750  
E 1,464.000

PART OF  
MAP 111, GRID 14  
LANDS N/F  
TRADEPOINT ATLANTIC, LLC  
D.B. 35478, PG. 379

MATCHLINE - SHEET C-412



KEY MAP  
NOT TO SCALE

LEGEND

| EXISTING NOTE     | TYPICAL NOTE TEXT                    | PROPOSED NOTE           |
|-------------------|--------------------------------------|-------------------------|
| ---               | ONSITE PROPERTY LINE / R.O.W. LINE   | ---                     |
| ---               | CONTOUR LINE                         | ---                     |
| TC 516.4 OR 516.4 | SPOT ELEVATIONS                      | • TC 516.00 • BC 515.50 |
| ---               | SANITARY SEWER LINE                  | ---                     |
| ---               | UNDERGROUND WATER LINE               | ---                     |
| ---               | INDUSTRIAL WATER LINE                | ---                     |
| ---               | UNDERGROUND ELECTRIC LINE            | ---                     |
| ---               | UNDERGROUND GAS LINE                 | ---                     |
| ---               | OVERHEAD WIRE                        | ---                     |
| ---               | UNDERGROUND TELEPHONE LINE           | ---                     |
| ---               | STORM SEWER                          | ---                     |
| ---               | LIMIT OF DISTURBANCE                 | ---                     |
| ---               | SAWCUT                               | ---                     |
| ---               | CONCRETE CURB & GUTTER               | ---                     |
| ---               | IDA CRITICAL AREA BOUNDARY           | ---                     |
| ---               | FEMA FLOOD ZONE AE (ELEV 5) BOUNDARY | ---                     |

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SITE CIVIL AND CONSULTING ENGINEERING  
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LANDSCAPE ARCHITECTURE  
SUSTAINABLE DESIGN  
PERMITTING SERVICES  
TRANSPORTATION SERVICES

REVISIONS

| REV | DATE | COMMENT | DRAWN BY | CHECKED BY |
|-----|------|---------|----------|------------|
|     |      |         |          |            |

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PROJECT No.: MDA230002.00  
DRAWN BY: RLB  
CHECKED BY: MUG  
DATE: 6/15/23  
CAD ID: GRAD-0

PROJECT:

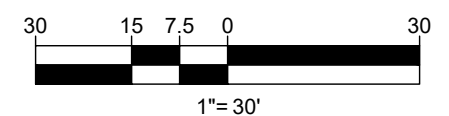
**CONSTRUCTION DOCUMENTS**  
FOR  
**TRADEPOINT ATLANTIC**  
PROJECT  
FLYWHEEL  
SPARROWS POINT BOULEVARD  
BALTIMORE, MD 21219  
ELECTION DISTRICT 15  
COUNCILMANIC DISTRICT 7  
BALTIMORE COUNTY

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SHEET TITLE:  
**FINAL GRADING PLAN**  
SHEET NUMBER:  
**C-413**  
ORG. DATE - 06/15/2023

**OWNER/DEVELOPER**  
TRADEPOINT DEVELOPMENT, LLC  
6995 BETHLEHEM BOULEVARD  
SPARROWS POINT, MD 21219  
CONTACT: LUKE KLITZ  
PHONE: 443-909-9617



MARYLAND COORDINATE SYSTEM (MCS)

GRADING 13 OF 13 LIMIT OF DISTURBANCE: 3,250,267 S.F. OR 74.62 AC.



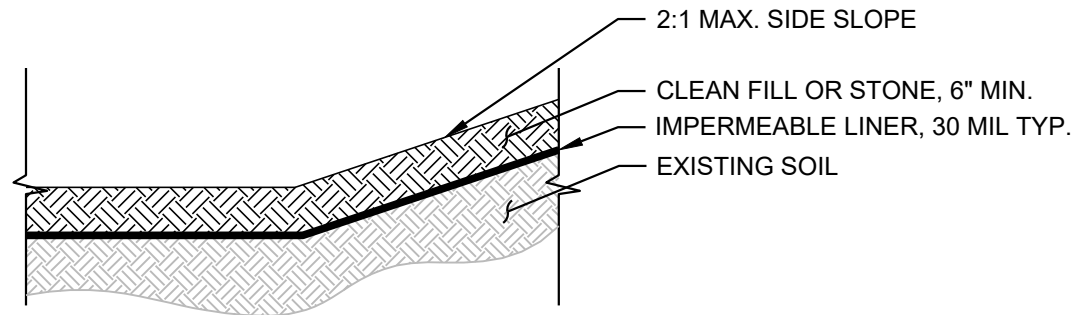
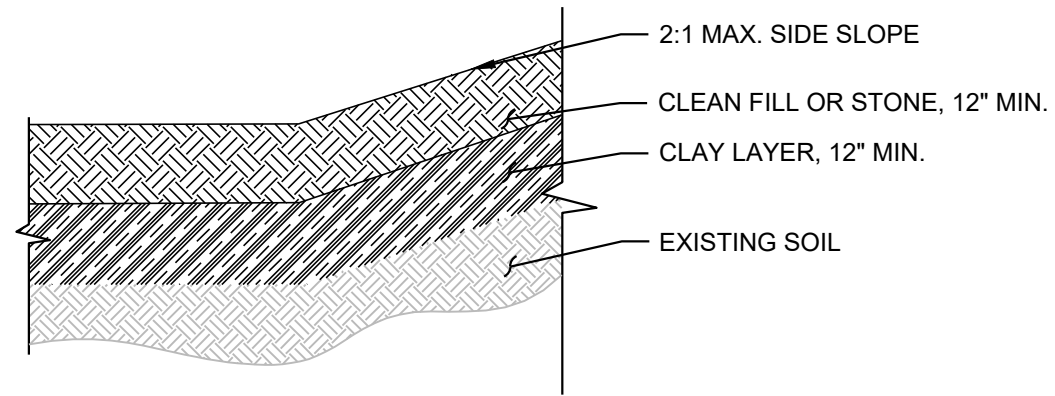
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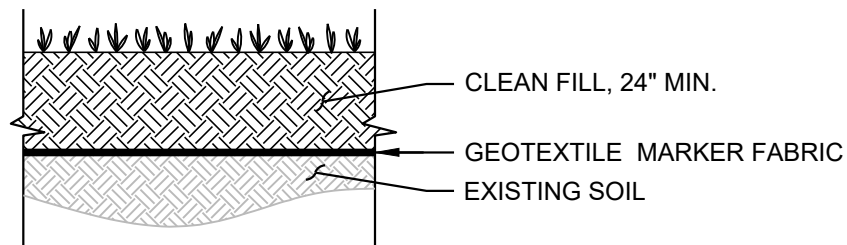
## **APPENDIX E**

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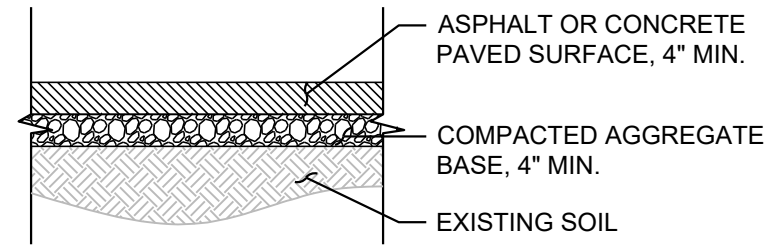
**TYPICAL POND SECTIONS**  
NOT TO SCALE



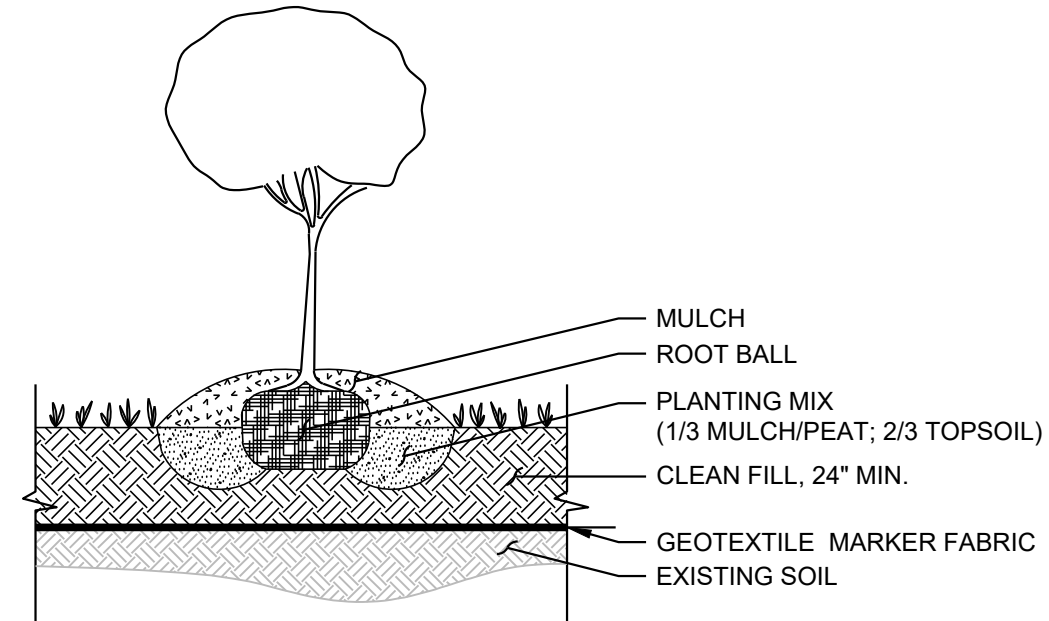
**TYPICAL LANDSCAPE SECTION**  
NOT TO SCALE

**GEOTEXTILE MARKER FABRIC SPECIFICATIONS**

THE GEOTEXTILE MARKER FABRIC SHALL BE A NONWOVEN PERVIOUS SHEET OF POLYPROPYLENE MATERIAL. ADD STABILIZERS AND/OR INHIBITORS TO THE BASE MATERIAL, AS NEEDED, TO MAKE THE FILAMENTS RESISTANT TO DETERIORATION BY ULTRAVIOLET LIGHT, OXIDATION AND HEAT EXPOSURE. REGRIND MATERIAL, WHICH CONSISTS OF EDGE TRIMMINGS AND OTHER SCRAPS THAT HAVE NEVER REACHED THE CONSUMER, MAY BE USED TO PRODUCE THE GEOTEXTILE. POST-CONSUMER RECYCLED MATERIAL MAY BE USED. GEOTEXTILE SHALL BE FORMED INTO A NETWORK SUCH THAT THE FILAMENTS OR YARNS RETAIN DIMENSIONAL STABILITY RELATIVE TO EACH OTHER, INCLUDING THE EDGES. GEOTEXTILES SHALL MEET THE REQUIREMENTS SPECIFIED IN TABLE 1. WHERE APPLICABLE, TABLE 1 PROPERTY VALUES REPRESENT THE MINIMUM AVERAGE ROLL VALUES IN THE WEAKEST PRINCIPAL DIRECTION. VALUES FOR APPARENT OPENING SIZE (AOS) REPRESENT MAXIMUM AVERAGE ROLL VALUES



**TYPICAL PAVING SECTION**  
NOT TO SCALE



**TYPICAL PLANTING SECTION**  
NOT TO SCALE

TCDNG'3"

| Mechanical Properties        | Test Method | Unit  | Minimum Average Roll Value |           |
|------------------------------|-------------|---|----------------------------|-----------|
|                              |             |   | MD                         | CD        |
| Grab Tensile Strength        | ASTM D4632  | lbs (N)   | 120 (534)                  | 120 (534) |
| Grab Tensile Elongation      | ASTM D4632  | %   | 50                         | 50        |
| Trapezoid Tear Strength      | ASTM D4533  | lbs (N)   | 50 (223)                   | 50 (223)  |
| CBR Puncture Strength        | ASTM D6241  | lbs (N)   | 310 (1380)                 |           |
| Maximum Opening Size         |             |   |                            |           |
| Apparent Opening Size (AOS)  | ASTM D4751  | U.S. Sieve (mm)                                 | 70 (0.212)                 |           |
| Minimum Roll Value           |             |   |                            |           |
| Permittivity                 | ASTM D4491  | sec <sup>-1</sup>                               | 1.7                        |           |
| Flow Rate                    | ASTM D4491  | gal/min/ft <sup>2</sup> (l/min/m <sup>2</sup> ) | 135 (5500)                 |           |
| Minimum Test Value           |             |   |                            |           |
| UV Resistance (at 500 hours) | ASTM D4355  | % strength retained                             | 70                         |           |

P:\EnviroAnalytics Group\60443M EAG\_TPA Redevelopment\Drawg\B6\Production\Figure 6b - Environmental Capping Detail.dwg Plotted: April 9, 2019

|             |          |
|-------------|----------|
| scale       | N/A      |
| date        | 9/8/2020 |
| project no. | 160443M  |

|          |     |
|----------|-----|
| designed | RJC |
| checked  | TNP |
| drawn    | RJC |

**O R I O W O "CAPPING SECTION DETAILS**  
SPARROWS POINT  
BALT. COUNTY, MARYLAND

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## **APPENDIX F**

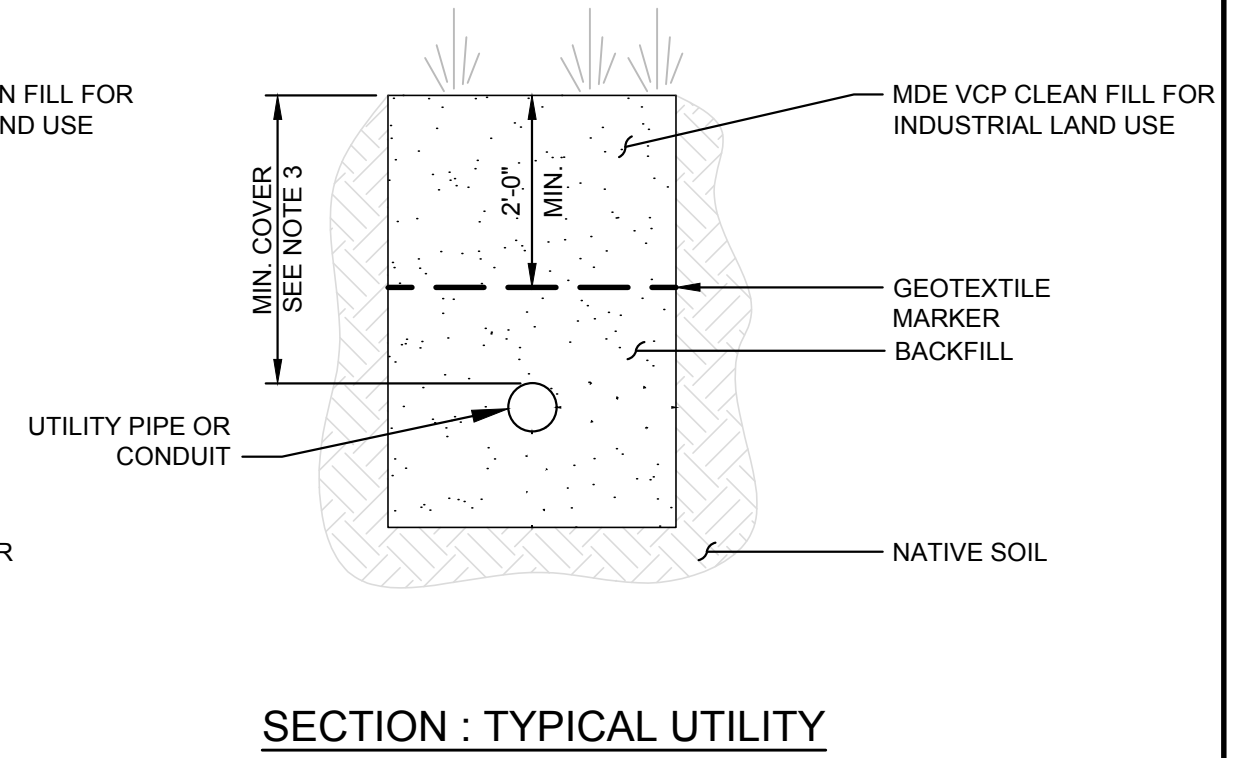
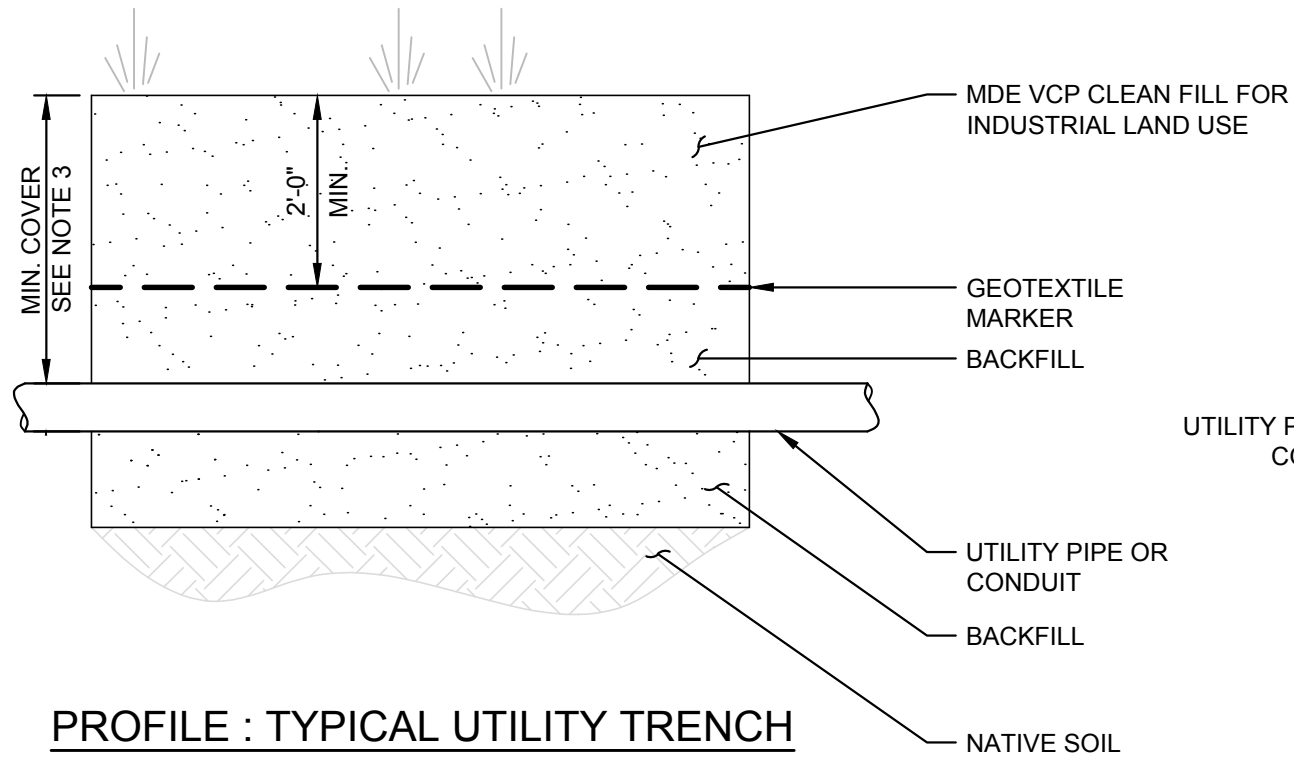
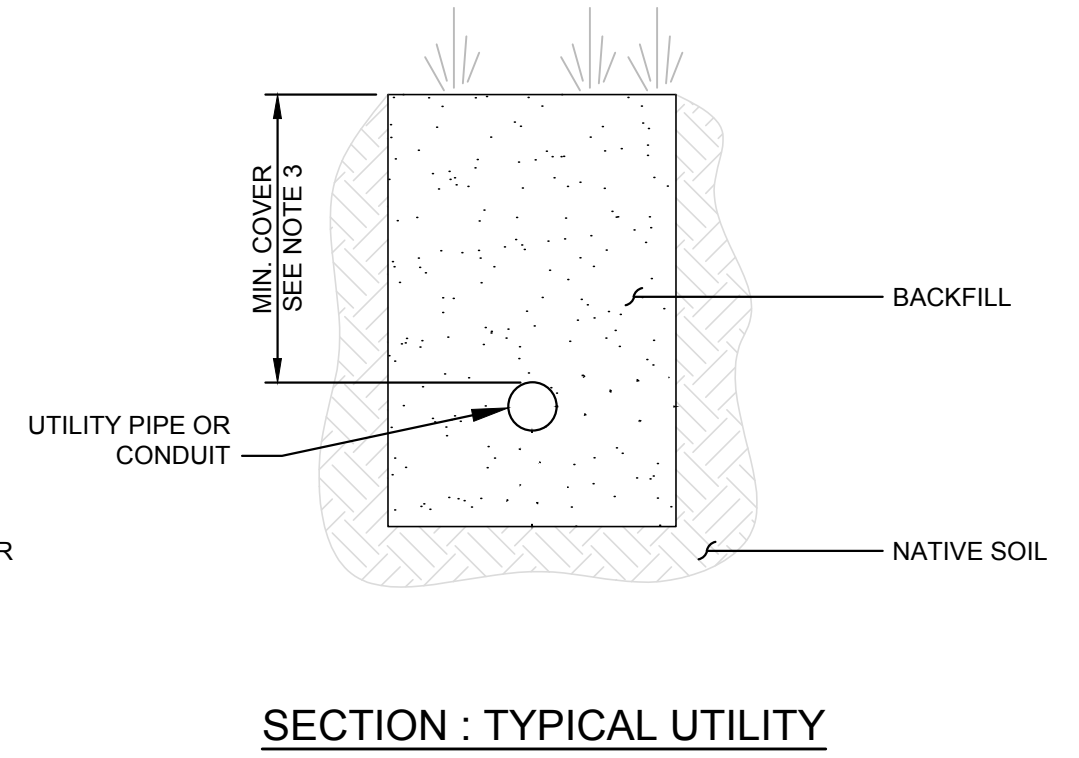
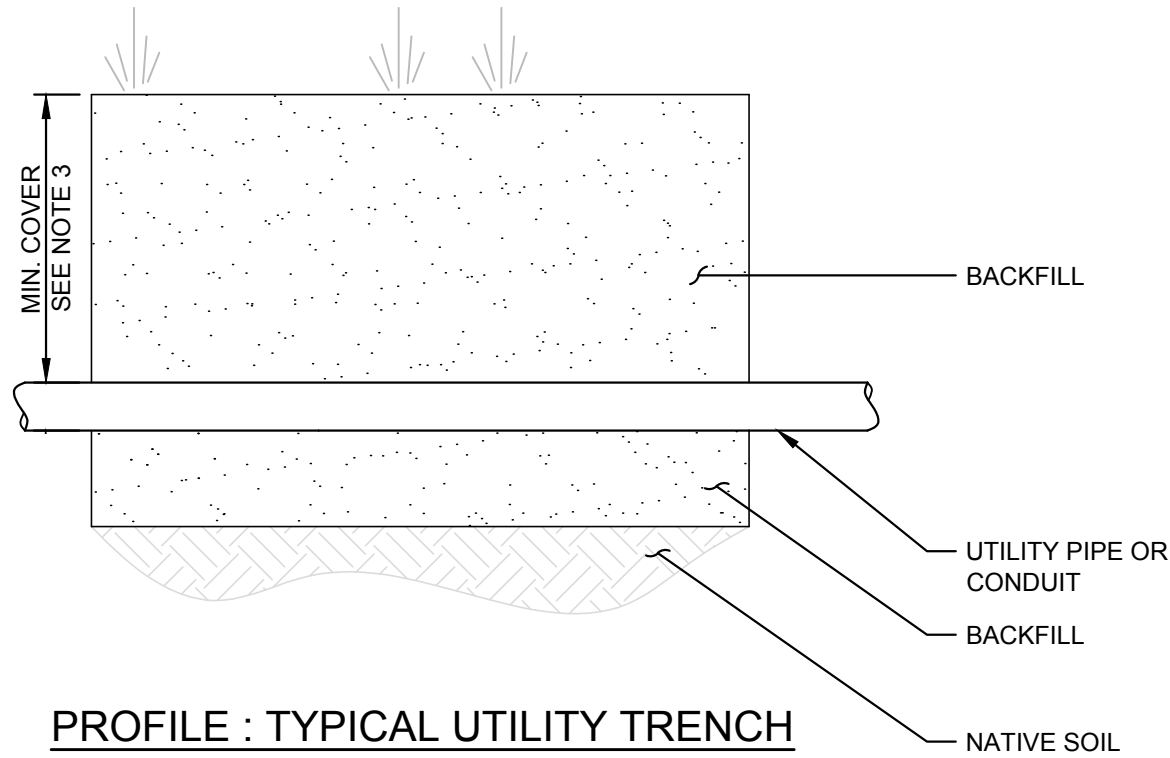
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**GENERAL NOTES:**

1. ALL PIPES OR CONDUIT SHALL BE LEAK-PROOF AND WATERTIGHT. ALL JOINTS SHALL BE SEALED OR GASKETED.
2. ALL PIPES SHALL BE PROPERLY PLACED AND BEDDED TO PREVENT MISALIGNMENT OR LEAKAGE. PIPE BEDDING SHALL BE INSTALLED IN SUCH A MANNER AS TO MINIMIZE THE POTENTIAL FOR ACCUMULATION OF WATER AND CONCENTRATED INFILTRATION.
3. MINIMUM COVER ABOVE UTILITY SHALL BE BASED ON SPECIFIC UTILITY REQUIREMENTS.
4. TRENCHES SHALL BE BACKFILLED WITH BEDDING AND MATERIALS APPROVED BY MDE.
5. FOR ANY UTILITY SEGMENT WHICH GOES THROUGH AN AREA WHICH IS DESIGNATED TO RECEIVE A LANDSCAPED CAP, THE UPPER 2 FEET OF BACKFILL MUST MEET THE REQUIREMENTS OF MDE VCP CLEAN FILL FOR INDUSTRIAL LAND USE. IN THIS CASE THE MDE VCP CLEAN FILL WILL BE UNDERLAIN BY A GEOTEXTILE MARKER FABRIC. UTILITY SEGMENTS WHICH GO THROUGH AREAS WHICH DO NOT REQUIRE CAPPING OR ARE DESIGNATED TO RECEIVED A PAVED CAP WILL BE BACKFILLED WITH MATERIALS APPROVED BY MDE FOR THIS USE.



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**CRRGP F KZ'I**

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## **Utility Excavation NAPL Contingency Plan**

Revision 5 – September 20, 2022

### **Objectives:**

The purpose of this plan is to describe procedures to be followed in the event that non-aqueous phase liquid (NAPL) is encountered in utility trenches or other excavations during development of the Tradepoint Atlantic property. The specific objectives of this plan and the procedures outlined herein are:

1. To ensure identification and proper management of NAPL contaminated soils.
2. To ensure proper worker protection for working in areas of NAPL contamination.
3. To ensure that the installation of new utilities does not create new preferential flow paths for the migration of NAPL or soil vapors.

### **Identification of Oil & Grease and Petroleum Contaminated Soil:**

An Environmental Professional (EP) will be on-site to determine if soils show evidence of the presence of NAPL during installation of utility trenches or other excavation activities completed during development. NAPL-contaminated soils can be identified by the presence of free oil. Free oil (NAPL) is liquid oil which could potentially be drained or otherwise extracted from the soil, and is the focus of this contingency plan, although severe staining accompanied by odors may be addressed via similar contingency measures provided herein (based on the judgement of the EP).

If NAPL is encountered during construction, potentially impacted material from the excavation will be removed and separated on plastic / covered with the same. Additional discussion of removal of material is in the **Soil Excavation, Staging, Sampling and Disposal** section below. If NAPL is encountered in an area where there is no known historical NAPL impact, the MDE will be notified (see **Initial Reporting** section) and the open excavation may be allowed to sit overnight. If after removal of the initial material identified additional NAPL impacted material enters the open excavation, the extent of impacts may be delineated and additional material removed / segregated. .

### **Soil Excavation, Staging, Sampling and Disposal:**

The EP will monitor all utility trenching and excavation activities for signs of potential contamination. In particular, soils will be monitored with a hand-held photoionization detector (PID) for potential volatile organic compounds (VOCs) and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of NAPL contamination that may be different than what was already characterized.

Soil exhibiting physical evidence of NAPL contamination, which is located within a proposed new utility or subsurface structure (i.e., foundation, sump, electrical vault, underground tank, etc.), will



be excavated and segregated for disposal at the on-site nonhazardous landfill (Greys Landfill) or an off-site facility pending the completion of required analytical testing. If NAPL material continues to enter the open excavation, additional excavation may be continued in the field based on visual screening supplemented by the PID.

Any recovered NAPL impacted material will be segregated and collected for disposal. As required for disposal, samples impacted by NAPL will be collected for profiling/waste characterization and submitted to a fixed laboratory. Upon receipt of any additional characterization analytical results, the stockpiles will be tracked from generation to disposal.

### **Initial Reporting:**

If evidence of NAPL in soil or groundwater is encountered during excavation in an area with no known historic NAPL impact, it will be reported to the MDE. Information regarding the location and characteristics of NAPL contaminated material will be documented as follows:

- Location (Site / Parcel ID with map);
- Approximate extent of contamination (horizontally and vertically – prepare a sketch including dimensions);
- Relative degree of contamination (i.e. free oil with strong odor vs. staining); and
- Visual documentation (take photographs and complete a photograph log)

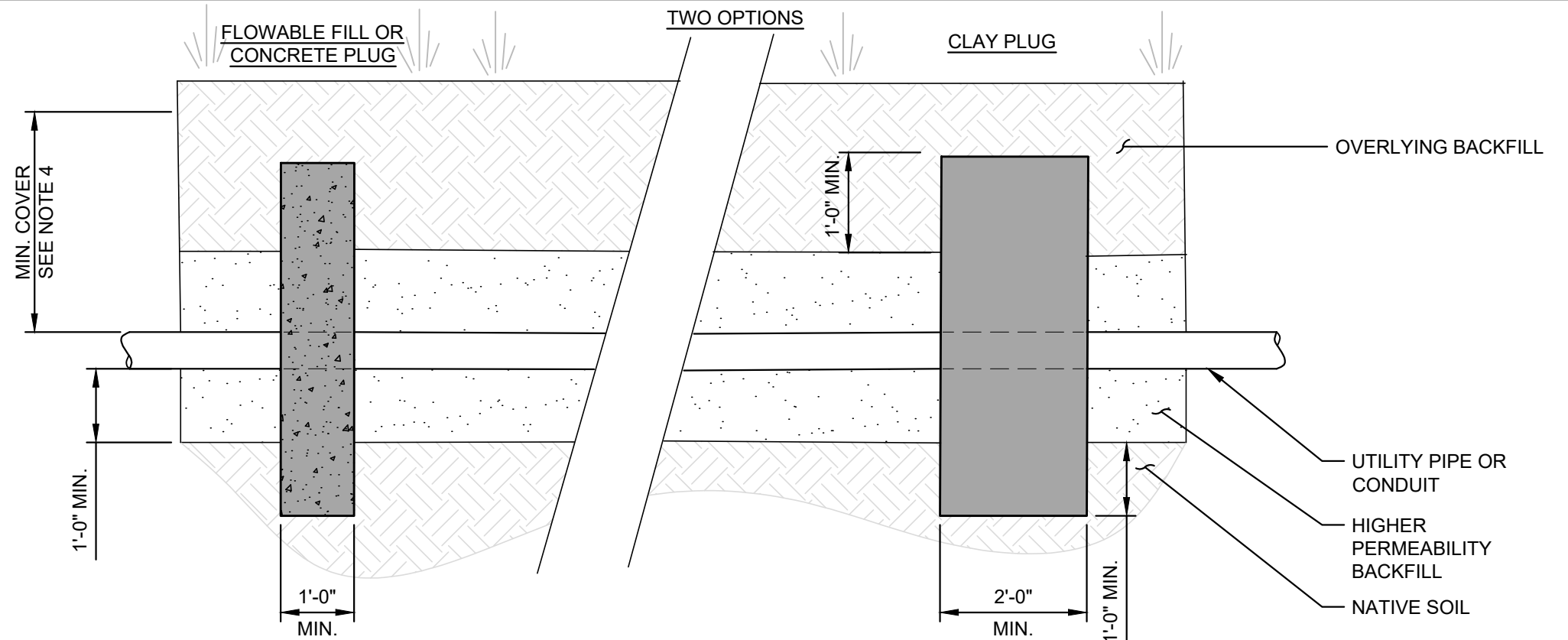
### **Utility Installations in Impacted Areas:**

Underground piping or conduits installed through areas of known NAPL contamination shall be leak proof and water tight. All joints will be adequately sealed or gasketed, and pipes or conduits will be properly bedded and placed to prevent leakage. Trench backfill will meet the MDE definition of clean fill, or be otherwise approved by the MDE. Bedding must be properly placed and compacted below the haunches of the pipe. Clay, flowable fill, or concrete plugs may be placed every 100 feet across any permeable bedding to minimize the preferential flow and concentration of water along the bedding of such utilities.

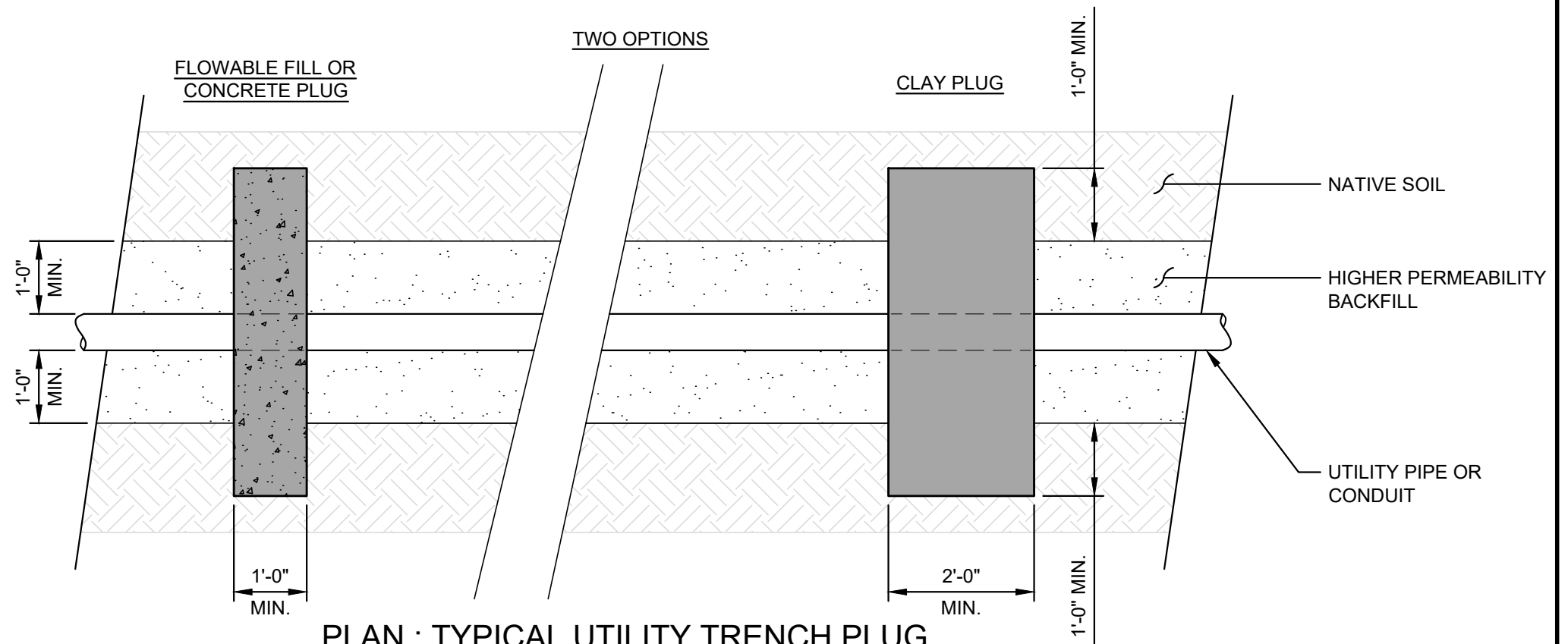
If required, each trench plug will be constructed with a 2-foot-thick clay plug or 1-foot-thick flowable fill or concrete plug, perpendicular to the pipe, which extends at least 1 foot in all directions beyond the permeable pipe bedding. The plug acts as an anti-seep collar, and will extend above the top of the pipe. A specification drawing for installation of the trench plug has been provided as **Figure 1**.

**GENERAL NOTES:**

1. ALL PIPES OR CONDUIT PASSING THROUGH AREAS OF PETROLEUM CONTAMINATION SHALL BE LEAK-PROOF AND WATERTIGHT. ALL JOINTS SHALL BE SEALED OR GASKETED.
2. ALL PIPES SHALL BE PROPERLY PLACED AND BEDDED TO PREVENT MISALIGNMENT OR LEAKAGE. PIPE BEDDING SHALL BE INSTALLED IN SUCH A MANNER AS TO MINIMIZE THE POTENTIAL FOR ACCUMULATION OF WATER AND CONCENTRATED INFILTRATION.
3. ANTI-SEEP COLLARS FROM THE PIPE MANUFACTURER, THAT ARE PRODUCED SPECIFICALLY FOR THE PURPOSE OF PREVENTING SEEPAGE AROUND THE PIPE, ARE ACCEPTABLE IF INSTALLED IN STRICT ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS, AND ONLY WITH PRIOR APPROVAL BY TPA.
4. MINIMUM COVER ABOVE UTILITY SHALL BE BASED ON SPECIFIC UTILITY REQUIREMENTS.
5. TRENCHES SHALL BE BACKFILLED WITH BEDDING AND MATERIALS APPROVED BY MDE.
6. FOR ADDITIONAL REQUIREMENTS, INCLUDING THE USE OF MDE VCP CLEAN FILL FOR INDUSTRIAL LAND USE AND INSTALLATION OF GEOTEXTILE MARKER FABRIC, REFER TO NOTE 5 ON THE TYPICAL UTILITY CROSS SECTIONS.
7. ALL UTILITIES INSTALLED THROUGH AREAS CONTAINING NAPL OR ELEVATED CHEMICAL IMPACTS WITH THE POTENTIAL TO TRANSMIT VAPORS ALONG PREFERENTIAL FLOW PATHWAYS SHALL BE EITHER 1) BACKFILLED WITH LOW PERMEABILITY BACKFILL MATERIAL (LESS THAN OR EQUAL TO THE PERMEABILITY OF THE EXISTING SUBGRADE), OR 2) INSTALLED WITH TRENCH PLUGS ALONG THE ALIGNMENT IN ACCORDANCE WITH THE DETAILS SHOWN ON THIS PLAN AND THE FOLLOWING NOTES:
  - A.) UTILITY TRENCH PLUGS SHALL BE INSTALLED AT 100-FOOT (MAX.) INTERVALS THROUGH ALL AREAS OF NAPL CONTAMINATION.
  - B.) UTILITY TRENCH PLUGS SHALL EXTEND A MINIMUM OF 1-FOOT IN ALL DIRECTIONS BEYOND ANY HIGHER PERMEABILITY BACKFILL MATERIALS (I.E., MATERIALS EXCEEDING THE PERMEABILITY OF THE EXISTING SUBGRADE).



**SECTION : TYPICAL UTILITY TRENCH PLUG**



**PLAN : TYPICAL UTILITY TRENCH PLUG**

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**UTILITY TRENCH PLUG**  
Sparrows Point Site  
Tradepoint Atlantic

September 2020  
Not to Scale  
160443M

Figure  
**1**

P:\EnviroAnalytics Group\160443M EAG\_ITPA Redevelopment\Drawings\NAPL Contingency\SK01\_UTILITY Trench Plug\_rev2.dwg Plotted: September 24, 2018