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## RESPONSE ACTION PLAN

**11411 Red Run Boulevard  
Owings Mills, Baltimore County, Maryland**

April 16, 2024

Submitted to:

**Maryland Department of the Environment  
Voluntary Cleanup Program**

1800 Washington Boulevard, Suite 625

Baltimore, Maryland 21230

Attn: Mr. Chris Hartman

Prepared for:

**Red Run Owner, LLC**

c/o Whiteford Taylor Preston

7 Saint Paul Street, Suite 1500

Baltimore, Maryland 21202-1636

Attn: Mr. Trent Zivkovich

---

Prepared by:

**Geo-Technology Associates, Inc.**

*Geotechnical and Environmental Consultants*

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Laurel, Maryland 20707

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GTA Project No: 31220334

# GEO-TECHNOLOGY ASSOCIATES, INC.

GEOTECHNICAL AND  
ENVIRONMENTAL CONSULTANTS



*A Practicing Geoprofessional Business Association Member Firm*

April 16, 2024

Red Run Owner, LLC  
c/o Whiteford Taylor Preston  
7 Saint Paul Street, Suite 1500  
Baltimore, Maryland 21202-1636

Attn: Mr. Trent Zivkovich

Re: Response Action Plan  
**11411 Red Run Boulevard**  
Owings Mills, Baltimore County, Maryland

Dear Mr. Zivkovich:

In accordance with our agreement, Geo-Technology Associates, Inc. (GTA) has prepared this Response Action Plan (RAP) for the above referenced subject property. The subject property is comprised of an approximately 11.15-acre parcel located adjacently southwest of Red Run Boulevard, and is improved with a 112,002 square foot office building, paved parking lots, concrete walkways, landscaped areas, and a diesel-fueled emergency back-up generator. This RAP has been prepared to address environmental impacts identified during prior evaluations.

We appreciate the continued opportunity to be of assistance on this project. Should you have any questions regarding this information, or should you require additional information, please contact our office at (410) 792-9446.

Sincerely,

**GEO-TECHNOLOGY ASSOCIATES, INC.**



Scott W. Cumming

Senior Environmental Scientist



Benjamin G. Myers, P.E.

Vice President

SWC/SJS/BGM

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## 1.0 INTRODUCTION

### 1.1 Overview and Purpose

At the request of Red Run Owner, LLC (Client and Applicant) c/o Whiteford Taylor Preston, Geo-Technology Associates, Inc. (GTA) has prepared this Response Action Plan (RAP) for the 11411 Red Run Boulevard property (the “subject property”). During previous environmental evaluations, impacted soil was identified above the applicable Maryland Department of the Environment (MDE) criteria.

The Client applied to the MDE Voluntary Cleanup Program (VCP) as an “Inculpable Person” for the subject property. Inculpable Person status was granted to Red Run Owner, LLC on September 21, 2021. The subject property use is proposed to remain commercial (Tier 2). The subject property is currently zoned for Light Manufacturing (ML).

This RAP has been prepared to establish a proposed remedy for impacted soil within the site boundary in conjunction with continued commercial use. The proposed remedies include soil management during excavation, a groundwater use restriction, and the use of appropriate health and safety measures during RAP implementation. The RAP has been prepared for MDE submittal so that a Certificate of Completion (COC) may be obtained following the RAP implementation.

### 1.2 Limitations

This report was prepared by GTA for the sole and exclusive use of the Client, under the terms and conditions of GTA’s contract with the Client. GTA acknowledges that this document is being submitted to the MDE and will be part of the public record, and that the MDE is expected to use this report as part of its review process. However, use of this report by any unauthorized third party is at their sole risk. GTA is not responsible for any claims, damages, or liabilities associated with unauthorized third-party use. Reliance on this report can be provided to other parties at the request of the Client, subject to the terms and conditions of GTA’s contract with the Client.

## 2.0 BACKGROUND

### 2.1 Site Description

The subject property comprises approximately 11.15 acres adjacently southwest of Red Run Boulevard, and is improved with a 112,002 square foot office building, paved parking lots, concrete walkways, landscaped areas, and a diesel-fueled back-up generator. A Site Location Map is presented as Figure 1.

### 2.2 Proposed Development

The proposed use of the subject property is for commercial purposes. No change in use is being proposed.

## 2.3 Environmental Site History

### 2.3.1 Environmental Data

Several previous environmental evaluations of the subject property have been prepared and should be reviewed for detailed information regarding site history and prior sampling and analysis results, including the following.

- Phase I Environmental Site Assessment (ESA); December 1998; prepared by Geolab
- Phase I ESA; February 2009; prepared by Environ International Corporation
- Phase II ESA; March 31, 2009; prepared by Environ International Corporation
- Phase I ESA; August 20, 2021; prepared by AEI Consultants
- VCP Application; February 28, 2022; prepared by GTA

The primary finding of these reports was the subject property's former use as the Pikesville Sportsman's Club. The overall Pikesville Sportsman's Club included parcels in addition to the subject property. The 1998 and 2009 Phase I ESAs identified two trap shooting fields on the eastern portion of subject property, including lead-shot drop zones. At least three additional trap fields were located to the east of the subject property. As part of a 2009 Phase II ESA, Environ advanced 17 soil borings using direct-push and hand auger methods. Fourteen borings were located in the southeastern portion of the subject property correlating to the location of the former trap shooting fields and associated lead-shot fall zones, including four borings through the existing asphalt parking lot, and 10 borings in the grass covered and landscaped fringe of the subject property (adjacent to the parking lot on the southwestern and southeastern portions of the subject property). Three additional borings were advanced in presumed non-trap field areas to collect background data. Surface (0.5-foot) samples were retained from each boring and subsurface samples (2-foot) were retained from five of the borings. All 22 samples were analyzed for priority pollutant metals by USEPA Method 6020A, and seven samples were analyzed for polycyclic aromatic hydrocarbons (PAHs) BY USEPA Method 8270C.

#### Soil Analysis Results

In the Environ 2009 Phase II ESA, Table 1 (Detected Constituents in Soil) presents the results of the soil sampling and analysis performed, and was incorporated into a figure that GTA extracted and presents as Figure 2 (Historical Data Plan). The 2009 Phase II ESA soil data was compared to 2008 MDE residential and non-residential cleanup criteria.

In the table below, GTA compared the 2009 Phase II ESA soil data to the MDE's Non-Residential Cleanup Standard (NRCS) and Residential Cleanup Standard (RCS), and the Anticipated Typical Concentration (ATC) for Central Maryland as presented in MDE's Cleanup Standards for Soil and Groundwater; October 2018; Interim Final Guidance (Update No. 3). The analytical results are presented in milligrams per kilogram (mg/kg).

TABLE 1 SOIL ANALYSIS SUMMARY	
Analysis Parameter	Results Summary
Priority Pollutant Metals	<p>Of the 22 surface and subsurface samples collected:</p> <ul style="list-style-type: none"> <li>• Seven soil samples contained arsenic above the ATC value of 4.9 mg/kg.</li> <li>• 10 soil samples contained total chromium above the ATC value of 30 mg/kg. None of the samples were speciated to identify the hexavalent chromium component of the total chromium value.</li> <li>• One surface soil sample contained lead above the NRCS of 550 mg/kg. One subsurface sample exceeded the RCS for lead value of 200 mg/kg, but below the NRCS.</li> <li>• Detections of the remaining priority pollutant metals did not exceed the MDE comparison values.</li> </ul>
Polycyclic Aromatic Hydrocarbons (PAHs)	<p>Of the 22 samples collected, seven surface samples were analyzed for PAHs. Of those:</p> <ul style="list-style-type: none"> <li>• Two soil samples contained benzo(a)anthracene above the NRCS of 21 mg/kg. Detections in two additional samples exceeded the RCS of 1.1.</li> <li>• Four soil samples contained benzo(a)pyrene above the NRCS and RSC values of 2.1 mg/kg and 0.11 mg/kg, respectively.</li> <li>• Two soil samples contained benzo(b)fluoranthene above the NRCS of 21 mg/kg. Detections in two additional samples exceeded the RCS of 1.1.</li> <li>• Four soil samples contained dibenz(a,h)anthracene above the NRCS and RSC values of 2.1 mg/kg and 0.11 mg/kg, respectively.</li> <li>• Detections of the remaining PAHs did not exceed the MDE NRCS. However, three compounds were detected above the respective RCS values, including:                         <ul style="list-style-type: none"> <li>• Two soil samples containing benzo(k)fluoranthene above 11 mg/kg.</li> <li>• Four soil samples containing indeno(1,2,3-cd)pyrene above 1.1 mg/kg.</li> </ul> </li> </ul>

### 3.0 EXPOSURE ASSESSMENT

#### 3.1 Future Land Use/Occupants

No change in land use is planned.

### 3.2 Contaminants of Potential Concern

#### 3.2.1 Soil

Based on the 2009 Phase II ESA, PAHs and lead are considered the primary soil Contaminants of Potential Concern (COPC), for the dermal exposure, ingestion, and inhalation pathways.

#### 3.2.2 Groundwater

Groundwater has not been evaluated, and no groundwater COPCs have been identified. However, as discussed in Section 5.4, a groundwater use restriction is planned.

### 3.3 Exposure Pathway Evaluation

Based on prior evaluations, certain potential future environmental exposure risks exist at the site. A site-specific Human Health Risk Assessment has not been prepared for this site, because elimination of the identified exposure pathways to future occupants (child visitor, youth visitor, adult visitor, and adult on-site worker) is proposed. Potential risks to construction workers may exist. The potential exposure pathways are summarized in the following table and are discussed below.

POTENTIAL EXPOSURE PATHWAYS			
Media	Potential Exposed Population	Exposure Pathway	COPCs
Soil	Child Visitor Youth Visitor Adult Visitor Adult On-Site Worker	Dermal Exposure Incidental Ingestion Inhalation of Volatiles and Fugitive Dust	None
	Construction Worker	Dermal Exposure Incidental Ingestion Inhalation of Volatiles and Fugitive Dust	Lead  Benzo(a)anthracene Benzo(a)pyrene Benzo(b)fluoranthene Dibenz(a,h)anthracene

Because excavations are planned to eliminate the identified soil impacts, PAHs and lead are not considered COPCs to the post-remediation residents or visitor. Remedial goals related to exposed populations are summarized in Section 4.0, and the soil management techniques that are planned for limiting exposure are described in Section 5.0.

## 4.0 CLEANUP CRITERIA

The cleanup criteria for the subject property are summarized in the table below. The cleanup criteria for the COPCs reflect the MDE NRCS values, which are the generic risk-based guidance values in MDE’s *Cleanup Standards for Soil and Groundwater; October 2018; Interim Final Guidance (Update No. 3)*. The NRCS cleanup criteria are inherently conservative for the construction worker population.

CLEANUP CRITERIA			
Media	COPC	Cleanup Criteria	Basis
Soil	Lead	550 mg/kg	NRCS
	Benzo(a)anthracene	21 mg/kg	
	Benzo(a)pyrene	2.1 mg/kg	
	Benzo(b)fluoranthene	21 mg/kg	
	Dibenz(a,h)anthracene	2.1 mg/kg	

If other COPCs are identified, the cleanup criteria will be re-evaluated with MDE. Generally, the cleanup criteria that will be applied to any additional COPCs will be the published MDE NCS values, or site-specific values calculated using the appropriate frequency exposure parameters, as the need arises. The use of cleanup criteria other than those tabulated above will only occur with prior MDE approval.

## 5.0 REMEDIES AND INSTITUTIONAL CONTROLS

### 5.1 Health and Safety Measures

A site-specific Environmental Health and Safety Plan (E-HASP) will be prepared to reduce direct contact exposure to the identified soil contaminants during the performance of construction activities that could involve impacted media. The E-HASP will provide recommended procedures to reduce the potential for over-exposure. The potential for worker exposure to site contaminants is primarily via direct contact, ingestion, or inhalation of nuisance dust. The primary action taken to mitigate potential exposures to construction workers will be the avoidance of direct contact with potentially impacted soil, and the appropriate use of personal protective equipment during construction activities.

The E-HASP will be submitted to the Client under separate cover and will be provided to contractors involved in construction activities potentially encountering impacted media, for their information. A copy of the E-HASP will be provided to MDE as a courtesy prior to the start of construction.

The Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) for Particles Not Otherwise Regulated (PNOR), or nuisance dust, is 15 milligrams per cubic meter (mg/m<sup>3</sup>). The nuisance dust concentration of 15 mg/m<sup>3</sup> can be visually identified without active dust monitoring equipment; therefore, if visible dust is generated during general construction activities, dust suppression measures (e.g., wetting, misting, etc.) will be implemented. If such efforts do not effectively suppress visible dust, then dust monitoring will be initiated to ensure nuisance dust does

not exceed the OSHA PEL of 15 mg/m<sup>3</sup>. The nuisance dust PEL of 15 mg/m<sup>3</sup> will be used as a stop work action level, and earthwork will cease until dust is no longer visible and dust concentrations are below the 15 mg/m<sup>3</sup> stop work action level.

If indications of petroleum impacts are encountered during construction, such as soil staining, odors, etc., air monitoring for volatiles will be conducted using a portable photoionization detector (PID). The monitoring will be conducted in/around the excavation, as needed based on the nature and location of the impacted materials. The relevant PID Action Levels are summarized below.

PID ACTION LEVEL SUMMARY	
PID Reading	Response Action
< 10 ppm	Continue monitoring; no other action required.
≥ 10 ppm (sustained for 15 minutes)	Implement engineering controls, such as ventilation of the work area, covering contaminated materials, etc. Continue monitoring.
≥ 100 ppm (sustained for 15 minutes)	Stop work, implement engineering controls, and if needed activate HASP guidelines for worker respiratory protection.

## 5.2 Utility Location

Prior to mobilizing to the subject property, GTA will notify Miss Utility and contract a private utility location service to identify underground utilities. Additionally, GTA will review relevant site plans provided by the Client to attempt to determine locations of buried utilities. GTA's primary utility concerns are focused on the electrical transformers in the work area.

## 5.3 Soil and Fill Management

### 5.3.1 Waste Characterization Sampling for Disposal Facility Acceptance

The existing analytical data for the COPC-impacted soil in the remediation area is 14 years old, and is likely inadequate to meet the intake requirements of the potential disposal facilities.

Based on the projected volume of impacted soil that will be excavated from the area of concern (less than 150 cubic yards), GTA will collect one 20-point composite waste characterization sample from in situ surface soil (0-1') and will analyze the sample for parameters required by local disposal facilities (e.g., Soil Safe, Clean Earth, Modern Landfill). The waste characterization sample will likely be analyzed for volatile organic compounds (VOCs), Total Petroleum Hydrocarbons Diesel Range Organics and Gasoline Range Organics, PAHs, Resource Conservation and Reclamation Act (RCRA) metals, and Toxic Characteristic Leaching Procedure (TCLP) metals. Additional waste characterization analyses such as full TCLP (VOCs, Semi-VOCs, pesticides, herbicides, and metals) and reactivity, ignitability, and corrosivity may also be required depending on the disposal facility.

This sampling and analysis activity will be conducted in advance of the soil removal to allow for the disposal facility to process and approve the application.

### 5.3.2 Impacted Soil Remediation

A length of approximately 325 feet of the existing wooden privacy fence adjacent to the southwestern and southeastern curblines of the parking lot on the southern portion of the subject property will be removed, along with a row of existing conifer trees (approximately 28 trees) adjacent to the southwestern property boundary. As many as nine additional trees may need to be removed from the southeastern property boundary to create clear access to the impacted soil.

After the fence and trees are removed, a contractor will use soft-dig technology and/or hand tools to excavate the top one foot of impacted soil from around three existing pad-mounted electrical transformers on the southern portion of the area of concern (see Figure 3 for more detail). The contractor will then utilize an excavator to remove the top one foot of soil from the remaining portions of the area of concern. GTA personnel will evaluate excavation spoils and monitor the excavations for soil impacts.

Impacted soil will be direct-loaded onto dump trucks or roll off dumpsters and transported to the approved disposal facility. If needed, the spoils may be temporarily stockpiled on and covered by plastic sheeting. Impacted soil transportation and disposal procedures are described in Section 5.3.4.

### 5.3.3 Post-Remediation Confirmatory Sampling

After impacted soils are excavated, GTA will collect confirmatory soil samples from the excavated area to demonstrate that the remaining soils meet the cleanup criteria. The remediated area is expected to encompass approximately 3,800 square feet and will be divided into 15 approximately 250-square-foot decision units (DUs). In each DU, 12 sub-samples will be collected from the exposed excavation bottom to create one 12-point composite sample for each DU (15 composite samples total). The confirmatory samples will be analyzed for PAHs and lead, and other parameters may be included if warranted based on the field conditions. If the results meet the cleanup criteria, then no further remedial effort in that area will be necessary.

If the results exceed the cleanup criteria in one or more DUs, at least six inches of additional soil will be stripped from the bottom of the impacted DU(s), and re-sampling will occur in the same manner. This process will repeat until the results are acceptable.

### 5.3.4 Impacted Soil Transportation and Disposal

GTA proposes to direct-load remediation spoils to dump trucks or roll off dumpsters for transportation to the approved disposal facility, and avoid temporary stockpiling of impacted

soils on the subject property. Impacted soil will be handled, transported, and disposed in accordance with local, state, and federal regulations. Disposal documentation will be included in RAP Completion Report to be provided to MDE VCP.

Alternatively, the excavated soils may be considered for beneficial reuse at a suitable off-site location, such as a commercial site, subject to MDE approval. Additional soil characterization may be necessary for beneficially reusing the excavated soils from these areas. This approach will follow MDE's *Fill Material and Soil Management Guidance*, reflecting the following beneficial use criteria:

- Residential Unrestricted Use Soil and Fill Material (Category 1),
- Non-Residential Restricted Use Soil and Fill Material (Category 2),
- Restricted Use Soil and Fill Material, Cap Required (Category 3), and
- Ineligible Soil and Fill Material (Category 4).

#### 5.3.5 Soil Contingencies

The impacted soil removal approach described above may require modification, depending on the confirmatory analysis results or other unforeseen circumstances.

If necessary, it may be necessary to consider leaving impacted soils in place and under an environmental cap. Although this remedial approach is not foreseen, it may become necessary if impacted soils remain deeper than the planned excavation activities. If this option becomes necessary, the specific capping profiles and future maintenance obligations will be established through MDE consultation.

#### 5.3.6 Off-Site Fill Materials

Imported soils to be used as backfill will be obtained from sources that are pre-approved by MDE (if possible), or will be obtained from new sources that will be approved by MDE prior to being transported to the subject property. For new sources, once a prospective source of fill soils is identified, GTA will prepare and submit a sampling/analysis work plan to MDE for review and approval. After sampling, the results will be provided to MDE for approval prior to transporting the material to the subject property.

The remediated area will likely utilize topsoil or planting material/medium to restore the subject property. These materials will be acquired from standard commercial providers of such materials, with clean fill certifications. MDE will be provided with a letter from the originating source facility which states that, to the best of their knowledge, the material is not impacted by petroleum products or hazardous materials. If MDE does not consider the clean fill certification to be sufficient to document the material's environmental quality, GTA will prepare and submit a sampling/analysis work plan to MDE for review and approval. After sampling, the results will be provided to MDE for approval prior to transporting the material to the subject property.

## 5.4 Groundwater Use Restriction

The subject property is serviced by public utilities; however, to eliminate potential concerns associated with possible groundwater contamination, the groundwater at the subject property will be prohibited from being used for any purpose via restrictions recorded in the property deeds (i.e., via an environmental covenant).

## 6.0 CONTINGENCIES

If site conditions observed during remediation differ substantially from those described herein, modifications to this RAP may be necessary. Such differing conditions may warrant an adjustment of sampling procedures, analytical methods, remedial activities, etc. and such modifications will be addressed in an addendum or revision to this RAP. MDE will be notified of any newly discovered contamination, changes to this RAP, or citations from other regulatory agencies.

## 7.0 ADMINISTRATIVE

### 7.1 Schedule

The RAP implementation is expected to occur between May 2024 and October 2024. Updates to the implementation schedule will be provided to MDE when additional details are known.

The VCP project manager will be notified in writing within 5 calendar days prior to the beginning of RAP implementation activities. Schedule updates will be provided as needed.

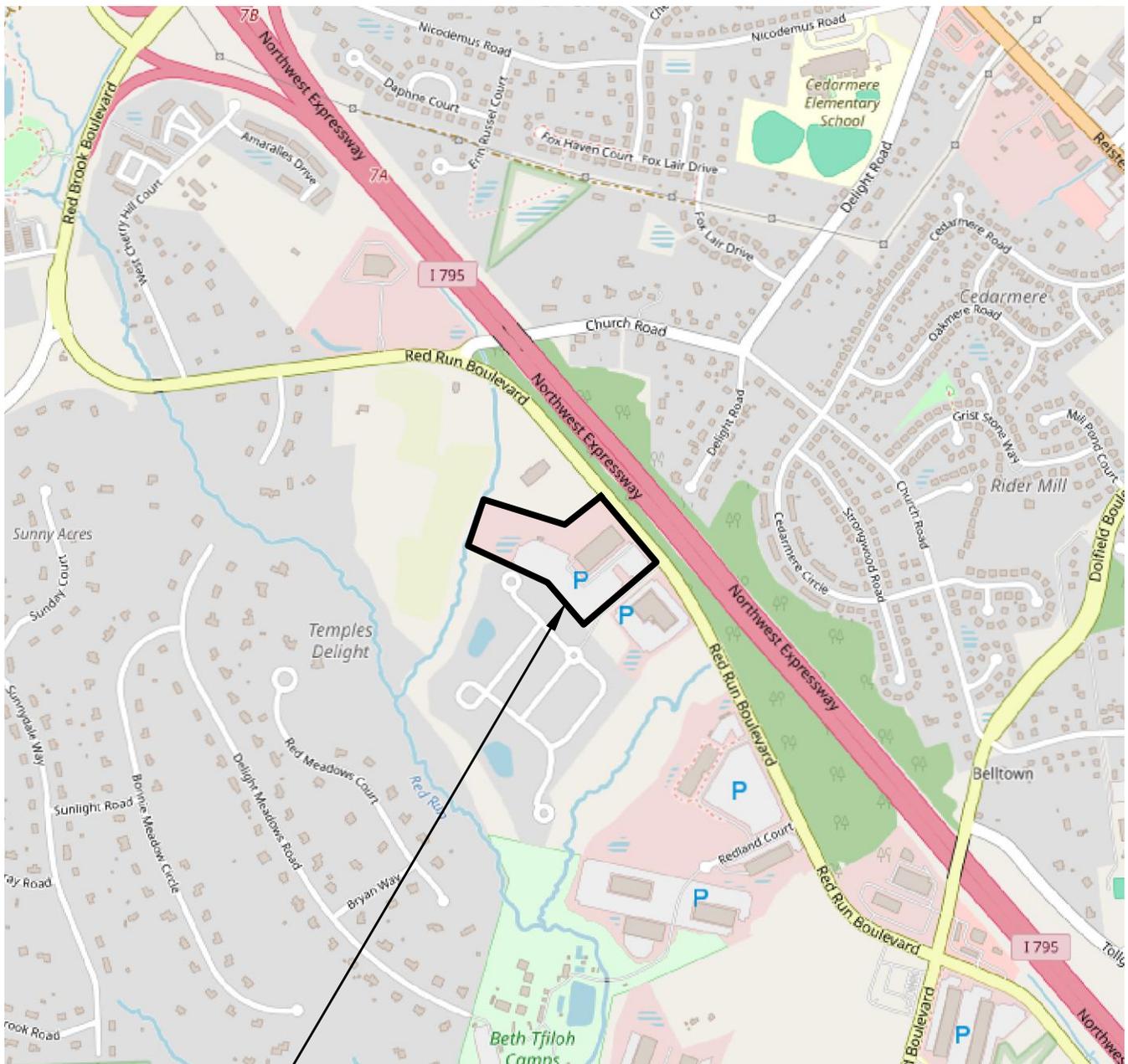
### 7.2 Documentation

During implementation of this RAP, GTA will prepare monthly progress reports summarizing the remedial activities occurring during that month. These monthly progress reports will be submitted to the Client and to MDE by the 15th day of the following month, to demonstrate implementation of this RAP. It is expected that up to two RAP implementation reports will be necessary. At the conclusion of RAP implementation, GTA will prepare a RAP Completion Report, so that a Certificate of Completion (COC) can be obtained.



# **APPENDIX A**

## **Figures**



Approximate Subject  
Property Boundary

**Notes**

1. Base map image obtained from Open Street Maps Online GIS Software.



Approximate Scale  
1 inch = 1,000 feet

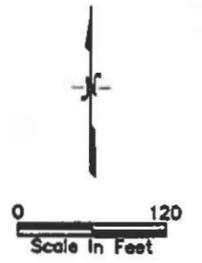
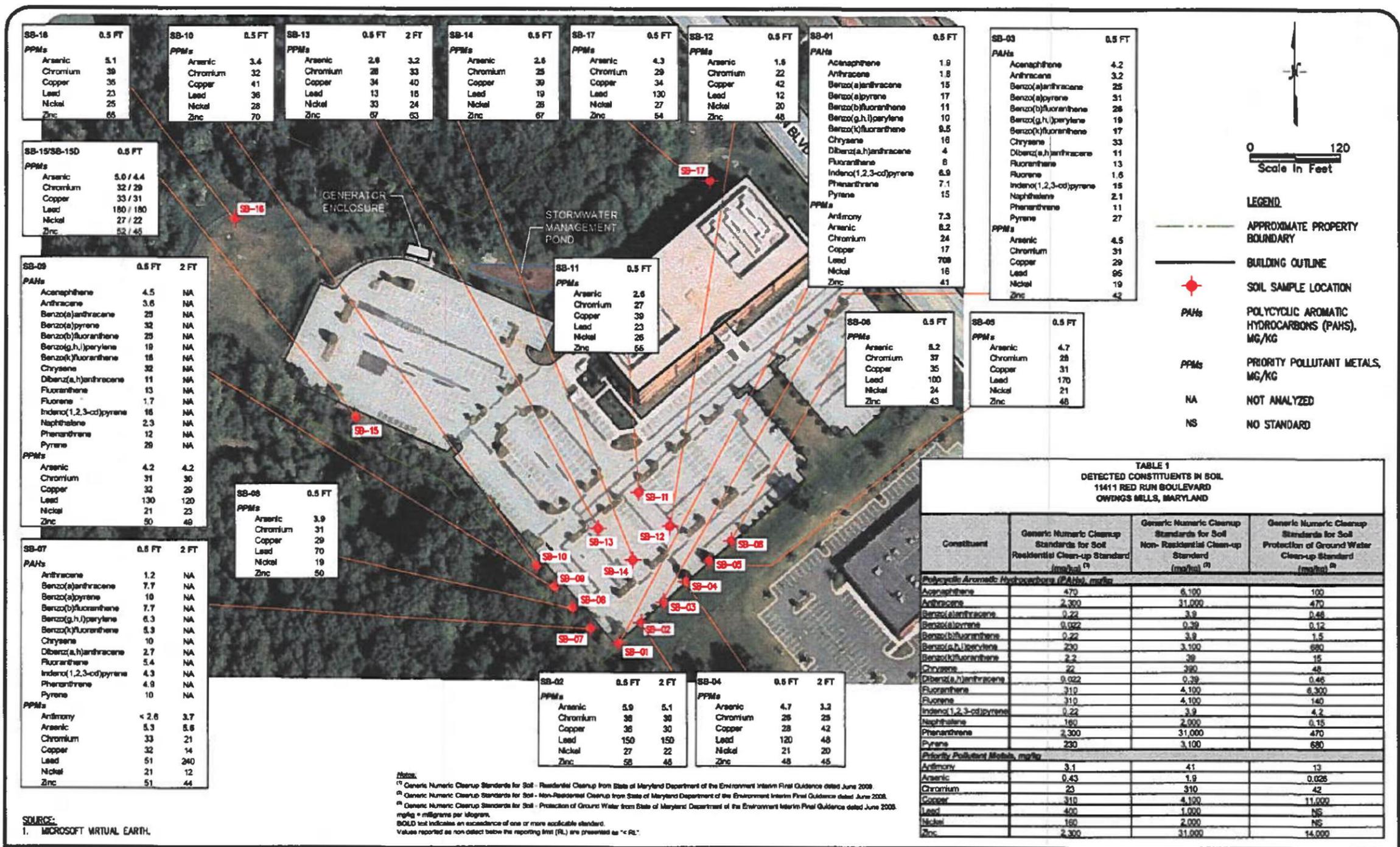


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11411 RED RUN BOULEVARD  
BALTIMORE COUNTY, MARYLAND

**SITE LOCATION MAP**



- LEGEND**
- APPROXIMATE PROPERTY BOUNDARY
  - BUILDING OUTLINE
  - ◆ SOIL SAMPLE LOCATION
  - PAHs POLYCYCLIC AROMATIC HYDROCARBONS (PAHs), MG/KG
  - PPMs PRIORITY POLLUTANT METALS, MG/KG
  - NA NOT ANALYZED
  - NS NO STANDARD

**TABLE 1  
DETECTED CONSTITUENTS IN SOIL  
11411 RED RUN BOULEVARD  
OWINGS MILLS, MARYLAND**

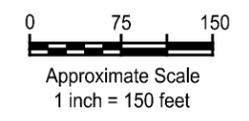
Constituent	Generic Numeric Cleanup Standards for Soil Residential Clean-up Standard (mg/kg) (1)	Generic Numeric Cleanup Standards for Soil Non-Residential Clean-up Standard (mg/kg) (2)	Generic Numeric Cleanup Standards for Soil Protection of Ground Water Clean-up Standard (mg/kg) (3)
<b>Polycyclic Aromatic Hydrocarbons (PAHs), mg/kg</b>			
Acenaphthene	470	6,100	100
Anthracene	2,300	31,000	470
Benzo(a)anthracene	0.22	3.9	0.46
Benzo(a)pyrene	0.022	0.39	0.12
Benzo(b)fluoranthene	0.22	3.9	1.5
Benzo(b)fluoranthene	230	3,100	680
Benzo(k)fluoranthene	2.2	39	15
Chrysene	22	390	48
Dibenz(a,h)anthracene	0.022	0.39	0.46
Fluoranthene	310	4,100	6,300
Fluorene	310	4,100	140
Indeno(1,2,3-cd)pyrene	0.22	3.9	4.2
Naphthalene	160	2,000	0.15
Phenanthrene	2,300	31,000	470
Pyrene	230	3,100	680
<b>Priority Pollutant Metals, mg/kg</b>			
Antimony	3.1	41	13
Arsenic	0.43	1.9	0.028
Chromium	23	310	42
Copper	310	4,100	11,000
Lead	400	1,000	NS
Nickel	160	2,000	NS
Zinc	2,300	31,000	14,000

**Notes:**  
 (1) Generic Numeric Cleanup Standards for Soil - Residential Clean-up from State of Maryland Department of the Environment Interim Final Guidance dated June 2008.  
 (2) Generic Numeric Cleanup Standards for Soil - Non-Residential Clean-up from State of Maryland Department of the Environment Interim Final Guidance dated June 2008.  
 (3) Generic Numeric Cleanup Standards for Soil - Protection of Ground Water from State of Maryland Department of the Environment Interim Final Guidance dated June 2008.  
 mg/kg = milligrams per kilogram.  
 BOLD text indicates an exceedance of one or more applicable standard.  
 Values reported as non-detect below the reporting limit (RL) are presented as "< RL".

SOURCE:  
1. MICROSOFT VIRTUAL EARTH.



**SUMMARY OF DETECTED CONSTITUENTS IN SOIL**  
ADP  
11411 RED RUN ROAD  
OWINGS MILLS, MD 21117



- Notes**
- Base image *Summary of Detected Constituents in Soil* by Environ, dated 2/23/2009.

**GTA**  
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11411 RED RUN BOULEVARD  
BALTIMORE COUNTY, MARYLAND  
**HISTORICAL DATA PLAN**



**LEGEND:**



Proposed Excavation Area Boundary

**Notes**

1. Base image obtained from Google Earth (©2024 Google).



Approximate Scale  
1 inch = 50 feet



**GEO-TECHNOLOGY ASSOCIATES, INC.**  
**GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS**

14280 PARK CENTER DRIVE, SUITE A  
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11411 RED RUN BOULEVARD  
BALTIMORE COUNTY, MARYLAND

**PROPOSED EXCAVATION PLAN**

PROJECT: 31220334

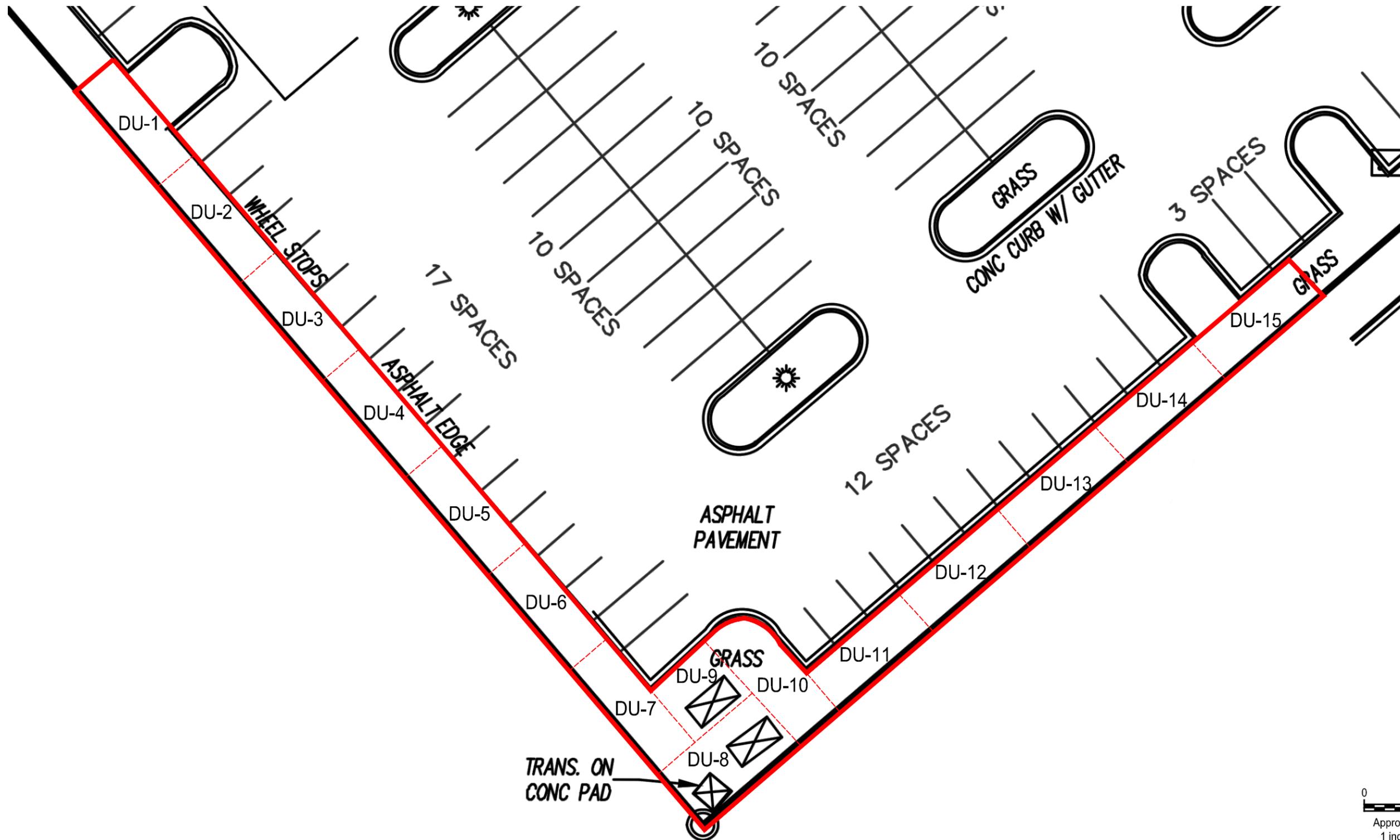
DATE: March 2024

SCALE: 1" = 50'

DESIGN BY: BRS

REVIEW BY: SWC

FIGURE: 3



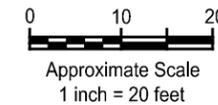
**LEGEND:**

 Proposed Excavation Area Boundary

 Proposed Decision Unit (DU) - Approximately 250 ft<sup>3</sup>

**Notes**

1. Base image ALTA / NSPS LAND TITLE SURVEY by First Order LLC, dated June 22, 2021



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**CONFIRMATORY SAMPLING PLAN**

PROJECT: 31220334	DATE: March 2024	SCALE: 1" = 20'	DESIGN BY: BRS	REVIEW BY: SWC	FIGURE: 4
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