



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

April 7, 2025

ELECTRONIC AND CERTIFIED MAIL

Mr. David Irving, Vice President
Catellus Maryland, LLC
20251 Century Boulevard, Suite 170
Germantown, MD 20874

RE: Request for Information to ensure compliance with Land Use Controls in Quantum Maryland
Property (Former Eastalco Aluminum Plant)
5601 Manor Woods Road, Frederick MD 21701
BMI#MD202

Dear Mr. Irving:

The Maryland Department of the Environment (MDE) conducted an inspection at the Quantum Maryland property located at 5601 Manor Woods Road, Frederick, MD("site") on March 28th, 2025. By this letter, we request additional information to evaluate compliance with the requirements set forth in the following documents:

- Environmental Covenant (EC) issued for the property on November 28, 2017.
- Environmental Management Plan (EMP) 1A dated April 1, 2024
- EMP 2 dated May 20, 2024
- EMP 3 dated June 4, 2024
- EMP 4 dated June 4, 2024
- EMP 5 dated November 13, 2024

Specifically, **the property must maintain compliance with the following:**

1. Environmental Covenant issued by the MDE specifies:
 - a. The Health and Safety Plan must include appropriate dust control measures and air monitoring to ensure that all worker protection requirements are met.
2. All EMPs approved by the MDE specifies:
 - a. Visual indications of dust will be observed and recorded, and dust suppression activities will be implemented during earth moving activities at the site.
 - b. A water truck will be routinely present on-site during construction activities and available for use.
 - c. Potable water and approved site dewatering water will be used for dust control.
 - d. Dust monitoring efforts will be implemented to confirm dust doesn't exceed OSHA PEL of 15 mg/m³.

ADDITIONAL INFORMATION NEEDED:

MDE identified the following areas where additional information is needed to determine compliance with the LUCs:

- The MDE site inspection on March 28th, 2025, identified that the required dust control measures were not being implemented on site. Excessive dust was noted by Tate Stevens and Jessica Shulman on March 28th, 2025, Site Visit report. Onsite personnel confirmed the lack of water trucks being used for dust control in the previous weeks, resulting in excessive dust in the work site. In addition, LRP has received citizen inquiries about elevated dust levels in the past month. Consequently, MDE is requesting additional clarification/information regarding the dust control measures. **Please provide verification that proper dust control and monitoring measures were occurring on site in the form of invoices documentation confirming the presence of a water truck, approximate volumes of water utilized for dust control, source of water (potable/frac tanks), and photographic evidence of dust control and monitoring being implemented on site. Please also confirm that dust monitoring will occur daily at the site and dust control measures will be implemented, as required, during all future work at the site.**

The information submitted will be used to determine whether the property is in compliance with the LUCs as set forth in the Environmental Covenant and Environmental Management Plans. All requested information should be provided to the MDE within fourteen (14) business days of receipt of this letter. If you have any questions, please contact Ms. Anuradha Mohanty at 410-537-3446 or anuradha.mohanty@maryland.gov.

Sincerely,

Anuradha Mohanty

Anuradha Mohanty
Project Manager
Land Restoration Program

cc: Mr. Michael Kuykendall, Sr. Vice President, Catellus Maryland, LLC. (Via email: mkuykendall@catellus.com)

Mr. Bill Kennedy, Sr. Vice President, Catellus Maryland, LLC. (Via email: bkennedy@catellus.com)

Mr. William Silverstein, Senior Consultant, GEI (Via email: wsilverstein@geiconsultants.com)

Mr. Brian Dietz, Chief, State Assessment and Remediation Division (Via email: bdietz@maryland.gov)

Ms. Amy Hollister, Section Head, State Superfund (Via email: amy.hollister@maryland.gov)

Ms. Jessica Shulman, Geologist, Land Restoration Program (Via email: jessica.shulman@maryland.gov)

Mr. Tate Stevens, Geologist, Land Restoration Program (Via email: tate.stevens@maryland.gov)