

# RESPONSE TO COMMENTS

## AREA 1 PHASE 1 DETAILED DEVELOPMENT PLAN BALTIMORE WORKS SITE, BALTIMORE, MARYLAND AUGUST 2013; REVISED DECEMBER 2013

Responses to supplemental comments issued by the Maryland Department of the Environment (MDE) on December 5, 2013, relative to the Area 1 Phase 1 Detailed Development Plan for the Baltimore Works Site, Baltimore, Maryland, dated August 2013, Revised December 2013, are presented herein. Each comment is presented verbatim in italics with a direct response to the comment immediately below. The responses have been incorporated into the revised Area 1 Phase 1 Detailed Development Plan (DDP) as denoted herein.

### *MDE/SOLID WASTE PROGRAM COMMENTS AND RELATED RESPONSES*

*Comments re DDP 120313/120413 versions*

1. *BD 120213 response to MDE comments –*

- a. *Point 3, response to MDE comment E.v. – the response cites the Dock Street platform – if that structure is not built, they must demonstrate that the proposed alternative also responds to the Department’s concerns regarding lowering the MMC elevation to 5’.*

**Response:**

Acknowledged. Developer will demonstrate that the proposed alternative also responds to the Department’s concerns regarding lowering the MMC elevation to 5’.

- b. *Point 7, response to MDE comment G.b. – provide the document “Declaration of Easements, Covenants and Restrictions” within one week after it is recorded at Land Records of Baltimore City.*

**Response:**

Acknowledged. The Developer will provide the document “Declaration of Easements, Covenants and Restrictions” within one week after it is recorded at Land Records of Baltimore City.

2. *EE cover letter – drawing F1.15 note 7 – it is unclear whether the note means that <16,000 ft<sup>2</sup> will be open only during a 100 year storm. The statement should specify that at no time*

*during the project will more than 16,000 ft<sup>2</sup> be open below the MMC.*

**Response:**

Acknowledged. The statement is changed to specify that at no time during the project will more than 16,000 ft<sup>2</sup> be open below the MMC. Drawing F1.15 attached.

3. *SPRP – page 15, 1st bullet – would chromium-contaminated materials such as groundwater continue to be collected if incompatible materials had been spilled?*

**Response:**

Incompatible material spills will be handled and stored separately. Chromium-contaminated groundwater will continue to be collected by the HMS to meet the Gradient Performance Standard. Should a release occur of material that is deemed to be incompatible with the HMS performance, the extraction well closest to the release will be temporarily disabled until it is determined that there will no effect on the system from the released material.

4. *SWPPP –*

- a. section 4.2.6 – the last paragraph cites the November 2013 SPRP – the citation should be corrected to reference the most recent SPRP.*

**Response:**

The date is changed to December 2013. Page change attached.

- b. Section 4.3.3 – first paragraph after bullets – same comment as 4.a.*

**Response:**

The date is changed to December 2013. Page change attached.

- Make sure all trucks which entered any disturbed area, have gone through decontamination procedures for tires, prior to leaving the site; and
- Discuss and promote good housekeeping practices with employees.

Good housekeeping elements are covered in the storm water inspections and throughout the Facility's storm water management process.

Workers should be familiar with and have access to the Spill Prevention and Response Plan (SPRP), dated December 2013 in Appendix B of the DDP, for specific procedures and protocols regarding spills and leaks. On-site training will be conducted prior to the start of work to orient workers with plan requirements. Each worker receiving training will be required to sign an attendance log confirming their participation.

#### 4.2.7 *Visual Inspections*

Storm water inspections will be conducted at this facility as required. Inspection forms are provided in Appendix B of this document. At a minimum, authorized personnel will perform a monthly inspection of the Facility. The trained inspector will perform the inspections consistent with the requirements of the General Discharge Permit and Materials Handling and Management Plan. A copy of the General Discharge Permit will be provided to MDE. The inspections will be performed to detect evidence of potential common problems that may occur during construction.

At the completion of each inspection, the inspector will review the SWPPP to determine if any observation may require revisions to the SWPPP. Any suggested revisions to the SWPPP will be brought to the attention of the Developer's representative. If the Developer's team determines that revisions are necessary, the SWPPP will be revised. No changes to the SWPPP may be implemented without prior MDE approval.

In addition to the monthly inspections, quarterly inspections of proposed outfalls will also be performed and after major storm events. The inspections will be performed to detect evidence of potential storm water blockage or pollution.

- appropriate and timely adjustment, repair, or replacement of equipment; and
- maintenance of complete records of inspections and equipment.

Preventive maintenance for site management areas and sediment and erosion control structures includes inspection for debris or other clogging material to ensure proper functioning of the structures, repair of minor erosion, cleaning of ditches and structures, reseeding and fertilization of vegetative areas.

### 4.3.3 *Good Housekeeping*

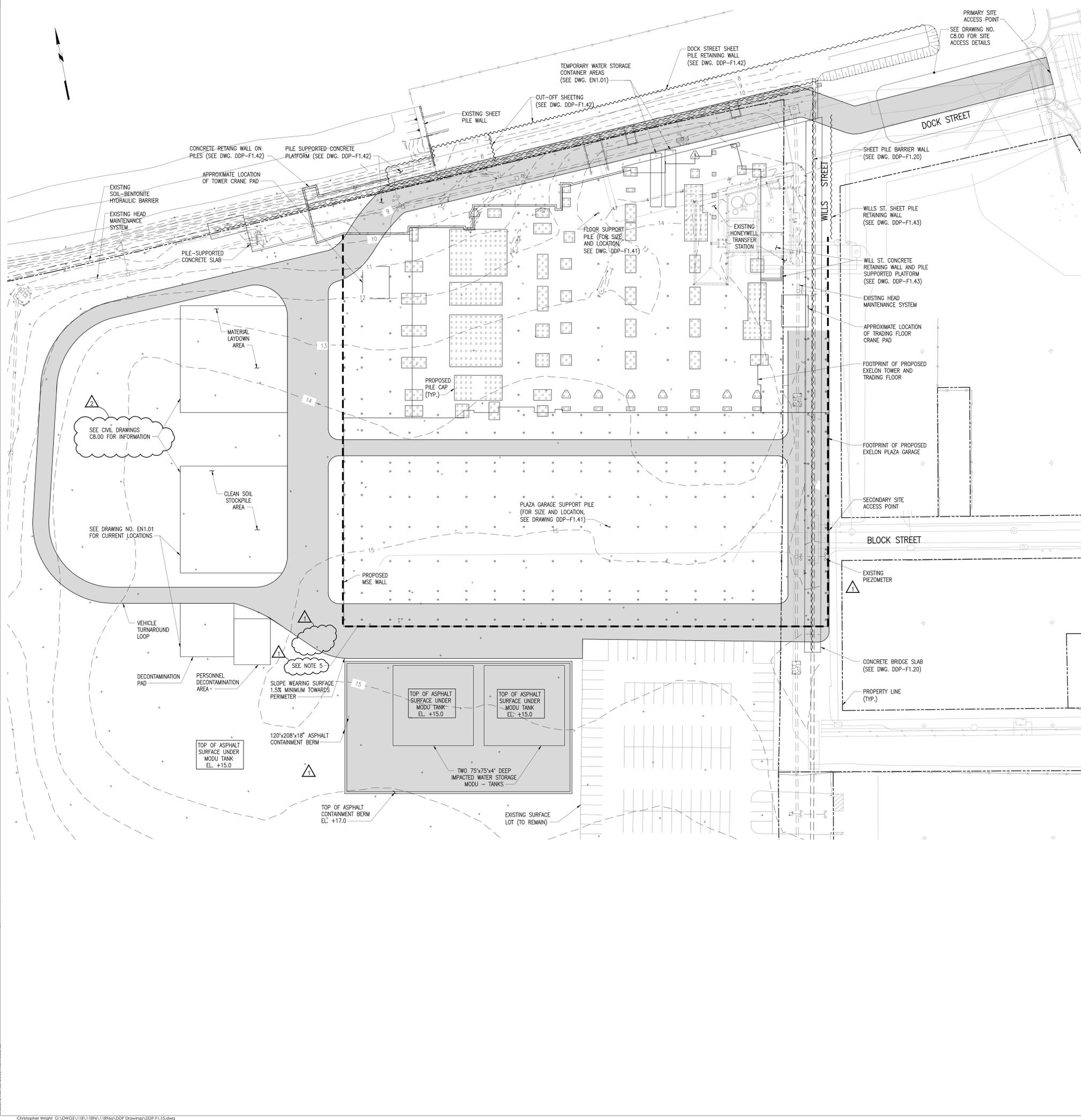
Good housekeeping practices require that the facility is maintained in a clean and orderly manner. This is accomplished through instilling proper employee work habits and by training and checking the progress through visual inspections. Good housekeeping assures that:

- floors and surfaces are kept clean and orderly;
- spill response equipment is properly located, in adequate supply and working order, and the location(s) are known to all employees;
- spills and leaks are promptly cleaned up and recovered material is properly disposed; and
- all paved and vegetated areas are routinely kept clean of litter and debris and are properly maintained.

Employees should be familiar with and have access to the Spill Prevention and Response Plan (SPRP), dated [December](#) 2013 in Appendix B of the DDP, for specific procedures and protocols regarding spills and leaks.

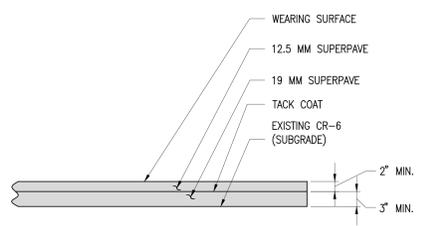
Floors and ground surfaces should be cleaned by sweeping or shoveling and not by washing. Hosing down an area with water increases the potential for pollutants to be carried down-gradient to be released at a later time into storm water. Brooms should be stored in an appropriate area and should not be exposed to precipitation. Shovels should be cleaned before being stored.

Sorbents are materials that are capable of cleaning up spills through the physical/chemical processes of adsorption and absorption. Typical sorbent materials that can be thrown onto a spill on paved surfaces include clays, sand, kitty litter, and sorbent booms, matting and pads. Sorbent booms should be used to absorb spills on unpaved areas. For



- NOTES:**
- For General and Technical notes, see Drawings DDP-F1.01, DDP-F1.02 and DDP-F1.03.
  - Plaza Garage piles shall be filled with concrete prior to placement of cover soil or placement of bridge slab. See detailed sequence shown on Drawing F1.31.
  - Construction access road in the area indicated should be demolished up to 6' minimum south of the proposed MSE wall prior to start of MSE wall installation.
  - Raise existing manhole rims and lids. Remove and replace flush with new pavement surface.
  - See Material, Handling and Management Plan, July 2013, by ERM.
  - Vehicular speed must be less than 15 mph. Provide signage consistent with MDOT, road work construction standards.
  - For the storage volume shown, at any one time, the total area of excavations that drain beneath the MMC must be less than 16,000 square feet. Maintain water level in modutanks a minimum of 6 inches below capacity at all times.
  - Confirm storage and roadway construction layout by survey for conformance with approved workplans.

- LEGEND:**
- 13 - As-Built elevation contour at grade
  - Proposed Asphalt Construction Access Road



**DETAIL 1: TYPICAL ASPHALT SECTION**  
SCALE: 1:1

THIS DRAWING HAS BEEN PREPARED AS A GUIDELINE FOR CONSTRUCTION LAYDOWN AREAS, ACCESS, STORAGE AREAS ETC THAT MAY BE REQUIRED DURING CONSTRUCTION. CONTRACTOR MAY SUBMIT ALTERNATIVES FOR REVIEW AND APPROVAL AS A PART OF CONTRACTOR WORK PLAN PRIOR TO START OF ANY CONSTRUCTION ACTIVITY.

**PROGRESS SET  
NOT FOR  
CONSTRUCTION**

