



Engineers and Scientists

August 26, 2020

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

> Re: RADWP Addendum Area B: Sub-Parcel B6-3 Tradepoint Atlantic Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group LLC (ARM) is pleased to submit the following Response and Development Work Plan (RADWP) Addendum to the Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA). This RADWP Addendum is being submitted to document proposed modifications to the utility plan for the Sub-Parcel B6-3 development project on the Tradepoint Atlantic property located in Sparrows Point, Maryland. This includes modifications to external utility alignments and tie-in locations.

A RADWP is currently being implemented for Sub-Parcel B6-3. The previously submitted RADWP (Revision 1 dated June 17, 2020) was approved by the MDE and USEPA via email on June 22, 2020.

Project Description

The proposed work will include modifications to stormwater, sanitary sewer and force main, gas, electric, and telephone utility alignments and connection tie-ins to the Sub-Parcel B6-3 facility. Several alignments will be completed outside of the Sub-Parcel B6-3 boundary in external construction areas. The proposed stormwater utility will extend north to connect to the Tin Mill Canal (TMC). The sanitary sewer and force main utility will connect to an existing force main system to the northeast. Proposed gas, electric, and telephone connection tie-ins will be completed at the southeastern corner of Sub-Parcel B6-3 at Sparrows Point Boulevard. Note that, because the utility alignments have changed, the areas originally designated as "External Construction" areas in the approved RADWP are superseded by this revised plan.

Appendix A contains selected project construction drawings for the proposed work. *Sheet C-501* provides an overview of the proposed utility alignments, and *Sheet C-502* through *Sheet C-505* present the detail drawings. **Figure 1** provides an overview of the proposed work, incorporating the information shown on *Sheet C-501* to indicate the amended utility alignments as well as the associated limit of disturbance (LOD) for the development project.

Note that the installation of the outfall piping at the TMC has already been completed. This work was completed using OSHA certified HAZWOPER trained construction crews. The contractor has been instructed to cease all work on the TMC. The section of disturbed cap within the TMC will be replaced as originally constructed with a geotextile filter fabric overlain by rip-rap lining up to the final top of bank grade (with a minimum cap thickness of 2 feet). Work has been discontinued at the TMC until this Addendum is approved. The final capping will be performed by OSHA certified HAZWOPER trained construction crews. With the exception of the TMC outfall, the work covered by this Addendum does not include disturbances of any pre-existing cap.

Summary of Environmental Conditions

Proposed work extends outside of the area previously addressed by the Sub-Parcel B6-3 RADWP. Therefore, supplemental soil and groundwater data proximate to the proposed utility alignments and connection tie-ins are provided herein.

Soil boring locations from the Parcel B6 Phase II Investigation relevant to Sub-Parcel B6-3 are shown on **Figure S1** and **Figure S2**. One new soil boring location (B6-075-SB) has been selected as it provides relevant soil data in the vicinity of the stormwater and sanitary sewer force main near the northern end of the project. Soil sample results that exceeded the Project Action Limits (PALs) at the soil borings, including this new location, are shown on **Figure S1** and **Figure S2**. Arsenic was the only PAL exceedance at B6-075-SB.

Groundwater sampling locations from the Finishing Mills Groundwater Phase II Investigation relevant to Sub-Parcel B6-3 are shown on **Figure GW1**. One new groundwater sample location (TM18-PZM005) has been selected to characterize groundwater around the modified utility alignments. Aqueous PAL exceedances at this location include two SVOCs (benz[a]anthracene and naphthalene), two inorganics (total lead and manganese), and DRO. Based on groundwater elevation data obtained during the Finishing Mills Groundwater Phase II Investigation, groundwater may be encountered during ground intrusive work including excavations and utility trenching. All groundwater encountered will be managed in accordance with the protocols outlined in the RADWP, as specified below.

General Work Requirements

The construction of the proposed utilities will remain subject to the development implementation protocols outlined in the RADWP, including but not limited to the following:



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- Oversight will be provided by an Environmental Professional (EP) during ground intrusive construction activities to ensure compliance with soil screening requirements, and proper water management.
- Development activities will be conducted under the property-wide Health and Safety Plan (provided as Appendix H of the RADWP).
- Any ground intrusive work will be performed using Modified Level D Personal Protective Equipment (PPE) in accordance with the requirements outlined in the approved PPE Standard Operational Procedure (SOP) (provided as Appendix C of the RADWP).
- Erosion and sediment controls will be installed as required.
- Dust monitoring will be implemented as required (see Section 5.1.5 of the RADWP).
- If dewatering is necessary, sampling and disposal will be conducted as required (see Section 5.2.2 of the RADWP).
- The Utility Excavation NAPL Contingency Plan will be implemented as required (provided as Appendix G of the RADWP).

In accordance with the RADWP, all utility trenches will be backfilled with bedding and backfill materials approved by the MDE. During field screening by the EP, if there is no evidence of significant contamination (i.e., elevated PID readings, staining, petroleum materials, etc.) the excavated materials will be proposed as backfill within the utility trenches, or placed elsewhere on the Sub-Parcel B6-3 under areas to be capped. The EP will monitor the soil excavation activities for signs of significantly contaminated material which may not be suitable for reuse. In general, all excavated materials are expected to be suitable for replacement within the utility trenches.

Any notable or non-standard conditions, including but not limited to staining, strong odors, discoloration, evidence of NAPL, or other evidence of contamination which has not previously been characterized, will be reported to the MDE. If required, preventive measures will be implemented in accordance with the Utility Excavation NAPL Contingency Plan to prevent the discharge to, or migration of, petroleum product along a utility conduit via 1) the use of low permeability backfill or 2) installation of trench plugs along the alignment.

Schedule & Reporting

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As noted above, Modified Level D PPE will be used throughout the implementation of this utility installation fieldwork in accordance with the approved SOP to ensure Construction Worker safety. Tradepoint Atlantic intends to complete tying in and capping the TMC outfall upon agency approval, with an estimated completion date of September 2020. The modified utility installations and tie-ins will be documented in the same Development Completion Report as the remainder of Sub-Parcel B6-3.

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If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

Respectfully Submitted, ARM Group LLC

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Joshua M. Barna, G.I.T. Staff Geologist

Nel Pets

T. Neil Peters, P.E. Senior Vice President



FIGURES









APPENDIX A

	STANDARD DRAWING LEGEND				ABBREVIATIONS	
		I OR LINTIRE FLAN				
	LIMIT OF V	WORK	LOWLOW	AC		
F	LIMIT OF D	DISTURBANCE	LOD—LOD—		AMERICANS WITH	
	EXISTING NOTE	TYPICAL NOTE TEXT	PROPOSED NOTE			
-		ONSITE PROPERTY LINE / R.O.W. LINE		BC		
		NEIGHBORING		BF	BASEMENT FLOOR	
		INTERIOR PARCEL LINE		вк	BLOCK	
		EASEMENT LINE	—	BL	BASELINE	
		SETBACK		BLDG	BUILDING BUILDING BENCHMARK	
H		LINE		BRL	BUILDING RESTRICTION LINE	
				CF	CUBIC FEET	
			CURB AND GUTTER	CL		
			SPILL TRANSITION			
		CONCRETE CURB & GUTTER		CONC	CONCRETE	
			DEPRESSED CURB AND GUTTER	СРР	CORRUGATED PLASTIC PIPE	
				CY	CUBIC YARDS	
	÷ 0	WITH LIGHT		DEC	DECORATIVE	
	<u> </u>	POLE LIGHT		DEP	DUCTILE IRON PIPE	
		TRAFFIC	D	DOM	DOMESTIC	
		LIGHT		ELEC	ELECTRIC	
	0	UTILITY POLE	0	ELEV		
		TYPICAL	Ţ	EP F9		
	<u> </u>			EW	END WALL	
	Ŷ		¢	EX	EXISTING	
		TYPICAL SIGN	_ v _	FES	FLARED END SECTION	
	\wedge	PARKING		FF		
	<u> </u>	COUNTS	<u> </u>	FH	FINISHED GRADE	
				G	GRADE	
		CONTOUR	190	GF	GARAGE FLOOR (AT DOOR)	
Ŀ	169	LINE	187	GH	GRADE HIGHER SIDE OF WALL	
	TC 516.4 OR 516.4	SPOT ELEVATIONS	TC 516.00 TC 516.00 MATCH EX (518.02 ±)	GRT	GRATE	
		1		GV	GATE VALVE	
H	SAN]	CANITADY	SAN	HDPE	HIGH DENSITY POLYETHYLENE PIPE	
		LABEL	#	HP	HIGH POINT	
	X #	STORM	$\left(\begin{array}{c} X\\ \#\end{array}\right)$	HOR	HORIZONTAL	
		SANITARY SEWER				
⊢				INV	INVERT	
Ľ	W	WATER LINE	W	LF	LINEAR FOOT	
	£	UNDERGROUND ELECTRIC LINE	Е	LOC		
	G	UNDERGROUND	G	LOD		
		GAS LINE		LP	LOW POINT	
	ОН	OVERHEAD WIRE	ОН	L/S		
-	7		T			
F		UNDERGROUND		МН	MANHOLE	
		CABLE LINE		MJ	MECHANICAL JOINT	
=	= = = = = = = = = = = = = = = = = = = =	STORM SEWER		OC		
	<i>S</i>	SANITARY	s	PA PC	POINT OF ANALYSIS	
H				PCCR	POINT OF COMPOUND	
	U			PI		
	S	SANITARY MANHOLE		POG	POINT OF GRADE	
	(\Box)	STORM		PROP	PROPOSED	
	WM	MANHOLE		PT	POINT OF TANGENCY	
	×** 1 × 1	WATER METER	•	PTCR	POINT OF TANGENCY, CURB RETURN	
	$\overset{\mathrm{WV}}{\bowtie}$	WATER		PVC	POLYVINYL CHLORIDE PIPE	
		GAS		PVI	POINT OF VERTICAL INTERSECTION	
		VALVE		PVT	POINT OF VERTICAL TANGENCY	
	\boxtimes	GAS METER		R	RADIUS	
		TYPICAL END		RET WALL	RETAINING WALL	
		SECTION		R/W	RIGHT OF WAY	
	CP CP	HEADWALL OR ENDWALL		S	SLOPE	
2		GRATE INLFT		SAN		
		CURB	<u>ר</u>	STA	STATION	
	<u>ـــــ</u>	INLET		STM	STORM	
-2-1-0	0	CLEAN OUT	0	S/W	SIDEWALK	
	Ē		Ē	TBR		
70 I. MIN				TC	TOP OF CURB	
	(/)	MANHOLE	\square	TELE	TELEPHONE	
	EB	ELECTRIC BOX	EB	TPF	TREE PROTECTION FENCE	
GKAL	EP	ELECTRIC	ED	TW TYP	TYPICAI	
CCHM	[<u></u> ,	PEDESTAL		UG	UNDERGROUND	
			1	UP	UTILITY POLE	
ILAIN				W	WIDE	
D DNIIA	-	TEST		W/L W/M	WATER LINE WATER METER	
	~	PIT		±	PLUS OR MINUS	
200020		BENCHMARK		0	DEGREE	
		BORING		Ø #		

STANDARD ONS





	PROPOSED NOTE				
-					
	• [TC 516.00] • [BC 515.50] 				
NE E	W				
	Е G				
	ОН				
-	T				
-	FM				
	LOD				
	CURB AND GUTTER				
	SPILL CURB				



EXISTING NOTE	TYPICAL NOTE TEXT	PROPOSE
	ONSITE PROPERTY LINE / R.O.W. LINE	
— — <u>120</u> — —	CONTOUR LINE	<u>120</u> 121
TC 516.4 OR 516.4	SPOT ELEVATIONS	• TC 516.00
SLSL	SANITARY SEWER	SLS
W/	UNDERGROUND WATER LINE	WW
E	UNDERGROUND ELECTRIC LINE	E -
G	UNDERGROUND GAS LINE	G -
OH	OVERHEAD WIRE	——————————————————————————————————————
<i>T</i>	UNDERGROUND TELEPHONE LINE	T -
	STORM SEWER	
FM	SANITARY SEWER FORCE MAIN	FM
	LIMIT OF DISTURBANCE	LOD
NB NB	IDA CRITICAL AREA BOUNDARY CONCRETE CURB & GUTTER	SPILL CLIRB



\MD1620669\DRAWINGS\PLAN SETS\MASS GRADING PLANS\MD1620669-UTP-3---->LAYOUT: C-503 - UTILITY PL



EXISTING NOTE	TYPICAL NOTE TEXT	PROPOSE
	ONSITE PROPERTY LINE / R.O.W. LINE	·
— — <u>120</u> — 121	CONTOUR LINE	<u> </u>
TC 516.4 OR 516.4	SPOT ELEVATIONS	• TC 516.00
	SANITARY SEWER LINE	SL S -
//	UNDERGROUND WATER LINE INDUSTRIAL WATER LINE UNDERGROUND	W I E
<i>G</i>	UNDERGROUND GAS LINE	G
	OVERHEAD WIRE	ОН
7	UNDERGROUND TELEPHONE LINE	T
= = = = = = = = = = = =	STORM SEWER	
FM	SANITARY SEWER FORCE MAIN	FN
	LIMIT OF DISTURBANCE	LOD
NB NB	IDA CRITICAL AREA BOUNDARY CONCRETE CURB &	C