# Response and Development Work Plan Addendum Retail Area \#1 

Area B: Sub-Parcel B6-2<br>Tradepoint Atlantic<br>Sparrows Point, Maryland

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ARM Project 160443M-6

Respectfully Submitted,


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### 1.0 INTRODUCTION

### 1.1. BACKGROUND

ARM Group Inc. (ARM), on behalf of EnviroAnalytics Group (EAG), has prepared this Response and Development Work Plan (RADWP) Addendum to facilitate the construction of a Royal Farms station designated as Retail Area \#1. This retail lot is proposed for occupancy and use on Sub-Parcel B6-2 (the Site). The construction and use of any retail lot at the Site must be approved by the Maryland Department of the Environment (MDE) and the United Stated Environmental Protection Agency (USEPA). The proposed major grading and utility installation tasks for the Site were covered by the agency-approved Sub-Parcel B6-2 RADWP. The RADWP provided a Screening Level Risk Assessment (SLRA) for the entire Site to evaluate potential risks to Composite Workers and Construction Workers. The SLRA concluded that a capping remedy would adequately protect Composite Workers (and site visitors) from potential future exposures once the retail lots are occupied. The SLRA also determined the length of time that Construction Workers can perform intrusive work at the Site before site-specific health and safety measures may be needed for worker protection.

### 1.2. ObJECTIVES

The RADWP specified that a brief addendum detailing the site plan for each retail lot would be provided to the MDE and USEPA once the plans for each retail lot were finalized. The RADWP stated that the addendum would need to include the layout of the proposed retail lot, along with an indication of the proposed final capping remedy. The primary objectives of this document are to allow the construction of the proposed retail lot at the Site, and to allow occupancy prior to full implementation of the site-wide (Sub-Parcel B6-2) capping remedy. A secondary objective of this document is to demonstrate that there are no concerns related to the proposed intrusive work schedule for Construction Workers.

### 2.0 RADWP ADDENDUM

### 2.1. REQUIREMENTS OF THE AdDENDUM

The Sub-Parcel B6-2 RADWP provides minimum cross sections and specifications for all types of capping remedies which may be installed during the development of each retail lot, including requirements for any paved areas, landscaped areas, and/or stormwater ponds. The RADWP is the primary guidance document for all future development activities associated with the retail area. The RADWP established the following procedure to obtain agency approval to begin the construction of each individual retail lot:

Once plans for each retail lot are finalized, the MDE and USEPA will be provided with a brief RADWP Addendum detailing the site plan for the retail lot, along with an indication of the proposed final capping remedy, and a discussion of any concerns related to the intrusive work schedule (if any) associated with the construction of the applicable retail lot. Multiple retail lots may be combined into the same addendum if the sequencing of development is conducive to a single submission. The SLRA presented herein will serve as the primary reference document for any future development associated with SubParcel B6-2, and addenda will be prepared and submitted to the agencies as necessary.

In addition, the proposed retail lot may be constructed and occupied prior to full implementation of the capping remedy which is required for the entire Site. The site-wide capping remedy throughout Sub-Parcel B6-2 is proposed to be installed using a phased approach as the individual retail lots are designed. To facilitate the use of the proposed retail lot, interim measures are required to protect workers and visitors, as outlined in the RADWP as follows:

Depending on occupancy opportunities prior to the completion of all retail development phases, access restrictions or other mechanisms will be used to prevent potential exposures to uncapped portions of the Composite Worker Area during the interim period to temporarily prevent potential exposures until the required capping remedy is fully implemented. With these temporary restrictions, the Composite Worker and child/youth visitors will not be exposed to potentially impacted soils while commercial activities are being conducted on (completed) capped portions of the Site. If occupancy of the Site is proposed prior to full implementation of the capping remedy for the Composite Worker Area, a detailed RADWP Addendum must be submitted to the agencies and approved prior to use. The RADWP Addendum would need to include details of the proposed interim measures including locations and protocols for the installation and maintenance of the proposed remedy. The interim measures could include temporary access restrictions (e.g., fencing) and/or temporary capping mechanisms (e.g., crushed concrete), among other possible responses.

### 2.2. Retail Area \#1

### 2.2.1. General Development Protocols

The construction of the retail lot will remain subject to all development implementation protocols outlined in the Sub-Parcel B6-2 RADWP, including but not limited to the following:

- Development activities will be conducted under the property-wide Health and Safety Plan
- Oversight will be provided by an Environmental Professional (EP) during interim remedy and permanent cap installation, as well as all intrusive construction activities
- Soil screening requirements will be implemented as required
- Erosion and sediment controls will be installed as required
- Dust monitoring will be implemented as required
- If dewatering is necessary, sampling and disposal will be conducted as required
- The NAPL Contingency Plan will be implemented as required
- Utility backfill materials must be approved by the MDE Voluntary Cleanup Program (VCP). MDE VCP clean fill approved for commercial land use will be required at depths and alignments where the utility trench could be considered to be part of a landscaped cap (i.e., depths less than or equal to 2 feet). Slag or other approved backfill soil not meeting the MDE VCP definition of clean fill may be used in areas where the utility trench will be covered by an additional cap.


### 2.2.2. Proposed Layout and Capping Remedy

Development drawings for the proposed retail lot are provided in Appendix A. As indicated in the drawings, the proposed retail lot will include a commercial building, car wash, fuel tanks, and multiple fuel stations. The retail lot will be capped by paved driveways and parking areas, paved building slabs, and landscaped areas between the paved areas. All of the cross sections for each type of proposed capping remedy will be required to meet the minimum thicknesses given in the Sub-Parcel B6-2 RADWP.

Outside of the defined lease boundary, ingress and egress driveways will be constructed to allow access to and from the retail lot. As indicated in the site plan drawing provided in Appendix B, paved drives are currently proposed along several alignments adjacent to the lease boundary. The locations of paved ingress/egress roads are subject to agency review and approval. The paved drives will also be subject to the minimum cap thicknesses given in the Sub-Parcel B6-2 RADWP. The undesignated areas between the Retail Area \#1 boundary and the access roads will be considered landscaped areas and will consist of a minimum of 2 feet of clean fill (meeting VCP requirements for commercial land use) prior to being planted. Trees will be
installed with a minimum of 2 feet of clean fill (meeting VCP requirements for commercial land use) around the root ball. A geotextile marker fabric will be placed between the clean backfill and underlying soils. A figure showing the proposed landscaped areas has been included in Appendix C. Please note that the drawing provided in Appendix C is not based on the most current development plan and differs slightly from the current layout; rather, it is intended to indicate that the undesignated areas immediately adjacent to the Retail Area \#1 boundary will be capped as landscaped areas. Also note that the enclosed Future Development Area to the east of Retail Area \#1 (as shown in Figure 1) will be addressed in a separate development plan.

The major utility trenching and installation tasks will be conducted under the scope of work described in the Sub-Parcel B6-2 RADWP. However, as shown in the site plan drawing in Appendix B, utility tie-ins will be installed under this addendum.

### 2.2.3. Construction Worker Intrusive Work

As demonstrated in the Sub-Parcel B6-2 RADWP, the Site will be raised in elevation with net fill. The majority of intrusive activities proposed will be conducted through the construction fill materials placed during the mass grading of the Site. As indicated in the site plan drawing provided in Appendix B, the only utility work proposed under this addendum will be minor utility tie-ins. The installation of several fuel tanks and other underground structures is also proposed, as indicated in the development drawings included in Appendix A. The anticipated duration of intrusive work required to install the tanks and underground structures is 10 days. The SLRA presented in the Sub-Parcel B6-2 RADWP indicated that an exposure duration of 36 days did not result in any potentially unacceptable risk or hazard. Because the duration of intrusive activities is expected to be less than 36 days, there are no concerns for Construction Workers for this development project.

### 2.2.4. Temporary Access Restrictions - Interim Measures

As stated above, agency approval is required if portions of the Site will be occupied prior to full implementation of the capping remedy for the entire Sub-Parcel B6-2. The interim measures for the proposed retail lot will consist of the installation of perimeter fencing to prohibit access to uncapped areas of the Site. The perimeter fence will be installed along the alignments shown in Appendix C. Please note that the drawing provided in Appendix C is not based on the most current development plan and differs slightly from the current layout; rather, it is intended to indicate that the fence will be installed along the perimeter of the access roads around Retail Area \#1. The installation of the interim measure will satisfy the agency requirement to address potential exposures for a Composite Worker or visitor.

The perimeter fence will be constructed using non-ground intrusive chain link temporary storm fencing. A sample photograph of the temporary fencing which has previously been approved for use on the Tradepoint Atlantic property is included as Appendix D.

Construction oversight by an EP will ensure and document that the interim measures are built as designed and appropriate environmental and safety protocols are followed. All construction activities, including the installation of the interim measures, remain subject to the requirements given in the Sub-Parcel B6-2 RADWP. The EP shall provide records to document:

- Daily observations of construction activities during remedy installation
- Proper remedy construction and alignment
- Other encountered conditions covered by the RADWP, as applicable

Regular inspections will be required to verify that there are no potential exposure risks for Composite Workers or visitors caused by deficiencies in the interim measures. Inspections of the interim measures will be completed at a minimum frequency of monthly. Tradepoint Atlantic personnel (the responsible party) will perform inspections, perform maintenance of the interim measures, and retain inspection records. If the responsible party determines that an exposure risk is present (e.g., missing or damaged sections of fence), the MDE must be notified within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If a corrective action is required, the MDE notification will include documentation of the observed conditions and the location of any repairs.

If no deficiencies are apparent and the interim measures do not require any substantial maintenance, the inspection records will be reported to the MDE and USEPA on an annual basis. In addition, the MDE and USEPA will be provided with a written notice at least 30 days prior to any planned removal or modification to the proposed interim measures once they have been installed.

### 3.0 REPORTING AND IMPLEMENTATION SCHEDULE

As stated in the Sub-Parcel B6-2 RADWP, a Development Completion Report and Notice of Readiness for Use will be prepared following construction of each proposed retail lot. In addition to summarizing the completed capping activities, records shall be provided to document the installation of the interim measures.

As specified in the preceding section, if the results of the monthly inspections of the interim measures indicate that an exposure risk is present, the MDE must be notified within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If no deficiencies are apparent and the interim measures do not require any substantial maintenance, the inspection records will be reported to the MDE and USEPA on an annual basis. In addition, the MDE and USEPA will be provided with a written notice at least 30 days prior to any planned removal or modification to the proposed interim measures once they have been installed.

The proposed implementation schedule is shown below.
Task
Proposed Completion Date
Anticipated RADWP Addendum Approval
June 1, 2018

Tank Installation
August 2018
Permanent Capping Remedy Installation
August 2018
Interim Measures Installation
August 2018
Submittal of Completion Report/
September 2018
Notice of Readiness for Use*
Submittal of Interim Measures
Inspection \& Maintenance Results
Annually Following
Interim Measures Installation (Deficiencies reported within 48 hours)
*Notice of Readiness for Use shall 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 Addendum and the retail lot is suitable for occupancy.

FIGURES


## APPENDIX A




## APPENDIX B



## APPENDIX C



## APPENDIX D



Non-Ground Intrusive Chain Link Temporary Storm Fencing
Sample Photograph
Provided by Tradepoint Atlantic on January 5, 2018

