Response and Development Work Plan Addendum Retail Area #4 – Project Bayou

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

Prepared For:



TRADEPOINT ATLANTIC

1600 Sparrows Point Boulevard Sparrows Point, Maryland 21219

Prepared By:



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ARM Project No. 21010206

Revision 1 – May 17, 2022

Respectfully Submitted,

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1.1. BACKGROUND

ARM Group LLC (ARM), on behalf of Tradepoint Atlantic (TPA), has prepared this Response and Development Work Plan (RADWP) Addendum to facilitate the construction of a retail/restaurant building designated as Retail Area #4. The proposed construction of Retail Area #4 has been designated as "Project Bayou". This retail lot is proposed for occupancy and use on Sub-Parcel B6-2 (the Site). The proposed layout of Retail Area #4 is shown on **Figure 1**.

Pursuant to Paragraph 3 of the First Amendment to the Administrative Consent Order (ACO), a cost comparison of the commercial environmental remediation costs against the originally budgeted industrial environmental cost estimate shall be performed. The estimated cost of the environmental oversight work to be performed by an Environmental Professional (EP) for Retail Area #4 is \$50,000. This cost is equivalent to the normal and customary cost for environmental oversight work performed on industrial parcels at Sparrows Point. The capping specifications and standards for this commercial development (building slab, concrete sidewalks, asphalts paving, clean capped landscaping) are the same as capping specifications and standards for an industrial parcel. Accordingly, there are no additional costs to the Budget based on commercial development and use; the semi-annual Budget review pursuant to Paragraph 84 of the ACO will continue to be conducted as required.

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 (Revision 1 dated January 24, 2018).

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 was recently updated to account for changes in the proposed boundary of the retail area, including the removal of the southern portion of the retail area originally proposed to the south of the Tin Mill Canal (TMC). The revised SLRA was presented in the Sub-Parcel B6-2 RADWP Addendum: SLRA Update dated June 28, 2021. 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 ground intrusive work at the Site before site-specific health and safety measures may be needed for worker protection. This evaluation indicates that additional site-specific health and safety measures (beyond standard Level D protection) would be required only if an individual worker exceeded 40 exposure days of intrusive work.

1.2. OBJECTIVES

The approved Sub-Parcel B6-2 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 objectives of this document are to allow the construction of the proposed retail development at the Site, to allow occupancy prior to full implementation of the site-wide (Sub-Parcel B6-2) capping remedy, and 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 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 Sub-Parcel 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 developed. To facilitate the use of the proposed retail lot, interim measures could be required for some retail lots 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.

There are no interim remedies to be installed for Retail Area #4. The development area will be fully capped by surface engineering controls as more fully described in Section 2.2.2.

2.2. RETAIL AREA #4

Figure S1 presents a summary of the soil sample results that exceeded the Project Action Limits (PALs) within Retail Area #4. There were no semivolatile organic compounds (SVOC) or diesel range organics (DRO) soil exceedances within Retail Area #4. **Figure GW1** present all groundwater sample results that exceeded the PALs within Retail Area #4.

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 (Revision 1 dated January 24, 2018) and RADWP Addendum: SLRA Update (dated June 28, 2021), including but not limited to the following:

- Development activities will be conducted under the property-wide Health and Safety Plan (HASP) and all ground intrusive work will be performed in accordance with the modified Level D Personal Protective Equipment (PPE) requirements outlined in the property-wide Sparrows Point Development PPE Standard Operational Procedure (SOP).
- Oversight will be provided by an EP during 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 2,437 square foot fast food restaurant building. The retail lot will be capped by paved driveways and parking areas, paved building slab, and landscaped areas between the paved areas. The proposed cap areas and types are shown on **Figure 2**. 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.

Driveways will be constructed to allow access to and from the retail lot. As indicated in the site plan drawing provided in **Appendix A**, paved drives and parking lots are currently proposed in several areas within the lease boundary, with primary access on the southern side of the retail lot. The paved drives and parking lots will also be subject to the minimum cap thicknesses given in the Sub-Parcel B6-2 RADWP. Areas within the Retail Area #4 boundary not covered by asphalt, building slab, or concrete will be considered landscaped areas and will be capped with 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.

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

2.2.3. Construction Worker Ground Intrusive Work

As indicated in the site plan drawings provided in **Appendix A**, additional utilities and tie-ins will be installed under this Addendum. Ground intrusive activities which could result in potential Construction Worker exposures are expected to be limited primarily to utility installation tasks performed by specific crews. The revised SLRA presented in the Sub-Parcel B6-2 RADWP Addendum: SLRA Update dated June 28, 2021 indicated that an exposure duration of 40 days did not result in any potentially unacceptable risk or hazard for Construction Workers.

As a conservative and protective measure, during all development work on the TPA property, Construction Workers performing ground intrusive work will adhere to the upgraded PPE requirements outlined in the property-wide Sparrows Point Development PPE SOP. The PPE SOP was created after the submission of the Sub-Parcel B6-2 RADWP but was attached to the Sub-Parcel B6-2 RADWP Addendum: SLRA Update dated June 28, 2021. The approved modified Level D PPE requirements, including specific PPE details, planning, tracking/supervision, enforcement, and documentation, are outlined in the PPE SOP.

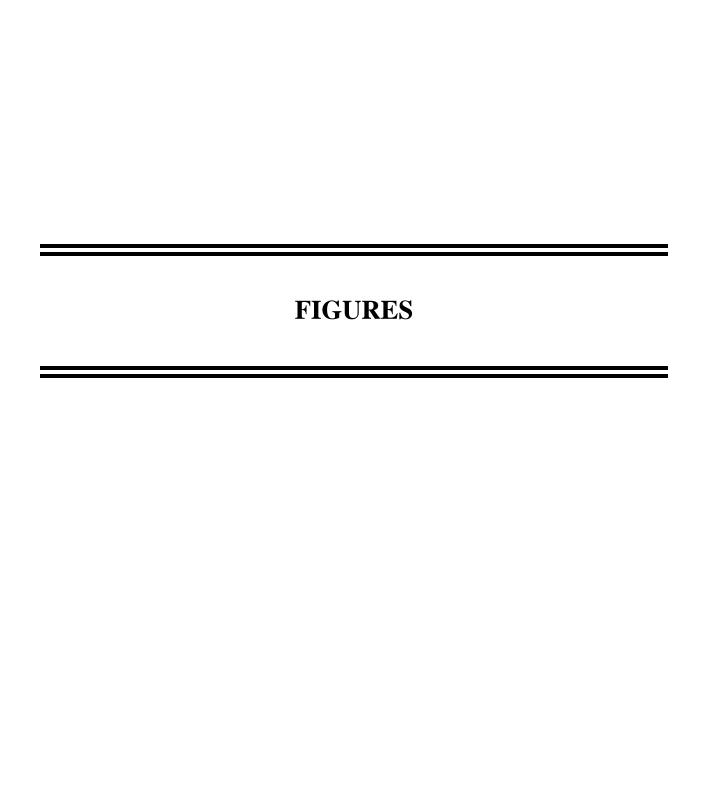
3.0 REPORTING AND IMPLEMENTATION SCHEDULE

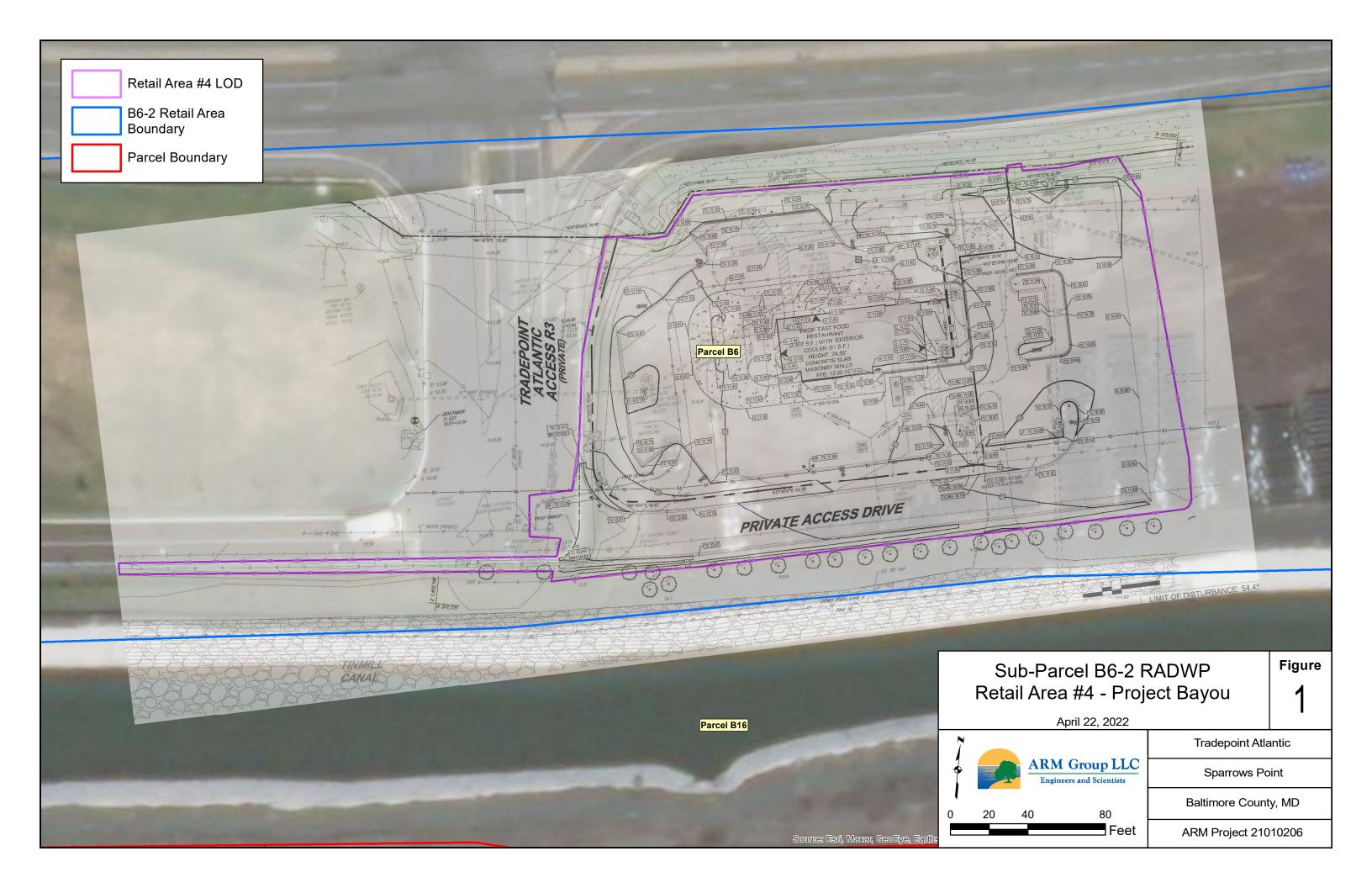
A Development Completion Report and Notice of Completion of Remedial Actions will be prepared following construction of each proposed retail lot. The Development Completion Report will summarize the completed capping activities.

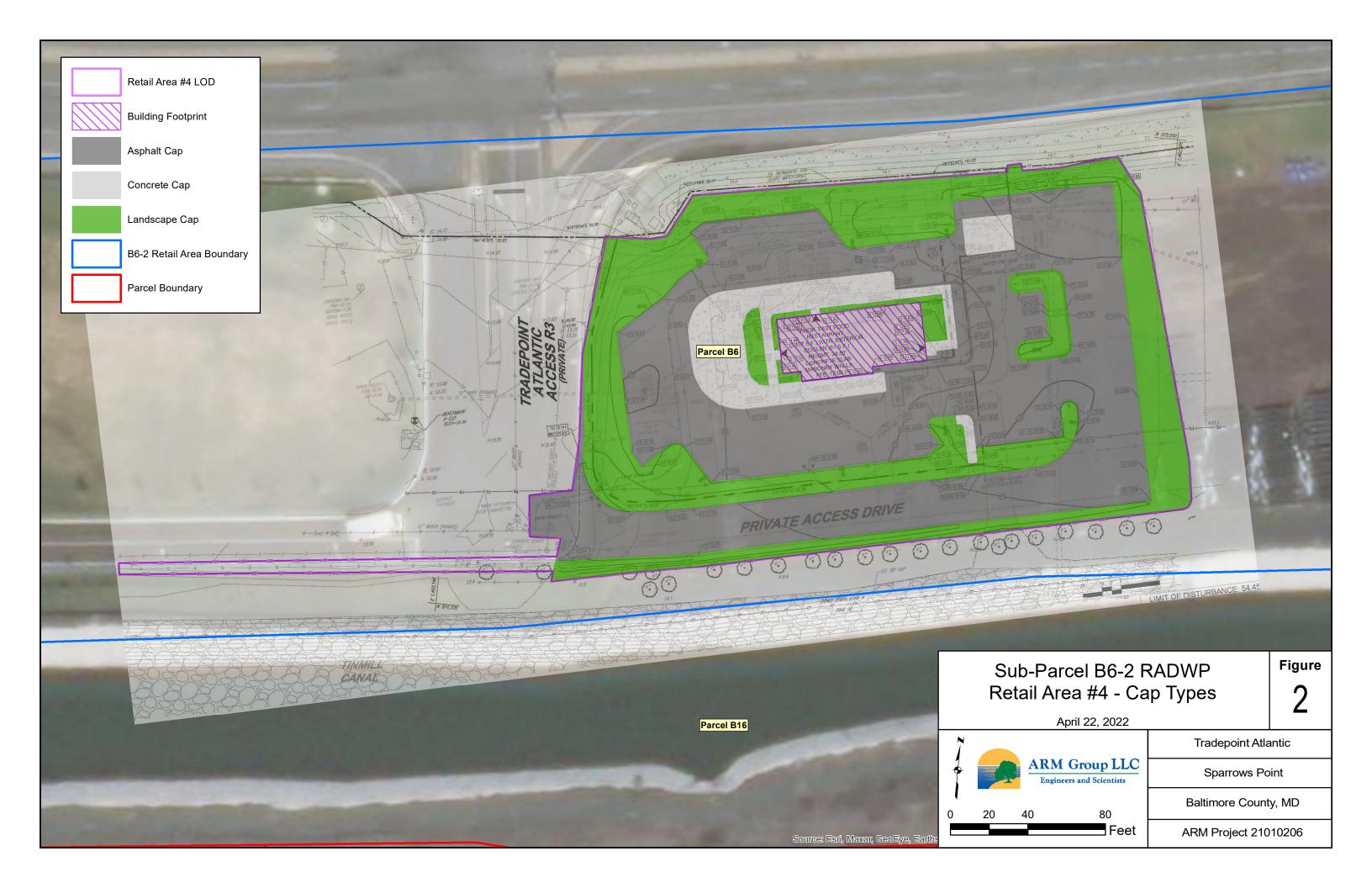
The proposed implementation schedule is provided below.

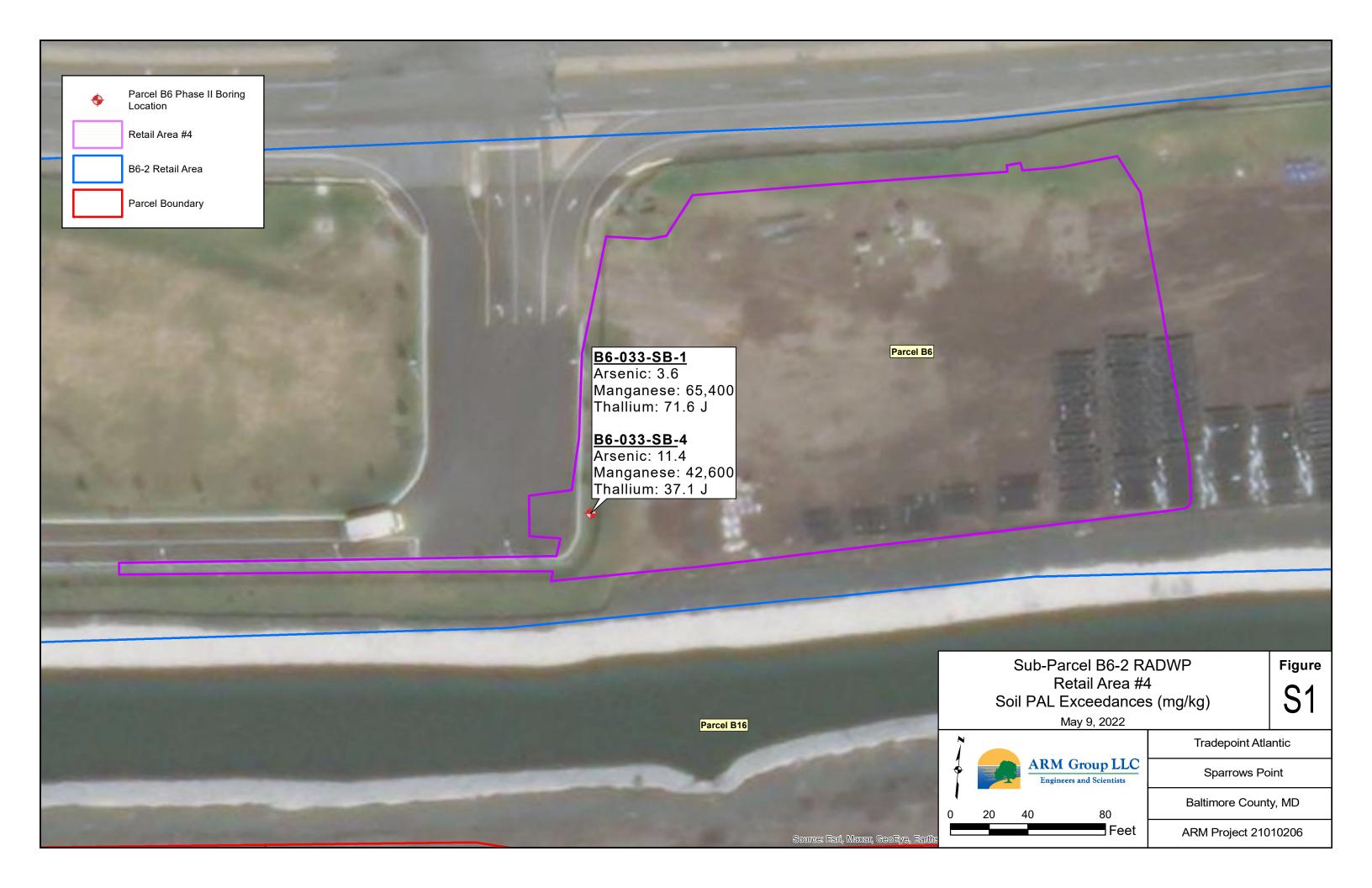
Task	Proposed Completion Date
Anticipated RADWP Addendum Approval	June 2022
Installation of Erosion and Sediment Controls	June 2022
Utility Installation	August 2022
Permanent Capping Remedy Installation	April 2023
Submittal of Completion Report/ Notice of Completion of Remedial Actions*	August 2023

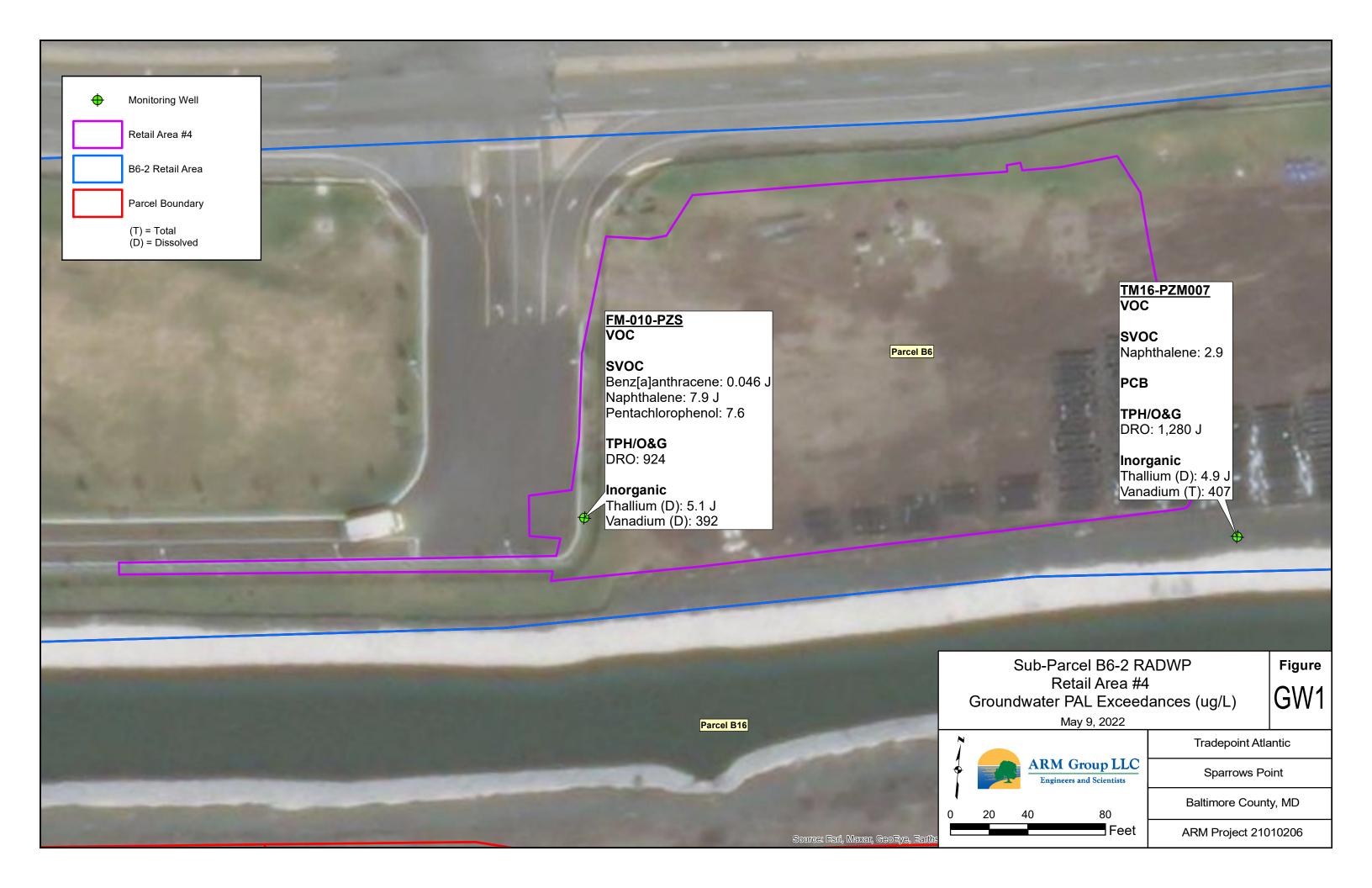
^{*}Notice of Completion of Remedial Actions shall be prepared by Professional Engineer registered in Maryland and submitted with the Development Completion Report to certify that the work is consistent with the requirements of this RADWP Addendum and the retail lot is suitable for occupancy.



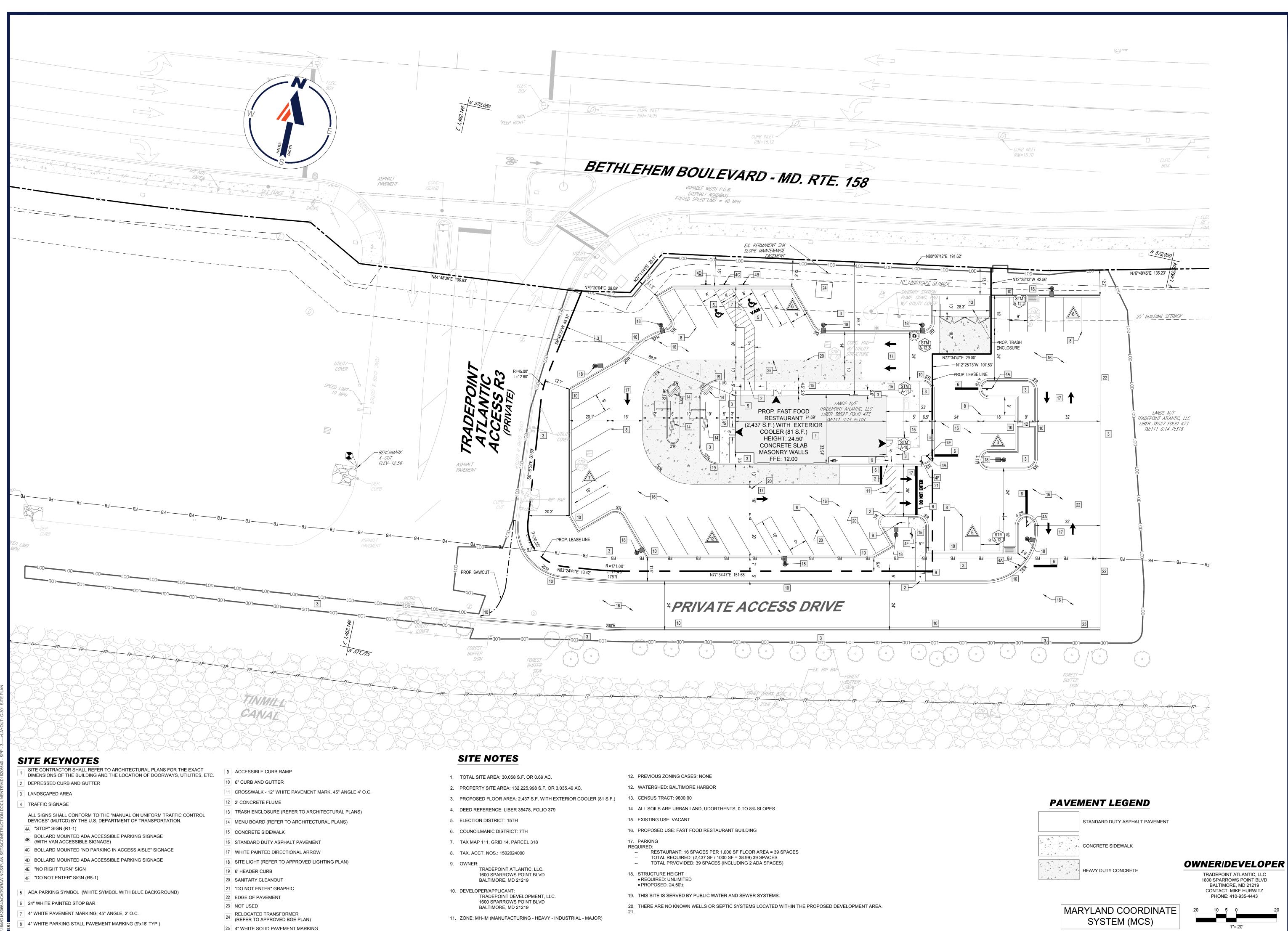








APPENDIX A



SITE CIVIL AND CONSULTING ENGINEERING
LAND SURVEYING
PROGRAM MANAGEMENT
LANDSCAPE ARCHITECTURE
SUSTAINABLE DESIGN
PERMITTING SERVICES
TRANSPORTATION SERVICES

REVISIONS

REV DATE COMMENT DRAWN BY CHECKED BY

1 6/21/21 REVISED PER COUNTY COMMENTS MJG

2 4/11/22 REV. PER UPDATED DMD MJG

MJG



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DOCUMENT UNLESS INDICATED OTHERWISE.

PROJECT No.: MD1620664

DRAWN BY: CHECKED BY: DATE: CAD I.D.:

PROJECT:

PROJECT BAYOU

_____ FOR ____

TRADEPOINT ATLANTIC

7301 BETHLEHEM BOULEVARD
BALTIMORE, MD 21219
TM 111, GRID 14, PARCEL 318
ELECTION DISTRICT 15
COUNCILMANIC DISTRICT 7
BALTIMORE COUNTY

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M.J. GESELL

PROFESSIONAL ENGINEER

MARYLAND LICENSE NO. 44097
PROFESSIONAL CERTIFICATION
I, MICHAEL J. GESELL, HEREBY CERTIFY THAT THESE

DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND, LICENSE NO. 44097, EXPIRATION DATE: 6/9/23

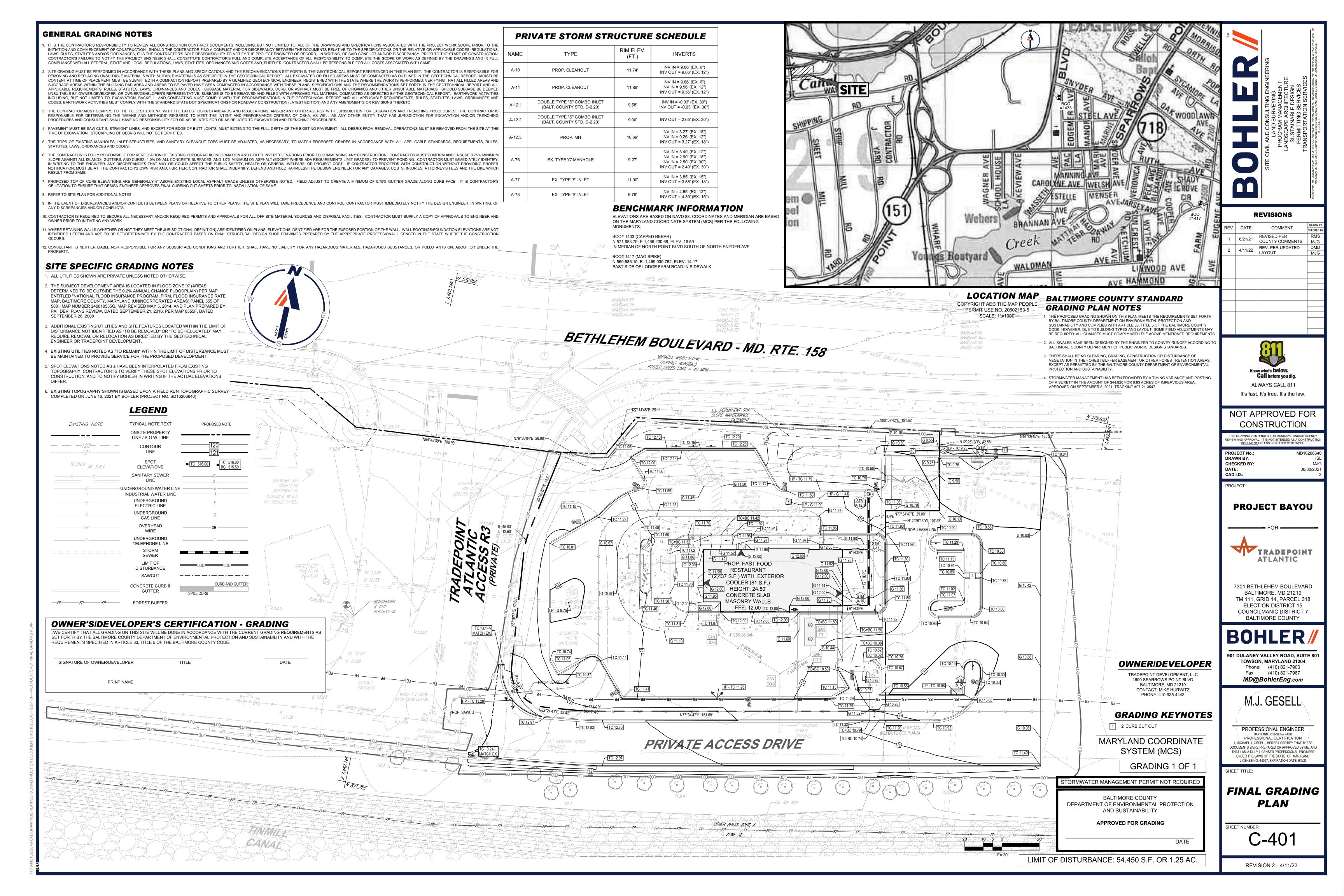
HEET TITLE:

SITE PLAN

CUEET NUMBER.

C-301

REVISION 2 - 4/11/22



ST	STORM STRUCTURE SCHEDULE								
NAME	TYPE	RIM ELEV. (FT.)	INVERTS						
A-10	PROP. CLEANOUT	11.74'	INV IN = 9.86' (6") INV OUT = 9.86' (12")						
A-11	PROP. CLEANOUT	11.89'	INV IN = 9.86' (6") INV IN = 9.56' (12") INV OUT = 9.56' (12")						
A-12.3	PROP. MH	10.69'	INV IN = 3.27' (18") INV IN = 9.26' (12") INV OUT = 3.27' (18")						

CROSSING TABLE

	STO	RM	SEV	VER PI	PE S	CHEDUL	.E
ROM	FROM INV	то	TO INV	PIPE LENGTH	SLOPE (%)	DIAMETER (IN.)	MATERIAL
A-10	9.86'	BLDG	10.00'	13.47'	1.04%	6"	HDPE
A-11	9.56'	A-10	9.86'	29.98'	1.00%	12"	HDPE
A-11	9.86'	BLDG	10.00'	13.47'	1.04%	6"	HDPE
-12.3	9.26'	A-11	9.56'	29.84'	1.00%	12"	HDPE
	A-10 A-11 A-11	ROM FROM INV A-10 9.86' A-11 9.56' A-11 9.86'	ROM FROM TO A-10 9.86' BLDG A-11 9.56' A-10 A-11 9.86' BLDG	ROM FROM TO INV A-10 9.86' BLDG 10.00' A-11 9.56' A-10 9.86' A-11 9.86' BLDG 10.00'	ROM FROM TO TO PIPE LENGTH A-10 9.86' BLDG 10.00' 13.47' A-11 9.56' A-10 9.86' 29.98' A-11 9.86' BLDG 10.00' 13.47'	ROM FROM INV TO INV LENGTH (%) A-10 9.86' BLDG 10.00' 13.47' 1.04% A-11 9.56' A-10 9.86' 29.98' 1.00% A-11 9.86' BLDG 10.00' 13.47' 1.04%	A-10 9.86' BLDG 10.00' 13.47' 1.04% 6" A-11 9.86' BLDG 10.00' 13.47' 1.04% 6" A-11 9.86' BLDG 10.00' 13.47' 1.04% 6"

NAME	TYPE	RIM ELEV. (FT.)	INVERTS
CO-1	CLEANOUT	11.06'	INV IN = 7.51' (4") INV OUT = 7.51' (4")
CO-2	CLEANOUT	11.24'	INV IN = 7.12' (4") INV IN = 6.86' (4") INV OUT = -3.88' (15")
CO-3	CLEANOUT	11.25'	INV IN = 7.64' (4") INV OUT = 7.64' (4")
GT	CONNECTION TO GREASE TRAP	11.46'	INV IN = 7.86' (4") INV OUT = 7.61' (4")

	SANITARY PIPE SCHEDULE						
FROM	FROM INV	то	TO INV	PIPE LENGTH	SLOPE (%)	DIAMETER (IN.)	MATERIAL
CO-1	7.51'	GT	7.61'	5.00'	2.00%	4"	SDR-35 PVC
CO-2	6.86'	CO-3	7.64'	38.77'	2.01%	4"	SDR-35 PVC
CO-2	7.12'	CO-1	7.51'	19.10'	2.04%	4"	SDR-35 PVC
CO-3	7.64'	BLDG	8.00'	17.61'	2.04%	4"	SDR-35 PVC
GT	7.86'	BLDG	8.00'	6.52'	2.15%	4"	SDR-35 PVC

TEST PIT NOTE

CONTRACTOR TO TEST PIT 2 FEET BELOW
PROPOSED UTILITY OR UNTIL EXACT LOCATION OF
EXISTING UTILITY IS IDENTIFIED AND SUBMIT ANY
DISCREPANCIES TO BOHLER ENGINEERING IN

OWNER/DEVELOPER

TRADEPOINT DEVELOPMENT, LLC 1600 SPARROWS POINT BLVD BALTIMORE, MD 21219 CONTACT: MIKE HURWITZ PHONE: 410-935-4443

"	REVISIONS								
-	REV	DATE	COMMENT	DRAWN BY CHECKED BY					
	1	6/21/21	REVISED PER COUNTY COMMENTS	RMS MJG					
	2	4/11/22	REV. PER UPDATED LAYOUT	DMD MJG					
CUI									



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06/30/2021

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PROJECT BAYOU

TRADEPOINT ATLANTIC

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UTILITY PLAN

C-501

REVISION 2 - 4/11/22

