

October 5, 2021

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

> Re: Test Pit Completion Report B6-066 Delineation Area Area B: Parcel B6 Tradepoint Atlantic Sparrows Point, MD 21219

Dear Ms. Brown:

ARM Group LLC (ARM), on behalf of Tradepoint Atlantic (TPA), has prepared this Completion Report to document the test pitting activities in Parcel B6 (the Site) on the TPA Property located in Sparrows Point, Maryland. This completion report is being provided to the Maryland Department of the Environment (MDE) and United States Environmental Protection Agency (USEPA) to present the observations of the test pitting investigation.

Background

On July 5, 2016, soil boring B6-066-SB was completed during the Parcel B6 Phase II Investigation. The soil boring was completed in the northwestern portion of Parcel B6 and targeted an historical Waste Oil Pit. During the completion of this boring, a strong petroleum odor and non-aqueous phase liquid (NAPL) were observed. Screening piezometer B6-066-PZ was installed at this location (refer to **Figure 1**) in accordance with the NAPL delineation protocols provided in the Parcel B6 Phase II Investigation Work Plan. Non-aqueous phase liquid (NAPL) was observed in this screening piezometer immediately following installation. The MDE was notified of this NAPL detection on July 5, 2016. In accordance with the standard Phase II Investigation procedures across the TPA property, 69 NAPL screening piezometers were subsequently installed between July 6, 2016 and April 26, 2017 in the shallow hydrogeologic zone surrounding B6-066-PZ to delineate the source area. The final configuration of the screening piezometers is presented on **Figure 1**. Of the 69 installed piezometers, 49 had trace or measurable NAPL detections. The

delineation investigation was summarized in the NAPL Delineation Completion Report for B6-066-PZ (Revision 0 dated April 14, 2021).

Following a period of routine gauging and reporting between July 2016 and April 2021, all available piezometers in the B6-066-PZ NAPL delineation area that had not been previously destroyed were properly abandoned on May 3, 2021 in accordance with COMAR 26.04.04.34 through 36. Abandonment of these piezometers was proposed as part of the NAPL Delineation Completion Report Comment Response Letter and Piezometer Abandonment Request (dated March 26, 2021) in order to provide space for material and equipment storage. Piezometer abandonment details were presented in the B6-066 Test Pitting Work Plan and Piezometer Abandonment Completion Report (Revision 0 dated June 4, 2021).

In March 2021, prior to piezometer network abandonment, a NAPL sample was collected from the delineation piezometers for hydrocarbon fingerprinting analysis. The hydrocarbon fingerprinting analysis determined that the NAPL is most likely a lubricating oil. Results of this analysis are included as **Attachment 1**.

Test Pit Investigation

On July 8, 2021, in order to further assess the presence of NAPL on the site, an excavator was used to dig four test pits at the locations shown on **Figure 2**. Test pitting was conducted in accordance with the methods specified in QAPP Worksheet 21 – Field SOPs, SOP No. 015 – Test Pitting. Test pitting procedures were outlined in the B6-066 Test Pitting Work Plan and Piezometer Abandonment Completion Report (Revision 0 dated June 4, 2021).

The test pits were each dug to a depth of approximately 2 feet below the observed water table. Each test pit was approximately 20 feet in length and 5 feet in width (one excavator bucket width). Subsurface material above the water table was relatively uniform between each of the four test pits. The subsurface above the water table in all four test pits was typically comprised of a mixture of silt, sand, and slag fill in varying thicknesses with some clay at depth. All excavated material was screened using a hand-held photoionization detector (PID) as well as visual and olfactory methods to determine if there was evidence of NAPL contamination. Photographs of each test pit are included in **Attachment 2**. Further details on the observations within each test pit are presented below.

<u>TP-1:</u>

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Groundwater in TP-1 was observed at approximately 6 feet below ground surface (bgs). TP-1 was excavated to a total depth of approximately 8 feet bgs. Material below the water table was dark, odorous, and appeared to have petroleum impacts. Material removed from below the water table in the test pit had PID readings of up to 80 parts per million (ppm). Dark material excavated from

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below the water table was placed in a designated stockpile and covered. The water surface within TP-1 showed a moderate LNAPL sheen.

<u>TP-2:</u>

Groundwater in TP-2 was observed at approximately 6 feet bgs. TP-2 was excavated to a total depth of approximately 10 feet bgs. Material below the water table was dark, odorous, and appeared to have petroleum impacts. Material removed from below the water table in the test pit had PID readings of up to 100 ppm. Dark material excavated from below the water table was placed in a designated covered stockpile at the surface. The water surface within TP-2 showed LNAPL accumulation of less than 1 inch. TP-2 showed the most LNAPL accumulation of the four test pits. Due to the observed NAPL accumulation, an observation point was installed in TP-2 during backfilling. Details of the observation point's construction are further described in the trailing sections.

<u>TP-3:</u>

Groundwater in TP-3 was observed at approximately 4 feet bgs. TP-3 was excavated to a total depth of approximately 6 feet bgs. TP-3 had no elevated PID readings or evidence (visual or olfactory) of petroleum impacts. Material from TP-3 was not separated into segregated stockpiles at the surface and the water surface did not show signs of LNAPL sheen or accumulation.

<u>TP-4:</u>

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Groundwater in TP-4 was observed at approximately 5 feet bgs. TP-4 was excavated to a total depth of approximately 7 feet bgs. Material removed from below the water table was dark and appeared to have petroleum impacts, but did not have odors or PID readings above 10 ppm. Dark material excavated from below the water table was placed in a designated stockpile and covered. The water table showed only a light LNAPL sheen.

Excavated Material Handling

Three test pits (TP-1, TP-2, and TP-4) contained material below the water table that showed visible evidence of petroleum impacts when stockpiled at the surface. Material removed from TP-1 and TP-2 also had high (80-100 ppm) PID readings. Impacted material was segregated based on evidence of contamination and placed on and covered with plastic sheeting adjacent to each test pit. The segregated material will be sampled and properly disposed of in accordance with its sample results. Unimpacted material (including all material removed from TP-3) was utilized as backfill. Details on the post-closure monitoring are described in the designated section below.

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Backfill Procedure

The four test pit locations were backfilled on August 6, 2021. Prior to backfilling, one temporary observation point was constructed in the most impacted test pit, TP-2, by installing 4-inch diameter PVC screen and riser. This observation point will serve as a temporary monitoring location. The observation point was installed with 5 feet of screen and 10 feet of riser that extends above the surface. The screen was placed at the bottom of the test pit to screen across the groundwater table. Self-compacting recycled aggregate (#57 stone) was used to backfill from the bottom of TP-2 to approximately 1 foot above the water table. The remainder of the test pit was backfilled using the unimpacted excavated and stockpiled material. The material was placed in 1-foot lifts and compacted with an excavator bucket. The PVC was secured at the surface and backfill material was placed around the PVC with extra precaution taken to not damage the screen or riser. The observation point was left in place for future monitoring. The remaining three test pits (TP-1, TP-3, -TP-4) were backfilled with the unimpacted material removed from each test pit.

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Post-Closure Monitoring

The 4-inch observation point was installed during backfilling and subsequently monitored for the accumulation of NAPL. The monitoring point did not show evidence of NAPL accumulation after 30 days of equilibration. At this time, TPA is requesting approval to remove the observation point.

The NAPL present in this portion of Parcel B6 will be considered for its proximity to any excavations and/or utility installations that may be proposed for any potential future development plans in this area. If future utilities are proposed in the vicinity, appropriate protocols for the protection of workers and the mitigation of potential NAPL migration via preferential flow paths will be included in a future Response and Development Work Plan. Monitoring wells or extraction wells in the area may also be proposed as part of the forthcoming Site-Wide Groundwater Corrective Measures Study (CMS) and the Sitewide Groundwater Monitoring Plan.

Following your review of this interim report, if you have any questions, or if we can provide any additional information, 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

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Kaye Guille, P.E., PMP Senior Engineer

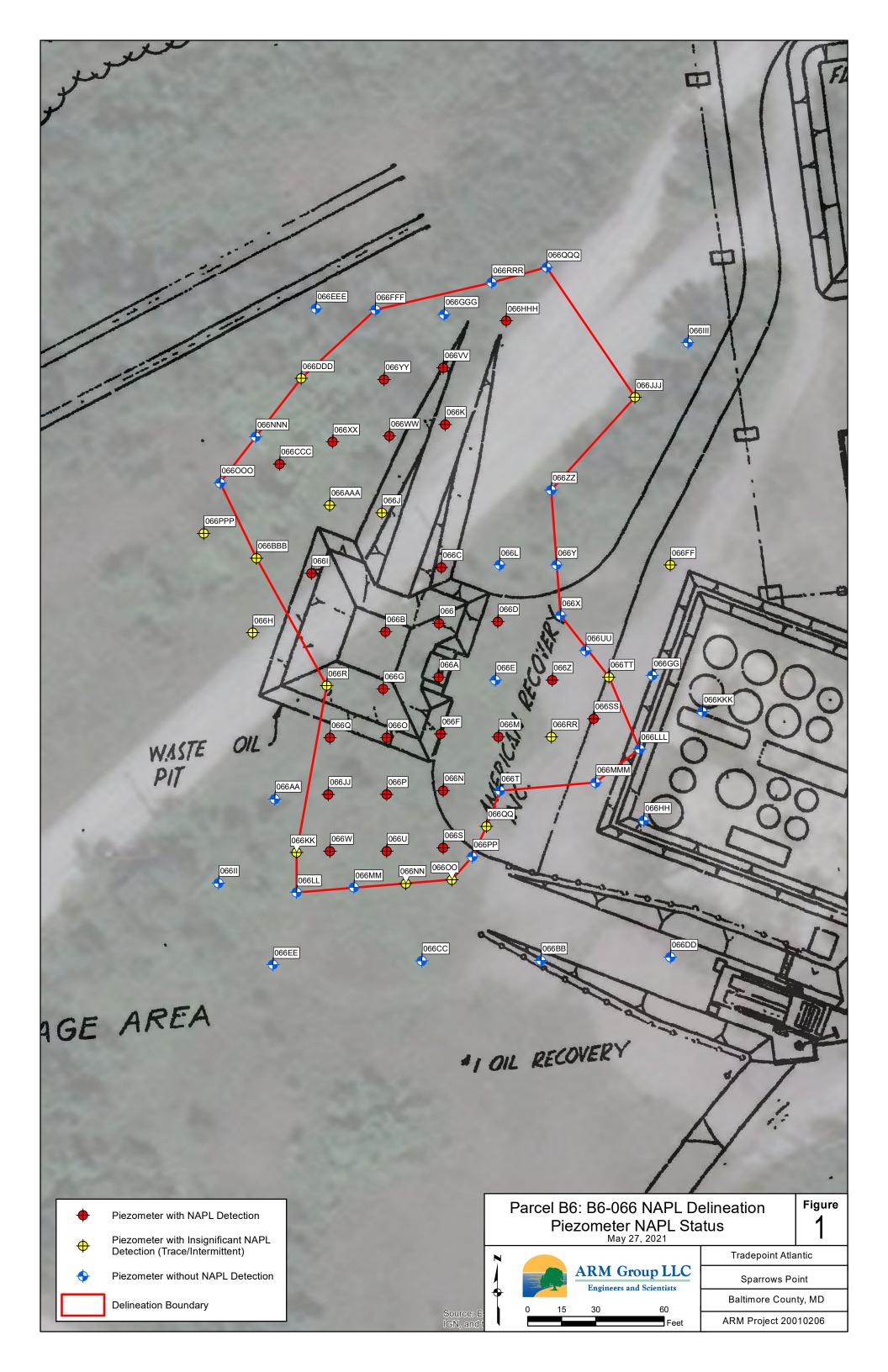
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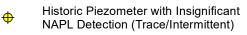


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TP-2 Observation Point



Historic Piezometer with NAPL Detection



Historic Piezometer without NAPL Detection

		Figure 2								
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ATTACHMENT 1

TGI

Torkelson Geochemistry, Inc.

2528 South Columbia Place, Tulsa, Oklahoma 74114-3233 Voice 918-749-8441

April 13, 2021

Bob Tworkowski Tradepoint Atlantic 1600 Sparrows Point Blvd, Sparrows Point, MD 21219

DRAFT

Subject: Hydrocarbon fingerprint analysis and evaluation of six product samples from the Sparrows Point IM, Sparrows Point, MD.

Introduction

Six product samples were submitted to Torkelson Geochemistry by Tradepoint Atlantic for hydrocarbon fingerprint (capillary gas chromatography) analysis and interpretation of results, see chain of Custodies, Figures 1 and 2.

The following are my interpretations/opinions of the data. Please keep in mind that these interpretations are made without any hands on knowledge of the site or other analyses done on the samples. In addition, the petroleum in the samples has probably been altered/weathered which can make an accurate interpretation of product type somewhat more difficult since some of the key features of the product may have been altered or removed by the evaporation, water washing and perhaps bacterial processes.

Discussion of Results

The B17 LNAPL sample appears to be a lubricating oil of some sort with a very small amount of unidentifiable light ends. The B17 LNAPL sample chromatogram (Figures 3 and 10) shows a series of peaks that starts at benzene (Bnz) and continues to the end of the chromatogram and an unresolved hump that starts at about nC13, reaches a maximum between nC24 and nC25 and continues to the end of the chromatogram. The large unresolved hump and associated peaks is most likely a lubricating oil of some sort. The identity of the very small amount of light ends in the benzene to nC14 range is not obvious.

The B18 LNAPL sample appears to be a mixture of a heavy material, perhaps a #5 or #6 fuel oil and a smaller amount of coal tar. The B18 LNAPL sample chromatogram (Figures 4 and 11) shows a series of peaks that starts at benzene (Bnz) and continues to about the end of the chromatogram and a broad unresolved hump that starts at about nC10, reaches a maximum at about nC33 and continues to the end of the chromatogram. The broad unresolved hump and smaller peaks may be a heavy fuel oil such as #5 or #6. The naphthalene and larger unlabeled peaks are probably polynuclear aromatic compounds and are typical of a coal tar.

The B6-066 LNAPL sample appears to be a lubricating oil of some sort with a small amount of unidentifiable light ends. The B6-066 LNAPL sample chromatogram (Figures 5 and 12) shows a series of peaks that starts at normal butane (nC4) and continues to the end of the chromatogram and an unresolved hump that starts at about nC13, reaches a maximum at about nC30 and continues to the end of the chromatogram. The large unresolved hump and associated peaks is most likely a lubricating oil of some sort. The identity of the small amount of light ends in the nC4 to nC14 range is not obvious.

The CO124 DNAPL sample appears to be a coal tar. The CO124 DNAPL sample chromatogram (Figures 6 and 13) shows a series of peaks that starts at benzene (Bnz) and continues to about the end of the chromatogram. The larger unlabeled peaks are probably polynuclear aromatic compounds and are typical of a coal tar.

The CO125 DNAPL sample appears to be a coal tar. The CO125 DNAPL sample chromatogram (Figures 7 and 14) shows a series of peaks that starts at benzene (Bnz) and continues to about the end of the chromatogram. The larger unlabeled peaks are probably polynuclear aromatic compounds and are typical of a coal tar.

The identity of the CO173 LNAPL sample is not obvious but may be a mixture of two products. The CO173 LNAPL sample chromatogram (Figures 8 and 15) shows a series of peaks that starts at about normal butane (nC5) and continues to the end of the chromatogram. The early peaks from the beginning of the chromatogram to about nC12 are some sort of highly aromatic mixture. The heavier portion from about nC12 to the end of the chromatogram has some fairly large normal paraffin peaks but the identity of this material is not obvious.

Please let me know if you have any questions regarding this preliminary interpretation.

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Bruce Torkelson

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Sparrows Point IM, Sparrows Point, MD : B17 LNAPL Sample ID Acquired : Apr 06, 2021 08:53:38

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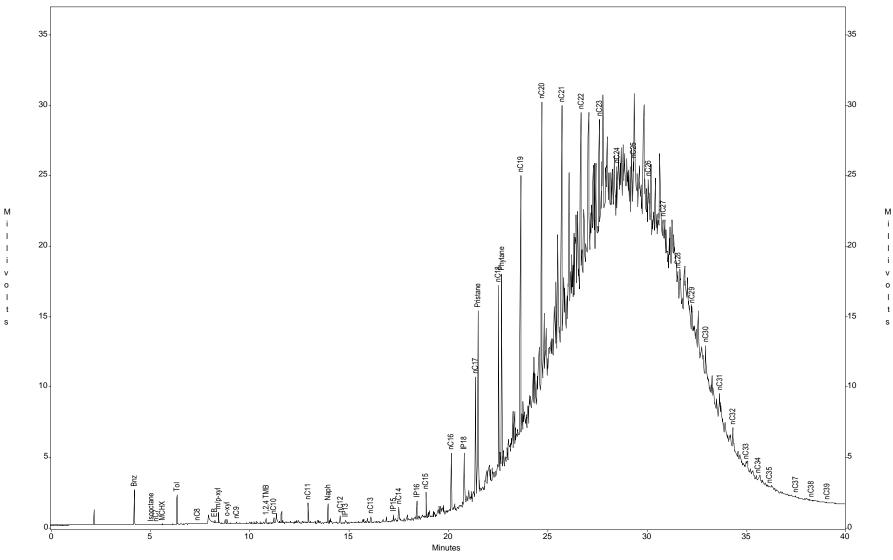


Figure 3, Gas chromatogram of the B17 LNAPL sample.

Sparrows Point IM, Sparrows Point, MD Sample ID : B18 LNAPL Acquired : Apr 06, 2021 15:41:57

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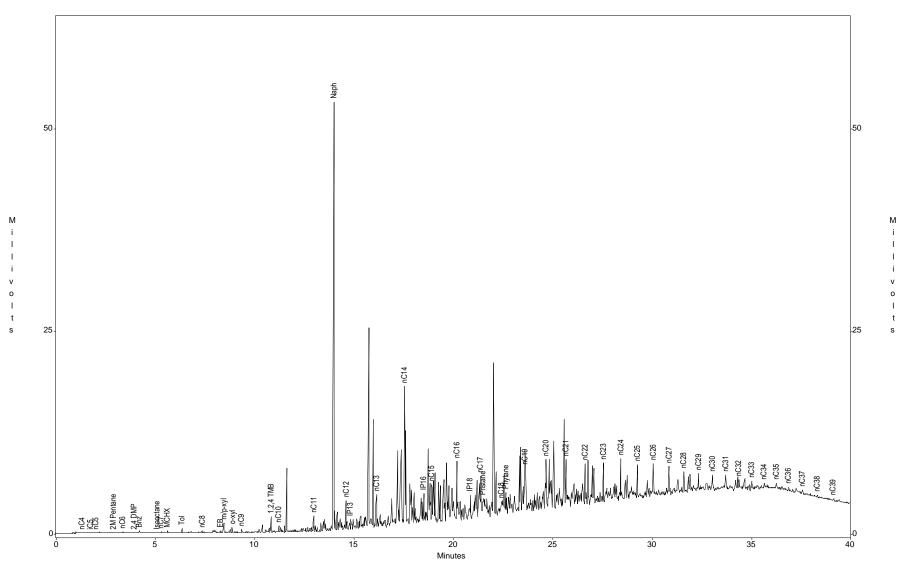


Figure 4, Gas chromatogram of the B18 LNAPL sample.

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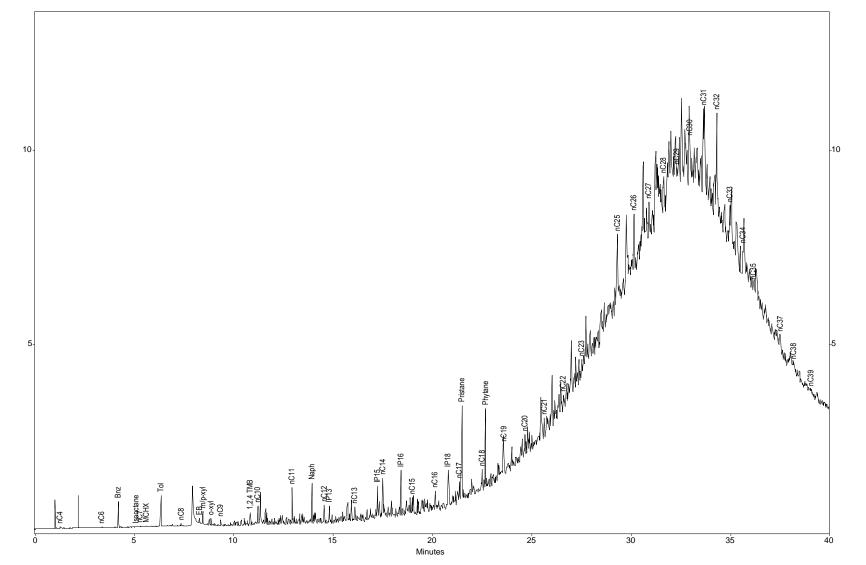


Figure 5, Gas chromatogram of the B6-066 LNAPL sample.

Sparrows Point IM, Sparrows Point, MD Sample ID : CO124 DNAPL Acquired : Apr 06, 2021 14:00:28

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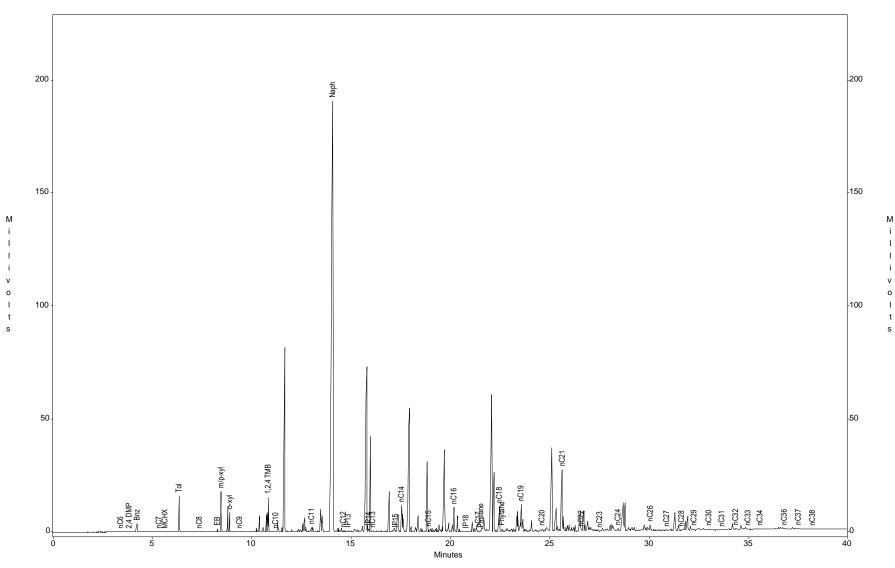


Figure 6, Gas chromatogram of the CO124 DNAPL sample.

Sparrows Point IM, Sparrows Point, MDSample ID: CO125 DNAPLAcquired: Apr 06, 2021 12:17:21

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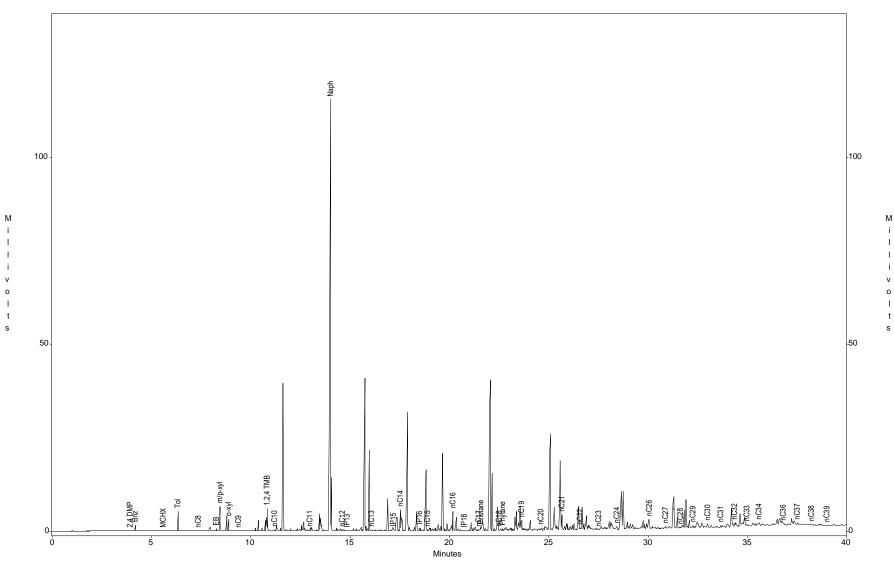
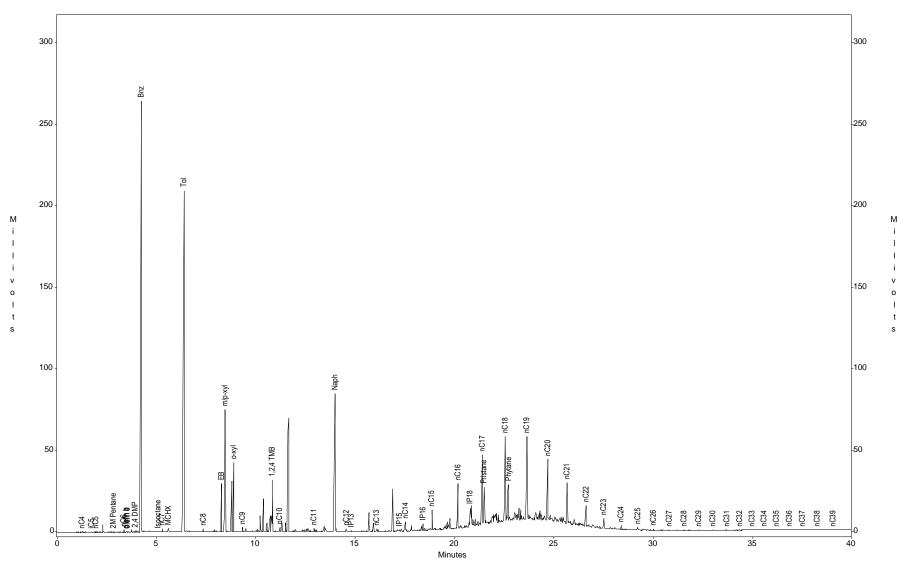
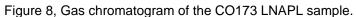


Figure 7, Gas chromatogram of the CO125 DNAPL sample.

Sparrows Point IM, Sparrows Point, MDSample ID: CO173 LNAPLAcquired: Apr 06, 2021 08:04:42

c:\ezchrom\chrom\21016\co173 -- Channel A





c:\ezchrom\chrom\21016\gadiwax2 -- Channel A

Sparrows Point IM, Sparrows Point, MD Sample ID : Gas/Dies/Wax std Acquired : Apr 06, 2021 10:35:22

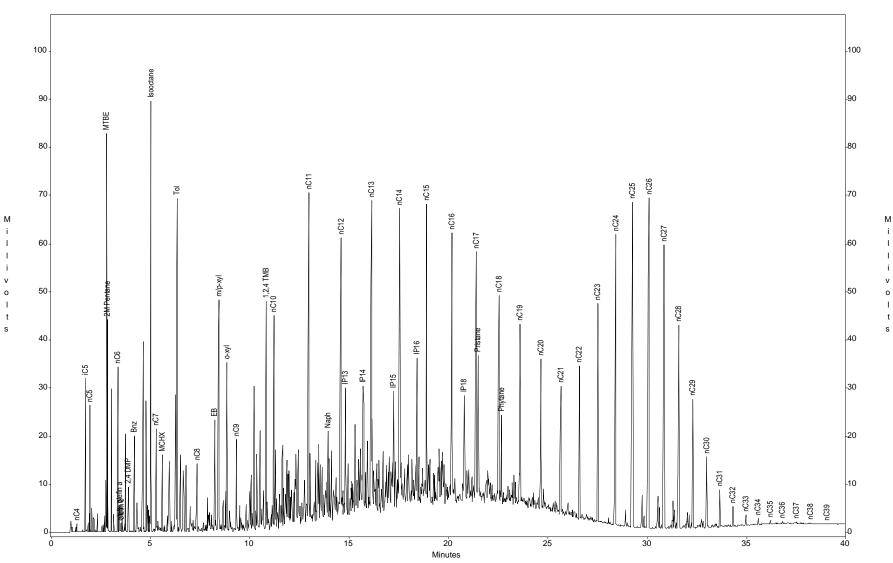


Figure 9, Gas chromatogram of laboratory standard (gasoline/diesel/wax mixture).

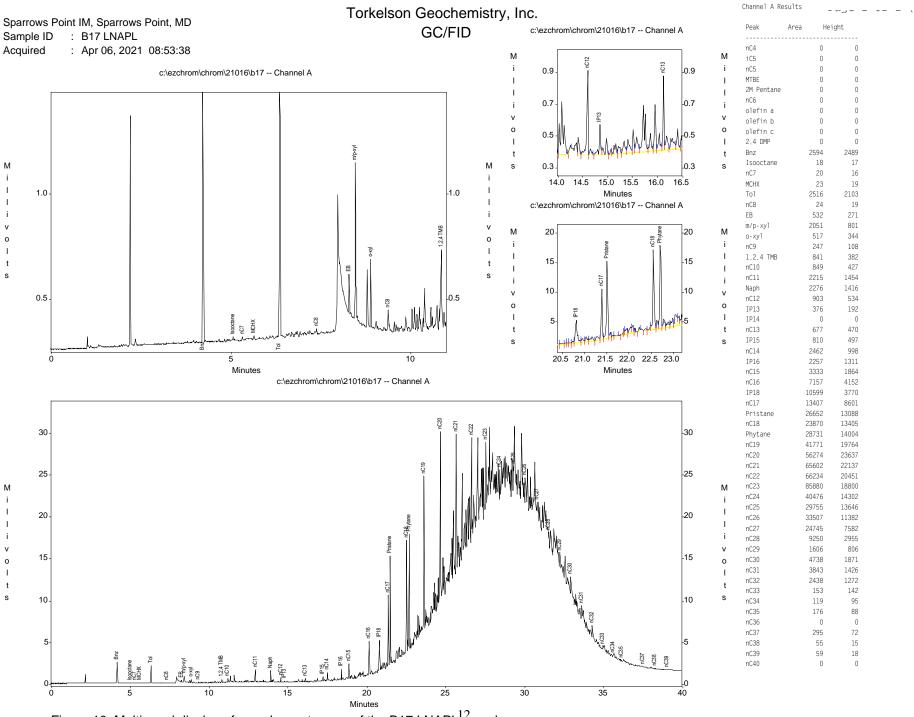


Figure 10, Multipanel display of gas chromatogram of the B17 LNAPL¹² sample.

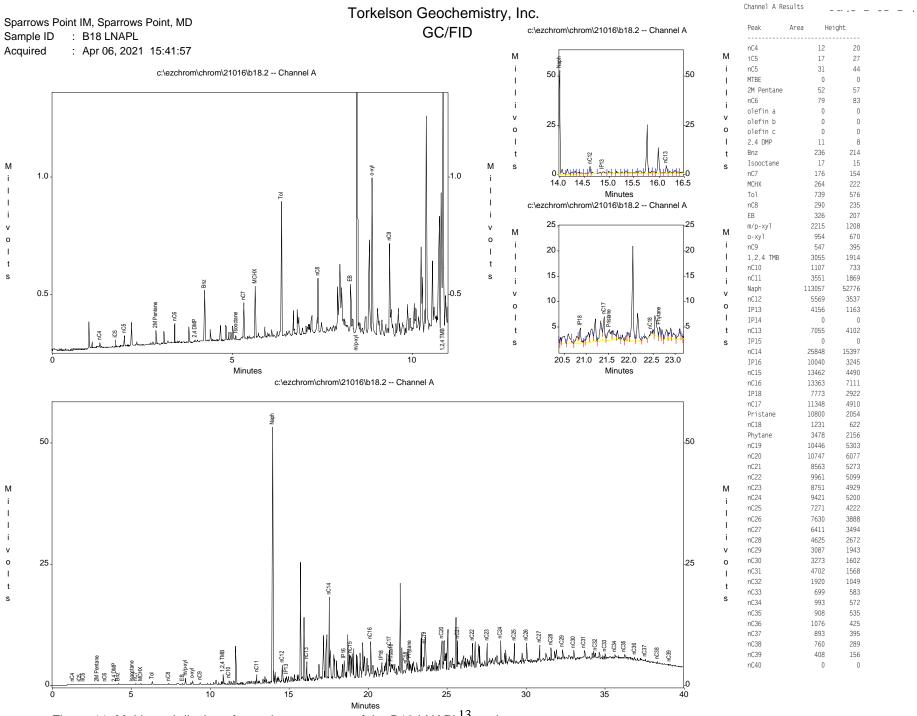


Figure 11, Multipanel display of gas chromatogram of the B18 LNAPL¹³ ample.

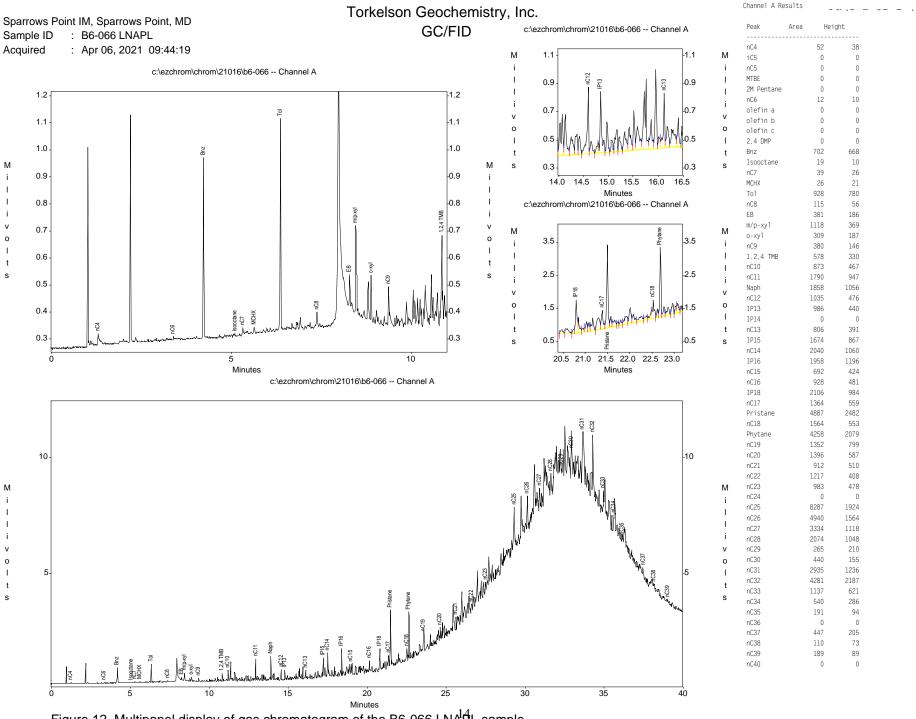
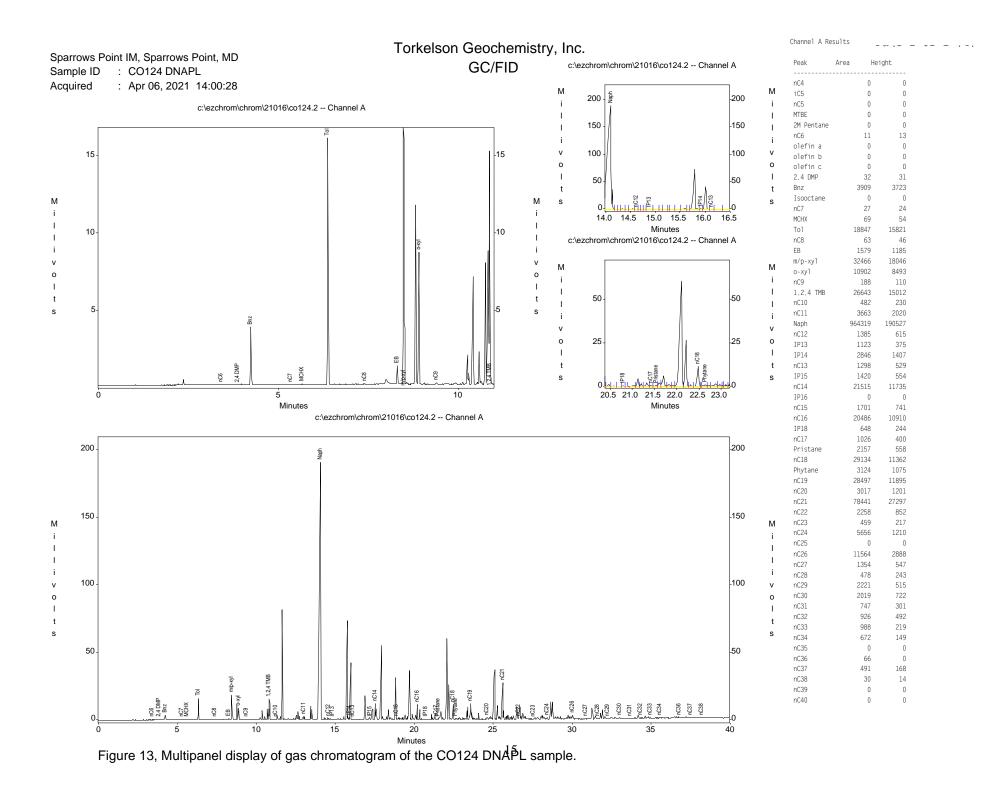


Figure 12, Multipanel display of gas chromatogram of the B6-066 LNAPL sample.



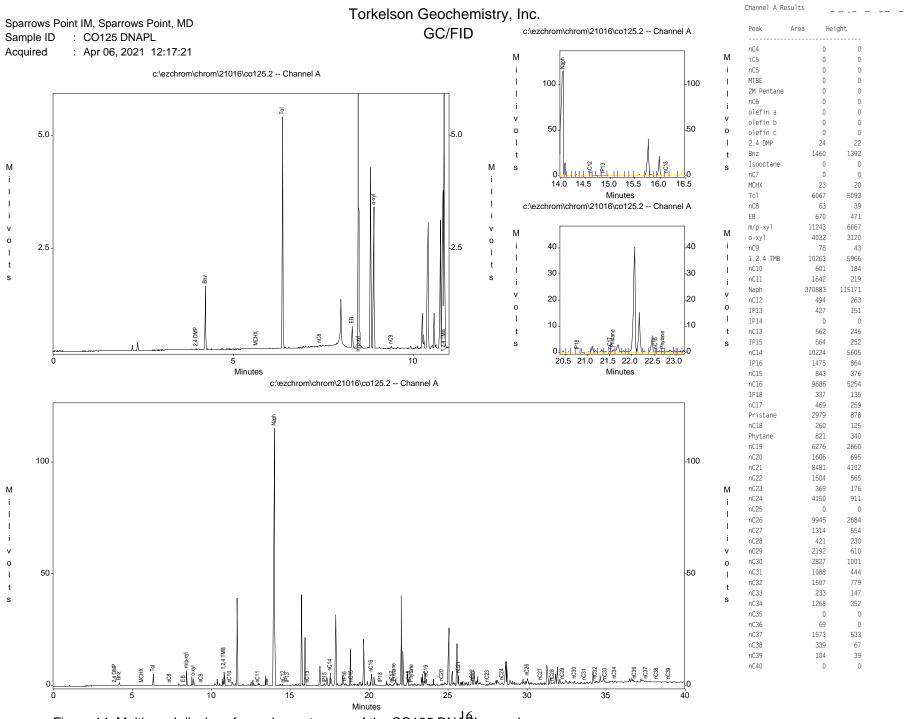
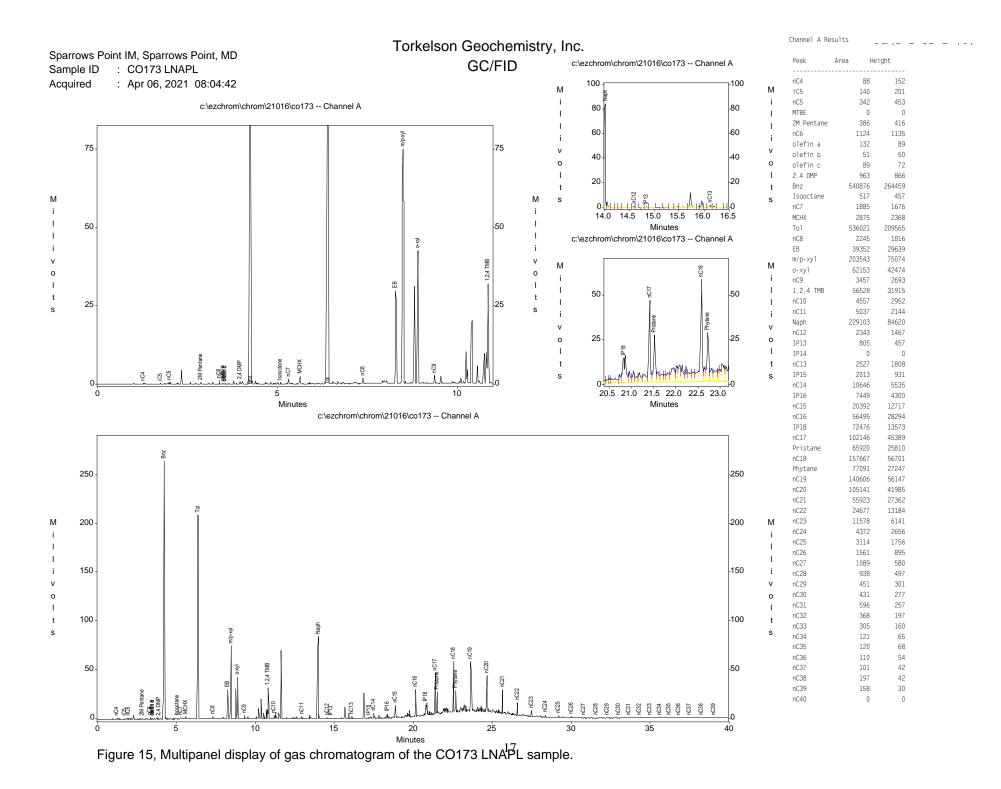


Figure 14, Multipanel display of gas chromatogram of the CO125 DNAPL sample.



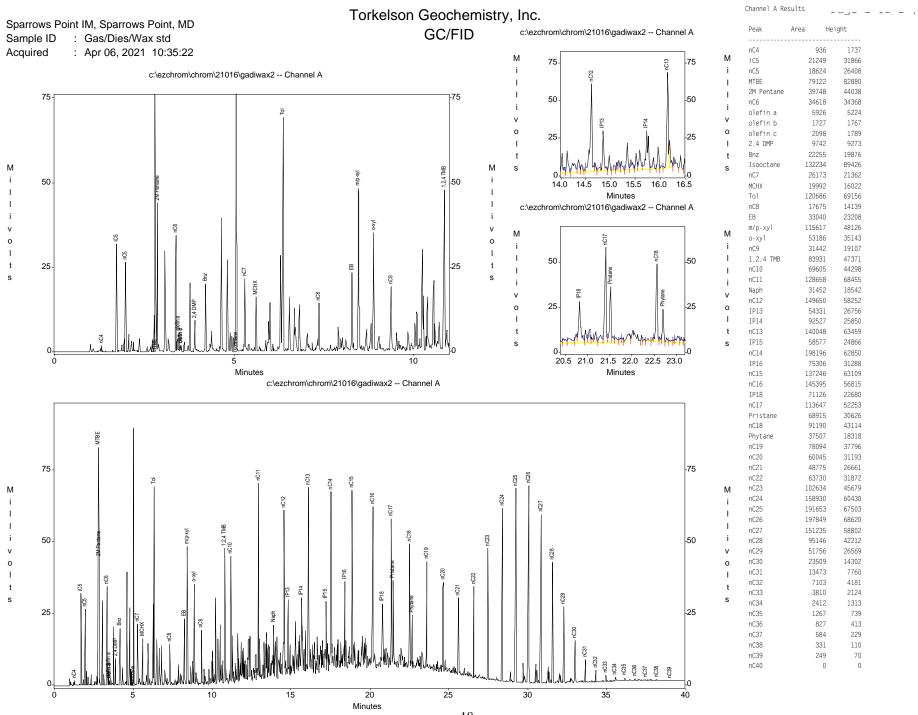


Figure 16, Multipanel display of gas chromatogram of laboratory standard (gasoline/diesel/wax mixture).

Table 1. Results of physical property analyses.

Torkelson Geochemistry, Inc.														
	Physical Properties Measurements													
Sample	TGI Job	Density of NAPL (gm/ml)	Viscosity of NAPL (centipoise)	Surface Tension Air/Water (dynes/cm)	Interfacial Tension NAPL/Water (dynes/cm)	Surface Tension Air/NAPL (dynes/cm)	Temperature of Measurements							
CO173 LNAPL	21016	NR	6.2	NR	NR	NR	60F							

NR = Not Requested

ATTACHMENT 2



070821-1: TP-1 - Test Pit following excavation



070821-2: TP -1 – Excavated Material Stockpiles



071221-1: TP-2 – Test Pit following extraction



070821-3: TP-2 - Excavated Material Stockpile



080621-1: TP-2 – Observation Point (While Backfilling)



080621-2: TP-2 – Temporary Monitoring Point (Backfilled)



070821-4: TP-3 - Test Pit following excavation



070821-5: TP-3 - Excavated Material Stockpile



070821-6: TP-4 - Test Pit following excavation



070821-7: TP-4 - Excavated Material Stockpile