

# **Area 1, Phase 2 Spill Prevention and Response Plan Parcel 3 Development**

**Honeywell Baltimore Works Site  
Baltimore, Maryland**

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Project No.: 0572981

Prepared for:

**Honeywell International, Inc., U.S.  
Environmental Protection Agency, Region III  
Maryland Department of the Environment**

Prepared by:

**Harbor Point Parcel 3 Development, LLC  
Environmental Resources Management, Inc.**

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**Acronyms and Abbreviations**

<u>Name</u>	<u>Description</u>
AST	Aboveground Storage Tank
bgs	Below ground surface
BMPs	Best Management Practices
° C	Degrees Celsius
CAMP	Construction Air Monitoring Plan
CDP	Conceptual Development Plan
CFR	Code of Federal Regulations
CHASP	Contractor Health and Safety Plan
COC	Contaminant of Concern
COMAR	Code of Maryland Regulations

<b><u>Name</u></b>	<b><u>Description</u></b>
COPR	Chromium Ore Process Residue
CR	Crusher Run
CrVI	Hexavalent Chromium
CSSA	Cover Soil Stockpile Area
DDP	Detail Development Plan
DOT	U.S. Department of Transportation
DW	Deep Well
EC	Emergency Coordinator
EE	Engineering Evaluation
EMMP	Environmental Media Monitoring Plan
EPS	Expanded Polystyrene
ERM	Environmental Resources Management, Inc.
ERP	Emergency Response Plan
ERS	Environmental Remediation System
ESC	Erosion and Sediment Control
EWMI	Environmental Waste Minimization, Inc.
F	Fahrenheit
GCL	Geosynthetic Clay Line
GGMP	Groundwater Gradient Monitoring Plan
H&S	Health and Safety
HASP	Health and Safety Plan
HAZMAT	Hazardous Materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
HB	Hydraulic Barrier
HDPE	High Density Polyethylene
HMS	Head Maintenance System
Honeywell	Honeywell International Inc.
HPD	Harbor Point Development LLC
HSC	Health and Safety Coordinator
HSG	Health and Safety Guidance
HW	Hazardous Waste
IC	Ion Chromatography
LLDPE	Linear Low Density Polyethylene
LOD	Limits of Disturbance
m	Meter
m <sup>3</sup>	Cubic Meters
MDE	Maryland Department of the Environment
MDOT	Maryland Department of Transportation
MD SWM	Maryland Stormwater Design Manual
mg	Milligram
MHMP	Material Handling and Management Plan
MLW	Mean Low Water
MMC	Multimedia Cap
MPs	Monitoring Plates
MSDSs	Material Safety Data Sheets
msl	Mean Sea Level
MSS	Master Supervisory Station
MPs	Monitoring Plates

<b><u>Name</u></b>	<b><u>Description</u></b>
NAAQS	National Ambient Air Quality Standard
NELAP	National Environmental Laboratory Accreditation Program
ng	Nanogram
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
OCP	Oil Control Program
OSHA	Occupational Safety and Health Administration
oz/sy	Ounce per square yard
PAHs	Polycyclic Aromatic Hydrocarbons
PAM	Perimeter Air Monitor
PE	Professional Engineer
PELs	Permissible Exposure Limits
PM	Project Manager
PM <sub>10</sub>	Particulate Matter with aerodynamic diameter < 10 micrometer
PPE	Personal Protection Equipment
psf	Pounds per square foot
PVC	Polyvinyl Chloride
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RAMs	Real-time Aerosol Monitors
RCRA	Resource Conservation and Recovery Act
RIC	Remote Intelligent Controllers
RQ	Reportable Quantity
S-B	Soil-bentonite
SWP	Solid Waste Program
SPCC	Spill Prevention, Control, and Countermeasure
SPRP	Spill Prevention and Response Plan
SSMP	Surface Soil Monitoring Plan
SSO	Site Safety Officer
SW	Shallow Well
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plan
µg	Microgram
µg/m <sup>3</sup>	Micrograms per cubic meter
USDOJ	U.S. Department of Justice
µm	Micrometer
USEPA	U.S. Environmental Protection Agency
UST	Underground Storage Tank
VCP	Voluntary Clean-up Program

## 1. INTRODUCTION

Harbor Point Parcel 3 Development LLC and its consultant(s) have prepared this Spill Prevention and Response Plan (SPRP) for the Parcel 3 development (Project). The Project is planned on a portion of the former AlliedSignal Baltimore Works Site (Site), located in Baltimore, Maryland. The Project will consist of constructing two, seven-story Office Buildings, an open space public area referred to as "Point Park", a promenade along the bulkheaded shoreline, and general site development, such as sidewalks, landscaping, a parking garage, a drop-off area, and other ancillary features.

This SPRP has been prepared as part of the Detailed Development Plan (DDP) for the Project, and is to be used in conjunction with the Material Handling and Management Plan (MHMP), the Storm Water Pollution Prevention Plan (SWPPP), and the Construction Air Monitoring Plan (CAMP) prepared for the Project. This SPRP is applicable to development support activities as described in the DDP, and terminates post-construction following completion of the activities identified in the DDP.

### 1.1 Background and Purpose

The approved Environmental Remediation System (ERS) is operated and maintained by Honeywell International Inc. (Honeywell) pursuant to the Consent Decree dated April 27, 1989, as amended, by and between Honeywell, the U.S. Department of Justice, U.S. Environmental Protection Agency (EPA) and Maryland Department of the Environment (MDE), to contain chromium contaminated groundwater and limit exposure to impacted soil. The ERS consists of the Multimedia Cap (MMC), Hydraulic Barrier, Head Maintenance System (HMS) and Outboard Embankment.

Honeywell currently stores less than 1,320 gallons of aboveground oil storage and less than 42,000 gallons of underground oil storage. Based on these threshold volumes, Honeywell is not subject to the Spill Prevention, Control, and Countermeasures (SPCC) regulations under 40 CFR 112. Nonetheless, Honeywell maintains a SPCC for activities associated with the operation of the ERS. The Honeywell SPCC will continue to remain in effect for routine ERS operations and maintenance activities conducted outside the footprint of redevelopment.

This Plan is intended to describe the measures to be implemented by Harbor Point Parcel 3 Development LLC and its Contractors to prevent hazardous material and petroleum product discharges (i.e., spills) from occurring, and mitigate the effects of a discharge, should one occur. Spills are inclusive of solids and liquids.

Solids include, but are not limited to, asphalt, stone aggregates, concrete and wood debris, soil and product residuals from the former chromium ore production facilities. Liquids include but are not limited to groundwater, seeps, fuel, oil, decontamination liquids, liquids generated from subsurface dewatering activities, liquid that may have come in contact with site soils beneath the existing environmental protections exposed by the work, or liquids that may have come in contact with other potentially contaminated material.

For the purpose of this development project, Harbor Point Parcel 3 Development is considered the "Developer". Contractors are required to notify as soon as possible the Developer's Representative and Honeywell's Representative of a spill that occurs and is subject to this SPRP. Examples of spills that could occur that would be subject to this document include the following:

1. Diesel fuel spill from construction equipment or re-fueling tank, either during re-fueling or a fuel line;
2. Hydraulic fluid spill from a hydraulic line break in construction equipment;
3. Soil spill during loading of soil excavated from below the MMC into containers or during on-site transport; and

4. Water spill of either chromium-contaminated ground water or surface water in contact with affected soil during transfer into a temporary holding tank or tanker for off-site disposal.

The Solid Waste Program within MDE must be notified immediately in the event of a release of hazardous waste or hazardous waste-contaminated materials (See Section 6.0).

## 1.2 Consistency with Other Plans

A MHMP has been prepared to address the handling and management of solids (asphalt, stone aggregates, concrete and wood debris, COPR and soil) and liquids (storm water, decontamination water and groundwater) that may be encountered during the intrusive activities at the Site. A Surface Water Pollution Prevention Plan (SWPPP) has been prepared which presents best management practices for managing storm water runoff during construction activities.

## 2. GENERAL SITE DESCRIPTION

### 2.1 Location, Site Use and Layout

The Site is located on a peninsula on the northeast shore of the Patapsco River of the Inner Harbor, in the Fells Point section of Baltimore City, Maryland. The Site is surrounded by water on the north, west and south, the Living Classrooms facility to the north and by the Thames Street Wharf Office Building and its associated parking lots to the east.

### 2.2 Site Use

For prior environmental remediation purposes, the Site has been divided into Areas 1, 2, and 3. Area 1 which is approximately 15 acres in area, is the principal site of Honeywell's (formerly AlliedSignal) Baltimore Works Facility (Figure 1). Chromium ore was processed in Area 1 from 1845 to 1985. The former manufacturing processes resulted in chromium impacts to soil and groundwater. The ERS is maintained and operated by Honeywell to contain ground water impacted by hexavalent chromium (CrVI) in Area 1, and to control the potential for human exposure to affected soil. The ERS consists of the MMC, the Hydraulic Barrier, the HMS, groundwater storage and transfer system, and the Outboard Embankment. The HMS maintains an inward ground water gradient to mitigate the migration of chromium-impacted ground water from the Site.

Area 2 was mainly used for coal and raw chromium ore storage. In addition, a fertilizer warehousing and supply company operated in this area for many years.

Area 3 consists of five separate properties all with a history of industrial activity. This industrial activity included brass casing, oil blending and storage, lumber storage and coating/plastics production.

Honeywell purchased all of these properties by 1993 at which time all manufacturing was halted and subsequently all buildings and tanks were removed.

The Project will be the second major construction activity in Area 1, scheduled for commencement of construction in January 2022. The first construction (Phase 1) in Area 1 included the Exelon Tower and Central Plaza that was completed in 2016 in accordance with the USEPA and the MDE approved plans.

### 3. FACILITY CONTACT SUMMARY AND APPLICABLE PERMITS

Honeywell Contact: George Pfeiffer  
Honeywell International Inc.  
101 Columbia Road, P.O. Box 2105  
Morristown, NJ 07962  
908-791-0897

Resident Honeywell Site Manager:  
Bryn Hansen, Jacobs  
1000 Wills Street  
Baltimore, MD 21231  
410-404-9111

Developer: Jonathan Flesher  
Beatty Development Group, LLC  
1300 Thames Street, Suite 10  
Baltimore, MD 21231  
443-463-3937

The Emergency Coordinator (EC) and contact information is presented in Section 6.1.

Applicable state and local permits and/or approvals required for this project are summarized below:

Jurisdiction	Permits and/or Approvals
MDE	General Permit for Stormwater Associated with Construction Activity
Maryland Department of Natural Resources, Critical Area Commission	Chesapeake Bay Critical Area
MDE	General Permit for Discharges from Tanks, Pipes, Other Containment Structures, Dewatering Activities, and Groundwater Remediation (MDE General permit 17HT)
City of Baltimore	Building Permit
City of Baltimore	Stormwater Management
City of Baltimore	Developer's Agreement



## 4. LIQUID DISCHARGE PREVENTION

### 4.1 Procedures

Direct discharge of collected liquids to adjacent surface waters or ground surfaces is prohibited unless authorized by permit. Characterization and proper disposal of captured and stored liquids is to be performed in accordance with the MHMP. Liquids characterized as Non-Contact Water (Non-Contact Water and Contact Water are defined in the MHMP and reiterated at the end of this section of the SPRP) may be discharged in accordance with the requirements set forth in the General Permit to Discharge Stormwater Associated with Construction Activities (14 GP), and/or supplemental permit such as General Discharge Permit 17HT, if required. Required permits will be obtained from MDE before starting construction to establish discharge requirements.

Surface water, i.e. rain water sheet flow, will be excluded from the excavation zones using temporary diversion berms constructed from clean cover soil. Temporary diversion berms must therefore be covered by plastic or other impermeable material to reduce the potential for erosion of the berm material.

Containment berms for “controlled” storage and equipment decontamination areas, as shown on DDP figures, must be constructed to mitigate potentially impacted water contacting clean cover soil. Controlled storage and equipment decontamination areas will also have a sealed, sump within the containment berms for removal of potentially impacted water (see MHMP).

Two types of fuel storage tanks are anticipated during construction activities at the Site: 1) generators; 2) and small above ground storage tanks (ASTs) for storage of equipment fuel. A fuel truck is also anticipated to enter and exit the Project for equipment re-fueling. All petroleum product ASTs used at the Project will be double walled and constructed in accordance with typical industry specifications and will contain approximately 250 to 500 gallons of fuel. Alternatively, the storage tanks may be placed in secondary containment, using for example a “Collapse-A-Tainer”. The storage containers used will be compatible with the characteristics of the petroleum product they contain, and with temperature and pressure conditions.

Emergency generators with a day tank will also likely be used for the Project with a capacity of approximately 250 gallons. Piping connected with a storage tank will be placed aboveground for easy access and visual monitoring during use. The piping will either be double walled or placed in secondary containment. The total volume of petroleum stored during the Project, including the generator day tank and small AST, is anticipated to be between 500 and 750 gallons.

Fuel trucks will enter the Project during construction activities to re-fuel equipment and fuel oil storage tanks. (i.e., cranes, excavators, day tanks, etc.). Fueling of equipment will be performed using the portable, containment system. The Developer’s Field Representative or designee will direct the Contractor to ensure that the driver understands the Project layout, knows the protocol for entering the property and delivering the fuel, and is familiar with this SPRP. The Developer’s Field Representative or designee will also check to make sure that the driver has the necessary equipment to respond in the event that a discharge from the vehicle or fuel delivery hose occurs.

The trucks and/or Contractor will be equipped with a functioning spill kit that meets industry standards exercised by experienced professionals performing the same services under similar circumstances. Those engaged with re-fueling activities will be knowledgeable with the deployment and use of the kit.

Transfer of contact water and water/groundwater extracted by the HMS or extracted for construction purposes will be conducted within a containment area of sufficient size and construction of appropriate materials to contain materials spilled during transfer. A spill kit will be maintained near the area where the

transfer occurs. Spills within the containment area will be managed in a similar manner to the procedures noted in section 5.0 of this plan.

## 4.2 Contact Water and Non-Contact Water

As defined in the MHMP, there are two categories of water, “Contact Water” and “Non - Contact Water” , which are anticipated to be managed during intrusive work, as summarized below:

- Contact Water – Contact Water consists of the following:
  - Stormwater that potentially comes into contact with contaminated media below the geomembrane;
  - Decontamination water used to decontaminate equipment that contacted controlled soil/debris; and
  - Groundwater from dewatering, including stormwater that collects in excavations where groundwater is also present.
- Non-Contact Water – Non-Contact Water consists of the following:
  - Stormwater that has not come into contact with contaminated material below the geomembrane.

Contact water will be collected in on-site storage tanks for profiling and appropriate offsite disposal.

To minimize generation of contact water, management of surface water run-off will be in accordance with and as approved erosion and sediment control plan that will be submitted with the DDP. Stormwater run-off will be diverted away from excavations. Non-contact water that accumulates in a depressed area will be pumped to an on-site storage tank. Non-contact water will be discharged under the General Permit to Discharge Stormwater Associated with Construction Activities (14 GP), and/or supplemental permit such as General Discharge Permit 17HT, if required. Required permits will be obtained from MDE before starting construction to establish discharge requirements. Any testing required by these permits will be conducted in accordance with the permits.

## 5. CONSTRUCTION STORAGE AND OPERATION

### 5.1 Contact Water Storage and Operations

Contact water will be conveyed to sumps and pumped to a designated double-walled frac tank. For contingency purposes, a minimum of two 15,000-gallon frac tanks will be provided at the Site. Sump pumps will be operated as needed to convey the collected water. Sumps and conveyance lines will be pumped “dry” to the dedicated frac tanks for contact water. Contact Water will be transferred in double-walled pipes.

Contact Water will be held for analytical testing for waste profiling, as required by the receiving facility. Contact water will be collected in on-site storage tanks for profiling and appropriate offsite disposal either at hazardous disposal facility or non-hazardous disposal facility as discussed in Section 5.1 of the MHMP. Specific provisions, e.g. container labeling, secondary containment, inspection and record keeping, will be followed. Contact Water will be transported off-site for disposal following written approval of acceptance from the receiving facility’s representative. As such, contact water tanks will be labeled appropriately upon placing the water into the tanks. Contact Water that is profiled as hazardous waste will be managed in accordance with COMAR 26.13.03. Contact water that is profiled as hazardous waste will be disposed at the Honeywell approved EQ York, Pennsylvania facility, unless otherwise approved by Honeywell or directed by the facility.

When off-site disposal is scheduled, the frac tank will be emptied using a vacuum tanker truck (or other suitable equipment), which will then transport the liquid to the disposal facility. In the event that a vacuum truck is not available, a centrifugal transfer pump (or other suitable means) may be used to pump water to a transfer tractor-trailer. Transfer operations associated with contact water from the frac tank to vacuum trucks or similar will occur within an area of secondary containment.

The location of frac tanks for the contact water is indicated on the DDP Figure 1; however, this location may be relocated during construction, due to the tight spatial constraints on the Project.

### 5.2 Non-Contact Water Storage and Operations

Non-contact water collected in excavations and depressions will be pumped to a designated Modutank. For contingency purposes, two Modutanks will be provided at the Site. Each Modutank will be 50 feet square and 4 feet deep. Contact water and Non-contact water will not be commingled.

Non-contact water will be discharged under the General Permit to Discharge Stormwater Associated with Construction Activities (14 GP), and/or supplemental permit such as General Discharge Permit 17HT, if required. Required permits will be obtained from MDE before starting construction to establish discharge requirements. Any testing required by these permits will be conducted in accordance with the permits.

The location of Modutanks are indicated on the DDP Figure 1; however, this location may be relocated during construction due to the tight spatial constraints on the Project.

In the event of an extreme storm one of the Modutank may be used for storage of contact water. Based on a high intensity short duration (1-day) 100 year rain event or a low intensity long duration (2-day) 100 year rain event with a maximum catchment area below the Geomembrane of 7,250 square feet, one Modutank for contact water and one Modutank for non-contact will be required for management of storm water. After the rain event, the Modutank used to temporarily store contact water will be decontaminated for re-use with non-contact stormwater. For details of rain event, catchment, and storage calculations, refer to DDP Engineering Evaluation (EE) Memorandum 1.

### 5.3 Re-Fueling Operations

Construction equipment will be re-fueled nearby its working location and, when possible, stationed on a portable “collapse-a-tainer” secondary containment system. In situations where a portable secondary containment system is not used, i.e., stationary equipment such as tower cranes, spill control supplies will be provided during re-fueling. Those engaged with re-fueling activities will be knowledgeable with the deployment of the collapse-a-tainer and use of the spill kit. If a fuel spill occurs outside of the collapse-a-tainer system, other measures in addition to a spill kit may be used to contain and manage the spill. These measures include the following:

- Installation of containment berms around the spill;
- Installation of swales around the spill;
- Construction of a sump(s) for removal of the spill. Spilled fuel liquids that are collected will be conveyed to a storage container specifically designated for spilled fuel or other petroleum materials; spilled fuel will not be mixed with the groundwater storage tanks designated for other purposes;
- Other containment measures may be used to immediately stop the migration of the liquids; a
- Removal of soil materials that are impacted by the spill for characterization and off-site disposal. The soil would be excavated at a minimum to a depth at which there is no visual or olfactory evidence of the spill. Soil excavation will not penetrate any part of the ERS not intended to be disturbed as part of development; and
- Temporary storage of impacted soil or water will be in designated containers located within the Sealed Container Storage Area shown on DDP Figure 1.

## 6. DISCHARGE NOTIFICATIONS

The Contractor will immediately commit all necessary manpower, equipment, and materials required to prevent a spill from reaching waterways, shorelines, or sewers. Once the spill, release or discharge is under control, the Contractor will immediately notify the Developer's Representative and Honeywell's Representative.

In the event of an oil spill or discharge at the facility, the Developer's Representative and Honeywell's Resident Site Manager will be notified immediately once the spill or discharge is under control. MDE's Oil Control Program (OCP) will to be notified by the Developer's Representative in accordance with COMAR 26.10.08.01 Reporting Of Suspected Releases. The MDE OCP contact number to report a spill is 866-633-4686 (24 hour) or 410-974-3551.

In the event of a release of hazardous waste or hazardous waste-contaminated materials, the Solid Waste Program (SWP) within MDE must be notified at 410-537-3315, and if possible contact Ed Dexter or designee of MDE at 410-537-3315.

The Developer's environmental response contractor for responded to spills is Environmental Waste Minimization, Inc. (EWMI), contact number 877-460-1038. Honeywell's emergency response contractor, Maryland Environmental Services at 410-979-8200, Baltimore City or the Maryland Department of the Environment's HAZMAT Team may also be contacted by the Developer's Representative to recover the oil. Disposal of any recovered materials generated from cleanup by a spill response contractor will be coordinated through the Honeywell's Resident Site Manager to ensure proper disposal of recovered materials in accordance with Maryland regulations.

### 6.1 Project Specific Emergency Contacts

In the event of a contaminated groundwater spill, material release, fire or explosion, the following Honeywell and Developer contacts should be notified immediately.

#### Emergency Coordinator (EC)

Developer: Jonathan Flesher – 443-463-3937

Resident Site Manager: Bryn Hansen – 410-404-9111

### 6.2 Emergency Notifications

The following table (Table 6-1) provides government agency and emergency response contact information in the event of a spill:

**Table 6-1: Emergency Contact Information**

Emergency Reporting	Name	Phone
US Coast Guard Spill Reporting	National Response Center (Chemtrec)	800-424-8802
EPA Region III Reporting	US EPA Region III	215-814-5000
State Reporting	Maryland Department of the Environment Emergency Response Notification	866-633-4686 (24 hour) or 410-974-3551
	Maryland Natural Resources Police	410-643-5773

Emergency Reporting	Name	Phone
Local Reporting	Baltimore Fire Department	911 (emergency) 410-396-3083 (non-emergency)
Emergency Response Contractor	Maryland Environmental Services	410-729-8200
	EWMI (Developer's response contractor)	877-460-1038

### 6.3 Discharge Response Procedures

In the event of an oil, contaminated groundwater or contact water spill outside of the containment area, spill response measures will be utilized to minimize migration of contaminated material.

If the EC or designee determines that the facility has had a release, fire, or explosion that could threaten human health or the environment, or if the release is of a quantity which would exceed the Reportable Quantity (RQ) for chromium (1 pound as referenced in the Code of Federal Regulations 40 CFR 302.4) outside of secondary containment, the EC or designee shall report his findings as follows:

- Name, address, and telephone number of the person reporting;
- Name, address, and telephone number and the responsible party;
- Specific location of the incident;
- Date and time the incident occurred or was discovered;
- Name of the chemical/material released;
- Source and cause of the release;
- Total quantity discharged;
- Medium into which the substance was discharged;
- Amount spilled into water;
- Weather conditions;
- Name of the carrier or vessel, the railcar/truck number, or other identifying information;
- Number and type of injuries or fatalities;
- Whether an evacuation has occurred;
- Estimation of the dollar amount of property damage;
- Description of current and future cleanup actions; and
- Other agencies notified or about to be notified.

If construction stops in response to a fire, explosion, or release, the EC or designee shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. Immediately after an emergency, the EC or designee shall provide for storage or disposal of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

If the spill material is flammable, all ignition sources shall be controlled/disabled. Fire extinguishers will be on hand for immediate use. The following actions should be taken as needed:

- Clear the area;

- Keep unnecessary personnel away;
- Identify the spilled material and report to the Honeywell Resident Site Manager
- Develop a plan of action;
- Don additional protective equipment;
- Control the source of the spill;
- Dike or apply absorbent material to spill;
- Decontaminate area as necessary; and
- Decontaminate personnel.

The EC or designee shall ensure that, in the affected areas of the site:

- Waste that may be incompatible with the released material is not stored or disposed of until cleanup procedures are completed;
- Treatment or disposal of waste materials may not occur on site; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Material spills may occur during construction from excavation, truck loading, and vehicle accidents. Every effort will be made to prevent or minimize spilled groundwater discharge to the local surface waters.

Should an onsite spill of contaminated groundwater occur, the immediate response will include closing off the source of the spill, controlling the spilled material, application of a sorbent material or sand bagging, and street sweeping, as appropriate. The spill shall be collected as soon as possible, either manually or with equipment such as pumps. Ground material such as concrete or asphalt, which comes in contact with the spill, shall be cleaned as appropriate. Ground material that comes in contact with the spill that would not or cannot be cleaned will be removed for disposal and replaced with clean material. Removed materials that were in contact with the spilled contaminated groundwater will be stored in roll-off containers for characterization testing. The final disposition of these materials will be determined based on the test results. Spilled contaminated groundwater that is collected will be stored in the designated groundwater tanks and managed with the HMS extracted groundwater.

Records of all spills and releases will be documented in a log. The reported information described above will be included in the log.

## 6.4 Written Notifications

If the facility discharges more than 1,000 U.S. gallons of oil in a single discharge, or discharges more than 42 U.S. gallons of oil in each of two discharges that occur within any twelve-month period, into or upon navigable waters, a written report will be sent to the following address within 60 days of meeting the 1,000-gallon or 42-gallon criteria discussed above (this reporting criteria is consistent with 40 CFR 112.4):

### U.S. EPA – Region III

Office of Remediation, 3LC20  
1650 Arch Street  
Philadelphia, PA 19103  
Attn: Mr. Moshood Oduwole

A copy of this written report will also be sent to the following State agencies:

**Maryland Department of the Environment (MDE), Solid Waste Program**

1800 Washington Boulevard  
Baltimore, Maryland 21230  
Attn: Mr. Edward Dexter

**Maryland Department of the Environment (MDE), Land Management Administration –  
Oil Control Program**

1800 Washington Boulevard  
Baltimore, Maryland 21230  
Telephone: 410-537-3442

The written report will include the following information:

- Name and location of the facility and name of the owner/operator;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

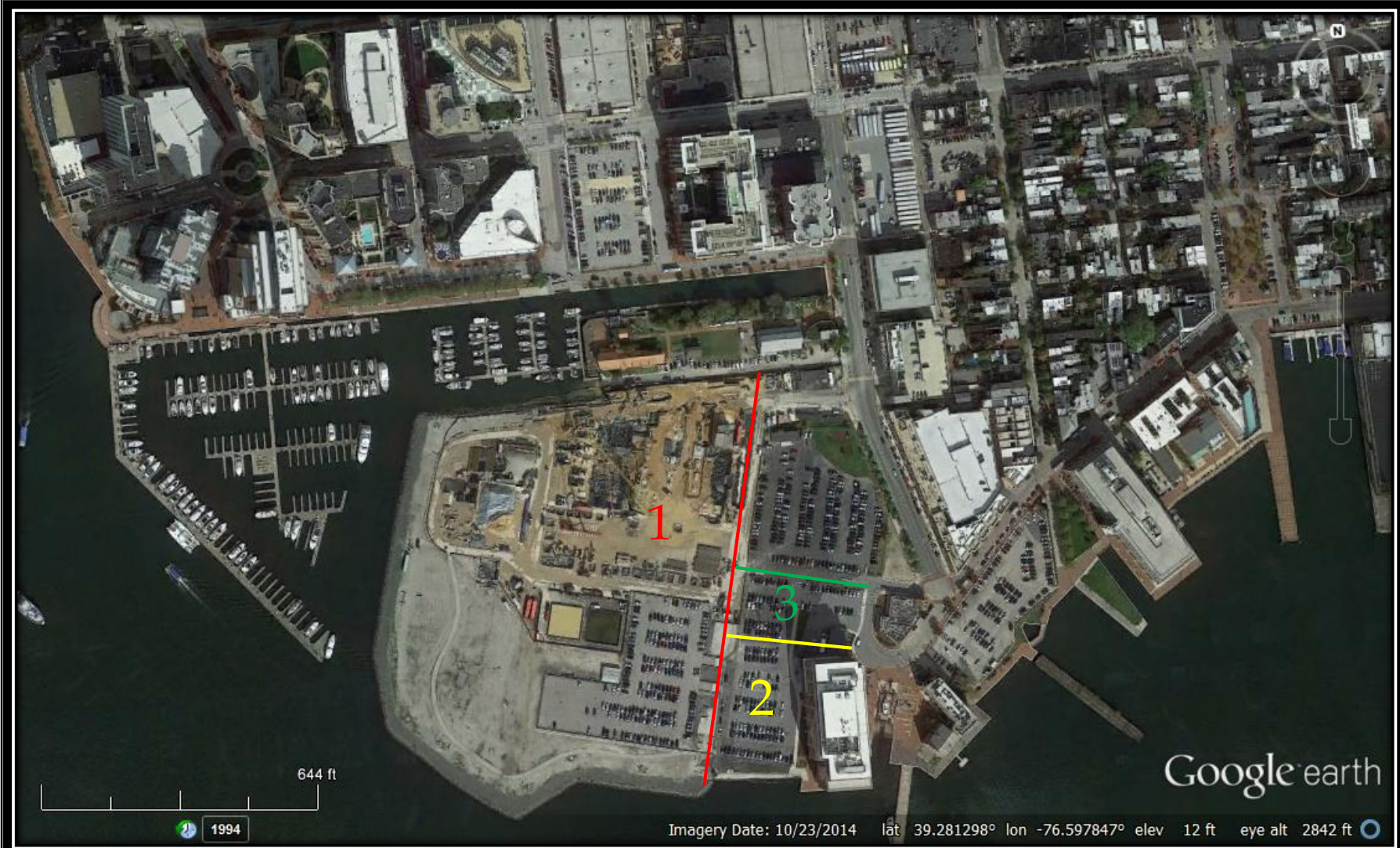
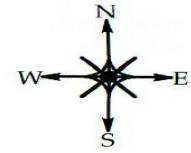


## **7. DISCHARGE PREVENTION MEASURES, CONTROLS AND COUNTERMEASURES POST CONSTRUCTION ACTIVITIES**

This SPRP is limited to construction-related activities. Once construction is completed, the current spill prevention control and countermeasures (SPCC) plan will continue to be employed at the site.

## **FIGURES**

**Figure 1**  
**Site Location Map**  
**Harbor Point**  
**Baltimore, Maryland**



- 1 - Area 1: Exelon Headquarters
- 2 - Area 2: Thames Street Wharf and Wills Wharf Office Buildings
- 3 - Area 3: Point Street Apartments