



ARM Group LLC

Engineers and Scientists

December 9, 2021

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

Re: Comment Response Letter:
Former Coke Oven Area (Parcel B10) –
Northeast Delineation Letter
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the following response to a comment provided by the Maryland Department of the Environment (MDE) via email on October 5, 2021 regarding the previous submission of the Northeast Delineation Letter (dated September 2, 2021) for the former Coke Oven Area (COA, the Site) of the TPA property located in Sparrows Point, Maryland.

The Northeast Delineation Letter Report has been revised and is provided accompanying this Comment Response Letter. The response to the USEPA's comment is given below; the original comment is included in italics with the response following.

- 1. Please submit the laboratory reports from this groundwater sampling event.*

The lab reports have been included as Attachment 3 in the revised submittal.

- 2. Fig. 3: SW14-PZM004 is more than 300' from CO05B-PZM and CO05D-PZM which had detections of NAPL - MDE does not agree that this area is defined to the north and west.*

Text has been updated. Additional delineation wells will be proposed as part of the CPA Combined Delineation Work Plan.

- 3. Is there any plan to further delineate the extent of DNAPL around CO212B-PZM. Historical wells located in the area are more than 300' away in most directions.*

Not at this time. For CMS purposes, the completed delineation around CO212B-PZM is sufficient.

- 4. Figures 3/4 and 5/6 show that the areas to the west and southwest of CO08-PZM005 and CO08-PZM036 are not defined.*

Text has been updated. Additional delineation wells will be proposed as part of the CPA Combined Delineation Plan.

5. *A solvent odor was identified in the soil boring log for CO05C-PZM. This location and any nearby wells should be sampled for full-suite VOCs to investigate potential for chlorinated solvents in groundwater.*

Full VOCs were run on the sample, although only benzene and naphthalene were included in the report. For CO05C-PZM, the only VOC detections were for benzene, naphthalene, acetone (14.1 µg/L), carbon disulfide (0.86 J µg/L), and toluene (0.47 J µg/L). All concentrations are below PALs. There were no CVOC detections for any sampling locations for TCE, PCE, 1,1,1-TCA, carbon tetrachloride, vinyl chloride, 1,1-DCA, 1-1-DCE, cis-1,2-DCE, and trans-1,2-DCE.

6. *MDE expects a more detailed discussion of the void identified in the soil boring log for CO05D-PZM from 17' - 23' bgs. Is this void the source of NAPL? Have there been attempts to pump this area?*

ARM field staff indicated that the drillers noted the rods progressed quickly at this depth, indicating a possible void or very soft clay. However, when placing sand for the filter pack, no additional sand was needed (when compared with other locations), indicating that if there was a void, it was not extensive. No pumping has been attempted on this well; however, it is proposed for transmissivity testing as part of the *Site-wide NAPL Transmissivity Work Plan* (dated September 1, 2021). Additional text has been added to the Northeast Delineation Letter Report.

7. *During the most recent conference call, ARM stated that they foresee submitting additional sampling for the area, but it seemed that it would focus more to the north of Cell 6. This report deems delineation sufficient to move forward with remedies in the CMS process; however MDE does not agree that groundwater contamination is fully delineated. Additional work is needed. Please let me know if you have any comments or questions.*

ARM is preparing a CPA Combined Delineation Plan, that covers the area to the north of Cell 6 as well as other areas. ARM has revised this Plan based on MDE's comments on this report.



If you have questions regarding any information covered in this document, please feel free to contact Peter Haid at Tradepoint Atlantic: 443-649-5055.

Respectfully Submitted,
ARM Group LLC



Kaye Guille, P.E., PMP
Staff Geologist



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

