



ARM Group LLC

Engineers and Scientists

November 11, 2021

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

Re: Comment Response Letter:
RADWP Addendum
Area B: Sub-Parcel B4-2
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 responses to comments received from the Maryland Department of the Environment (MDE) via email on October 14, 2021 regarding the Response and Development Work Plan (RADWP) Addendum (dated September 13, 2021) for Sub-Parcel B4-2 of the TPA property located in Sparrows Point, Maryland. Responses to the comments are given below; the original comments are included in italics with responses following. A revised RADWP Addendum (Revision 1) will be submitted following MDE concurrence with this Comment Response Letter.

1. *What are the plans for the rail line that bisects the two sections of this parcel (Northern and Southern)? This area is not included as part of this development plan, despite running completely through the area. Does this mean that the rail line will be fenced off from both sections, therefore the northern and southern sections will not be accessible from each other? What is the current construction of the rail line? Is it newly constructed and therefore built within VCP capping specifications? Or is it historical with exposed slag construction? The Agencies will determine if this would be acceptable for a remedy decision based on responses so please be as detailed as possible.*

The rail line is historical, with slag ballast construction. Therefore, the rail line between the northern and southern portions of the Sub-Parcel will be fenced on either side to prevent Composite worker exposure. The rail spur is a controlled workspace with stringent access restrictions and work requirements as tracked and monitored the Federal Railroad Administration.

Access to the controlled workspace will be limited to those workers who have been trained under the rail related requirements of Title 49 of the Code of Federal Regulations (CFR) for on-track safety. On-track safety means a state of freedom from the danger of being struck by a moving railroad train or other railroad equipment, provided by operating and safety rules that govern track occupancy by personnel, trains and on-track equipment. Training and testing per 49 CFR 214.343 is required annually for Tradepoint Rail (TPR) personnel and all those required to complete work on rail lines. They must also abide by the TPR Worker Protection Program prepared in accordance with 49 CFR 217.307 and approved by the FRA. When TPR or other, outside personnel are required to be on the tracks for inspections or repairs, flagging is implemented in accordance with 49 CFR 218.37.

Note that, even though the northern and southern portions of the development area are noncontiguous and not accessible from each other, they will be treated as the same Sub-Parcel.

2. *Provide a schedule of work for this addendum.*

An implementation schedule has been added to the Addendum.

3. *Page 1. The detail regarding remedy details being provided in B4-2 RADWP, Rev. 1 is vague. Is this statement saying that the remedy details that were provided in the B4-2 RADWP, Rev. 1 are the same as those being proposed for the additional development area detailed in this addendum? This should be explicitly spelled out if the expectation is that the B4-2 RADWP, Rev. 1 is to be referenced for those details.*

Yes, environmental capping and corresponding institutional controls were proposed as the surface engineering control for the northern portion of Sub-Parcel B4-2 in the RADWP (Revision 1 dated September 22, 2020). The RADWP Addendum proposes the same capping and institutional controls for the southern portion of the Sub-Parcel. Following development of both portions of the Sub-Parcel, a Development Completion Report and Institutional Controls and Operations & Maintenance Plan will be completed for the Sub-Parcel as a whole.

4. *Provide more details in the introduction regarding the proposed use of this added development area.*

Like the northern portion of the Sub-Parcel, the southern portion is intended for use as an Automotive Roll-On, Roll-Off (RORO) Distribution Center. This language has been added to the Addendum.

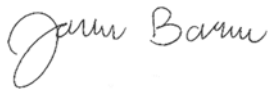


5. *Page 3. This page states that NAPL was not detected within the addendum (southern) development area. This is untrue. NAPL was observed in both B18-034-SB and B18-074-SB. Provide a proposed utility figure that underlays soil and groundwater sample locations, with results provided. Make sure to depict NAPL locations. Add a discussion of proposed utilities and potential for encountering groundwater.*

NAPL was observed in both B18-034-SB and B18-074-SB. This has been added to the revised Addendum. **Figure 6** has been added to show the locations of these NAPL observations and language has been added to the text to discuss contingency measures to address the potential presence of NAPL that could be encountered during construction. Discussion of proposed utilities and potential for encountering groundwater has been added to the text.

If you have questions regarding any information covered in this document, please feel free to contact ARM Group LLC at (410) 290-7775.

Respectfully Submitted,
ARM Group LLC



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