



ARM Group Inc.

Engineers and Scientists

December 14, 2018

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

Re: Response and Development Work Plan
Addendum
Area B: Sub-Parcel B5-1
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group Inc. (ARM) has prepared this Response and Development Work Plan (RADWP) Addendum to address minor changes to the proposed development area and the interim capping remedies within Area B: Sub-Parcel B5-1 (the Site). The most recent RADWP (Revision 3) dated September 27, 2017 was approved by the Maryland Department of the Environment (MDE) on July 19, 2017 and the United States Environmental Protection Agency (USEPA) on October 12, 2017. On July 12, 2018, an Addendum to the RADWP (Revision 2) was submitted and then approved by the MDE in an email dated July 25, 2018. This new RADWP Addendum provides details regarding a minor update to the Site boundary resulting from nearby development to the north, and additional revisions to the interim capping remedies that have been approved on the Site. Based on the nature of these revisions, the RADWP itself will not be updated, but this RADWP Addendum serves the purpose of documenting pertinent updates to the development plan.

In the agency-approved RADWP, Sub-Parcel B5-1 was proposed to be approximately 124 acres and included six buildings. As can be seen on **Figure 1**, this original proposed development boundary overlaps with the more recent development areas designated as Logistic Center XII and Sub-Parcel B2-2 (Logistics Center X) along the northern Site boundary. There are approximately 11.5 acres of overlap between the original Sub-Parcel B5-1 boundary and the two Logistic Centers to the north. To eliminate this overlap at the northern boundary, the proposed area of Sub-Parcel B5-1 has been reduced to approximately 112.5 total acres as can be seen on **Figure 2**. To achieve this, the two northernmost buildings proposed within Sub-Parcel B5-1 have been removed from the plans. Between the proposed Logistic Centers X and XII and the current edge of pavement at the northern end of ongoing construction on Sub-Parcel B5-1, there

is an approximately 100-foot wide void space of unpaved land which is highlighted on **Figure 3**. Tradepoint Atlantic intends to install a segment of temporary fence near the edge of the existing asphalt (north of the two central buildings) in the short term. The temporary fence will define the interim northern boundary of the Site and restrict access to the uncapped area while development continues for Sub-Parcel B5-1 and the two Logistics Centers to the north. The void space will ultimately be capped by permanent surface engineering controls, which will be installed in accordance with the requirements of the MDE's Voluntary Cleanup Program (VCP).

At this time, the two central buildings on Sub-Parcel B5-1 have been completed, including a permanent capping remedy consisting of asphalt paving immediately around the two buildings. An interim remedy consisting of 4 inches of MDE-approved crushed concrete shall be placed on the remaining portions to the far east and west. The majority of the eastern quadrant of the southern portion of the Site has been paved with asphalt. The remaining areas of the incomplete southern portion of the Site shall be covered with an interim remedy consisting of a layer of 4 inches of MDE-approved crushed concrete, except as noted below. This new RADWP Addendum addresses certain changes to the interim capping remedy in the southern region of the Site that are a result of a separate project that will be implemented to the south of the Site.

Directly to the south of the Site, work on the A-Yard Limited-Scope Project Plan (LSPP) will commence in the near future. This project includes approximately 18 acres of a heavy duty bituminous concrete pavement area with a cross section consisting of a combined 4 inches of bituminous concrete surface and binder overlying 12 inches of aggregate base. The LSPP for the A-Yard was approved by the agencies via email on September 5, 2018. There are approximately 2.2 acres of overlap between the area to be paved for the A-Yard and the southern portion of Sub-Parcel B5-1 as can be seen on **Figure 3** included with this RADWP Addendum. Therefore, the interim capping remedy for the southern region of Sub-Parcel B5-1 needs to be amended to accommodate for this overlap. The paving thicknesses being implemented in the A-Yard meet the requirements for surface engineering controls outlined in the approved Sub-Parcel B5-1 RADWP (Revision 3). This ensures that the proposed change in the interim capping remedy from crushed concrete to pavement in the overlapping area will still meet both the short-term and long-term goals for protecting Composite Workers against potential risks.

The revised development boundary and interim capping remedy do not necessitate any significant adjustments or any revisions in the text of the approved Sub-Parcel B5-1 RADWP (Revision 3). The development implementation protocols and oversight requirements, etc. will remain the same as in the approved version of the RADWP. Additional utilities that are proposed to be installed from the A-Yard through the southern portion of Sub-Parcel B5-1 (covered by interim remedies) were addressed by the approved LSPP and will be installed in accordance with that plan.



If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group Inc. at 410-290-7775.

Respectfully submitted,
ARM Group Inc.



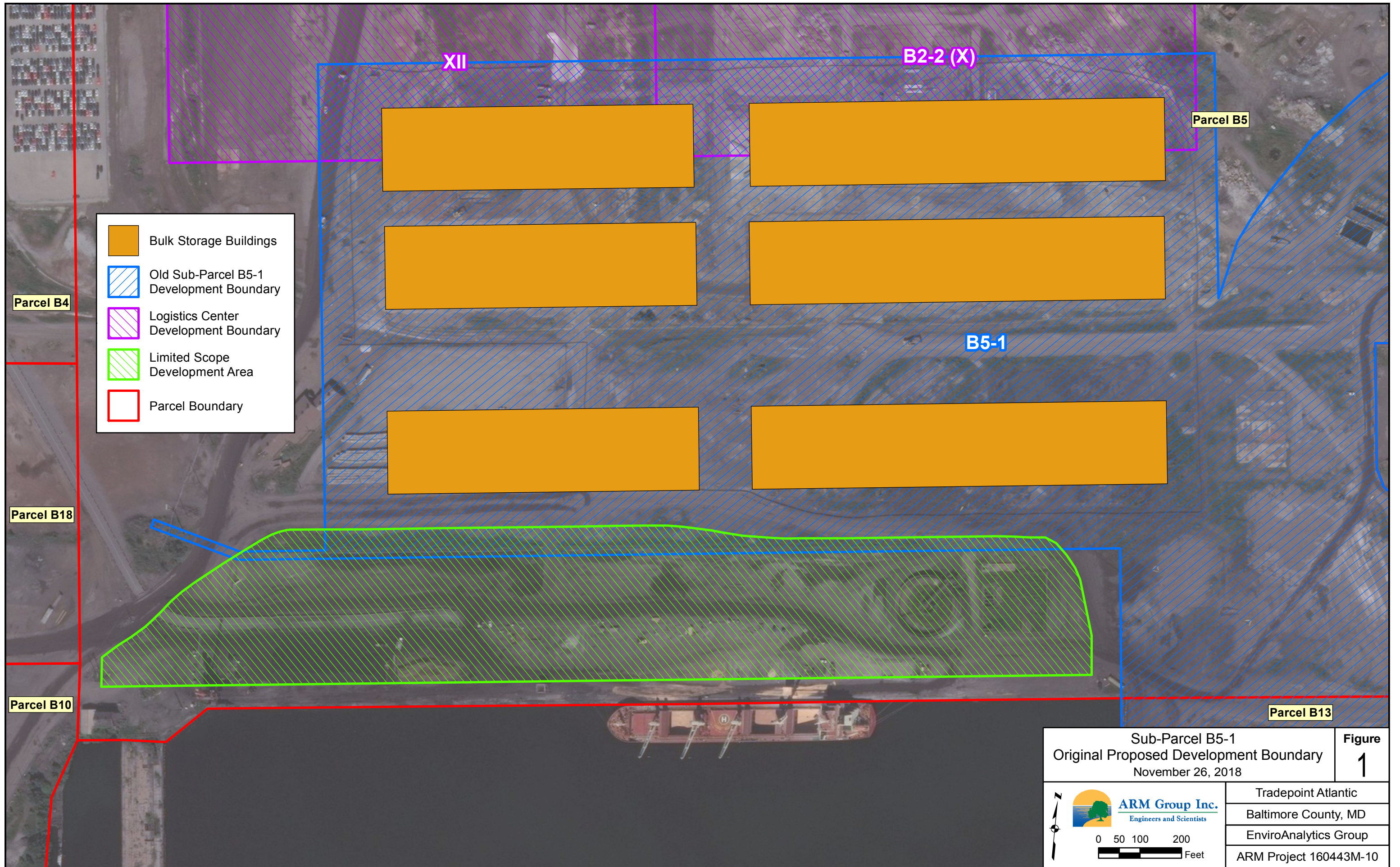
Taylor R. Smith
Project Engineer










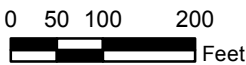
T. Neil Peters, P.E.
Senior Vice President

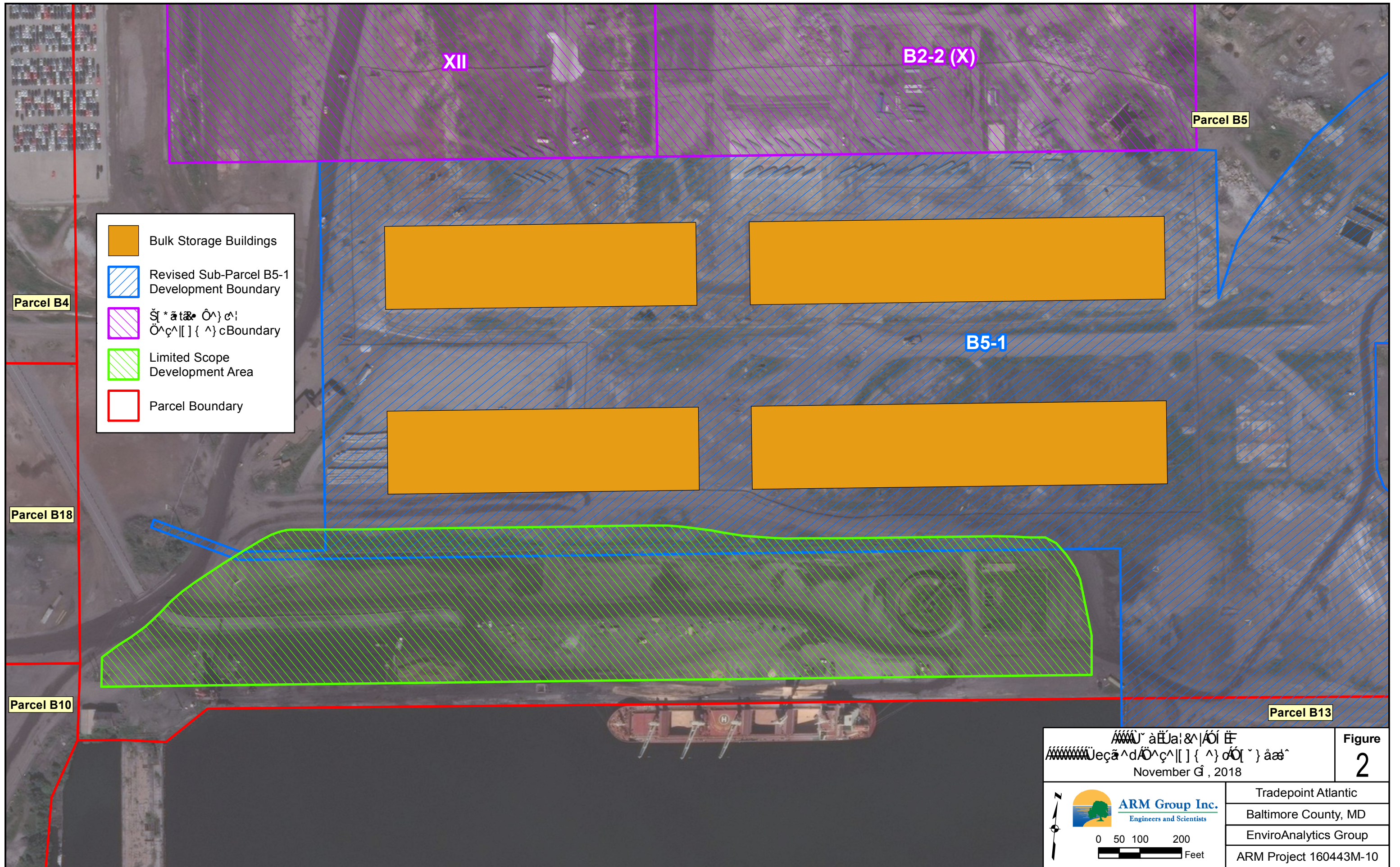







FIGURES




-  Bulk Storage Buildings
-  Old Sub-Parcel B5-1 Development Boundary
-  Logistics Center Development Boundary
-  Limited Scope Development Area
-  Parcel Boundary

Sub-Parcel B5-1 Original Proposed Development Boundary November 26, 2018		Figure 1
  ARM Group Inc. Engineers and Scientists	Tradepoint Atlantic Baltimore County, MD EnviroAnalytics Group ARM Project 160443M-10	
		



-  Bulk Storage Buildings
-  Revised Sub-Parcel B5-1 Development Boundary
-  Parcel Boundary
-  Limited Scope Development Area
-  Parcel Boundary

November 6, 2018		Figure 2
		
Tradepoint Atlantic Baltimore County, MD EnviroAnalytics Group		ARM Project 160443M-10
