

TRUCK SCALE AND UTILITY REDEVELOPMENT WORK PLAN

AREA A: PARCEL A2
TRADEPOINT ATLANTIC
SPARROWS POINT, MARYLAND

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1.0 INTRODUCTION AND SITE DESCRIPTION

ARM Group Inc. (ARM), in conjunction with EnviroAnalytics Group (EAG), has prepared this Truck Scale and Utility Redevelopment Work Plan for a portion of the Tradepoint Atlantic property that occurs within Area A: Parcel A2 (the Site). Parcel A2 is comprised of 41 acres of the approximately 3,100-acre former steel making facility (**Figure 1**), bounded to the south and east by the Baltimore Beltway. Parcel A2 is partially occupied by the Reservoir Road Warehouse and DACS Building. The remainder of the Site is occupied by roads or undeveloped areas comprised of open space and woods.

According to the Phase I Environmental Site Assessment (ESA) prepared by Weaver Boos Consultants dated May 19, 2014, the Reservoir Road Warehouse was formerly used for material storage of refractory supplies, electrical materials, and other parts. This report stated that the DACS Building (also called the In Process Storage Building) was formerly used for storage of materials, most notably several drums containing lubricants. Improvements have been made in the DACS Building and are expected for the Reservoir Road Warehouse. The Reservoir Road Warehouse has been leased for commercial use, and exterior facility improvements are planned to enable the immediate use of this facility.

This Redevelopment Work Plan is intended to support the construction of a new truck scale outside of the Reservoir Road Warehouse, as well as a 4-inch potable water line for a sprinkler system. The approximate positions of these facility improvements are indicated in **Figure 2**. Tradepoint Atlantic has submitted a letter (**Appendix A**) requesting an expedited review to achieve construction deadlines for the proposed redevelopment on this Site. Facility improvements approved and installed as part of this Work Plan shall be described in a Parcel A2 Construction Completion Report submitted to the agencies. Required response actions associated with the greater Parcel A2 or any future construction work will be addressed in a separate Response and Development Work Plan (or similar) to be submitted in the future.

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (effective September 12, 2014); and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (effective November 25, 2014).

An application to enter the Tradepoint Atlantic property into the Maryland Department of the Environment Voluntary Cleanup Program (MDE-VCP) was submitted to MDE on September 10, 2014. Parcel A2 is part of the acreage that was removed (Carveout Area) from inclusion in the Multimedia Consent Decree between Bethlehem Steel Corporation, the United States Environmental Protection Agency (USEPA), and the Maryland Department of the Environment (MDE) (effective October 8, 1997) as documented in correspondence received from USEPA on September 12, 2014. Based on this agreement, USEPA determined that no further investigation or corrective measures will be required under the terms of the Consent Decree for the Carveout Area. However, the SA reflects that the property within the Carveout Area will remain subject to the USEPA's RCRA Corrective Action authorities.

2.0 ENVIRONMENTAL SITE ASSESSMENT RESULTS

2.1. PHASE I ENVIRONMENTAL SITE ASSESSMENT RESULTS

A Phase I Environmental Site Assessment (ESA) was completed by Weaver Boos Consultants for the entire Sparrows Point property on May 19, 2014. Weaver Boos completed site visits of Sparrows Point from February 19 through 21, 2014, for the purpose of characterizing current conditions at the former steel plant. The Phase I ESA identified particular features across the Tradepoint Atlantic property that presented potential risks to the environment. These Recognized Environmental Conditions (RECs) included buildings and process areas where releases of hazardous substances and/or petroleum products potentially may have occurred. The Phase I ESA also relied upon findings identified during a previous visual site inspection (VSI) conducted as part of the RCRA Facility Assessment (RFA) prepared by A.T. Kearney, Inc. dated August 1993, for the purpose of identifying Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) on the property. This 1991 VSI is regularly cited in the Description of Current Conditions (DCC) report prepared by Rust Environmental and Infrastructure, dated January 1998 (included with Weaver Boos' Phase I ESA). Weaver Boos' distinction of a REC or Non-REC was based upon the findings of the DCC Report (which was prepared when the features remained on-site in 1998) or on observations of the general area during their site visit. Weaver Boos made the determination to identify a feature as a REC based on historical information, observations during the site visit, and prior knowledge and experience with similar facilities. There were no RECs identified within the Parcel A2 boundaries.

Relevant SWMUs and AOCs were also identified as located in Figure 3-1 from the DCC Report. This figure generally shows the SWMUs, AOCs, and main facility areas within the property boundaries. There were no SWMUs or AOCs identified within the Parcel A2 boundaries.

2.2. PHASE II INVESTIGATION RESULTS – PARCEL A2

A Phase II Investigation for soil, groundwater, and sub-slab soil gas conditions was performed for the Site in accordance with the requirements outlined in the ACO as further described in the approved Phase II Investigation Work Plan – Area A: Parcel A2 dated September 15, 2015. The complete findings from Phase II Investigation are presented in the Phase II Investigation Report – Area A: Parcel A2 (Revision 2) dated December 19, 2016.

A total of 50 soil samples (from the 23 boring locations shown in **Figure 3**) were collected between September 15 and November 5, 2015 and analyzed to assess the presence or absence of contamination in Parcel A2.

A total of four shallow groundwater samples were collected from temporary groundwater sample collection points in Parcel A2 to assess groundwater conditions. The sample collection points were also surveyed and gauged to develop a potentiometric map for the Site. The locations of

the shallow groundwater sample points are shown on **Figure 4**, along with the groundwater elevation contours developed from gauging measurements collected on January 11, 2016.

A total of 18 sub-slab temporary monitoring probes were installed at the locations provided on **Figure 5** to collect sub-slab soil gas samples below the Reservoir Warehouse and DACS Building. The Reservoir Warehouse consists of approximately 290,000 square feet and the DACS Building consists of approximately 60,000 square feet.

2.2.1. Summary of Soil Sample Results

Exposures to surface and subsurface soils will occur during the construction of the proposed facility improvements. Soil sample results from Parcel A2 were screened against Project Action Limits (PALs) established in the site-wide Quality Assurance Project Plan (QAPP) dated April 5, 2016 (or other direct guidance from the agencies) to identify any exceedances based on EPA's Regional Screening Levels (RSLs) for the Composite Worker exposure to soil. The Composite Worker is defined by the USEPA as a long-term receptor exposed during the work day who is a full time employee that spends most of the workday conducting maintenance activities (which typically involve on-site exposures to surface soils) outdoors. **Table 1** and **Table 2** provide a summary of the detected organic compounds and inorganics in the soil samples submitted for laboratory analysis, and **Figure 6** and **Figure 7** present a summary of the soil sample results that exceeded the PALs. Any compound for which any result was identified above the soil PAL was identified as an exceedance. PAL exceedances in soil within Parcel A2 were limited to four metals (arsenic, manganese, lead, and hexavalent chromium) and four SVOCs (benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, and dibenz[a,h]anthracene).

2.2.2. Summary of Groundwater Results

Construction Workers will not be exposed to groundwater since the excavations for the construction of the truck scale and water line are not expected to intersect with the groundwater table (estimated water table depth of approximately 5 feet bgs). Groundwater data were screened against the PALs established in the QAPP (or other direct guidance from the agencies), and the complete results are presented in the Phase II Investigation Report – Area A: Parcel A2 (Revision 2) dated December 19, 2016. PAL exceedances in shallow groundwater within Parcel A2 consisted of four inorganic compounds (dissolved arsenic, dissolved cobalt, dissolved iron, and dissolved manganese), one SVOC (1,4-dioxane), and Oil & Grease. Each groundwater collection point was inspected for evidence of non-aqueous phase liquid (NAPL) using an oil-water interface probe prior to sampling, and no measureable NAPL was detected during any of the gauging events.

2.2.3. Sub-Slab Soil Gas Investigation

The purpose of the investigation was to verify that conditions within, below, and around the building do not pose a potentially unacceptable risk to future commercial workers occupying the enclosed spaces of the Reservoir Road Warehouse and DACS Building. Sub-slab soil gas data were screened against the PALs established in the QAPP, and the complete results are presented in the Phase II Investigation Report – Area A: Parcel A2 (Revision 2) dated December 19, 2016. None of the VOC detections exceeded the applicable PALs in the sub-slab soil gas samples, and no construction work will be completed within the enclosed buildings.

2.3. HUMAN HEALTH SCREENING LEVEL RISK ANALYSIS (SLRA)

A human health Screening Level Risk Analysis (SLRA) was performed for soils in Parcel A2 to determine potential future risks to Composite Workers and Construction Workers. There is no potential for human exposure to groundwater for a Composite Worker since groundwater is not used on the Tradepoint Atlantic property (and is not proposed to be utilized). The Construction Worker will not be exposed to groundwater since the excavations for the construction of the truck scale and water line are not expected to intersect with the groundwater table. No elevated concentrations of VOCs were identified above the PALs in any sub-slab soil gas samples, so potential risks from exposures to vapor are expected to be negligible, and no work will be completed within the existing enclosed buildings.

2.3.1. Analysis Process

The SLRA has been conducted for soils to further evaluate the Site conditions in support of the design of necessary response measures. The SLRA included the evaluation process described in the Phase II Investigation Report – Area A: Parcel A2 (Revision 2) dated December 19, 2016. Compounds that are present at concentrations at or above the EPA Regional Screening Levels (RSLs) set at a target cancer risk of $1E-6$ or target non-cancer Hazard Quotient (HQ) of 0.1 were identified as constituents of potential concern (COPCs) to be included in the SLRA. Parcel A2 (40.6 ac) consisted of one single exposure unit (EU) inclusive of the entire Site.

The complete risk assessment process is provided in the Phase II Investigation Report, with one update: Although the PALs (discussed in preceding sections) remain unchanged, the COPC screening levels for PAHs were modified for the SLRA based on the USEPA Integrated Risk Information System (IRIS) Recent Additions for benzo[a]pyrene dated January 19, 2017 with adjustments for PAH relative potency factors.

2.3.2. Parcel A2 SLRA Results and Risk Characterization

Soil data were divided into three datasets (surface, subsurface, and pooled) for the Parcel A2 exposure unit to evaluate potential current and future exposure scenarios. The current Composite Worker will be exposed only to surface soils. However, if construction activities were to result in the placement of subsurface material over existing surface soils, a future Composite Worker could be exposed to a mixture of surface and subsurface soils. In Parcel A2, all excavated soils will be properly transported to an appropriate permitted disposal facility, so exposures to subsurface soils will not be created by this proposed work. The Construction Worker will be exposed to both surface and subsurface soils (i.e., pooled) during excavation and utility trenching/installation.

Exposure point concentrations (EPCs) were calculated for each soil dataset (i.e., surface, subsurface, and pooled surface/subsurface) using the ProUCL software (version 5.0) developed by the USEPA. The EPCs for lead are the average (i.e., arithmetic mean) values for each dataset. The average lead concentrations are presented for each dataset in **Table 3**. ProUCL input table and output tables derived from the data for each COPC in soils are provided in the Parcel A2 Phase II Report. The calculated EPCs are shown in **Table 4** (surface soils) and **Table 5** (subsurface soils). **Table 6** presents the supplemental EPCs generated from the pooled surface and subsurface soils for the site-wide EU. The EPCs presented herein are based on site-wide data for Parcel A2. It should be noted that the area of work will be limited to the area in front of the Reservoir Road Warehouse (**Figure 2**), in the vicinity of two Phase II Investigation borings (A2-012-SB and A2-032-SB). The observed impacts at these boring locations were negligible. Therefore, the risk assessment presented herein is believed to be overly conservative.

As indicated on **Table 3**, neither surface, subsurface, nor pooled soils exceeded an average lead value of 800 mg/kg. The screening criterion for lead was set at an exposure unit arithmetic mean of 800 mg/kg based on the RSL, with a secondary limit of 2,737 mg/kg based on the Adult Lead Model developed by the USEPA (corresponding to a 5% probability of a blood lead level of 10 ug/dL). There were no locations where detections of lead exceeded 10,000 mg/kg.

There were no soil exceedances of the Oil & Grease PAL (6,200 mg/kg) or evidence of possible NAPL in any soil cores which would warrant additional evaluation. None of the detections of PCBs exceeded any of the applicable PALs.

Composite Worker Assessment:

Risk ratios for the estimates of potential EPCs for the Composite Worker scenario are shown in **Table 7** (surface), **Table 8** (subsurface), and **Table 9** (pooled surface and subsurface soils). The results are summarized as follows:

Worker Scenario	Medium	Hazard Index (>1)	Total Cancer Risk
Composite Worker	Surface Soil	none	5E-6
	Subsurface Soil	Nervous System = 2	3E-6
	Surface & Subsurface Soil	none	3E-6

The current Composite Worker will be exposed only to surface soils. The risk ratios indicate that the cumulative cancer risk for the Composite Worker exposure to surface soils was less than the acceptable risk criterion identified in the Risk Characterization Approach for no further action (1E-5). When the non-cancer risks were segregated and summed by target organ for cumulative Hazard Index (HI), no target organ exceeded a cumulative HI of 1 in surface soils. The calculated total cancer risk and cumulative HI for a Composite Worker exposed to surface soils demonstrated acceptable risk conditions (did not exceed the regulatory standards) as identified in the Risk Characterization Approach.

Construction activities could result in the placement of subsurface material over existing surface soils exposing a future Composite Worker to a mixture of surface and subsurface soils. The risk ratios indicate that the cumulative cancer risks for the Composite Worker scenario were equal to 3E-6 for subsurface soils (and pooled soils) in the parcel. An elevated hazard above the HI of 1 was calculated for the nervous system (HI=2) due to elevated manganese for a potential future Composite Worker exposure to subsurface soils. No other target organs exceeded a cumulative HI of 1 in subsurface soils. This elevated hazard for the subsurface was mitigated in the pooled soil dataset. This evaluation indicates that unacceptable Composite Worker risk could potentially be caused by the placement of a significant volume of subsurface material (from below 1-foot bgs) to the surface. To address the potential risk from this scenario, this Redevelopment Work Plan specifies that no excavated material will be replaced on-site during the truck scale or water line construction. Therefore, the Composite Worker risks will not be impacted by the proposed work. Required response actions associated with any future construction work would be addressed in a separate Response and Development Work Plan (or similar) for that work.

Construction Worker Assessment:

Risk ratios have been calculated for the estimates of potential EPCs for the Construction Worker scenario for the anticipated schedule for the proposed project (30-day exposure frequency). These risk ratios are shown in **Table 10** (surface), **Table 11** (subsurface), and **Table 12** (pooled surface and subsurface soils). The variables entered for calculation of site-specific Soil Screening Levels (SSLs) (EU area, input assumptions, and exposure frequency) are indicated as notes on the tables. The spreadsheets used for computation of the site-specific 30-day Construction Worker SSLs are included as **Appendix B**. The results are summarized as follows:

Worker Scenario	Medium	Hazard Index (>1)	Total Cancer Risk
Construction Worker (30 work day schedule)	Surface Soil	none	1E-7
	Subsurface Soil	none	6E-8
	Surface & Subsurface Soil	none	7E-8

The Construction Worker may be exposed to only surface soils or a combination of surface and subsurface soils (i.e. pooled) during the proposed excavation and utility trenching/installation activities. There were no elevated screening level estimates of Construction Worker cancer risk above the acceptable risk criterion of 1E-5 for the site-specific 30-day exposure frequency. In addition, none of the non-carcinogens caused a cumulative HI to exceed 1 for any target organ system for surface, subsurface, or pooled soils using the 30-day exposure frequency. This assessment indicates that site-specific health and safety protocols or further action are not required for the proposed schedule of construction for intrusive activities. Therefore, additional worker protective measures beyond standard level D protection are not necessary for the intrusive redevelopment work planned at this time for Parcel A2.

3.0 PROPOSED SITE REDEVELOPMENT PLAN

Tradepoint Atlantic is proposing to construct a truck scale and water line on Parcel A2 in the vicinity of the Reservoir Road Warehouse. The focus of this document is the construction of these features to support the immediate use of the parcel. The proposed future use of the parcel is Tier 3B – Restricted Industrial.

Certain compounds (organics and inorganics) are present in soils located near the surface at concentrations in excess of the PALs established in the QAPP (set based on USEPA’s RSLs for industrial soils or other direct guidance from the agencies). Therefore, soil is considered a potential media of concern. Construction Workers may contact impacted surface and subsurface soil during earth movement activities associated with construction. The proposed health and safety controls outlined in Section 4 and the site-specific Health and Safety Plan (HASP) will mitigate the potential risk to Construction Workers from contacting impacted soils at the Site.

No significant groundwater impacts were identified in Parcel A2. While concentrations of PAL exceedances in groundwater on site are not deemed to be a human health hazard since there is no groundwater use, proper water management is required to prevent unacceptable discharges or risks to Construction Workers. Excavations completed for the construction of the truck scale and water line are not expected to intersect with the groundwater table, so no special management protocols will be established for groundwater. However, if groundwater is encountered, the proposed health and safety controls outlined in Section 4 and the site-specific HASP will mitigate the potential risk to Construction Workers from contacting impacted groundwater.

Approximately 0.1 acres (<1% of Parcel A2) will be covered by the new truck scale, and the water line connection for the sprinkler system has an initial estimated length of approximately 100 linear feet. The approximate locations of the facility improvements (truck scale and water line) are indicated in **Appendix C** and **Figure 2**. The remaining areas of Parcel A2 will remain in their current condition and will be subject to institutional controls to prevent future adult workers and visitors from contacting impacted soil at the Site (addressed in the Parcel A2 Phase II Investigation Report dated December 19, 2016, which was submitted to the agencies for review). The existing Reservoir Road Warehouse and DACS Building will be retained and will cover 8.0 acres (or 20%) of Parcel A2. The existing access roadways will also remain, and will cover 3.4 acres (or 8%) of the parcel.

The process of constructing the proposed facility improvements involves the tasks listed below. As-built and regulatory documentation for the outlined tasks and procedures will be provided in a Parcel A2 Construction Completion Report:

1. Sediment and erosion control installation for redevelopment.

Installation of erosion and sediment controls will be completed prior to any construction at the Site. Any soils which are disturbed during the installation of erosion and sediment controls will be removed from the Site for proper disposal.

2. Grading and site preparation

Site grading activities will be minimal, with no major excavations planned. Any material that is not suitable for compaction below the truck scale will be excavated and replaced with subbase material, although it is not anticipated that poor soils will be encountered. Borrow materials will be obtained from MDE-approved common borrow-site stockpiles or processed slag aggregate, if necessary, and shall be free of organic material, frozen material, or other deleterious material. In the case that there is excess material, the spoils will be stockpiled at a suitable location in accordance with the Materials Management Plan (MMP) for the Sparrows Point Facility (Papadopoulos & Associates, et al., June 17, 2015). This work will be coordinated with MDE accordingly. No excess material will leave the 3,100 acre property without prior approval from MDE.

3. Installation of underground utility structures

Underground utility work will be completed in association with the construction of the sprinkler water line. Soil from the utility trenching excavation will be removed from the Site for proper disposal. Groundwater is not expected to be encountered, and dewatering is not anticipated. The location of the proposed underground utility has been provided in the Redevelopment Plan Drawings (**Appendix C**) and **Figure 2**.

4. Placement of subbase and paving

Following the completion of any preparatory work, placement of subbase will commence. The truck scale will receive a layer of subbase material, which will consist of processed slag or a replacement aggregate material.

5. Stormwater management

No new stormwater facilities are proposed for construction at the Site during this redevelopment activity, but stormwater will be managed in accordance with a master plan for the Tradepoint Atlantic property. Stormwater from Parcel A2 will be conveyed to a stormwater management facility on the property to be determined. Tradepoint Atlantic plans to submit a master stormwater management plan to Baltimore County that describes the new stormwater management facilities. The new stormwater management facilities will discharge to existing stormwater outfalls permitted under the current industrial stormwater NPDES permit.

4.0 REDEVELOPMENT IMPLEMENTATION PROTOCOLS

This plan presents protocols for the handling of soils and fill-materials in association with construction of the truck scale and sprinkler water line in Parcel A2. In particular, this plan highlights the minimum standards for construction practices and managing potentially contaminated materials to reduce potential risks to workers and the environment.

Several soil and groundwater samples have been identified across the parcel with constituent concentrations that are above the PALs, although the two soil borings in the vicinity of the construction area had negligible detections of most analytes, and only one exceedance of the PAL (arsenic at 4.1 mg/kg in A2-032-SB-4). Because PAL exceedances can present potential risks to human health and the environment at certain concentrations, this plan presents material management and other protocols to be followed during the work to adequately mitigate such potential risks for encountered material. Following completion of the SLRA, the screening level estimates of Construction Worker cancer risks for the site-specific exposure frequency (30 days) were all less than 1E-5 (the acceptable level for no further action). Furthermore, none of the potential non-cancer hazards were elevated above the HI of 1 for any exposure scenario when the schedule for intrusive construction activities was assessed at 30 days. Therefore, general worker protective controls (Level D) and health and safety measures will be sufficient for the proposed redevelopment, with no additional site-specific requirements.

4.1. SOIL EXCAVATION AND UTILITY TRENCHING

A pre-excavation meeting shall be held to address proper operating procedures for working on-site and monitoring excavations and utility trenching in potentially contaminated material. This meeting shall consist of the construction manager and any workers involved with excavation and/or utility work. During the pre-excavation meeting, all workers shall review the proposed excavation and trenching locations and associated utility inverts. The site-specific Health and Safety Plan for the project shall also be reviewed and discussed.

The Environmental Professional (EP) will monitor soil excavation activities and utility trenching/installation. To the extent practical, all excavation activities should be conducted in a manner to minimize double or extra handling of materials. Any stockpiles shall be kept within the Site footprint, and in a location that is not subjected to concentrated stormwater runoff. Stockpiles shall be managed as necessary to prevent the erosion and off-site migration of stockpiled materials, and in accordance with the applicable provisions of the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. Excavated soil should be placed on polyethylene and covered with polyethylene to minimize potential exposures and erosion when not in use. Stockpiled materials will be sampled in accordance with waste disposal requirements, and properly transported to an appropriate permitted disposal facility.

Utility trenches are to be over-excavated to a minimum of one foot on all sides of the proposed utility. All utility trenches will be backfilled with bedding and backfill materials meeting the MDE definition of clean fill. Mobilization of potential petroleum is not expected to be an issue at this Site based on existing investigative data. However, additional preventative measures will be required if evidence of petroleum contamination is encountered to prevent the discharge of petroleum product or sheen associated with the installation of the utility system. Contingency measures have been developed to ensure that utilities will be constructed in a manner that will prevent the migration of any encountered total petroleum hydrocarbons (TPH)/Oil & Grease, and that excavated material will be properly managed. The Utility Excavation NAPL Contingency Plan (**Appendix D**) provides protocols and procedures to delineate elevated TPH/Oil & Grease and prevent mobilization of NAPL along the utility if NAPL is encountered during the construction activities.

The EP will monitor all soil excavation activities for signs of potential contamination that may not have been previously identified. In particular, soils will be monitored with a hand-held PID for potential VOCs, and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of contamination that may be different than what was already characterized. If screening of excavated materials by the EP indicates the presence of conditions of potential concern (i.e., sustained PID readings greater than 100 ppm, visual staining, unsuitable waste materials, etc.), such materials shall be segregated for additional sampling and special management. Excavated material that is visibly stained or impacted by NAPL will be segregated and managed in accordance with the requirements specified in the Utility Excavation NAPL Contingency Plan. The MDE will be notified if such materials are encountered during utility work.

4.2. SOIL SAMPLING AND DISPOSAL

All stockpiled materials will be sampled in accordance with waste disposal requirements, and properly transported to an appropriate permitted disposal facility. Excavated materials that are determined by the EP to warrant sampling and analysis because of elevated PID readings or other indicators of potential contamination that has not previously been characterized shall be sampled and analyzed to determine how the materials should be managed. In this case, a sampling work plan including a description of the material, estimated volume and sampling parameters will be submitted and approved by MDE.

If sampling indicates that the stockpiled material is a hazardous waste, then such materials shall be shipped off-site in accordance with applicable regulations to an appropriate and permitted RCRA disposal facility. The quantities of all materials that require disposal either off-site or at the on-site landfill (Greys), if any, will be recorded and identified in the Parcel A2 Construction Completion Report.

4.3. FILL

Processed slag aggregate from the Tradepoint property will be used as compacted sub-base for the truck scale for this project. All over-excavated utility trenches will be backfilled with material meeting the MDE definition of clean fill. Any clean fill material imported to the site will be screened according to MDE guidance for suitability.

4.4. SEDIMENT/EROSION CONTROL

Erosion and sediment controls will be installed prior to commencing work in accordance with 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. Sediment which accumulates in the controls, if any, shall be periodically removed and properly managed. Excavated materials to be stockpiled shall be placed on polyethylene and covered with polyethylene to minimize potential exposures and erosion when not in use (including at the end of each day). A weighted cover system shall be used to keep the covers in place.

4.5. DUST CONTROL

General construction operations, soil excavation and transport, soil grading, and utility trenching will be performed at the Site. These activities are anticipated to be performed in areas of impacted soils. To limit worker exposure to contaminants borne on dust and windblown particulates, dust control measures will be implemented, if warranted when the listed activities are performed in areas with impacted soil. The action level proposed for the purpose of determining the need for dust suppression techniques (e.g. watering and/or misting) and/or continuous monitoring during the redevelopment activities on Site will be 3.0 mg/m³. The lowest of the site-specific dust action levels, OSHA PELs, and ACGIH TLV was selected as the proposed action level.

If visible dust is generated in the breathing zone, air monitoring will be implemented as follows:

- At the start of intrusive activities;
- Periodically during intrusive activities (15-minute intervals);
- When contaminants other than those previously identified are being handled;
- When a different type of operation is initiated or conditions change;
- If personnel are working in areas with obvious particulate contamination; and
- If a sufficient reasonable interval has passed so that exposures may have significantly changed.

Air monitoring will be performed using a ThermoElectron Corporation Personal Data RAM 1000AN dust monitor or equivalent real-time air monitoring device. If the action level (3.0 mg/m³) is exceeded as a result of conditions occurring at the Site, operations will be stopped and dust suppression implemented. The background dust concentration will be utilized to evaluate whether Site activities are the source of the action level exceedance. Background concentrations

will be based on measurements over a minimum of a 1-hour period at the upwind Site boundary. This upwind data will be used to calculate a time weighted average background dust concentration. The background dust concentration may need to be recalculated periodically during the work day, based on changed upwind conditions. Operations may be resumed once monitoring indicates that dust concentrations are below the action level.

As applicable, air monitoring will be conducted during redevelopment implementation activities in the immediate work zones and surrounding areas to assess levels of exposure to Site workers, establish that the work zone designations are valid, and verify that respiratory protection being worn by personnel, if needed, is adequate. Concurrent with the work zone air monitoring, perimeter air monitoring will also be performed to ensure contaminants are not migrating off-site. Perimeter monitoring will include monitoring along the perimeter of the Site, including both the downwind and upwind portions of the Site. The concentration measured in the downwind portion of the Site shall not exceed the concentration in the upwind portion. If exceedances attributable to Site conditions are identified downwind for more than five minutes, dust control measures and additional monitoring will be implemented. The dust suppression measures may include wetting or misting through use of a hose connected to an available water supply or a water truck stationed on-site.

Dust control measures will be implemented as described above to address dust generated as a result of construction conducted on the Site. However, based on the nature of the area and/or on-going activities surrounding the Site, it is possible that windblown particulates may come from surrounding areas. As discussed above, the dust concentration in the upwind portion of the Site will be considered when monitoring dust levels in the work zone. A pre-construction meeting will be held to discuss the potential of windblown particulates from other activities impacting the air monitoring required for this response plan. Site contact information will be provided to address the possibility of upwind dust impacts.

4.6. WATER MANAGEMENT

It is not anticipated that any water management or dewatering will be required, as no excavations are expected to intersect with the water table during truck scale construction or utility trenching.

4.7. HEALTH AND SAFETY

A site-specific Health and Safety Plan (**Appendix E**) has been developed and is attached to this plan to present the minimum requirements for worker health and safety protection for the project. All contractors working on the Site must prepare their own Health and Safety Plan that provides a level of protection at least as much as that provided by the attached Health and Safety Plan. Alternately, on-site contractors may elect to adopt the Health and Safety Plan provided.

Prior to commencing work, the contractor must conduct an on-site safety meeting for all personnel. All personnel must be made aware of the Health and Safety Plan. Detailed safety

information shall be provided to personnel who may be exposed to COPCs. Workers will be responsible for following safety procedures to prevent contact with potentially contaminated soil or groundwater.

4.8. CONSTRUCTION OVERSIGHT

Construction Oversight by the EP will ensure and document that the project is built as designed and appropriate environmental and safety protocols are followed.

Upon completion, the EP will certify that the project is constructed in accordance with this Redevelopment Plan. Records shall be provided to document:

- Periodic Observations of Construction Activities
- Compliance with Soil Screening requirements
- Proper Truck Scale and Utility Construction

5.0 IMPLEMENTATION SCHEDULE

The proposed implementation schedule is shown below. Upon completion of the proposed redevelopment activities, a Construction Completion Report will be submitted to the agencies.

<u>Task</u>	<u>Proposed Completion Date</u>
Anticipated Plan Approval	TBD
Mobilization and Site Preparation	TBD
Installation of Erosion and Sediment Controls	TBD
Completion of Sprinkler Water Line (10 days of intrusive activities within trench)	March 31, 2017
Completion of Truck Scale (10 days of intrusive activities within excavation)	May 1, 2017

TBD = To be determined. Specific dates are contingent on Redevelopment Work Plan approval.

FIGURES



bing™

Image courtesy of USGS Earthstar Geographics SIO © 2016 Microsoft Corporation

<p>ARM Group Inc. Earth Resource Engineers and Consultants</p> <p>0 375 750 1,500 Feet</p>	<ul style="list-style-type: none"> Site Boundary Private Property Area A Boundaries Area B Boundaries 	<p>Tradepoint Atlantic Area A and Area B Parcels</p> <p>August 1, 2016</p>	<p>EnviroAnalytics Group</p> <p>Area A: Project 150298M Area B: Project 150300M</p>	<p>Tradepoint Atlantic</p> <p>Baltimore County, MD</p>	<p>Figure 1</p>
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1
WATER LINE

2
TRUCK SCALE

PREMISES AREA
1,396,322 SF
32.05 AC

DACS Building

Reservoir Road Warehouse

Parcel A2

POINT OF BEGINNING
N83°32'49"E 111.20'
N83°32'49"E 111.20'
S88°40'53"W 117.70'
N83°32'49"E 363.12'
N83°32'49"E 363.12'
N85°11'13"E 324.00'
N17°39'30"E 150.00'
N85°40'53"E 242.30'

PROPOSED INGRESS/EGRESS EASEMENT
31,341 S.F. ON 1.72 AC




EX. BUILDING
2012 RESERVOIR RD
294,200 SF

SPARROWS POINT TERMINAL, LLC
L. 35478, F. 379
TAX MAP 111, GRID 14, PARCEL 316
DISTRICT 15
ACCOUNT NO. 1502024000

Building Areas

Reservoir Rd Warehouse:
293,295 square feet

DACS Building:
56,458 square feet

Parcel A2 Facility Improvements Proposed Development Plan February 9, 2017		Figure 2
EnviroAnalytics Group ARM Project 160443M	Tradepoint Atlantic Baltimore County, MD	
 ARM Group Inc. Earth Resource Engineers and Consultants	<ul style="list-style-type: none"> — Facility Improvements Existing Buildings Parcel A2 Boundary 	
<div style="display: flex; align-items: center;">   </div>		





A2-013-PZ
(6.11 ft)



A2-031-PZ
(3.99 ft)

A2-025-PZ
(6.68 ft)

A2-022-PZ
(5.39 ft)

Parcel A2

Building Areas
Reservoir Rd Warehouse:
293,295 square feet
DACs Building:
56,458 square feet

Parcel A2 Groundwater Map Groundwater Elevation Contours - 1/11/2016 April 28, 2016		Figure 4
EnviroAnalytics Group ARM Project 160443M	Tradepoint Atlantic Baltimore County, MD	
 ARM Group Inc. Earth Resource Engineers and Consultants	<ul style="list-style-type: none"> ◆ Piezometer (GW Elevation) — Groundwater Contour (0.5 ft) □ Parcel A2 Boundary 	
		



Parcel A2

Building Areas
 Reservoir Rd Warehouse:
 293,295 square feet
 DACS Building:
 56,458 square feet

Parcel A2 Soil Gas Locations (No PAL Exceedances) April 28, 2016		Figure 5
EnviroAnalytics Group	Tradepoint Atlantic	
ARM Project 160443M	Baltimore County, MD	





A2-012-SB-1
Arsenic: 4.1 J
A2-012-SB-4
Arsenic: 4.1 J
A2-032-SB-4
Arsenic: 4.1 J
A2-032-SB-5

A2-018-SB-1
Arsenic: 4.6 J
A2-018-SB-4
Manganese: 42,700

A2-020-SB-1
Arsenic: 4.3
A2-020-SB-5
Arsenic: 9.8

A2-022-SB-1
A2-022-SB-5
Arsenic: 4.0

A2-021-SB-1
A2-021-SB-5
Arsenic: 5.8 J
Chromium VI: 9.0

A2-023-SB-1
Arsenic: 6.7
Manganese: 59,900
A2-023-SB-5
Arsenic: 6.2

A2-017-SB-1
Arsenic: 5.5
A2-017-SB-5
Manganese: 42,200 J

A2-033-SB-1
Arsenic: 4.4
A2-033-SB-4
Arsenic: 6.0

A2-015-SB-1
Arsenic: 13.5
A2-015-SB-5

A2-042-SB-1
Arsenic: 6.8
A2-042-SB-6

A2-034-SB-1
Arsenic: 11.0
Manganese: 32,800 B
A2-034-SB-3
Arsenic: 5.1
Manganese: 30,300
A2-034-SB-5
Arsenic: 5.6

A2-016-SB-1
A2-016-SB-5
Arsenic: 7.5
Manganese: 51,200
A2-016-SB-8
Arsenic: 9.6
Manganese: 29,800

A2-024-SB-1
Arsenic: 4.0
A2-024-SB-4
Arsenic: 7.5
Lead: 954
Manganese: 28,600

Parcel A2

A2-014-SB-1
A2-014-SB-5
Arsenic: 5.0
A2-014-SB-9
Arsenic: 5.2

A2-027-SB-1
Arsenic: 15.8
A2-027-SB-6
Arsenic: 9.2

A2-026-SB-1
Arsenic: 8.0
A2-026-SB-5
Arsenic: 9.8





A2-029-SB-1
Arsenic: 6.8
A2-029-SB-5
Arsenic: 5.5

A2-031-SB-1
Arsenic: 9.4
A2-031-SB-5
Arsenic: 5.8
A2-031-SB-10
Arsenic: 4.2

A2-028-SB-1
A2-028-SB-5

A2-030-SB-1
Arsenic: 6.4
A2-030-SB-5
Arsenic: 4.8

Building Areas
Reservoir Rd Warehouse:
293,295 square feet
DACs Building:
56,458 square feet

Parcel A2 Soil Borings Phase II Inorganic Exceedances (mg/kg) December 7, 2016		Figure 7
EnviroAnalytics Group	Tradepoint Atlantic	
ARM Project 160443M	Baltimore County, MD	
 ARM Group Inc. Earth Resource Engineers and Consultants	 Soil Boring  Parcel A2 Boundary	
		

TABLES

Table 1
Summary of Organics Detected in Soil
Parcel A2
Tradepoint Atlantic
Sparrows Point, Maryland

Parameter	Units	PAL	A2-012-SB-1	A2-012-SB-4	A2-013-SB-1	A2-013-SB-5	A2-014-SB-1	A2-014-SB-5	A2-014-SB-9	A2-015-SB-1	A2-015-SB-5	A2-016-SB-1	A2-016-SB-5											
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil										
			9/15/2015	9/15/2015	9/17/2015	9/17/2015	9/17/2015	9/17/2015	9/17/2015	9/17/2015	9/24/2015	9/24/2015	9/16/2015	9/16/2015										
Volatile Organic Compounds																								
1,2-Dibromo-3-chloropropane	mg/kg	0.064	0.0049	U	0.0044	U	0.0048	U	0.0054	UJ	0.0059	U	0.0045	U	0.0047	U	0.0066	U	0.0047	U	0.0052	U	0.0053	U
2-Butanone (MEK)	mg/kg	190,000	0.0098	U	0.0089	U	0.0097	U	0.0098	J	0.012	U	0.0089	U	0.0094	U	0.0078	J	0.0072	J	0.0088	J	0.011	U
4-Methyl-2-pentanone (MIBK)	mg/kg	56,000	0.0098	U	0.0089	U	0.0097	U	0.011	U	0.012	U	0.0089	U	0.0094	U	0.013	U	0.0095	U	0.01	U	0.011	U
Acetone	mg/kg	670,000	0.0054	J	0.0069	J	0.022		0.057		0.022		0.022		0.0094	U	0.034		0.027		0.057		0.043	
Benzene	mg/kg	5.1	0.0049	U	0.0044	U	0.0048	U	0.0054	U	0.0059	U	0.0045	U	0.0047	U	0.0066	U	0.0047	U	0.0052	U	0.0014	J
Carbon disulfide	mg/kg	3,500	0.013		0.0046		0.005		0.0054	U	0.013		0.003	J	0.0077		0.027	J	0.018		0.012		0.0053	U
Cyclohexane	mg/kg	27,000	0.0098	U	0.0089	U	0.0097	U	0.011	U	0.012	U	0.0089	U	0.0094	U	0.013	UJ	0.004	J	0.01	U	0.011	U
Ethylbenzene	mg/kg	25	0.0049	U	0.0044	U	0.0048	U	0.0054	U	0.0059	U	0.0045	U	0.0047	U	0.0066	U	0.0047	U	0.0052	U	0.0053	U
Methyl Acetate	mg/kg	1,200,000	0.049	UJ	0.044	UJ	0.048	UJ	0.054	UJ	0.059	UJ	0.045	UJ	0.047	UJ	0.066	U	0.047	U	0.052	U	0.053	U
Methylene Chloride	mg/kg	1,000	0.0049	U	0.0044	U	0.0048	U	0.0054	U	0.0044	J	0.0045	U	0.0047	U	0.0066	U	0.0047	U	0.0052	U	0.0053	U
Toluene	mg/kg	47,000	0.0049	U	0.0044	U	0.0048	U	0.0054	U	0.0059	U	0.0045	U	0.0047	U	0.0066	U	0.0047	U	0.0052	U	0.0053	U
Semi-Volatile Organic Compounds*																								
2-Methylnaphthalene	mg/kg	3,000	0.15	U	0.0087		0.023		0.011		0.012		0.0075	J	0.0085	U	0.11		0.044		0.057		0.23	
Acenaphthene	mg/kg	45,000	0.15	U	0.0078	U	0.0067	J	0.003	J	0.048		0.0079	U	0.0085	U	0.0035	J	0.0021	J	0.34		0.11	
Acenaphthylene	mg/kg	45,000	0.15	U	0.0078	U	0.0033	J	0.0022	J	0.0029	J	0.0045	J	0.0085	U	0.0083		0.03		0.022		0.042	
Acetophenone	mg/kg	120,000	1.8	U	0.39	U	0.39	U	0.42	U	0.35	U	0.39	U	0.42	U	0.35	U	0.35	U	0.36	U	0.36	U
Anthracene	mg/kg	230,000	0.15	U	0.0078	U	0.072		0.0059	J	0.014		0.0082		0.0085	U	0.027		0.031		0.24		0.17	
Benzaldehyde	mg/kg	120,000	1.8	U	0.39	U	0.39	U	0.24	J	0.35	U	0.39	U	0.42	U	0.21	J	0.23	J	0.36	U	0.36	U
Benzo[a]anthracene	mg/kg	2.9	0.15	U	0.0078	U	0.42		0.018		0.089		0.023		0.0085	U	0.093	J	0.13		2		0.48	
Benzo[a]pyrene	mg/kg	0.29	0.15	U	0.0078	U	0.56		0.017		0.21		0.025		0.0085	U	0.061		0.079		4.1		0.73	
Benzo[b]fluoranthene	mg/kg	2.9	0.15	U	0.0078	U	0.89		0.047		0.26		0.047		0.0052	J	0.17		0.15		4.5		1.3	
Benzo[g,h,i]perylene	mg/kg		0.032	J	0.0078	U	0.24		0.0084	U	0.15		0.0079	U	0.0026	J	0.039	J	0.048		0.73		0.16	
Benzo[k]fluoranthene	mg/kg	29	0.15	U	0.0078	U	0.28		0.018		0.12		0.021		0.0022	J	0.056		0.059		1.2		0.44	
Carbazole	mg/kg		1.8	U	0.39	U	0.39	U	0.42	U	0.35	U	0.39	U	0.42	U	0.35	U	0.35	U	0.36	U	0.36	U
Chrysene	mg/kg	290	0.15	U	0.0078	U	0.54		0.032		0.11		0.031		0.0019	J	0.15	J	0.15		2		0.5	
Dibenz[a,h]anthracene	mg/kg	0.29	0.15	U	0.0078	U	0.14		0.0084	U	0.047		0.0079	U	0.0085	U	0.018	J	0.021		0.5		0.077	
Fluoranthene	mg/kg	30,000	0.15	U	0.0078	U	0.61		0.05		0.12		0.057		0.0085	U	0.23	J	0.27		2		0.81	
Fluorene	mg/kg	30,000	0.15	U	0.0078	U	0.013		0.0096		0.0053	J	0.005	J	0.00087	J	0.0025	J	0.0025	J	0.084		0.044	
Indeno[1,2,3-c,d]pyrene	mg/kg	2.9	0.15	U	0.0078	U	0.25		0.0043	J	0.15		0.013		0.002	J	0.04	J	0.051		0.95		0.2	
Naphthalene	mg/kg	17	0.15	U	0.0023	J	0.016		0.014		0.014		0.012		0.0085	U	0.084		0.23		0.16		0.27	
Phenanthrene	mg/kg		0.15	U	0.0078	U	0.16		0.045		0.065		0.029		0.0085	U	0.14		0.12		0.86		0.59	
Pyrene	mg/kg	23,000	0.15	U	0.0078	U	0.75		0.042		0.11		0.05		0.0031	J	0.22	J	0.2		1.9		0.7	
PCBs																								
Total PCB	mg/kg	0.97	0.13	U	NA	0.14	U	NA	0.12	U	NA	NA	NA	0.12	U	NA	0.13	U	NA	0.13	U	NA	NA	NA
Aroclor 1254	mg/kg	0.97	0.019	U	NA	0.019	U	NA	0.017	U	NA	NA	NA	0.018	U	NA	0.018	U	NA	0.018	U	NA	NA	NA
Aroclor 1260	mg/kg	0.99	0.019	U	NA	0.019	UJ	NA	0.012	J	NA	NA	NA	0.018	U	NA	0.03	J	NA	0.03	J	NA	NA	NA
Oil and Grease																								
Oil and Grease	mg/kg	6,200	1,860		128		203		568		234		427		192		545		644		396		400	

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

*PAH compounds were analyzed via SIM

Values in Red indicate an exceedance of the Project Action Limit (PAL)

Table 1
Summary of Organics Detected in Soil
Parcel A2
Tradepoint Atlantic
Sparrows Point, Maryland

Parameter	Units	PAL	A2-016-SB-8		A2-017-SB-1		A2-017-SB-5		A2-018-SB-1		A2-018-SB-4		A2-020-SB-1		A2-020-SB-5		A2-021-SB-1		A2-021-SB-5		A2-022-SB-1		A2-022-SB-5			
			Soil		Soil		Soil		Soil		Soil		Soil		Soil		Soil		Soil		Soil		Soil		Soil	
			9/16/2015		9/17/2015		9/17/2015		9/15/2015		9/15/2015		9/16/2015		9/16/2015		9/15/2015		9/15/2015		9/17/2015		9/17/2015		9/17/2015	
Volatile Organic Compounds																										
1,2-Dibromo-3-chloropropane	mg/kg	0.064	0.0042	U	0.0051	U	0.005	U	0.0046	U	0.0053	U	0.0048		0.0052	U	0.0055	U	0.0053	U	0.0072	U	0.0042	U		
2-Butanone (MEK)	mg/kg	190,000	0.0085	U	0.018		0.01	U	0.0091	U	0.011	U	0.0089	U	0.01	U	0.011	U	0.011	U	0.014	U	0.0084	U		
4-Methyl-2-pentanone (MIBK)	mg/kg	56,000	0.0085	U	0.01	U	0.01	U	0.0091	U	0.011	U	0.0089	U	0.01	U	0.011	U	0.011	U	0.014	U	0.0084	U		
Acetone	mg/kg	670,000	0.017		0.11		0.027		0.023		0.019		0.04		0.012		0.021		0.011		0.014	U	0.0084	U		
Benzene	mg/kg	5.1	0.0042	U	0.0033	J	0.0024	J	0.0046	U	0.0053	U	0.0044	U	0.0052	U	0.0055	U	0.0053	U	0.0072	U	0.0042	U		
Carbon disulfide	mg/kg	3,500	0.0035	J	0.0051	U	0.005	U	0.011		0.034		0.0044	U	0.0052	U	0.0055	U	0.0053	U	0.045		0.0042	U		
Cyclohexane	mg/kg	27,000	0.0085	U	0.01	U	0.01	U	0.0091	U	0.011	U	0.0089	U	0.01	U	0.011	U	0.011	U	0.014	U	0.0084	U		
Ethylbenzene	mg/kg	25	0.0042	U	0.0051	U	0.005	U	0.0046	U	0.0053	U	0.0044	U	0.0052	U	0.0055	U	0.0053	U	0.0072	U	0.0042	U		
Methyl Acetate	mg/kg	1,200,000	0.042	U	0.051	UJ	0.05	UJ	0.046	UJ	0.053	UJ	0.044	U	0.052	U	0.055	UJ	0.053	UJ	0.072	UJ	0.042	UJ		
Methylene Chloride	mg/kg	1,000	0.0042	U	0.0043	J	0.005	U	0.0046	U	0.0053	U	0.0044	U	0.0052	U	0.0055	U	0.0044	J	0.0072	U	0.0042	U		
Toluene	mg/kg	47,000	0.0042	U	0.0021	J	0.0016	J	0.0046	U	0.0053	U	0.0044	U	0.0052	U	0.0055	U	0.0053	U	0.0072	U	0.0042	U		
Semi-Volatile Organic Compounds*																										
2-Methylnaphthalene	mg/kg	3,000	0.038		0.055		0.075		1.8		0.056		0.0055	J	0.008	U	0.03		0.0072	J	0.025		0.0012	J		
Acenaphthene	mg/kg	45,000	0.031		0.057		0.064		0.12		0.011		0.0077	U	0.008	U	0.0076	U	0.0074	U	0.0032	J	0.0076	U		
Acenaphthylene	mg/kg	45,000	0.0083		0.018		0.015		0.67		0.015		0.0077	U	0.008	U	0.02		0.0074	U	0.14		0.0076	U		
Acetophenone	mg/kg	120,000	0.37	U	0.35	U	0.36	U	0.35	U	0.37	U	0.39	U	0.4	U	0.38	U	0.37	U	0.37	U	0.38	U		
Anthracene	mg/kg	230,000	0.049		0.062		0.068		0.76		0.03		0.0033	J	0.008	U	0.0074	J	0.0029	J	0.03		0.0076	U		
Benzaldehyde	mg/kg	120,000	0.37	U	0.35	U	0.36	U	0.35	U	0.37	U	0.39	U	0.4	U	0.38	U	0.37	U	0.37	U	0.38	U		
Benzo[a]anthracene	mg/kg	2.9	0.21		0.26		0.24		3.8		0.14		0.021		0.008	U	0.035		0.0069	J	0.081		0.0076	U		
Benzo[a]pyrene	mg/kg	0.29	0.28		0.41		0.38		3.6		0.14		0.025		0.008	U	0.078		0.0074	U	0.052		0.0076	U		
Benzo[b]fluoranthene	mg/kg	2.9	0.49		0.76		0.61		5.5		0.27		0.041		0.008	U	0.11		0.013		0.13		0.0076	U		
Benzo[g,h,i]perylene	mg/kg		0.055		0.35		0.3		0.57		0.059		0.014		0.008	U	0.042		0.0036	J	0.012		0.0076	U		
Benzo[k]fluoranthene	mg/kg	29	0.23		0.26		0.23		2.4		0.096		0.015		0.008	U	0.035		0.0052	J	0.047		0.0076	U		
Carbazole	mg/kg		0.37	U	0.35	U	0.36	U	0.35	U	0.37	U	0.39	U	0.4	U	0.38	U	0.37	U	0.37	U	0.38	U		
Chrysene	mg/kg	290	0.25		0.32		0.28		3.5		0.18		0.024		0.008	U	0.051		0.011		0.097		0.0008	J		
Dibenz[a,h]anthracene	mg/kg	0.29	0.031		0.15		0.11		0.35		0.027		0.0077	U	0.008	U	0.012		0.0074	U	0.0064	J	0.0076	U		
Fluoranthene	mg/kg	30,000	0.34		0.43		0.39		5.5		0.26		0.04		0.008	U	0.054		0.032		0.2		0.002	J		
Fluorene	mg/kg	30,000	0.012		0.014		0.015		0.13		0.0053	J	0.0016	J	0.008	U	0.0011	J	0.0074	U	0.015		0.00071	J		
Indeno[1,2,3-c,d]pyrene	mg/kg	2.9	0.073		0.35		0.28		0.89		0.067		0.014		0.008	U	0.04		0.0074	U	0.012		0.0076	U		
Naphthalene	mg/kg	17	0.045		0.095		0.09		2.8		0.22		0.0057	J	0.0029	J	0.046		0.011		0.21		0.0076	U		
Phenanthrene	mg/kg		0.23		0.27		0.22		3.1		0.13		0.017		0.008	U	0.041		0.042		0.13		0.0076	U		
Pyrene	mg/kg	23,000	0.33		0.36		0.46		4.7		0.27		0.036		0.008	U	0.056		0.024		0.18		0.0023	J		
PCBs																										
Total PCB	mg/kg	0.97	NA		0.043	J	NA		0.038	J	NA		0.14	U	NA		0.13	U	NA		0.13	U	NA			
Aroclor 1254	mg/kg	0.97	NA		0.018	U	NA		0.017	U	NA		0.019	U	NA		0.019	U	NA		0.019	U	NA			
Aroclor 1260	mg/kg	0.99	NA		0.043	J	NA		0.038		NA		0.019	UJ	NA		0.019	U	NA		0.019	UJ	NA			
Oil and Grease																										
Oil and Grease	mg/kg	6,200	280		318		739		282		226		199		264		219		184		201		274			

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

*PAH compounds were analyzed via SIM

Values in Red indicate an exceedance of the Project Action Limit (PAL)

Table 1
Summary of Organics Detected in Soil
Parcel A2
Tradepoint Atlantic
Sparrows Point, Maryland

Parameter	Units	PAL	A2-023-SB-1	A2-023-SB-5	A2-024-SB-1	A2-024-SB-4	A2-025-SB-1	A2-025-SB-5	A2-026-SB-1	A2-026-SB-5	A2-027-SB-1	A2-027-SB-6	A2-028-SB-1											
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil											
			9/16/2015	9/16/2015	9/16/2015	9/16/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/18/2015											
Volatile Organic Compounds																								
1,2-Dibromo-3-chloropropane	mg/kg	0.064	0.0094	U	0.0057	U	0.012	U	0.0062	U	0.0083	U	0.0049	U	0.0059	U	0.0046	U	0.0051	U	0.0049	U	0.0056	U
2-Butanone (MEK)	mg/kg	190,000	0.019	U	0.011	U	0.024	U	0.012	U	0.017	U	0.0098	U	0.007	J	0.0092	U	0.0039	J	0.0098	U	0.0097	J
4-Methyl-2-pentanone (MIBK)	mg/kg	56,000	0.019	U	0.011	U	0.024	U	0.012	U	0.017	U	0.0098	U	0.0023	J	0.0092	U	0.01	U	0.0098	U	0.011	U
Acetone	mg/kg	670,000	0.037		0.018		0.028		0.028		0.015	J	0.014		0.045		0.019		0.045		0.0093	J	0.26	
Benzene	mg/kg	5.1	0.0094	U	0.0057	U	0.012	U	0.0042	J	0.0083	U	0.0049	U	0.0059	U	0.0046	U	0.0051	U	0.0049	U	0.0056	U
Carbon disulfide	mg/kg	3,500	0.0056	J	0.013		0.012	U	0.0067		0.025		0.0029	J	0.019		0.0052		0.0051	U	0.0049	U	0.0033	J
Cyclohexane	mg/kg	27,000	0.019	U	0.011	U	0.024	U	0.012	U	0.017	U	0.0098	U	0.012	U	0.0092	U	0.01	U	0.0098	U	0.011	U
Ethylbenzene	mg/kg	25	0.0094	U	0.0057	U	0.012	U	0.0021	J	0.0083	U	0.0049	U	0.0059	U	0.0046	U	0.0051	U	0.0049	U	0.0056	U
Methyl Acetate	mg/kg	1,200,000	0.094	U	0.057	U	0.12	U	0.062	U	0.083	U	0.049	U	0.059	U	0.002	J	0.051	U	0.049	U	0.056	U
Methylene Chloride	mg/kg	1,000	0.0094	U	0.0057	U	0.012	U	0.0062	U	0.0083	U	0.0049	U	0.0059	U	0.0062		0.0047	J	0.0048	J	0.0056	U
Toluene	mg/kg	47,000	0.0094	U	0.0057	U	0.012	U	0.0051	J	0.0083	U	0.0049	U	0.0059	U	0.0046	U	0.0051	U	0.0049	U	0.0056	U
Semi-Volatile Organic Compounds*																								
2-Methylnaphthalene	mg/kg	3,000	0.068		0.21		0.1		0.054		0.0073	U	0.0082	U	0.073	U	0.026		0.0077	U	0.0081	U	0.0031	J
Acenaphthene	mg/kg	45,000	0.013		0.25		0.012		0.04		0.0073	U	0.0082	U	0.098		0.066		0.0077	U	0.0081	U	0.0078	U
Acenaphthylene	mg/kg	45,000	0.098		0.025		0.18		0.038		0.0073	U	0.0082	U	0.073	U	0.0061	J	0.0077	U	0.0081	U	0.0078	U
Acetophenone	mg/kg	120,000	0.36	U	0.39	U	0.37	U	0.37	U	0.36	U	0.41	U	0.36	U	0.4	U	0.38	U	0.4	U	0.39	U
Anthracene	mg/kg	230,000	0.044		0.46		0.046		0.2		0.0065	J	0.0082	U	0.073	U	0.025		0.0077	U	0.0081	U	0.0018	J
Benzaldehyde	mg/kg	120,000	0.36	U	0.39	U	0.37	U	0.37	U	0.22	J	0.24	J	0.36	U	0.26	J	0.38	U	0.4	U	0.39	U
Benzo[a]anthracene	mg/kg	2.9	0.14		0.96		0.076		0.77		0.038		0.0082	U	0.2		0.12		0.0077		0.0046	J	0.0081	
Benzo[a]pyrene	mg/kg	0.29	0.12		0.93		0.069		0.79		0.038		0.097		0.39		0.23		0.0062	J	0.0081	U	0.012	
Benzo[b]fluoranthene	mg/kg	2.9	0.29		1.4		0.17		1.5		0.075		0.0082	U	0.44		0.27		0.012		0.0055	J	0.023	
Benzo[g,h,i]perylene	mg/kg		0.06		0.26		0.046		0.35		0.03		0.0082	U	0.32		0.17		0.008		0.0028	J	0.0055	J
Benzo[k]fluoranthene	mg/kg	29	0.099		0.53		0.056		0.46		0.032		0.0082	U	0.19		0.1		0.0064	J	0.0023	J	0.01	
Carbazole	mg/kg		0.36	U	0.2	J	0.37	U	0.37	U	0.36	U	0.41	U	0.36	U	0.4	U	0.38	U	0.4	U	0.39	U
Chrysene	mg/kg	290	0.25		0.9		0.11		0.79		0.056		0.0082	U	0.2		0.13		0.0067	J	0.0037	J	0.011	
Dibenz[a,h]anthracene	mg/kg	0.29	0.028		0.12		0.019		0.16		0.013		0.0082	U	0.085		0.061		0.0077	U	0.0081	U	0.0078	U
Fluoranthene	mg/kg	30,000	0.81		2.7		0.19		1.4		0.066		0.0082	U	0.17		0.12		0.0088		0.006	J	0.014	
Fluorene	mg/kg	30,000	0.016		0.25		0.031		0.053		0.0073	U	0.0082	U	0.0094	J	0.013		0.0077	U	0.0081	U	0.0013	J
Indeno[1,2,3-c,d]pyrene	mg/kg	2.9	0.065		0.32		0.039		0.42		0.028		0.0082	U	0.28		0.17		0.0077	U	0.0081	U	0.0078	U
Naphthalene	mg/kg	17	0.16		0.26		0.31		0.19		0.0023	J	0.0082	U	0.073	U	0.21		0.0017	J	0.0014	J	0.0045	J
Phenanthrene	mg/kg		0.51		2		0.23		0.81		0.0088		0.0082	U	0.073	U	0.091		0.0077	U	0.0081	U	0.0074	J
Pyrene	mg/kg	23,000	0.58		2.2		0.17		1.3		0.059		0.0082	U	0.18		0.13		0.0076	J	0.0054	J	0.013	
PCBs																								
Total PCB	mg/kg	0.97	0.12	U	NA		0.037	J	NA		0.13	U	NA		0.13	U	NA		0.14	U	NA		0.13	U
Aroclor 1254	mg/kg	0.97	0.018	U	NA		0.019	U	NA		0.018	U	NA		0.018	U	NA		0.019	U	NA		0.019	U
Aroclor 1260	mg/kg	0.99	0.018	UJ	NA		0.037	J	NA		0.018	U	NA		0.02		NA		0.019	U	NA		0.019	U
Oil and Grease																								
Oil and Grease	mg/kg	6,200	130		857		151		462		4,180		4,730		475		478		354		2,360		329	

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

*PAH compounds were analyzed via SIM

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 1
Summary of Organics Detected in Soil
Parcel A2
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-033-SB-4		A2-034-SB-1		A2-034-SB-3		A2-034-SB-5		A2-042-SB-1		A2-042-SB-6	
			Soil		Soil		Soil		Soil		Soil		Soil	
			9/16/2015		9/16/2015		9/16/2015		9/16/2015		9/24/2015		9/24/2015	
Volatile Organic Compounds														
1,2-Dibromo-3-chloropropane	mg/kg	0.064	0.0061	U	0.0048	U	0.0048	U	0.0048	U	0.0057	U	0.0061	U
2-Butanone (MEK)	mg/kg	190,000	0.012	U	0.0096	U	0.01		0.0096	U	0.012		0.025	
4-Methyl-2-pentanone (MIBK)	mg/kg	56,000	0.012	U	0.0096	U	0.0096	U	0.0096	U	0.011	U	0.012	U
Acetone	mg/kg	670,000	0.033		0.031		0.041	J	0.031		0.059		0.031	
Benzene	mg/kg	5.1	0.0019	J	0.0048	U	0.0027	J	0.0014	J	0.0057	U	0.0043	J
Carbon disulfide	mg/kg	3,500	0.007		0.0048	U	0.0048	U	0.0048	U	0.0078		0.055	
Cyclohexane	mg/kg	27,000	0.012	U	0.0096	U	0.0096	U	0.0096	U	0.011	U	0.016	
Ethylbenzene	mg/kg	25	0.0061	U	0.0048	U	0.0048	U	0.0048	U	0.0057	U	0.0019	J
Methyl Acetate	mg/kg	1,200,000	0.061	U	0.048	U	0.048	U	0.048	U	0.057	U	0.061	U
Methylene Chloride	mg/kg	1,000	0.0061	U	0.0048	U	0.0048	U	0.0048	U	0.0057	U	0.0062	
Toluene	mg/kg	47,000	0.0061	U	0.0048	U	0.0048	U	0.0048	U	0.0057	U	0.0044	J
Semi-Volatile Organic Compounds*														
2-Methylnaphthalene	mg/kg	3,000	0.18		0.092		0.14		0.14		0.022		0.0058	J
Acenaphthene	mg/kg	45,000	0.1		0.009		0.11		0.087		0.0071	U	0.0072	U
Acenaphthylene	mg/kg	45,000	0.035		0.017		0.032	J	0.024		0.02		0.0057	J
Acetophenone	mg/kg	120,000	0.35	U	0.36	U	0.36	U	0.36	U	0.35	U	0.36	U
Anthracene	mg/kg	230,000	0.4		0.024		0.19	J	0.19		0.015		0.0022	J
Benzaldehyde	mg/kg	120,000	0.35	U	0.36	U	0.36	U	0.36	U	0.27	J	0.25	J
Benzo[a]anthracene	mg/kg	2.9	0.72		0.071		0.96		0.42		0.086		0.0072	U
Benzo[a]pyrene	mg/kg	0.29	0.68		0.081		1.3		0.69		0.089		0.0072	U
Benzo[b]fluoranthene	mg/kg	2.9	1.3		0.17		1.9		1.1		0.16		0.0072	U
Benzo[g,h,i]perylene	mg/kg		0.16		0.033		0.17	J	0.15		0.062		0.0017	J
Benzo[k]fluoranthene	mg/kg	29	0.48		0.061		1.6		0.46		0.059		0.0072	U
Carbazole	mg/kg		0.35	U	0.36	U	0.17	J	0.36	U	0.35	U	0.36	U
Chrysene	mg/kg	290	0.69		0.097		0.93		0.44		0.1		0.0072	U
Dibenz[a,h]anthracene	mg/kg	0.29	0.08		0.014		0.09		0.073		0.026		0.0072	U
Fluoranthene	mg/kg	30,000	1.6		0.15		1.3	J	0.64		0.12		0.015	
Fluorene	mg/kg	30,000	0.14		0.0048	J	0.052		0.053		0.0037	J	0.002	J
Indeno[1,2,3-c,d]pyrene	mg/kg	2.9	0.19		0.034		0.24	J	0.2		0.062		0.0072	U
Naphthalene	mg/kg	17	0.25		0.42		0.29	J	0.096		0.054		0.021	
Phenanthrene	mg/kg		1.3		0.14		0.81	J	0.7		0.08		0.0092	
Pyrene	mg/kg	23,000	1.3		0.1		1.4		0.59		0.092		0.012	
PCBs														
Total PCB	mg/kg	0.97	NA		0.13	U	NA		NA		0.12	U	NA	
Aroclor 1254	mg/kg	0.97	NA		0.018	U	NA		NA		0.018	U	NA	
Aroclor 1260	mg/kg	0.99	NA		0.022	J	NA		NA		0.034	J	NA	
Oil and Grease														
Oil and Grease	mg/kg	6,200	682		241		NA		668		462		829	

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

*PAH compounds were analyzed via SIM

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradeport Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-012-SB-1	A2-012-SB-4	A2-013-SB-1	A2-013-SB-5	A2-014-SB-1	A2-014-SB-5	A2-014-SB-9	A2-015-SB-1								
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil								
			9/15/2015	9/15/2015	9/17/2015	9/17/2015	9/17/2015	9/17/2015	9/17/2015									
Metals																		
Aluminum	mg/kg	1,100,000	42,300		14,600		33,700		8,340		24,500		15,100		20,000		12,000	
Antimony	mg/kg	470	2.5	UJ	2.7	UJ	3	B	3.1	UJ	2.8	UJ	3.4	UJ	3.2	UJ	2.9	UJ
Arsenic	mg/kg	3	2.4	J	2.3	J	3.2		5.8		2.7		5		5.2		13.5	
Barium	mg/kg	220,000	526	J	83.2	J	388		40.4		277		72.4		62.1		155	
Beryllium	mg/kg	2,300	5.2		0.62	B	3.8		0.36	B	4		0.67	B	1	B	0.92	B
Cadmium	mg/kg	980	0.37	B	1.4	U	1.3	J	1.6	U	0.65	B	0.23	J	1.6	U	1.4	B
Chromium (total)	mg/kg	120,000	28.7	J	17.1	J	149		19		410		28.6		37.2		679	J
Chromium VI	mg/kg	6.3	1.1	U	1.2	U	1.2	UJ	1.3	UJ	1.1	UJ	1.2	UJ	1.3	UJ	1.1	U
Cobalt	mg/kg	350	5.1		5.8		3.2	J	5.3		4.7	B	8.9		6.7		19.6	J
Copper	mg/kg	47,000	19		7.8		30.3		22.5		46.7		15.3		18.4		124	J
Iron	mg/kg	820,000	31,900		13,000		34,100		13,300		62,000		20,800		19,800		171,000	J
Lead	mg/kg	800	6.7		8.8		65.9		64.1		123		37		18.6		109	J
Manganese	mg/kg	26,000	6,530		135		9,200	J	77.7	J	9,510	J	509	J	218	J	25,200	
Mercury	mg/kg	350	0.11	R	0.0043	J-	0.038	J-	0.058	J-	0.0033	J-	0.057	J-	0.041	J-	0.039	J
Nickel	mg/kg	22,000	7.1	J	12.9		7.6	J	10.1	J	34		12.8		17.8		39.1	J
Selenium	mg/kg	5,800	5.3		3.7	U	3.7	B	4.2	U	2.9	B	4.5	U	4.3	U	3.9	U
Silver	mg/kg	5,800	2.5	U	2.7	U	3.2	U	3.1	U	2.8	U	3.4	U	3.2	U	2.9	U
Thallium	mg/kg	12	8.5	U	9.1	U	10.7	U	10.5	U	9.4	U	11.3	U	10.7	U	9.7	UJ
Vanadium	mg/kg	5,800	96	J	21	J	348	J	24.9	J	1,030	J	46.1	J	39.6	J	1,480	
Zinc	mg/kg	350,000	21.7	J	30.3	J	303		76.7		163		82		60.8		594	
Other																		
Cyanide	mg/kg	150	0.73	J	0.62	UJ	1.1		0.64	U	0.094	J	0.72	U	0.74	U	0.59	

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-015-SB-5	A2-016-SB-1	A2-016-SB-5	A2-016-SB-8	A2-017-SB-1	A2-017-SB-5	A2-018-SB-1	A2-018-SB-4								
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil								
			9/24/2015	9/16/2015	9/16/2015	9/16/2015	9/17/2015	9/17/2015	9/15/2015	9/15/2015								
Metals																		
Aluminum	mg/kg	1,100,000	32,200		24,100		6,420		7,420		6,200		7,270		12,000		14,600	
Antimony	mg/kg	470	2.5	UJ	2.8	U	2.8	U	3.2	U	2.6	UJ	2.4	UJ	3	UJ	3.2	UJ
Arsenic	mg/kg	3	2.9		3		7.5		9.6		5.5		1.8	B	4.6	J	2.7	U
Barium	mg/kg	220,000	394		227		100		44.7		74.2		69.4		115	J	286	J
Beryllium	mg/kg	2,300	3.7		3.4		0.45	B	0.29	B	0.37	B	0.31	J	0.89	B	1.7	B
Cadmium	mg/kg	980	0.59	B	0.57	B	1	B	0.77	B	0.68	B	1.3		0.65	B	1.2	B
Chromium (total)	mg/kg	120,000	292	J	591		724		1,770		943		1,120		819	J	227	J
Chromium VI	mg/kg	6.3	1.1	U	1.1	UJ	1.1	UJ	1.1	UJ	1.1	UJ	1	J-	1	U	1.1	U
Cobalt	mg/kg	350	6.1	J	6.2		16.5		7.2		12.9		5.8		11.4		5.3	J
Copper	mg/kg	47,000	34.6	J	51.2		92.8		61.2		86		58.6		120		58.5	
Iron	mg/kg	820,000	102,000	J	89,100		175,000		313,000		154,000		196,000		132,000		109,000	
Lead	mg/kg	800	81.5	J	93.9		120		141		112		210		150		173	
Manganese	mg/kg	26,000	13,200		14,000		51,200		29,800		21,100	J	42,200	J	17,300		42,700	
Mercury	mg/kg	350	0.0083	J	0.02	J-	0.33	J-	0.021	J-	0.12	J-	0.35	J-	0.079	J-	0.0052	J-
Nickel	mg/kg	22,000	19.8	J	18.9		41.6		38.5		46		31.7		35.2		20	
Selenium	mg/kg	5,800	3.3	U	3.7	U	3.7	U	4.2	U	3.5	U	3.2	U	4	U	4.3	U
Silver	mg/kg	5,800	2.5	U	2.8	U	2.8	U	3.2	U	2.6	U	2.4	U	3	U	3.2	U
Thallium	mg/kg	12	8.2	UJ	9.2	U	9.3	U	10.6	U	8.7	U	8	U	10	U	10.7	U
Vanadium	mg/kg	5,800	772		923		1,570		4,160		2,820	J	3,320	J	1,830	J	1,010	J
Zinc	mg/kg	350,000	123		182		262		98.7		228		142		346	J	301	J
Other																		
Cyanide	mg/kg	150	1.4		0.72		0.17	J	0.56	J	0.68		0.37	J	1.2	J	0.7	J

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland

Parameter	Units	PAL	A2-020-SB-1	A2-020-SB-5	A2-021-SB-1	A2-021-SB-5	A2-022-SB-1	A2-022-SB-5	A2-023-SB-1	A2-023-SB-5								
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil								
			9/16/2015	9/16/2015	9/15/2015	9/15/2015	9/17/2015	9/17/2015	9/16/2015	9/16/2015								
Metals																		
Aluminum	mg/kg	1,100,000	15,100		11,100		6,330		5,770		34,300		10,600		8,660		16,100	
Antimony	mg/kg	470	3.1	U	2.8	U	3.1	UJ	2.8	UJ	1.4	B	3.5	UJ	2.7	U	2.9	U
Arsenic	mg/kg	3	4.3		9.8		2.7	J	5.8	J	3		4		6.7		6.2	
Barium	mg/kg	220,000	133		24.4		71.6	J	72.9	J	369		29.3		131		236	
Beryllium	mg/kg	2,300	0.95	B	0.58	B	0.42	B	0.22	B	5.5		0.39	B	0.53	B	1.3	
Cadmium	mg/kg	980	0.31	B	1.4	U	0.81	B	0.46	B	0.35	J	1.7	U	0.73	B	5	
Chromium (total)	mg/kg	120,000	22.7		27.5		984	J	1,100	J	7.5		18		1,070		732	
Chromium VI	mg/kg	6.3	1.2	U	0.53	J	3.6		9		1.1	UJ	1.2	UJ	1.1	U	1.2	U
Cobalt	mg/kg	350	6.4		3.7	B	1.8	J	2.6	B	1.9	B	2.9	J	4	J	9.2	
Copper	mg/kg	47,000	17.3		13.7		19.3		44.1		8		6.5		45.1		107	
Iron	mg/kg	820,000	18,900		32,700		136,000		185,000		7,920		13,600		139,000		81,700	
Lead	mg/kg	800	32.9		12.4		34.3		17.5		10		7.4		33		289	
Manganese	mg/kg	26,000	1,060		72.4		23,900		22,500		2,590	J	94.1	J	59,900		20,800	
Mercury	mg/kg	350	0.11	J-	0.12	UJ	0.0083	J-	0.11	R	0.11	R	0.11	R	0.0073	J-	0.039	J-
Nickel	mg/kg	22,000	11.8		8.9	B	12.4		17.6		3.8	J	6.1	J	17.4		32.6	
Selenium	mg/kg	5,800	4.1	U	3.7	U	4.1	U	3.7	U	2.8	B	4.6	U	3.2	B	3.9	U
Silver	mg/kg	5,800	3.1	U	2.8	U	3.1	U	2.8	U	3.1	U	3.5	U	2.7	U	2.9	U
Thallium	mg/kg	12	10.3	U	9.2	U	10.3	U	9.2	U	10.2	U	11.6	U	8.9	U	9.7	U
Vanadium	mg/kg	5,800	36.6		35.3		734	J	601	J	28.5	J	28.9	J	3,490		2,450	
Zinc	mg/kg	350,000	132		34.9		281	J	136	J	31.5		22.1		166		930	
Other																		
Cyanide	mg/kg	150	0.67	UJ	0.66	UJ	0.53	J	0.09	J	0.67	U	0.63	U	0.092	J-	1.7	J-

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-024-SB-1	A2-024-SB-4	A2-025-SB-1	A2-025-SB-5	A2-026-SB-1	A2-026-SB-5	A2-027-SB-1	A2-027-SB-6								
			Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil							
			9/16/2015	9/16/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015	9/24/2015							
Metals																		
Aluminum	mg/kg	1,100,000	5,510		14,200		42,000		16,600		14,900		14,900		13,700		13,400	
Antimony	mg/kg	470	2.9	U	3.1	U	1.3	J	3.1	UJ	2.4	UJ	3.6	UJ	2.1	UJ	3.2	UJ
Arsenic	mg/kg	3	4		7.5		3.1		8.5		8		9.8		15.8		9.2	
Barium	mg/kg	220,000	112		237		717		41.2		132		62.3		39.7		51.7	
Beryllium	mg/kg	2,300	1.2		0.97	B	5.2		0.7	B	0.66	B	0.49	B	0.63	J	0.65	B
Cadmium	mg/kg	980	1.4	U	3.9		0.39	J	0.21	B	0.52	B	1.8	U	1.1	U	1.6	U
Chromium (total)	mg/kg	120,000	17		1,160		8.9	J	36.7	J	255	J	70.3	J	26	J	21.9	J
Chromium VI	mg/kg	6.3	1.1	U	1.1	U	1.1	U	1.2	U	1.1	U	0.82	J	1.2	U	1.2	U
Cobalt	mg/kg	350	5.3		6.7		2.3	J	5.2	J	6.4	J	6.9	J	4.1	J	6.3	J
Copper	mg/kg	47,000	24.9		80.6		8.5	J	23.8	J	29.1	J	23.4	J	14.7	J	18.1	J
Iron	mg/kg	820,000	19,100		109,000		9,920	J	18,400	J	53,400	J	31,900	J	17,500	J	20,700	J
Lead	mg/kg	800	17.4		954		4.4	J	17.7	J	48.3	J	24.1	J	13.6	J	13.9	J
Manganese	mg/kg	26,000	417		28,600		5,170		65		10,700		867		72		74.8	
Mercury	mg/kg	350	0.027	J-	0.019	J-	0.0032	J	0.019	J	0.04	J	0.025	J	0.048	J	0.035	J
Nickel	mg/kg	22,000	15.2		23.7		4.8	B	13.2	J	18.4	J	17.5	J	11.7	J	16.9	J
Selenium	mg/kg	5,800	3.9	U	4.1	U	4.8		4.1	U	3.2	U	4.8	U	2.8	U	4.3	U
Silver	mg/kg	5,800	2.9	U	3.1	U	2.6	U	3.1	U	2.4	U	3.6	U	2.1	U	3.2	U
Thallium	mg/kg	12	9.7	U	10.3	U	8.7	UJ	10.3	UJ	8	UJ	12	UJ	7.1	UJ	10.7	UJ
Vanadium	mg/kg	5,800	45.7		3,550		29.2		36.3		1,100		100		36.1		29.9	
Zinc	mg/kg	350,000	86.9		782		26.6		52.2		231		145		35.8		53.3	
Other																		
Cyanide	mg/kg	150	0.53	J-	0.89	J-	0.12	J	0.74	U	0.48	J	0.3	J	0.67	U	0.61	U

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

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J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-028-SB-1	A2-028-SB-5	A2-029-SB-1	A2-029-SB-5	A2-030-SB-1	A2-030-SB-5	A2-031-SB-1							
			Soil	Soil	Soil	Soil	Soil	Soil	Soil							
			9/18/2015	9/18/2015	9/18/2015	9/18/2015	9/18/2015	9/18/2015	9/18/2015							
Metals																
Aluminum	mg/kg	1,100,000	11,300		12,000		14,800		13,400		15,900		14,700		22,400	
Antimony	mg/kg	470	3	UJ	2.6	UJ	3.2	UJ	2.5	UJ	2.9	UJ	2.7	UJ	3.3	UJ
Arsenic	mg/kg	3	2.5	B	2.4		6.8		5.5		6.4		4.8		9.4	
Barium	mg/kg	220,000	39.6		28.8		55.5		37.5		88.1		38.9		70.1	
Beryllium	mg/kg	2,300	0.38	B	0.5	B	0.58	B	0.35	B	0.64	B	0.42	B	0.81	B
Cadmium	mg/kg	980	1.5	U	1.3	U	1.6	U	1.2	U	0.26	J	1.4	U	0.24	J
Chromium (total)	mg/kg	120,000	22		21.6		38.1		19.6		28.5		31.3		34.9	
Chromium VI	mg/kg	6.3	1.2	U	1.1	U	1.2	U	1.3	U	1.1	U	1.1	U	1.3	U
Cobalt	mg/kg	350	3.8	J	5.1		4.9	J	4.1		7.7		6.3		7.7	
Copper	mg/kg	47,000	9		9.6		15.4		10.6		25		14.1		20.5	
Iron	mg/kg	820,000	12,100		8,980		21,200		15,100		19,500		17,800		25,900	
Lead	mg/kg	800	14.6		7.6		25		10.3		78.9		13.4		33.7	
Manganese	mg/kg	26,000	189	J	60	J	230	J	64.3	J	222	J	173	J	560	J
Mercury	mg/kg	350	0.02	J-	0.013	J-	0.033	J-	0.017	J-	0.59	J-	0.042	J-	0.058	J-
Nickel	mg/kg	22,000	9.5	J	12.9		12.6		11.3		14.2		17.6		17.8	
Selenium	mg/kg	5,800	4.1	U	3.4	U	4.2	U	3.3	U	3.9	U	3.6	U	4.4	U
Silver	mg/kg	5,800	3	U	2.6	U	3.2	U	2.5	U	2.9	U	2.7	U	3.3	U
Thallium	mg/kg	12	10.1	U	8.6	U	10.6	U	8.2	U	9.7	U	9	U	11.1	U
Vanadium	mg/kg	5,800	39.2	J	19.2	J	61.7	J	22.8	J	35.7	J	27.9	J	72	J
Zinc	mg/kg	350,000	53.9		44.8		73.7		34.4		117		41		121	
Other																
Cyanide	mg/kg	150	0.57	U	0.13		0.46		0.73	U	0.68	U	0.19		0.68	U

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-031-SB-5	A2-031-SB-10	A2-032-SB-4	A2-032-SB-5	A2-033-SB-1	A2-033-SB-4	A2-034-SB-1						
			Soil	Soil	Soil	Soil	Soil	Soil	Soil						
			9/18/2015	9/18/2015	9/15/2015	9/15/2015	9/16/2015	9/16/2015	9/16/2015						
Metals															
Aluminum	mg/kg	1,100,000	16,900		NA	27,100		13,200		19,000		7,240		15,300	
Antimony	mg/kg	470	2.9	UJ	NA	3.3	UJ	2.9	UJ	2.9	U	2.7	U	2.1	UJ
Arsenic	mg/kg	3	5.8		4.2	4.1	J	2.7	J	4.4		6		11	
Barium	mg/kg	220,000	51.7		NA	347	J	183	J	176		65.1		184	J
Beryllium	mg/kg	2,300	0.59	B	NA	3.1		0.68	B	2.8		0.33	B	0.85	
Cadmium	mg/kg	980	1.5	U	NA	1.4	B	1.5	U	1.1	B	0.48	B	1.8	
Chromium (total)	mg/kg	120,000	37.8		NA	318	J	22.6	J	636		986		1,040	
Chromium VI	mg/kg	6.3	0.76	J	NA	1.1	U	1.1	U	1.1	U	1.1	U	1.1	UJ
Cobalt	mg/kg	350	6.1		NA	6.7		6.2		9.4		14.4		16.7	
Copper	mg/kg	47,000	14.2		NA	38		9.4		67.1		80.3		159	
Iron	mg/kg	820,000	18,200		NA	72,500		12,200		93,700		187,000		208,000	
Lead	mg/kg	800	13.9		NA	69.8		10.5		134		85.5		304	
Manganese	mg/kg	26,000	83.6	J	NA	12,200		148		16,800		23,100		32,800	B
Mercury	mg/kg	350	0.02	J-	NA	0.0099	J-	0.0033	J-	0.02	J-	0.084	J-	0.066	J-
Nickel	mg/kg	22,000	15.5		NA	14.2		14.7		28		41.7		84	
Selenium	mg/kg	5,800	3.9	U	NA	2.7	B	3.9	U	2.3	B	3.6	U	1.9	J
Silver	mg/kg	5,800	2.9	U	NA	3.3	U	2.9	U	2.9	U	2.7	U	2.1	U
Thallium	mg/kg	12	9.8	U	NA	11.1	U	9.7	U	9.8	U	9	U	7	UJ
Vanadium	mg/kg	5,800	31	J	NA	517	J	27.2	J	1,800		3,700		2,030	J
Zinc	mg/kg	350,000	43.4		NA	602	J	42	J	348		167		530	
Other															
Cyanide	mg/kg	150	0.61	U	NA	0.3	J	0.56	UJ	0.45	J-	0.23	J	0.7	

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

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J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 2 - Parcel A2
Summary of Inorganics Detected in Soil
Tradepoint Atlantic
Sparrows Point, Maryland**

Parameter	Units	PAL	A2-034-SB-3		A2-034-SB-5		A2-042-SB-1		A2-042-SB-6	
			Soil		Soil		Soil		Soil	
			9/16/2015		9/16/2015		9/24/2015		9/24/2015	
Metals										
Aluminum	mg/kg	1,100,000	8,940		11,100		15,700		36,600	
Antimony	mg/kg	470	2.9	UJ	3	UJ	3.2	UJ	2.8	UJ
Arsenic	mg/kg	3	5.1		5.6		6.8		2.3	U
Barium	mg/kg	220,000	72.3	J	124	J	223		490	
Beryllium	mg/kg	2,300	0.61	B	0.72	B	1.2		5	
Cadmium	mg/kg	980	0.81	B	0.77	J	2.4		0.51	B
Chromium (total)	mg/kg	120,000	608		863		448	J	27.5	J
Chromium VI	mg/kg	6.3	1.1	UJ	1.1	UJ	1.1	U	1.1	U
Cobalt	mg/kg	350	17.5		6.4		7.3	J	2	B
Copper	mg/kg	47,000	90.6		60		75.3	J	6.2	J
Iron	mg/kg	820,000	160,000		164,000		105,000	J	25,900	J
Lead	mg/kg	800	163		65.4		175	J	5.3	J
Manganese	mg/kg	26,000	30,300		18,700		17,000		6,550	
Mercury	mg/kg	350	0.1	J-	0.027	J-	0.041	J	0.1	U
Nickel	mg/kg	22,000	27		58.5		25.7	J	3.6	B
Selenium	mg/kg	5,800	3.8	U	4	U	4.3	U	3.8	
Silver	mg/kg	5,800	2.9	U	3	U	3.2	U	2.8	U
Thallium	mg/kg	12	9.6	UJ	10.1	UJ	10.8	UJ	9.2	UJ
Vanadium	mg/kg	5,800	2,090	J	2,540	J	994		115	
Zinc	mg/kg	350,000	308		264		719		38.6	
Other										
Cyanide	mg/kg	150	NA		0.62		0.36	J	0.36	J

Detections in bold

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

UJ: This analyte was not detected in the sample. The actual quantitation/detection limit may be higher than reported.

J: The positive result reported for this analyte is a quantitative estimate.

J-: The positive result reported for this analyte is a quantitative estimate, but may be biased low.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

NA: This parameter was not analyzed for this sample.

R: The result for this analyte is unreliable. Additional data is needed to confirm or disprove the presence of this compound/analyte in the sample.

Values in Red indicate an exceedance of the Project Action Limit (PAL)

**Table 3 - Parcel A2
Assessment of Lead**

Exposure Unit	Surface/Sub-Surface	Arithmetic Mean (mg/kg)
Site-Wide (40.63 ac.)	Surface	73.62
	Sub-Surface	97.58
	Pooled	86.82

Adult Lead Model (ALM) Risk Levels	
Soil Concentration (mg/kg)	Probability of Blood Concentration of 10 ug/dL
2,737 mg/kg	5%
3,417 mg/kg	10%

**Table 4 - Parcel A2
Exposure Point Concentrations - Surface Soils**

Parameter	Cancer COPC Screening Level (mg/kg)	Non-Cancer COPC Screening Level (mg/kg)	EPC Type Site-Wide Exposure Unit	EPC Site-Wide Exposure Unit (mg/kg)
Arsenic	3.00	48.0	95% Student's-t UCL	7.26
Chromium VI	6.30	350	Maximum Value	3.60
Iron		82,000	95% Adjusted Gamma UCL	105,300
Manganese		2,600	95% Adjusted Gamma UCL	23,079
Vanadium		580	95% Chebyshev (Mean, Sd) UCL	1,803
Benzo[a]anthracene	21.0		99% KM (Chebyshev) UCL	2.21
Benzo[a]pyrene	2.10	22.0	99% KM (Chebyshev) UCL	2.82
Benzo[b]fluoranthene	21.0		95% KM (Chebyshev) UCL	2.00
Dibenz[a,h]anthracene	2.10		97.5% KM (Chebyshev) UCL	0.24

Bold indicates EPC higher than lowest SL

COPC = Constituent of Potential Concern

Benzo[a]pyrene screening level was derived from the USEPA IRIS Recent Additions dated January 19, 2017

PAH compounds screening levels were adjusted based on the relative potency factor

**Table 5 - Parcel A2
Exposure Point Concentrations - Sub-Surface Soils**

Parameter	Cancer COPC Screening Level (mg/kg)	Non-Cancer COPC Screening Level (mg/kg)	EPC Type Site-Wide Exposure Unit	EPC Site-Wide Exposure Unit (mg/kg)
Arsenic	3.00	48.0	95% KM (t) UCL	6.19
Chromium VI	6.30	350	95% KM (BCA) UCL	1.72
Iron		82,000	95% Chebyshev (Mean, Sd) UCL	147,300
Manganese		2,600	99% Chebyshev (Mean, Sd) UCL	43,368
Vanadium		580	97.5% Chebyshev (Mean, Sd) UCL	2,623
Benzo[a]anthracene	21.0		95% GROS Adjusted Gamma UCL	0.51
Benzo[a]pyrene	2.10	22.0	95% KM (t) UCL	0.36
Benzo[b]fluoranthene	21.0		95% GROS Adjusted Gamma UCL	1.08
Dibenz[a,h]anthracene	2.10		95% KM (t) UCL	0.05

Bold indicates EPC higher than lowest SL

COPC = Constituent of Potential Concern

Benzo[a]pyrene screening level was derived from the USEPA IRIS Recent Additions dated January 19, 2017

PAH compounds screening levels were adjusted based on the relative potency factor

**Table 6 - Parcel A2
Exposure Point Concentrations - Pooled Soils**

Parameter	Cancer COPC Screening Level (mg/kg)	Non-Cancer COPC Screening Level (mg/kg)	EPC Type Site-Wide Exposure Unit	EPC Site-Wide Exposure Unit (mg/kg)
Arsenic	3.00	48.0	95% KM (t) UCL	6.34
Chromium VI	6.30	350	95% KM (Percentile Bootstrap) UCL	1.38
Iron		82,000	95% Chebyshev (Mean, Sd) UCL	120,600
Manganese		2,600	97.5% Chebyshev (Mean, Sd) UCL	26,119
Vanadium		580	95% Chebyshev (Mean, Sd) UCL	1,695
Benzo[a]anthracene	21.0		95% KM (Chebyshev) UCL	0.66
Benzo[a]pyrene	2.10	22.0	95% KM (Chebyshev) UCL	0.84
Benzo[b]fluoranthene	21.0		95% KM (Chebyshev) UCL	1.17
Dibenz[a,h]anthracene	2.10		95% GROS Adjusted Gamma UCL	0.09

Bold indicates EPC higher than lowest SL

COPC = Constituent of Potential Concern

Benzo[a]pyrene screening level was derived from the USEPA IRIS Recent Additions dated January 19, 2017

PAH compounds screening levels were adjusted based on the relative potency factor

**Table 7 - Parcel A2
Surface Soils
Composite Worker Risk Ratios**

Parameter	Target Organs	Site-Wide Exposure Unit (40.63 ac.)				
		EPC mg/kg	Composite Worker			
			RSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	7.26	3.0	480	2.4E-06	0.02
Chromium VI	Respiratory	3.60	6.3	3,500	5.7E-07	0.001
Iron	None Specified	105,300		820,000		0.1
Manganese	Nervous	23,079		26,000		0.9
Vanadium	Dermal	1,803		5,800		0.3
Benzo(a)anthracene		2.21	21.0		1.1E-07	
Benzo(a)pyrene	None Specified	2.82	2.1	220	1.3E-06	0.01
Benzo(b)fluoranthene		2.00	21.0		9.5E-08	
Dibenz(a,h)anthracene		0.24	2.1		1.1E-07	
					5E-06	↓

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	1
	None Specified	0

Bold indicates the max value was used instead of the UCL due to too few detections

RSLs were obtained from the EPA Regional Screening Levels at <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables-may-2016>

**Table 8 - Parcel A2
Sub-Surface Soils
Composite Worker Risk Ratios**

Parameter	Target Organs	Site-Wide Exposure Unit (40.63 ac.)				
		EPC mg/kg	Composite Worker			
			RSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	6.19	3.0	480	2.1E-06	0.01
Chromium VI	Respiratory	1.72	6.3	3,500	2.7E-07	0.0005
Iron	None Specified	147,300		820,000		0.2
Manganese	Nervous	43,368		26,000		2
Vanadium	Dermal	2,623		5,800		0.5
Benzo(a)anthracene		0.5	21.0		2.4E-08	
Benzo(a)pyrene	None Specified	0.36	2.1	220	1.7E-07	0.002
Benzo(b)fluoranthene		1.08	21.0		5.1E-08	
Dibenz(a,h)anthracene		0.05	2.1		2.4E-08	
					3E-06	↓

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	2
	None Specified	0

RSLs were obtained from the EPA Regional Screening Levels at <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables-may-2016>

**Table 9 - Parcel A2
Pooled Soils
Composite Worker Risk Ratios**

Parameter	Target Organs	Site-Wide Exposure Unit (40.63 ac.)				
		EPC mg/kg	Composite Worker			
			RSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	6.34	3.0	480	2.1E-06	0.01
Chromium VI	Respiratory	1.38	6.3	3,500	2.2E-07	0.0004
Iron	None Specified	120,600		820,000		0.1
Manganese	Nervous	26,119		26,000		1
Vanadium	Dermal	1,695		5,800		0.3
Benzo(a)anthracene		0.66	21.0		3.1E-08	
Benzo(a)pyrene	None Specified	0.84	2.1	220	4.0E-07	0.004
Benzo(b)fluoranthene		1.17	21.0		5.6E-08	
Dibenz(a,h)anthracene		0.09	2.1		4.3E-08	
					3E-06	↓

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	1
	None Specified	0

RSLs were obtained from the EPA Regional Screening Levels at <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables-may-2016>

**Table 10 - Parcel A2
Surface Soils
Construction Worker Risk Ratios**

30 Day		Site-Wide Exposure Unit (40.63 ac.)				
Parameter	Target Organs	EPC mg/kg	Construction Worker			
			SSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	7.26	126	804	5.8E-08	0.01
Chromium VI	Respiratory	3.60	180	6,675	2.0E-08	0.001
Iron	None Specified	105,300		2,004,511		0.1
Manganese	Nervous	23,079		35,043		1
Vanadium	Dermal	1,803		13,346		0
Benzo(a)anthracene		2.21	1218		1.8E-09	
Benzo(a)pyrene	None Specified	2.82	143	56.1	2.0E-08	0.1
Benzo(b)fluoranthene		2.00	1420		1.4E-09	
Dibenz(a,h)anthracene		0.24	146		1.6E-09	
					1E-07	↓

Bold indicates maximum value used instead of UCL due to too few detections

SSLs calculated using equations in the EPA Supplemental Guidance dated 2002

Guidance Equation Input Assumptions:

- 5 cars/day (2 tons/car)
- 5 trucks/day (20 tons/truck)
- 3 meter source depth thickness

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	1
	None Specified	0

**Table 11 - Parcel A2
Sub-Surface Soils
Construction Worker Risk Ratios**

30 Day		Site-Wide Exposure Unit (40.63 ac.)				
Parameter	Target Organs	EPC mg/kg	Construction Worker			
			SSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	6.19	126	804	4.9E-08	0.01
Chromium VI	Respiratory	1.72	180	6,675	9.6E-09	0.000
Iron	None Specified	147,300		2,004,511		0.1
Manganese	Nervous	43,368		35,043		1
Vanadium	Dermal	2,623		13,346		0
Benzo(a)anthracene		0.5	1218		4.2E-10	
Benzo(a)pyrene	None Specified	0.36	143	56.1	2.5E-09	0.01
Benzo(b)fluoranthene		1.08	1420		7.6E-10	
Dibenz(a,h)anthracene		0.05	146		3.5E-10	
					6E-08	↓

SSLs calculated using equations in the EPA Supplemental Guidance dated 2002

Guidance Equation Input Assumptions:

- 5 cars/day (2 tons/car)
- 5 trucks/day (20 tons/truck)
- 3 meter source depth thickness

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	1
	None Specified	0

**Table 12 - Parcel A2
Pooled Soils
Construction Worker Risk Ratios**

30 Day		Site-Wide Exposure Unit (40.63 ac.)				
Parameter	Target Organs	EPC mg/kg	Construction Worker			
			SSLs (mg/kg)		Risk Ratios	
			Cancer	Non-Cancer	Risk	HQ
Arsenic	Cardiovascular; Dermal	6.34	126	804	5.0E-08	0.01
Chromium VI	Respiratory	1.38	180	6,675	7.7E-09	0.000
Iron	None Specified	120,600		2,004,511		0.1
Manganese	Nervous	26,119		35,043		1
Vanadium	Dermal	1,695		13,346		0
Benzo(a)anthracene		0.66	1218		5.4E-10	
Benzo(a)pyrene	None Specified	0.84	143	56.1	5.9E-09	0.01
Benzo(b)fluoranthene		1.17	1420		8.2E-10	
Dibenz(a,h)anthracene		0.09	146		6.2E-10	
					7E-08	↓

SSLs calculated using equations in the EPA Supplemental Guidance dated 2002

Guidance Equation Input Assumptions:

- 5 cars/day (2 tons/car)
- 5 trucks/day (20 tons/truck)
- 3 meter source depth thickness

Total HI	Cardiovascular	0
	Dermal	0
	Respiratory	0
	Nervous	1
	None Specified	0

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APPENDIX A

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**TRADEPOINT
ATLANTIC**

1600 Sparrows Point Boulevard
Baltimore, Maryland 21219

February 10, 2017

Maryland Department of Environment
1800 Washington Boulevard
Baltimore MD, 21230

Attention: Ms. Barbara Brown

Subject: Request to Enter Temporary CHS Review
Tradepoint Atlantic Parcel A-2

Dear Ms. Brown:

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (effective September 12, 2014); and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (effective November 25, 2014).

On September 11, 2014, Tradepoint Atlantic submitted an application to the Maryland Department of the Environment's (Department) Voluntary Cleanup Program (VCP).

In consultation with the Department, Tradepoint Atlantic affirms that it desires to accelerate the assessment, remediation and redevelopment of certain sub-parcels within the larger site due to current market conditions. To that end, the Department and Tradepoint Atlantic agree that the Controlled Hazardous Substance (CHS) Act (Section 7-222 of the Environment Article) and the CHS Response Plan (COMAR 26.14.02) shall serve as the governing statutory and regulatory authority for completing the development activities on Parcel A-2 and complement the statutory requirements of the Voluntary Cleanup Program (Section 7-501 of the Environment Article). Upon submission of a Site Response and Development Work Plan and completion of the remedial activities for the sub-parcel, the Department shall issue a "No Further Action" letter upon a recordation of an environmental covenant describing any necessary land use controls for the specific sub-parcel. At such time that all the sub-parcels within the larger parcel have completed remedial activities, Tradepoint Atlantic shall submit to the Department a request for issuing a Certificate of Completion (COC) as well as all pertinent information concerning completion of remedial activities conducted on the parcel. Once the VCP has completed its review of



**TRADEPOINT
ATLANTIC**

1600 Sparrows Point Boulevard
Baltimore, Maryland 21219

the submitted information it shall issue a COC for the entire parcel described in Tradepoint Atlantic's VCP application.

Alternatively, Tradepoint Atlantic or other entity may elect to submit an application for a specific sub-parcel and submit it to the VCP for review and acceptance. If the application is received after the cleanup and redevelopment activities described in this work plan are implemented and a No Further Action letter is issued by the Department pursuant to the CHS Act, the VCP shall prepare a No Further Requirements Determination for the sub-parcel.

If Tradepoint Atlantic or other entity has not carried out cleanup and redevelopment activities described in the work plan, the cleanup and redevelopment activities may be conducted under the oversight authority of either the VCP or the CHS Act, so long as those activities comport with this work plan.

Engineering and institutional controls approved as part of this Site Response and Development Work Plan shall be described in documentation submitted to the Department demonstrating that the exposure pathways on the sub-parcel are addressed in a manner that protects public health and the environment. This information shall support Tradepoint Atlantic's request for the issuance of a COC for the larger parcel.

Please do not hesitate to contact Tradepoint Atlantic for further information.

Thank you,

Peter Haid

Environmental Director
TRADEPOINT ATLANTIC
1600 Sparrows Point Boulevard
Baltimore, Maryland 21219
T 443.649.5055 C 732.841.7935
phaid@tradepointatlantic.com

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APPENDIX B

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**Construction Worker Soil Screening Levels
30 Work Day Exposure
Calculation Spreadsheet - Parcel A2**

Description	Variable	Value
Days worked per week	DW	5
Exposure duration (yr)	ED	1
Hours worked per day	ET	8
A/constant (unitless) - particulate emission factor	Aconst	12.9351
B/constant (unitless) - particulate emission factor	Bconst	5.7383
C/constant (unitless) - particulate emission factor	Cconst	71.7711
Dispersion correction factor (unitless)	FD	0.185
Days per year with at least .01" precipitation	P	130
Target hazard quotient (unitless)	THQ	1
Body weight (kg)	BW	80
Averaging time - noncancer (yr)	ATnc	1
Soil ingestion rate (mg/d)	IR	330
Skin-soil adherence factor (mg/cm ²)	AF	0.3
Skin surface exposed (cm ²)	SA	3300
Event frequency (ev/day)	EV	1
Target cancer risk (unitless)	TR	01E-06
Averaging time - cancer (yr)	ATc	70
A/constant (unitless) - volatilization	Aconstv	2.4538
B/constant (unitless) - volatilization	Bconstv	17.566
C/constant (unitless) - volatilization	Cconstv	189.0426
Dry soil bulk density (kg/L)	Pb	1.5
Average source depth (m)	ds	3
Soil particle density (g/cm ³)	Ps	2.65
Total soil porosity	Lpore/Lsoil	0.43
Air-filled soil porosity	Lair/Lsoil	0.28

Area of site (ac)	Ac	40.6
Overall duration of construction (wk/yr)	EW	6
Exposure frequency (day/yr)	EF	30
Cars per day	Ca	5
Tons per car	CaT	2
Trucks per day	Tru	5
Tons per truck	TrT	20
Mean vehicle weight (tons)	w	11
Derivation of dispersion factor - particulate emission factor (g/m2-s per kg/m3)	Q/Csr	13.7
Overall duration of construction (hr)	tc	1,008
Overall duration of traffic (s)	Tt	864,000
Surface area (m2)	AR	164,303
Length (km)	LR	405
Distance traveled (km)	ΣVKT	122
Particulate emission factor (m3/kg)	PEFsc	143,648,719
Derivation of dispersion factor - volatilization (g/m2-s per kg/m3)	Q/Csa	6.78
Total time of construction (s)	Tcv	3,628,800

Input
Calculation

Chemical	[^] Ingestion SF (mg/kg-day) ⁻¹	[^] Inhalation Unit Risk (ug/m ³) ⁻¹	[^] Subchronic RfD (mg/kg-day)	[^] Subchronic RfC (mg/m ³)	[^] GIABS	Dermally Adjusted RfD (mg/kg-day)	[^] ABS	[^] RBA	[*] Dia	[*] Diw	[*] Henry's Law Constant (atm-m ³ /mol)	[*] Kd	[*] Koc	DA	Volatilization Factor - Unlimited Reservoir (m ³ /kg)	Carcinogenic Ingestion/ Dermal SL (SLing/der)	Carcinogenic Inhalation SL (SLinh)	Carcinogenic SL (mg/kg)	Non-Carcinogenic Ingestion/ Dermal SL (SLing/der)	Non-Carcinogenic Inhalation SL (SLinh)	Non-Carcinogenic SL (mg/kg)
-/+Arsenic, Inorganic	1.50E+00	4.30E-03	3.00E-04	1.50E-05	1	3.00E-04	0.03	0.6			-	2.90E+01				126.3	85,354	126.1	811.8	78,648	803.5
**Chromium(VI)	5.00E-01	8.40E-02	5.00E-03	3.00E-04	0.025	1.25E-04	0.01	1			-	1.90E+01				187.7	4,369	180.0	6,703	1,572,953	6,675
^^Iron	-	-	7.00E-01	-	1	7.00E-01	0.01	1			-	2.50E+01							2,004,511		2,004,511
-Manganese (Non-diet)	-	-	2.40E-02	5.00E-05	0.04	9.60E-04	0.01	1			-	6.50E+01							40,450	262,159	35,043
**Vanadium and Compounds	-	-	1.00E-02	1.00E-04	0.026	2.60E-04	0.01	1			-	1.00E+03							13,694	524,318	13,346
Benz[a]anthracene	1.00E-01	6.00E-05	-	-	1		0.13	1	2.60E-02	6.70E-06	0.0004906	1.08E+03	1.80E+05	6.71E-10	1.59E+5	1485.4	6,770	1218.11			
--Benzo[a]pyrene	1.00E+00	6.00E-04	3.00E-04	2.00E-06	1	3.00E-04	0.13	1	4.80E-02	5.60E-06	0.0000187	3.54E+03	5.90E+05	2.37E-11	8.48E+5	148.54	3,589	142.63	636.58	61.52	56.1
Benzo[b]fluoranthene	1.00E-01	6.00E-05	-	-	1		0.13	1	4.80E-02	5.60E-06	0.0000269	3.60E+03	6.00E+05	2.91E-11	7.64E+5	1485.4	32,370	1420.19			
Dibenz[a,h]anthracene	1.00E+00	6.00E-04	-	-	1		0.13	1	4.50E-02	5.20E-06	5.76E-06	1.14E+04	1.90E+06	4.13E-12	2.03E+6	148.54	8,520	145.99			

-chemical specific parameters found in the IRIS 2011 at <https://www.epa.gov/iris>

+chemical specific parameters found in Cal EPA at <https://www.dtsc.ca.gov/AssessingRisk/upload/HHRA-Note-3-2016-01.pdf>

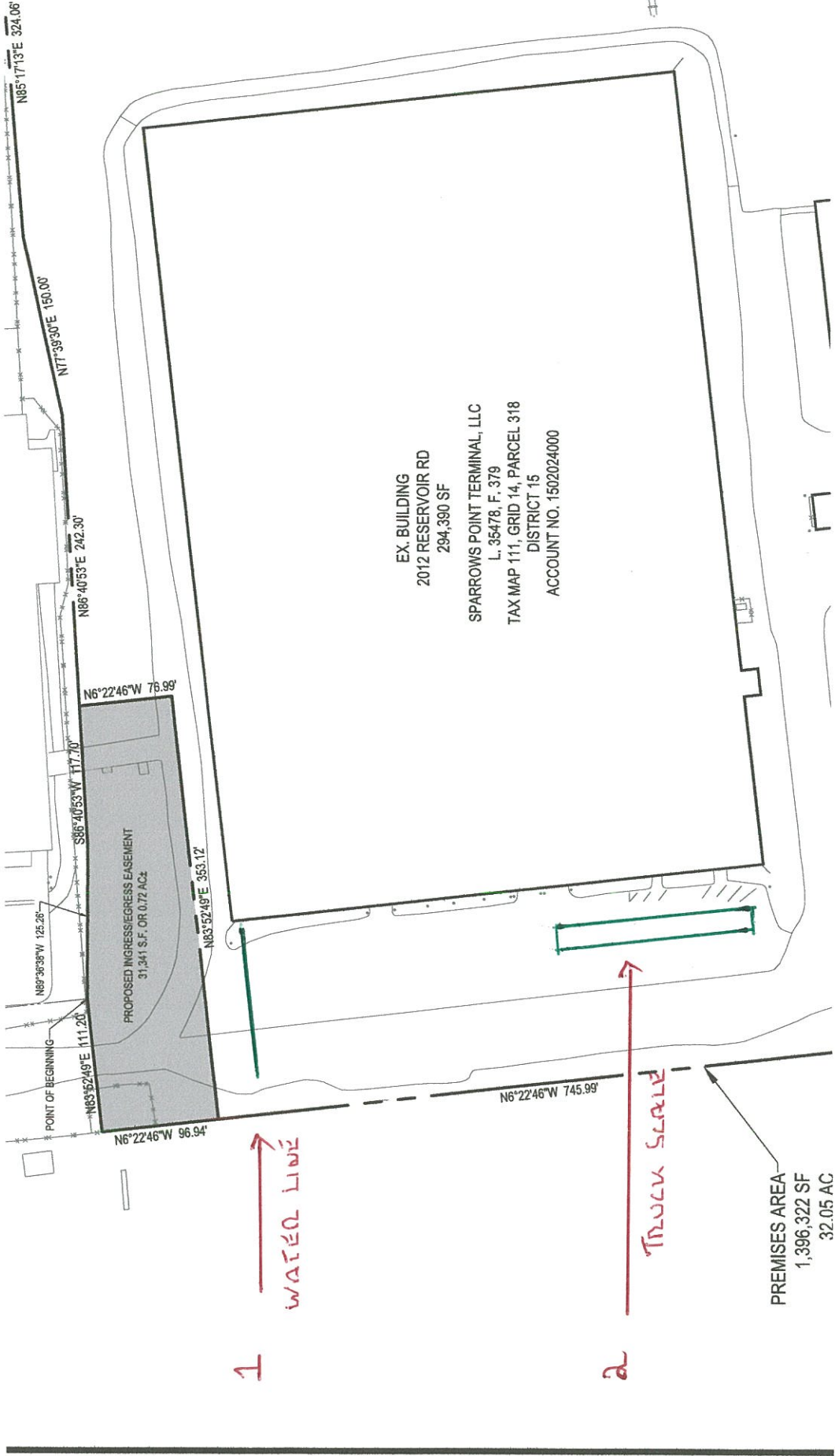
**chemical specific parameters found in Agency for Toxic Substances and Disease Registry Minimal Risk Levels (MRLs) at https://www.atsdr.cdc.gov/mrls/pdfs/atsdr_mrls.pdf

^chemical specific parameters found in the Database of EPA PPRTVs at <https://hhpprtv.oml.gov/quickview/pprtv.php>

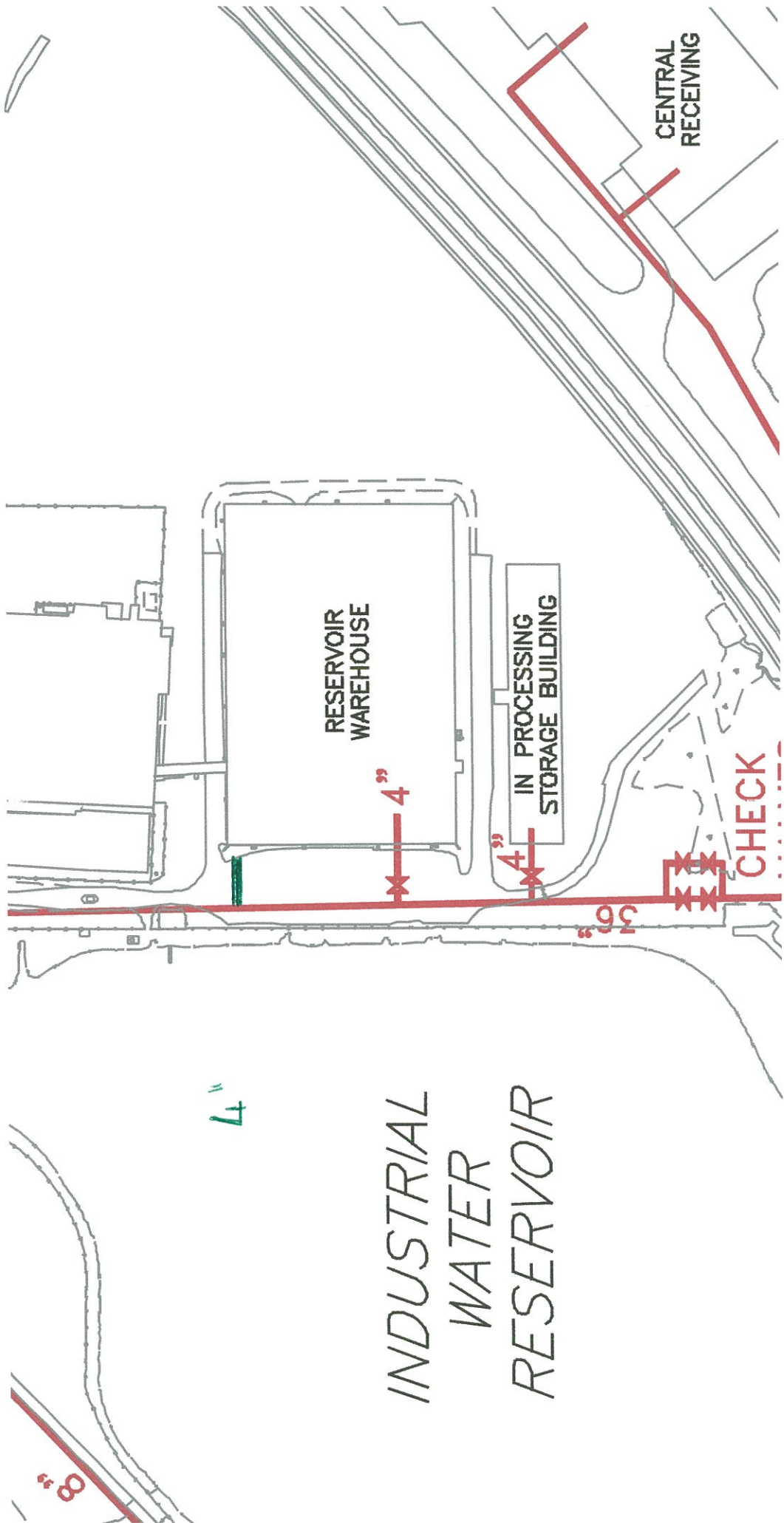
--chemical specific parameters found in the IRIS 2017 Recent Additions at <https://www.epa.gov/iris/iris-recent-additions> ; in addition, PAH compounds were adjusted based on the relative potency factor

APPENDIX C

B



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4"

INDUSTRIAL
WATER
RESERVOIR

8"

APPENDIX D

Utility Excavation NAPL Contingency Plan

Revision 1 – January 16, 2017

Introduction:

Proposed underground utilities and excavations necessary for the redevelopment of the Tradepoint Atlantic property may encounter areas of petroleum (TPH) and/or Oil & Grease contamination in soil. The assessment of TPH-DRO/GRO and Oil & Grease completed as part of each Phase II Investigation includes the following:

- TPH-DRO/GRO and Oil & Grease data are assessed with their respective location to subsurface utilities, stormwater conveyances and surface waters.
- Each soil boring with evidence of non-aqueous phase liquid (NAPL) in the soil cores, whether located near utilities or not, is investigated via the installation of a piezometer to assess mobility to groundwater.
- Locations that exhibit elevated detections of TPH/Oil & Grease or evidence of NAPL, that are within reasonable proximity (i.e. 25 feet) to subsurface utilities or stormwater conveyances and within reasonable proximity (i.e. 100 feet) to surface waters, will be identified for further delineation.

Any NAPL identified in soil borings or piezometers during the Phase II Investigation would be noted on relevant logs and identified in Response and Development Work Plans for construction planning purposes. Despite these planning efforts, unidentified pockets of contamination (including NAPL) may still be encountered during construction. This contingency plan provides the procedures to be utilized during construction work to properly address response and construction techniques if any materials impacted with NAPL are encountered.

Objectives:

The purpose of this plan is to describe procedures to be followed in the event that NAPL is encountered in utility trenches or other excavations during development of the Tradepoint Atlantic property. The specific objectives of this plan and the procedures outlined herein are:

1. To ensure identification and proper management of Oil & Grease and petroleum-contaminated soils.
2. To ensure proper worker protection for working in areas of Oil & Grease and petroleum contamination.
3. To ensure that the installation of new utilities does not create new preferential flow paths for the migration of free-phase hydrocarbons (Oil & Grease, TPH-DRO/GRO, etc.) or soil vapors.

Identification of Oil & Grease and Petroleum Contaminated Soil:

An Environmental Professional (EP) will be on-site to determine if soils show evidence of the presence of Oil & Grease or TPH present as NAPL. Oil & Grease or petroleum-contaminated soil can be identified by the presence of free oil, oil staining, a petroleum odor, or any combination of these conditions. Free oil (NAPL) is liquid oil which could potentially be drained or otherwise extracted from the soil. The appearance of oil staining is not always consistent, but varies depending on the nature of the oil, the soil type, and the age of the release. Staining associated with old petroleum contamination often has a greenish hue, but may also be brown or black. The olfactory sense is the most sensitive instrument for identifying petroleum contamination in the field. Therefore, a petroleum odor may be noted although there is no visible sign of oil or staining. In some instances, decaying organic matter can produce an odor similar to petroleum, but this is rare.

If NAPL is encountered in the utility trench, the extent of impacts shall be delineated by excavating trenches or installing borings perpendicular to the utility alignment to examine the soil for physical evidence of NAPL. Perpendicular transects will be investigated every 50 feet along through the section of the utility alignment where there is physical evidence of NAPL in the trench. Each transect will extend to a distance of 10 feet from the centerline of the utility.

Soil samples will be collected from the perpendicular borings or trenches to test for extractable Oil & Grease or petroleum-contaminated soil using the Oil Sticks™ test kit. This test kit provides a determination of whether hydrocarbons are present in soil and extractable (i.e. could mobilize as a NAPL). Oil Sticks™ change from a pale blue to a deep blue color when they come in contact with free product. This instantaneous change in color occurs even when miniscule amounts of product come in contact with the strip. The sensitivity of Oil Sticks™ is estimated to be about 1,000 to 2,000 mg/kg (for a presence/absence test) for soil testing. The field test is performed by placing approximately 3 tablespoons of soil in a clean sample cup and adding enough water to cover the sample. After stirring the sample and waiting ~1 minute, the Oil Sticks™ test strip should be swished through the water, making sure to touch the strip to the sides of the cup where product may collect at the interface (meniscus) between the cup, water, and air. If the strip turns deep blue, or deep blue spots appear, oil or hydrocarbon is present.

If extractable hydrocarbons are identified in Site soils, disposal requirements will be determined using the quantitative PetroFLAG™ hydrocarbon analysis system (see following section). The PetroFLAG™ hydrocarbon analysis system is a broad spectrum field test kit suitable for TPH contamination regardless of the source or state of degradation (Dexsil Corporation). PetroFLAG™ field test kits do not distinguish between aromatic and aliphatic hydrocarbons, but quantify all fuels, oils, and greases as TPH. Dilutions can be used to determine concentrations of TPH/Oil & Grease above the normal calibration range. Dexsil notes that positive results for TPH may occur if naturally occurring waxes and oils, such as vegetable oils, are present in the sample. Additional detail regarding the procedure for the PetroFLAG™ kit is given in **Attachment 1**.

Soil Excavation, Staging, Sampling and Disposal:

The EP will monitor all utility trenching activities for signs of potential contamination. In particular, soils will be monitored with a hand-held photoionization detector (PID) for potential VOCs, and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of contamination that may be different than what was already characterized. Excavated material that is visibly stained or that exhibits a sustained PID reading of greater than 10 ppm will be segregated and containerized or placed in a stockpile on polyethylene or impervious surface until the material can be analyzed for TPH/Oil & Grease by laboratory analysis or using the PetroFLAG™ kit to characterize the material for appropriate disposal. In addition, any hydrocarbon contamination discovered during construction activities that was not previously characterized must also be analyzed for PCBs prior to removal and transport to an appropriate disposal facility. If excavated and stockpiled, such materials will be covered with a plastic tarp so that the entire stockpile is encapsulated, and anchored to prevent the elements from affecting the integrity of the containment. The MDE will be notified if such materials are encountered during utility work.

Soil exhibiting physical evidence of NAPL contamination or elevated TPH/Oil & Grease locations with detections in the low percentage range will be excavated and segregated, pending the completion of any required PCB analytical testing, for disposal at the on-site nonhazardous landfill (Greys Landfill). The extent of the excavation will be determined in the field following screening with the Oil Sticks™ test kit, but disposal requirements will be determined via analysis with the PetroFLAG™ test kit (because the Oil Sticks™ method is not quantitative). Any recovered NAPL will be collected for off-site disposal. As required by the appropriate and MDE approved facility, samples impacted by NAPL will be collected for profiling/waste characterization and submitted to a fixed laboratory for the following analyses: metals, VOCs, TPH-DRO/GRO, and any additional analysis required by the selected disposal facility. Upon receipt of any additional characterization analytical results, the MDE Voluntary Cleanup Program (VCP) will be notified of the proposed disposal facility. Non-impacted material without evidence of NAPL (i.e. soils that may contain measureable concentrations of TPH/Oil & Grease but below percentage levels) may be placed on the Site in areas to be paved or capped.

Reporting:

If evidence of NAPL in soil or groundwater is encountered during excavation, it will be reported to the MDE (VCP Project Manager) within two hours. Information regarding the location and characteristics of any NAPL contaminated soil will be documented as follows:

- location (exact stationing)
- extent of contamination (horizontally and vertically – prepare a sketch including dimensions)
- relative degree of contamination (i.e. free oil with strong odor vs. slight staining)
- visual documentation (take photographs and complete a photograph log)

Utility Installations in Impacted Areas:

Underground piping or conduits installed through areas of Oil & Grease or petroleum contamination shall be leak proof and water tight. All joints will be adequately sealed or gasketed, and pipes or conduits will be properly bedded and placed to prevent leakage. All trench backfill will meet the MDE definition of Clean Fill. Pipe bedding will be installed to minimize the potential for accumulation of water and concentrated infiltration. This can be achieved by using a relatively small amount of low-permeability pipe bedding; open-graded stone will be avoided or only used in thicknesses of 6 inches or less. Bedding must be properly placed and compacted below the haunches of the pipe. Clay, flowable fill, or concrete plugs will be placed every 100 feet across any permeable bedding to minimize the preferential flow and concentration of water along the bedding of such utilities.

If required, each trench plug will be constructed with a 2-foot-thick clay plug or 1-foot-thick flowable fill or concrete plug, perpendicular to the pipe, which extends at least 1 foot in all directions beyond the permeable pipe bedding. The plug acts as an anti-seep collar, and will extend above the top of the pipe. Installation of each trench plug will follow the completion of the trench excavation, installation of granular pipe bedding (because dense-graded aggregate or soil or other pipe bedding is difficult to properly compact below the haunches of the pipe), and seating of the pipe. The trench plug will then be installed by digging out a 1-foot trench below and around the pipe corridor, and placing clay or flowable fill to construct the plug. A specification drawing for installation of the trench plug has been provided as **Figure 1**.

Attachment 1 - PetroFLAG™ Procedure

PetroFLAG™ field test kits use a proprietary turbidimetric reaction to determine the TPH concentration of solvent extracted samples (USEPA). Calibration standards provided with the unit are used to perform a two-point calibration for the PetroFLAG™. A blank and a 1,000 ppm standard are run by the analyzer unit to create an internal calibration curve.

Analysis of a soil sample is performed using three simple steps: extraction, filtration, and analysis. The PetroFLAG™ analysis is performed as follows:

- Place a 10 gram soil sample in a test tube.
- Add extraction solvent to the tube.
- Shake the tube intermittently for four minutes.
- Filter the extract into a vial that contains development solution
- Allow the solution to react for 10 minutes.

The filtration step is important because the PetroFLAG™ analyzer measures the turbidity or "optical density" of the final solution. Approximately 25 samples can be analyzed per hour. The vial of developed solution is placed in the meter, and the instrument produces a quantitative reading that reveals the concentration of hydrocarbons in the soil sample. The PetroFLAG™ method quantifies all fuels, oils, and greases as TPH between 15 and 2000 ppm (Dexsil Corporation). A 10x dilution of the filtered extraction solvent will be completed to allow for quantification of soil concentrations in excess of 10,000 ppm. The specially designed PetroFLAG™ analyzer allows the user to select, in the field, the response factor that is appropriate for the suspected contaminant at each site. Vegetable-based oils have been shown to exhibit a response factor of 18% (EPA Method 9074). Using the selected response factor, the analyzer compensates for the relative response of each analyte and displays the correct concentration in parts per million (ppm).

References:

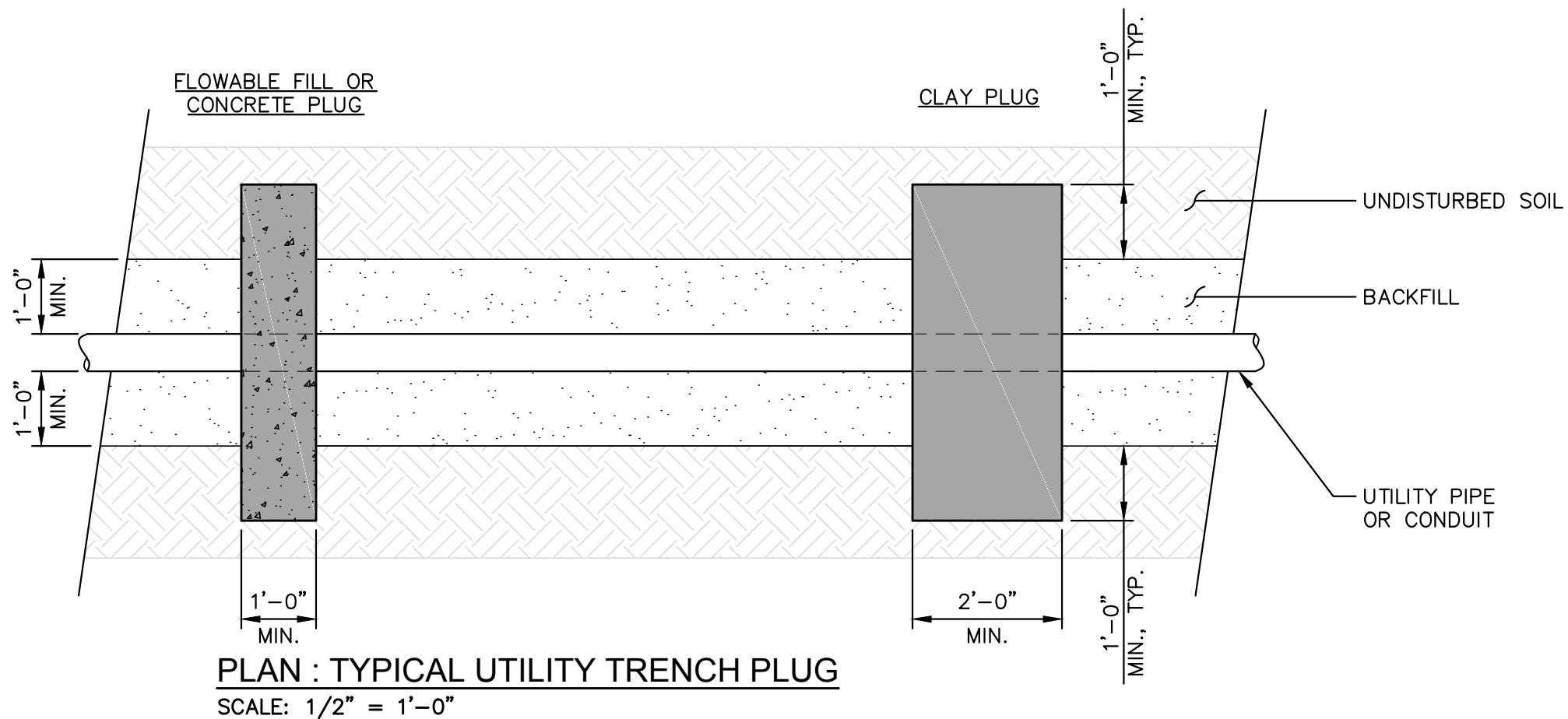
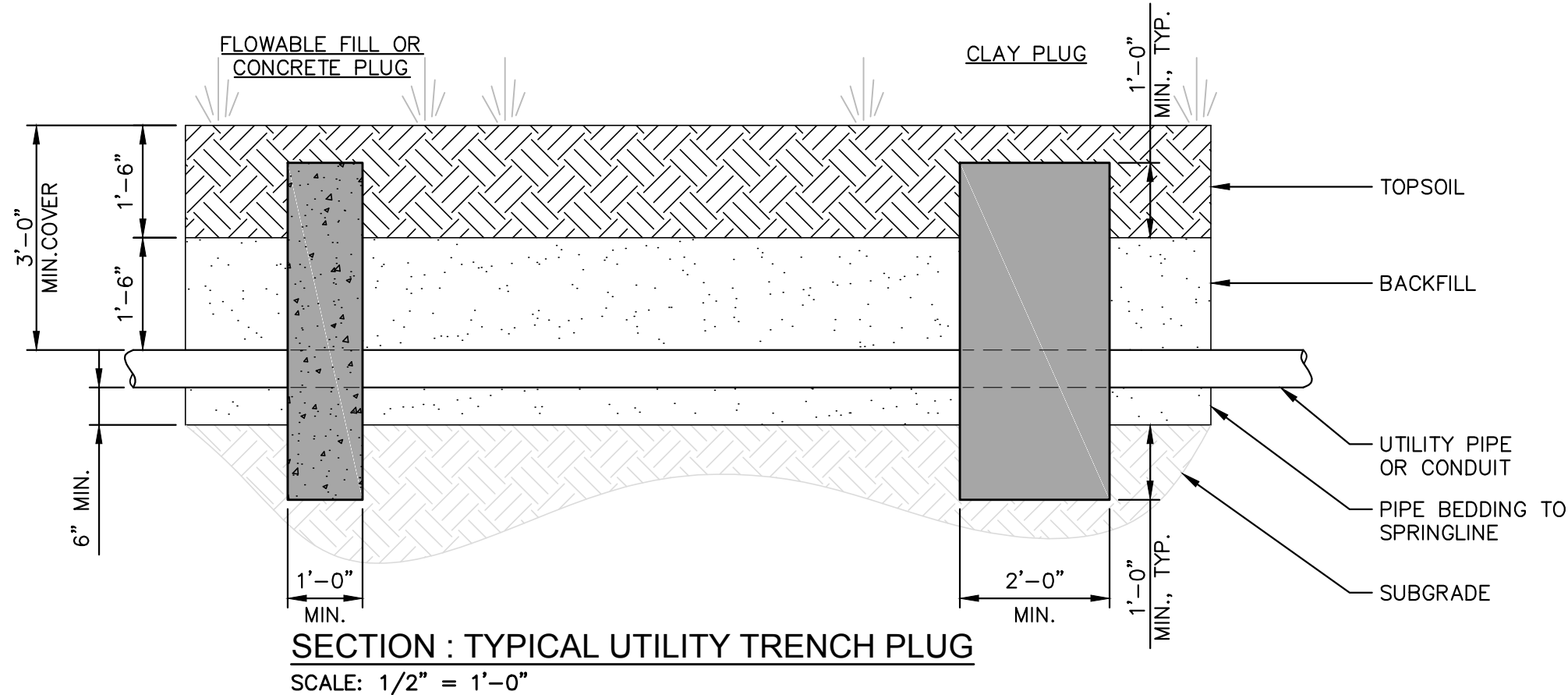
U.S. Environmental Protection Agency (EPA). Contaminated Site Clean-up Information (Clu-IN): Test Kits. Office of Superfund Remediation and Technology Innovation. <http://www.clu-in.net/characterization/technologies/color.cfm>

Dexsil Corporation. 2016. PetroFLAG Analyzer System (PF-MTR-01). http://www.dexsil.com/products/detail.php?product_id=23

EPA SW-846 Method Number 9074 - Turbidimetric Screening Procedure for Total Recoverable Hydrocarbons in Soil


GENERAL NOTES:

1. ALL PIPES OR CONDUIT PASSING THROUGH AREAS OF PETROLEUM CONTAMINATION SHALL BE LEAK-PROOF AND WATERTIGHT. ALL JOINTS SHALL BE SEALED OR GASKETED.
2. ALL PIPES SHALL BE PROPERLY PLACED AND BEDDED TO PREVENT MISALIGNMENT OR LEAKAGE. PIPE BEDDING SHALL BE INSTALLED IN SUCH A MANNER AS TO MINIMIZE THE POTENTIAL FOR ACCUMULATION OF WATER AND CONCENTRATED INFILTRATION.
3. ALL TRENCH BACKFILL SHALL MEET THE MDE DEFINITION OF CLEAN FILL.
4. TRENCH PLUGS SHALL EXTEND A MINIMUM OF ONE (1) FOOT BEYOND PERMEABLE BEDDING OR BACKFILL IN ALL DIRECTIONS.
5. ANTI-SEEP COLLARS FROM THE PIPE MANUFACTURER, THAT ARE PRODUCED SPECIFICALLY FOR THE PURPOSE OF PREVENTING SEEPAGE AROUND THE PIPE, ARE ACCEPTABLE IF INSTALLED IN STRICT ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS, AND ONLY WITH PRIOR APPROVAL BY EAG.



\\armgroup.lcl\CorpData\Projects\EnviroAnalytics Group\160443M EAG_TPA Redevelopment\Drawings\NAPL Contingency\SK01_ Utility Trench Plug.dwg Plotted: January 16, 2017

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 ARM Group Inc. Earth Resource Engineers and Consultants www.armgroup.net	UTILITY TRENCH PLUG		Figure 1
	Sparrows Point Site		
	EnviroAnalytics Group, LLC		
	January 2017	NONE	
		160443M	

APPENDIX E

HEALTH AND SAFETY PLAN

SPARROWS POINT TERMINAL SPARROWS POINT, MARYLAND

Prepared by:



Environmental Engineers

January 2015

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ATTACHMENTS

Attachment A – EAG Acknowledgment Form

Attachment B – MSDSs

1.0 INTRODUCTION

1.1 Background

The Sparrows Point Terminal site has historically been a steel making facility. It is located in Baltimore County, Maryland in the southeast corner of the Baltimore metropolitan area (approximately 9 miles from the downtown area), on the Sparrows Point Peninsula in the Chesapeake Bay watershed. The facility occupies the entire peninsula and is bounded to the west by Bear Creek; to the south by Patapsco River; and to the east by Jones Creek, Old Road Bay and residential areas of the City of Edgemere. The facility is bounded to the north by the Sparrows Point Country Club. The site is approximately 3,100 acres in size.

Pennsylvania Steel built the furnace at Sparrows Point in 1887 and the first iron was cast in 1889. Bethlehem Steel Corporation (BSC) purchased the facility in 1916 and enlarged it by building additional and plating facilities. BSC filed for bankruptcy in 2001. A series of entities has owned the site between then and now: the International Steel Group (ISG), Mittal Steel, ISG Sparrows Point, LLC, Severstal Sparrows Holding LLC, which was renamed to Severstal Sparrows Point, LLC, RG Steel Sparrows Point, LLC, and then a joint venture to Sparrows Point LLC (SP) and HRE Sparrows Point LLC. Most recently, in 2014, the property and assets were sold to Sparrows Point Terminal LLC (SPT). Environmental liability was retained by SP and work is currently being conducted by EnviroAnalytics Group, LLC (EAG) on behalf of SP.

- In addition to the current environmental investigation and remediation being conducted onsite by EAG and their consultants, there are other entities conducting work on the facility. Demolition of the remaining structures is currently ongoing at the site, and those contractors are being managed by SPT.
- The purpose of this document is to provide an overall health and safety plan (HASP) for EAG personnel and EAG directed contractors who are engaging in environmental investigation and remediation activities onsite. EAG directed contractors will also be expected to have their own Health and Safety Program, and they may opt to draft their own site specific HASP, provided it meets the requirements in this HASP.

1.2 Historic Operations

Steel manufacturing involves handling vast amounts of raw material including coke, iron ore, limestone and scrap steel, as well as recovering byproducts and managing waste materials. The operations listed below either were or are currently performed at the Sparrows Point Facility.

- Iron and steel production
- Coal chemical recovery system
- Other byproducts recovery systems
- Wastewater treatment systems
- Solid waste management
- Air pollution control

A number of site-specific environmental and hydrogeologic investigations have been prepared for the Sparrows Point facility. For the purposes of this HASP, information was obtained from the “Special Study Area Release Site Characterization” completed in 2001 by CH2MHill, as well as additional documents submitted since that time. There are five separate Special Study Areas as put forth in the Consent Decree:

- Humphrey Impoundment,
- Tin Mill Canal/Finishing Mills Areas,
- Coke Oven Area,
- Coke Point Landfill, and
- Greys Landfill.

Contaminated soils and groundwater may be present at the site. This plan was prepared based on an assessment of hazards expected to be present and a review of data from the previous site investigations and groundwater sampling events.

During the current investigations and remedial efforts, all related work will be performed in accordance with the requirements of this HASP and Occupational Safety and Health Administration (OSHA) regulations as defined in 29 Code of Federal Regulations (CFR) 1910.120 and 1926.65.

2.0 PURPOSE, SCOPE AND ORGANIZATION

This section describes the purpose, scope and organization of this HASP and the health and safety responsibilities of EAG, their employees, and their subcontractors involved in the field investigation and remediation activities at the Sparrows Point facility.

2.1 Scope

Field investigation and remediation activities for this project may include, but are not limited to:

- Groundwater sampling and monitoring,
- Groundwater and remediation well installation,
- Groundwater and remediation well repairs,
- Groundwater and remediation well closure and abandonment,
- Surface water sampling,
- Sediment sampling,
- Soil boring and subsurface soil sampling,
- Soil excavations for remedial purposes,
- Installation and operation of remediation systems for soil, soil vapor, and groundwater,
- Decommissioning and closure of remediation systems,
- Soil excavations for remedial purposes,
- Insitu soil mixing/soil stabilization,
- Exsitu soil mixing/soil stabilization,
- Dredging operations along Tin Mill Canal,
- Insitu chemical and/or biological injections, and
- Recovery of non-aqueous phase liquids (NAPL)

When EAG personnel are providing oversight of subcontractors, they will attend the safety and health briefings held by the contractor. EAG personnel will follow the requirements of this HASP, as well as any potentially more stringent requirements of the contractor’s health and safety plan.

When EAG personnel are conducting tasks on their own, with or without subcontractors, they will follow the requirements of this HASP. EAG contractors, such as drillers, will also be required to follow the requirements of this HASP, as well as any more stringent requirements of the contractor’s health and safety plan.

All EAG field personnel, including subcontractors to EAG, will be required to read and understand this HASP and agree to implement its provisions. All site personnel will sign the Acknowledgement Form included in **Attachment A** stating that they have read, understood, and agree to abide by the guidelines and requirements set forth in this plan.

2.2 Organization of Document

This HASP includes health and safety procedures for all generally anticipated project field activities. This plan also meets the OSHA requirements contained in the CFR, specifically 29 CFR 1910.120 and 29 CFR 1926, by including the following items:

- A description of staff organization, qualifications and responsibilities (Section 2.3),
- Hazard analysis (Section 3.0),
- Health hazard information (Section 4.0),
- Personal protective equipment (PPE), including available first aid, emergency, and safety equipment (Section 5.0),
- Employee and subcontractor training and standard safety procedures (section 6.0),
- Exposure monitoring plan (Section 7.0),
- Medical surveillance (Section 8.0),
- Site control measures and decontamination procedures for personnel and equipment (Section 9.0),
- Emergency response and contingency procedures (section 10.0), and
- Material Safety Data Sheets (MSDSs) for chemicals used on-site (**Attachment B**).

2.3 EAG Health and Safety Personnel

Personnel responsible for implementing this HASP include:

EAG Contacts for Sparrows Point Project Work	
VP Remediation, Russ Becker	(314) 686-5611
Senior Project Manager, James Calenda	(314) 620-3056
Senior Project Engineer, Elizabeth Schlaeger	(314) 307-1732
Josh Burke – Field Operations Manager	(314) 686-5623
Project Field Team Members, Jeff Wilson and Bill Trentzsch	(314) 620-3135, (314) 686-5598

3.0 HAZARD ANALYSIS

This section outlines the potential hazards related to the field activities listed in Section 2.1.

3.1 Hazard Analysis

The field activities planned for this project pose potential health and safety hazards for field team members. This section describes the hazards associated with the above-listed field activities. Detailed chemical, physical, and biological hazards information is provided in Section 4.0 (Health Hazard Information).

Hazards to which employees and subcontractors may be exposed to as a result of the above-listed activities include potential chemical exposures, lacerations, excessive noise, thermal stress, lifting of excessive weight or bulk, hand tools and heavy equipment, drilling and slips, trips and falls.

3.1.1 Chemical Hazards

Potential exposures to chemicals in the soil or groundwater include the possibility of dermal exposure (contact and/or absorption), inhalation of chemical contamination that may be encountered during sampling or during equipment decontamination activities, or ingestion of contaminants if good personal hygiene practices are not followed.

Benzene, naphthalene, and various metals are the major contaminants that have been identified in groundwater during previous investigations at the site. In addition, light NAPL (LNAPL – benzene, in particular) and dense NAPL (DNAPL – naphthalene, in particular) have also been identified or are heavily suspected in various locations in the Coke Oven Area. Dissolved metals the chemicals of concern primarily located in the area of Tin Mill Canal and the Rod and Wire Mill Area. Treatment chemicals, such as sulfuric acid, are currently being used in remediation systems. All appropriate MSDS sheets will be reviewed that apply to the investigation or remedial tasks being conducted. MSDS sheets are located in **Attachment B**. It should be noted that this is a dynamic document: should any additional chemicals be introduced or discovered, the MSDS sheets will be added to **Attachment B**, as necessary.

3.1.2 Physical Hazards

The potential physical hazards associated with field activities include:

- Excessive lifting
- Slips, trips, and falls
- Working at heights
- Exposure to extreme outside temperatures and weather
- Equipment hazards
- Drilling Hazards
- Noise
- Dust and fumes
- Injury from tools, equipment, rotating parts
- Electrical hazards
- Buried and overhead hazards
- Work over water
- Driving to, from, and around the site (including working in trafficked areas)

Additional hazards may be encountered based on the various task at hand. It will be the responsibility of the site manager, with the help of field staff, to identify and address any additional hazards on a “per task or job” basis. A Job Safety Analyses (JSA) may need to be conducted prior to the start of various tasks. Safety meetings will be conducted with all staff in attendance, before the start of any new task or when any significant personnel or other changes (such as a swift change in weather, for example) occur. Updated information relating to physical hazards will be presented during these meetings in an effort to familiarize the crew with potential hazards, discuss new situations, and determine how the associated risks can be reduced. Further, good housekeeping practices will be enforced to preclude other risks resulting from clutter and inattention to detail. In addition, internal field audits will be randomly conducted to ensure adherence to all procedures are being followed.

3.1.3 Biological Hazards

Biological hazards that may be encountered when conducting field activities include the following:

- Poisonous snakes and spiders
- Ticks and tick-borne diseases
- Stinging insects such as chiggers, bees, wasps, etc.
- Various viruses and diseases spread via animal to human contact such as West Nile virus or rabies
- Various viruses and diseases spread via human to human contact such as colds or the flu
- Dermal contact with poison ivy, oak, and/or sumac
- Bloodborne pathogens when administering first aid

First aid kits will be available on-site. It is crucial to note that any site personnel who has significant allergies should communicate that information to the field team they are working with, along with the location of their auto-injector pen (such as an Epi-Pen) for use in case of going into anaphylactic shock from something that would cause such a reaction (like a bee sting, for example). Personnel who suffer from such allergies are responsible for providing their own auto-injector devices as those are typically prescription based as well as specific to their particular allergy.

4.0 HEALTH HAZARD INFORMATION

This section provides chemical hazard information for those potentially hazardous materials expected to be present at the facility. Potential physical and biological hazards are also discussed in this section.

4.1 Chemical Hazards

Exposure to chemicals through inhalation, ingestion, or skin contact may result in health hazards to field workers. Hazards associated with exposure will be evaluated using OSHA Permissible Exposure Limits (PELs) and the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs). Each of these values are 8-hour, time-weighted averaged (TWAs) above which an employee cannot be exposed. EAG may also use the National Institute of Occupational Safety and Health (NIOSH) Recommended Exposure Limits (RELs) where applicable. Although the OSHA PELs are the only exposure limits enforceable by law, the most stringent of exposure limits will be used as the EAG-enforced exposure criteria during field activities.

The following is a summary of the potential hazards created by the compounds that may be encountered during field activities. Data from sampling of groundwater wells was reviewed to identify potential contaminants at the site. Contaminants of concern may include benzene, toluene, ethylbenzene and xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs), phenols, metals and water treatment chemicals. Table 4-1 contains chemical information and exposure limits for various chemicals that may be expected to be present in the investigation and remediation efforts. During the recovery of NAPL, the major contaminants of concern are benzene and naphthalene. It is possible that carbon monoxide may also be encountered from the use of various internal combustion engines (vehicular or otherwise); however, it is anticipated that since any such engine will be used outdoors, it is not expected that concentrations of concern will accumulate. With the use of any such engine, the engine should be positioned such that site personnel are upwind of the engine exhaust.

If any chemicals are brought on-site, MSDS must be made available and added to **Attachment B**. Personnel must be trained in the hazards and use of chemicals.

**Table 4-1
Chemical Contaminants of Potential Concern**

Chemical Name Synonyms (trade name)	Exposure Limits	Characteristics	Route of Exposure	Symptoms of Exposure
Benzene	PEL: 1PPM REL: 0.1 CA TLV: 0.5PPM STEL: 1PPM (NIOSH) Skin: YES	Colorless to light-yellow liquid with aromatic odor. LEL: 1.2% UEL: 7.8% VP: 75mm Fl.P: 12°F	INH ABS ING CON	Irritation of eyes, skin, nose, respiratory system, giddiness, headache, nausea, fatigue, anorexia, dermatitis, bone marrow depression
Ethylbenzene	PEL: 100PPM REL: 100PPM TLV: 100PPM STEL: 125PPM IDLH: 800PPM Skin: NO	Colorless liquid with an aromatic odor. LEL: 0.85 UEL: 6.7% IP: 8.76EV VP: 7mm Fl.P: 55°F	INH ING CON	Irritation of eyes, skin, mucous membranes; headache; dermatitis
1,1 dichloroethane	PEL: 100PPM REL: 100PPM TLV: 100PPM STEL: NA IDLH: 3000PPM Skin: NO	Colorless, oily liquid with a chloroform-like odor. LEL: 6.2% UEL: 16% IP: 11.05EV Vp: 64mm Fl.P: 56°F	INH ING CON	Irritation of eyes, CNS depression, liver, kidney, lung damage
Phenol	PEL: 5PPM REL: 5PPM, 15.6PPM (C) TLV: 5PPM STEL: NA IDLH 250PPM Skin: YES	Colorless to light pink crystalline solid with a sweet, acrid odor. LEL: 1.8% UEL: 5.9% IP: 8.12EV Vp: 0.08mm Fl.P: 175°F	INH ING CON ABS	Irritated eyes, nose, throat, anorexia, weakness, muscular ache, pain, dark urine, cyanosis, liver, kidney damage, skin burns, dermatitis, tremor, convulsions, twitch
Naphthalene	PEL: 10PPM REL: 10PPM TLV: 10PPM STEL: 15PPM IDLH: 250PPM Skin: YES	Colorless to brown solid with an odor of mothballs LEL: 0.9% UEL: 5.9% IP: 8.12EV Vp: 0.08mm Fl.P: 174°F	INH ABS ING CON	Irritation of eyes, headache, confusion, excitement, malaise, nausea, vomiting, abdominal pain, irritated bladder, profuse sweating, jaundice, hematuria, renal shutdown, dermatitis, optical neuritis, corneal damage
Toluene	PEL: 200PPM, 300PPM (C) REL: 100PPM TLV: 20PPM STEL: 150PPM IDLH: 500PPM Skin: YES	Colorless liquid with a sweet, pungent benzene-like odor. LEL: 1.1% UEL: 7.1% IP: 8.82EV VP: 21MM Fl.P: 40°F	INH ABS ING CON	Irritation of eyes, nose, fatigue, weakness, confusion, euphoria, dizziness, headache, dilated pupils, lacrimation, nervousness, muscle fatigue, insomnia, dermatitis, liver, kidney damage
Xylenes	PEL: 100PPM REL: 100PPM TLV: 100PPM STEL: 150PPM IDLH: 900PPM Skin: NO	Colorless liquid with an aromatic odor. LEL: 0.9% UEL: 6.7% IP: 8.40EV VP: 5MM Fl.P: 88°F	INH ABS ING CON	Irritated eyes, nose, respiratory system, headache, fatigue, dizziness, confusion, malaise, drowsiness, incoherence, staggering gait, corneal vacuolization, anorexia, nausea, vomiting, abdominal pain, dermatitis

Chemical Name Synonyms (trade name)	Exposure Limits	Characteristics	Route of Exposure	Symptoms of Exposure
Styrene	PEL: 100PPM, 200PPM (C) REL: 50PPM TLV: 20PPM STEL: 40PPM IDLH: 700PPM Skin: NO	Colorless to yellow, oily liquid with a sweet, floral odor. LEL: 0.9% UEL: 6.8% IP: 8.40eV VP: 5MM F.I.P: 88°F	INH ABS ING CON	Irritated eyes, nose, respiratory system, headache, fatigue, dizziness, confusion, malaise, drowsiness, weakness, narcosis, dermatitis
Chlorodiphenyl (54% chlorine) (11097-69-1)	PEL: 0.5mg/m ³ REL: 0.001mg/m ³ TLV: 0.5mg/m ³ STEL: N/A IDLH: 5mg/m ³ (CA) Skin: YES	Colorless to pale yellow viscous liquid with a mild hydrocarbon odor. LEL: NA UEL: NA IP: UNKNOWN VP: 0.00006MM F.I.P: NA	INH ABS ING CON	Irritated eyes, chloracne, liver damage, reproductive effects (carcinogen)
Polynuclear aromatic hydrocarbons (PAHs) (coal tar pitch volatiles) (65996-93-2)	PEL: 0.2mg/m ³ REL: 0.1mg/m ³ TLV: 0.2 mg/m ³ STEL: N/A IDLH: 80mg/m ³ (CA) Skin: NO	The pitch of coal tar is black or dark brown amorphous residue that remains after the redistillation process. LEL: N/A UEL: N/A IP: VARIES VP: VARIES F.I.P: VARIES	INH CON	Direct contact or exposure to vapors may be irritating to the eyes. Direct contact can be highly irritating to the skin and produce dermatitis. Exposure to vapors may cause nausea and vomiting. A potential human carcinogen.
Arsenic (inorganic)	PEL: 0.01mg/m ³ REL: NONE TLV: 0.5 mg/m ³ STEL: N/A IDLH: 5mg/m ³ (CA) Skin: NO	Silver-gray or tin-white brittle odorless solid. Air odor threshold: N/D.	INH ABS CON ING	Symptoms include ulceration of nasal septum, gastrointestinal disturbances, respiratory irritation and peripheral neuropathy. Potential occupational carcinogen.
Barium	PEL: 0.5mg/m ³ REL: 0.5mg/m ³ TLV: 0.5mg/m ³ STEL: N/A IDLH: 50mg/m ³ Skin: NO	White, odorless solid. Air odor threshold: N/D.	INH ING CON	Irritated eyes, skin, upper respiratory system, skin burns, gastroenteritis, muscle spasm, slow pulse, cardiac arrhythmia
Cadmium (elemental)	PEL: 0.005mg/m ³ REL: CA TLV: 0.01mg/m ³ STEL: N/A IDLH: 9mg/m ³ (CA) Skin: NO	Silver-white, blue-tinged lustrous, odorless solid. Air odor threshold: N/D.	INH ING	Symptoms include pulmonary edema, cough, tight chest, head pain, chills, muscle aches, vomiting and diarrhea. Potential occupational carcinogen.
Chromium (Metal)	PEL: 1.0mg/m ³ REL: 0.5mg/m ³ TLV: 0.5mg/m ³ STEL: N/A IDLH: 250mg/m ³ Skin: NO	Blue-white to steel-gray lustrous, brittle, hard odorless solid. Air odor threshold: N/D.	INH ING CON	Symptoms may include irritated eyes and skin, lung fibrosis.
Chromium (Chromium III inorganic compounds)	PEL: 0.5mg/m ³ REL: 0.5mg/m ³ TLV: 0.5mg/m ³ STEL: N/A IDLH: 25mg/m ³ Skin: NO	Varies depending on specific compound.	INH ING CON	Irritation of eyes, sensitivity dermatitis

Chemical Name Synonyms (trade name)	Exposure Limits	Characteristics	Route of Exposure	Symptoms of Exposure
Copper	PEL: 1mg/m ³ REL: 1mg/m ³ TLV: 1mg/m ³ STEL: N/A IDLH: 100mg/m ³ Skin: NO	Reddish, lustrous, malleable, odorless solid	INH ING CON	Irritation of eyes, nose, pharynx, nasal septum perforations, metallic taste, dermatitis
Lead (Elemental & Inorganic as Pb)	PEL: 0.05mg/m ³ RELO.1mg/m ³ TLV: 0.05mg/m ³ STEL: N/A IDLH: 100mg/m ³ Skin: NO	A heavy, ductile soft gray solid. Air odor threshold: N/D.	INH ING CON	Accumulative poison may cause weakness, insomnia, facial pallor, anorexia, malnutrition, constipation, abdominal pain, anemia, gingival lead line, paralysis of wrists and ankles, hypertension and kidney disease.
Nickel	PEL: 1mg/m ³ REL: 0.015mg/m ³ (Ca) TLV: 0.1mg/m ³ STEL: N/A IDLH: 10mg/m ³ Skin: NO	Lustrous, silvery, odorless solid. Air odor threshold: N/A VP: 0mm	INH CON ING	Sensitivity dermatitis, allergic asthma, pneumonitis
Vanadium pentoxide dust	PEL: 0.5mg/m ³ (C) REL: 0.05mg/m ³ (C) TLV: 0.05mg/m ³ STEL: N/A IDLH: 35mg/m ³ Skin: NO	Yellow-orange powder or dark gray, odorless flakes dispersed in air. VP: 0mm	INH ING CON	Irritated eyes, skin, throat, green tongue, metallic taste, eczema, cough, fine rales, wheezing, bronchitis
Zinc oxide	PEL: 5mg/m ³ REL: 5mg/m ³ TLV: 2mg/m ³ STEL: 10mg/m ³ IDLH: 500mg/m ³ Skin: NO	White, lustrous solid	INH	Metal fume fever, chills, muscular ache, nausea, fever, dry throat, cough, weakness, metallic taste, headache, blurred vision, low back pain, vomiting, fatigue, malaise
Sulfuric Acid (water treatment chemical)	PEL: 1mg/m ³ TLV: 0.2mg/m ³ Skin: YES	Oily, colorless to slightly yellow, clear to turbid liquid	IHN ABS ING CON	Can cause irritation or corrosive burns to the upper respiratory system, lung irritation, pulmonary edema, burns to mouth throat and stomach, erode teeth, skin lesions
Antiscale (water treatment chemical)	PEL: 1mg/m ³ TLV: 0.2mg/m ³ Skin: YES	Liquid, colorless, clear	IHN ABS ING CON	May cause severe skin burns and eye damage, can cause cancer, fatal if inhaled, may damage organs through prolonged exposure
Antifoam (water treatment chemical)	N/E	Liquid emulsion, white, opaque	IHN ABS ING CON	May be harmful to skin, if inhaled and if swallowed
Gases				
Carbon Monoxide	PEL: 50PPM REL: 35PPM TLV: 25PPM STEL: 200PPM (C) IDLH: 1200PPM Skin: NO	Colorless, odorless gas LEL: 12.5% UEL: 74% IP: 14.01eV VP: >35atm FI.P: N/A	INH	Headache, rapid breathing, nausea, tiredness, dizziness, confusion

NOTES:

OSHA PEL	Occupational Safety and Health administration Final Rule Limits, Permissible Exposure Limit for an eight-hour, time-weighted average
ACGIH TLV	American Conference of Governmental Industrial Hygienists, Threshold Limit Value for eight-hour, time-weighted average
STEL	Short-term Exposure Limit for a 15-minute, time-weighted average
NIOSH IDLH	National Institute for Occupational Safety and Health, Immediately Dangerous to Life or Health concentration
PPM	Part of vapor or gas per millions parts of air by volume at 25°Celsius and 760mm Hg mg/m ³ (milligram of substance per cubic meter of air)
CA	NIOSH has identified numerous chemicals that it recommends to be treated as potential or confirmed human carcinogens.
(C)	The (ceiling) concentration that should not be exceed during any part of the working exposure.
Skin	Refers to the potential contribution to the overall exposure by the cutaneous (absorption) route, including mucous membranes and eye, either by airborne or more particularly by direct contact with the substance.
UEL	Upper Explosive Limit – the highest concentration of a material in air that produces an explosion in fire or ignites when it contacts an ignition source.
LEL	Lower Explosive Limit – the lowest concentration of the material in air that can be detonated by spark, shock, fire, etc.
INH	Inhalation
ABS	Skin absorption
ING	Ingestion
CON	Skin and/or eye contact

4.2 Physical Hazards

Field employees and subcontractors may be exposed to a number of physical hazards during this project. Physical hazards that may be encountered include the following:

- Heat and cold stress
- Lifting hazards
- Slips, trips and falls
- Working around heavy equipment
- Drilling hazards
- Noise
- Use of hand and power tools
- Buried hazards
- Electrical hazards
- Underground and overhead utilities
- Working over water
- Travel to and from site

4.2.1 Heat Stress

Local weather conditions may produce an environment that will require restricted work schedules in order to protect employees from heat stress. The Project Manager or the Field Lead Team Member will observe workers for any potential symptoms of heat stress. Adaptation of work schedules and training on recognition of heat stress conditions should help prevent heat-related illnesses from occurring. Heat stress controls will be stated at 70°F for personnel in protective clothing and at 90°F for personnel in regular work clothing. Heat stress prevention controls include:

- Allow workers to become acclimatized to heat (three to six days)
- Provide rest breaks in a shaded or air-conditioned break area
- Provide sun screen to prevent sun burn
- Provide drinking water and electrolyte-replenishing fluids
- Keep ice readily available to rapidly cool field team members

The following Heat Stress Index should be used as a guide to evaluate heat stress situations. If the Heat Stress exceeds 105 degrees Fahrenheit, contact the project manager prior to conducting work for detailed guidance.

Heat Stress Index									
Temp. °F	Relative Humidity								
	10%	20%	30%	40%	50%	60%	70%	80%	90%
105	98	104	110	120	132				
102	97	101	108	117	125				
100	95	99	105	110	120	132			
98	93	97	101	106	110	125			
96	91	95	98	104	108	120	128		
94	89	93	95	100	105	111	122		
92	87	90	92	96	100	106	114	122	
90	85	88	90	92	96	100	106	114	122
88	82	86	87	89	93	95	100	106	115
86	80	84	85	87	90	92	96	100	109
84	78	81	83	85	86	89	91	95	99
82	77	79	80	81	84	86	89	91	95
80	75	77	78	79	81	83	85	86	89
78	72	75	77	78	79	80	81	83	85
76	70	72	75	76	77	77	77	78	79
74	68	70	73	74	75	75	75	76	77

NOTES: Add 10° F when protective clothing is being used; Add 10° F when in direct sunlight

HSI Temp	Category	Injury Threat
Above 130° F	Extreme Danger	No work unless emergency exists. Contact Cardno ATC RSC and Corporate Risk Management Department prior to proceeding. Heat cramps or exhaustion likely, heat stroke possible if exposure is prolonged and there is physical activity.
105° to 130° F	Danger	Contact RSC prior to proceeding. Requires strict adherence to ACGIH Heat Stress Guidelines, including use of on-site WBGT equipment. Heat cramps or exhaustion likely, heat stroke possible if exposure is prolonged and there is physical activity.
90° to 105° F	Extreme Caution	Heat cramps or exhaustion likely, heat stroke possible if exposure is prolonged and there is physical activity.
80° to 90° F	Caution	Heat cramps or exhaustion likely, heat stroke possible if exposure is prolonged and there is physical activity.
Below 80° F	Normal Range	Typical conditions for time of year. Little or no danger under normal circumstances. As always, anticipate problems and work safely.

4.2.2 Cold Stress

Frostbite and hypothermia are two types of cold injury that personnel must be protected against during the performance of field duties. The objective is to prevent the deep body temperature from falling below 96.8° F and to prevent cold injury to body extremities. Two factors influence the development of a cold injury the ambient temperature, and wind velocity. Reduced body temperature will very likely result in reduced mental alertness, reduction in rational decision making, and/or loss of consciousness with the threat of death.

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Use appropriate cold weather clothing when temperatures are at or below 40° F as exposed skin surfaces must be protected. These protective items can include facemask, hand wear, and foot wear. Workers handling evaporative solvents during cold stress conditions will take special precautions to avoid soaking gloves and clothing because of the added danger of prolonged skin contact and evaporative cooling. Personnel will wear protective clothing appropriate for the level of cold and planned physical activity. The objective is to protect all parts of the body, with emphasis on the hands and feet. Eye protection against glare and ultraviolet light should be worn in snowy and icy conditions.

The work rate should not be so great as to cause heavy sweating that could result in wet clothing. If heavy work must be done, opportunities for rest breaks will be provided where workers have the opportunity to change into dry clothing. Conversely, plan work activities to minimize time spent sitting or standing still. Rest breaks should be taken in a warm, dry area. Windbreaks can also be used to shield the work area from the cooling effects of wind.

If extreme cold-related weather conditions occur, EAG field personnel and subcontractors will take the following precautions:

- Wear adequate insulated clothing when the air temperature drops below 40°F
- Reduce work periods in extreme conditions to allow adequate rest periods in a warm area
- Change clothes when work clothes become wet
- Avoid caffeine (which has diuretic and circulatory effects)

4.2.3 Lifting Hazards

Field personnel may be exposed to injury caused by lifting heavy objects and various pieces large or unwieldy pieces of equipment. All field team members will be trained in the proper methods for lifting heavy and/or large equipment and are cautioned against lifting objects that are too heavy or too big for one person. Proper lifting techniques include the following:

- Keep feet approximately shoulder width apart
- Bend at the knees
- Tighten abdominal muscles
- Lift with the legs
- Keep the load close to the body
- Keep the back upright
- Use the buddy system for larger or heavy pieces of equipment

All drums will be staged using an approved drum dolly or other appropriate equipment. Proper care will be taken in the use of this equipment. Healthy employees with no medical restrictions may lift and carry a maximum of 50 pounds using proper lifting and carrying techniques. This recommended weight limit may be reduced depending on physical and workplace factors.

4.2.4 Slips, Trips and Falls

The most common hazards that will be encountered during field activities will be slips, trips and falls. Field team members are trained to use common sense to avoid these hazards such as using work boots/safety shoes with nonskid soles. When working on slippery surfaces, tasks will be planned to decrease the risk of slipping via avoiding the slippery areas, if possible, or utilizing engineering controls. Engineering controls may involve the placement of supplemental material such as boards, gravel, or ice melt should be utilized to mitigate slippery conditions. Other engineering controls may involve the use of footgear traction control devices. Employees and subcontractors will avoid slippery surfaces, use engineering controls as appropriate, not hurry, and maintain good housekeeping.

4.2.5 Buried Hazards

Whenever the ground is penetrated, the potential for contacting buried hazards exists. During the planning/mobilization phase, prior to drilling or other excavation activities, EAG personnel and/or their contractors will establish the location of underground utility lines (gas, electrical, telephone, fiber optic cable, etc.) and/or substructures or other potential buried hazardous items. This may be conducted by review of historic utility and substructure maps, private utility locates, ground penetrating radar, or other technologies. If there is any evidence of utilities or subsurface objects/structures, drilling or excavation activities may be offset. If activities cannot be offset, measures will be taken to remove, disconnect, and/or protect the utilities and/or subsurface structures and/or objects. Every reasonable effort will be made to clear the area of intrusive work prior to fieldwork being started.

4.2.6 Electrical Hazards

It may be possible that overhead power lines will be in proximate locations during drilling or excavation activities. At least a 20 foot clearance must be maintained from overhead power lines. No equipment such as drill rigs or dump trucks can be moved while masts or buckets are in the upright position. Field personnel and subcontractors performing electrical work are required to be appropriately trained to work on the electrical systems in question prior to start of work. Authorization from project management personnel is required prior to any electrical work or work near overhead power lines. . When using extension cords, all field workers will ensure that they are in good working condition, are correctly rated for use, and do not contain abrasions such that bare wires could be exposed to the environment. Extension cords will not be used in wet areas without plugging the extension cord into a ground fault circuit interrupter (GFCI). GFCIs will detect a short circuit and cut power.

4.2.7 Heavy Equipment Operations

Heavy equipment must be operated in a safe manner and be properly maintained such that operators and ground personnel are protected.

Requirements for Operators

- Only qualified, trained, and authorized operators are allowed to operate equipment
- Seat belts will be used at all times in all equipment and trucks
- Operators will stop work whenever ground personnel or other equipment enter their work area; work will resume only when the area has been cleared
- No personnel may ride on equipment other than the Authorized Operator
- No personnel may be carried or lifted in the buckets or working “arms” of the equipment
- Spotters will be used when ground personnel are in the vicinity of heavy equipment work areas and/or when an operator is backing equipment near other structures or congested area

Requirements for Ground Personnel

- All ground personnel must wear orange protective vests in work areas with any operating heavy equipment
- Ground personnel will stay outside of the swing zone or work area of any operating equipment
- Ground personnel may only enter the swing or work area of any operating equipment when:
 - They have attracted the operators attention and made eye contact
 - The operator has idled the equipment down and grounded all extensions
 - The operator gives the ground personnel permission to approach
- Ground personnel shall never walk or position themselves between any fixed object and running equipment or between two running pieces of equipment

Equipment

- Maintain operations manuals at the site for each piece of equipment that is present and in use
- Ensure operators are familiar with the manual for the equipment and operate the equipment within the parameters of the manual
- Ensure all equipment is provided with roll-over protection systems
- Verify that seatbelts are present and functional in all equipment
- Prohibit the use of equipment that has cab glass which is broken or missing
- Ensure that backup alarms are functional on all trucks and equipment
- Require all extensions such as buckets, blades, forks, etc. to be grounded when not in use
- Require brakes to be set and wheels chocked (when applicable) when not in use

Daily inspections of equipment are required using a Daily Heavy Equipment Safety Checklist. Equipment deemed to be unsafe as a result of daily inspection will not be used until required repairs or maintenance occurs. During maintenance/repair, ensure that motors are turned off, all extensions are grounded or securely blocked, controls are in a neutral position, and the brakes are set.

4.2.8 Drilling and Excavation Safety

Prior to any intrusive work, as previously mentioned, the location of underground utilities, such as sewer, telephone, gas, water and electric lines must be determined and plainly staked. Necessary arrangements must be made with the utility company or owner for the protection, removal or relocation of the underground utilities. In such circumstances, excavation will be done in a manner that

does not endanger the field personnel engaged in the work or the underground utility. Utilities left in place will be protected by barricading, shoring, suspension or other measures, as necessary.

The use of unsafe or defective equipment is not permitted. Equipment must be inspected regularly. If found to be defective, equipment must be immediately removed from use and either repaired or replaced prior to resuming work with that equipment. Field personnel will be familiar with the location of first-aid kits and fire extinguishers. Telephone numbers for emergency assistance must be prominently posted and kept current.

Good housekeeping conditions will be observed in and around the work areas. Suitable storage places will be provided for all materials and supplies. Pipe, drill rods, etc. must be securely stacked on solid, level sills. Work surfaces, platforms, stairways, walkways, scaffolding, and access ways will be kept free of obstructions. All debris will be collected and stored in piles or containers for removal and disposal.

The area of the site to undergo intrusive activity must be walked over with the drillers and/or heavy equipment operators to identify all work locations, as well as making sure all marked utilities are seen by those doing the intrusive work.

Drilling Specific Concerns:

In areas where utilities have been identified or may be suspected, pre-drilling clearance such as hand-augering, hand excavation (with shovels or post-hole diggers), or air-knifing to a depth of at least 5' below ground surface (BGS) may be required. The Project Manager will provide guidance in those instances on what has been determined as an acceptable means of clearing drilling locations. It should be noted that if the soil lithology changes to gravel within those 5 feet, that may be an indication of a utility trench and extreme caution should be taken OR the drilling location should be offset 5 horizontal feet from the original location. Should 3 consecutive attempts be made without success to offset a particular drilling location, the field personnel should stop and contact the Project Manager for further instruction.

Special precaution must be taken when using a drill rig on a site within the vicinity of electrical power lines and other overhead utilities. Electricity can shock, burn and cause death. When overhead electrical power lines exist at or near a drilling site, all wires will be considered dangerous.

A check will be made for sagging power lines before a site is entered. Power lines will not be lifted to gain entrance. The appropriate utility company will be contacted and a request will be made that it lift or raise cut off power to the lines.

The area around the drill rig will be inspected before the drill rig mast (derrick) is raised at a site in the vicinity of power lines. The minimum distance from any point on the drill rig to the nearest power line will be determined when the mast is raised or is being raised. The mast will not be raised and the drill rig will not be operated if this distance is less than 20 feet, because hoist lines and overhead power lines can be moved toward each other by the wind.

Before the mast is raised, personnel will be cleared from the immediate area, with the exception of the operator and a helper, when necessary. A check will be made to ensure safe clearance from energized power lines or equipment (minimum 20-foot clearance). Unsecured equipment must be removed from the mast and cables, mud lines and catline ropes must be adequately secured to the mast before raising. After it is raised, the mast must be secured to the rig in an upright position with steel pins.

Excavation Specific Concerns:

For excavation work, entry into an excavated area or trench will only be allowed when:

- Shoring, sloping, and spoil pile placement is in conformance with 29 CFR 1926 Subpart P, and
- Personal protection and monitoring, as detailed in this HASP, has been implemented.

All excavation contractors are required to provide an OSHA trained and certified Competent Person. Daily inspections of excavations, the adjacent areas, and protective systems shall be made by the Competent Person for evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions. An inspection shall be conducted by the Competent Person prior to the start of work and as needed throughout each shift. Inspections shall also be made after every rainstorm or other hazard increasing occurrence. All inspections made by the Competent Person should be recorded in the field log book. No personnel shall perform work in a trench or excavation that contains accumulated water (any accumulated water will need to be either pumped out until the trench/excavation is dry, or the accumulated water is allowed to disperse naturally). Each employee in an excavation shall be protected from cave-ins by an adequate protective system except when excavations are made entirely in stable rock or the excavation is less than 5 feet in depth and examination by the Competent Person provides no indication of a potential cave-in. Protective systems consist of sloping or benching, use of trench boxes or other shielding mechanisms, or the use of a shoring system in accordance with the regulations.

When mobile equipment is operated adjacent to an excavation and the operators/drivers do not have a clear and direct view of the edge of the excavation, a warning system such as barricades, hand or mechanical signals, or spotters are required.

Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard to personnel in the excavation. All temporary spoil piles shall be kept at least 2 feet away from the edge of the excavation. Spoil piles should be placed to channel rainwater or other run-off water away from the excavation.

All excavations deeper than 4 feet deep and which have the potential to have a hazardous atmosphere or oxygen deficient atmospheres (less than 19.5% oxygen) must be tested to ensure safe working conditions, prior to entry.

4.2.9 Use of Hand Tools and Portable Power Tools

Hand tools will be kept in good repair and used only for their designed purposes. Proper protective eyewear will be worn when using hand tools and portable power tools. Unguarded sharp-edged or

pointed tools will not be carried in field personnel's pockets. The use of tools with mushroomed heads, split or defective handles, worn parts, or other defects will not be permitted. Inspect all tools prior to start-up or use to identify any defects. Tools that have become unsafe will be reconditioned before reissue or they will be discarded and replaced. Throwing or dropping of tools from one level to another will not be permitted; rather, containers and hand lines will be used for transporting tools from one level to another if working at heights.

Non-sparking tools will be used in atmospheres where sources of ignition may cause fire or explosion. Electric-powered shop and hand tools will be of the double-insulated, shockproof type, or they will be effectively grounded. Power tools will be operated only by designated personnel who are familiar and trained with their use. When not in use, tools will not be left on scaffolds, ladders or overhead working surfaces.

4.2.10 Noise

Exposure to high levels of noise may occur when working near drill rigs or other heavy equipment. Also, depending upon where the work is being performed, local equipment (e.g., airports, factory machines, etc.) may produce high levels of noise. A good indication of the need for hearing protection is when verbal communication is difficult at a distance of 2-3 feet. Personnel will be provided with ear plugs and/or earmuffs when exposed to noise levels in excess of the 8-hour Permissible Exposure Limit (PEL) of 90 decibels.

4.2.11 Work Zone Traffic Control

Personnel will exercise caution when working near areas of vehicular traffic. Work zones will be identified by the use of delineators (traffic cones, flags, vehicles, DOT approved devices, temporary or permanent fencing, and/or safety barrier tape). Personnel will wear reflective vests when working in these areas. Depending on frequency, proximity, and nature of traffic, a flag person may also be utilized.

4.2.12 Work Over Water

If personnel will be working near, above or immediately adjacent to or within 6 feet of water that is 3 feet or more deep or where water presents a drowning hazard (e.g., fast-moving stream, water body with a soft bottom), employees are required to a U.S. Coast Guard (USCG) approved personal flotation device (PFD). All PFDs must have reflective tape on them to facilitate visibility. Employees must inspect PFDs daily before use for defects. Do not use defective PFDs.

4.2.13 Vehicle Use

Personnel must use caution when driving to, from, and across the site, paying special attention to other site traffic, as well as weather and road conditions. Heavy equipment should be transported during non-rush hour traffic.

4.3 Biological Hazards

Site activities on this Site may expose workers to other hazards such as poisonous plants, insects, animals, and indigenous pathogens. Protective clothing and respiratory protection equipment, and being capable of identifying poisonous plants, animals, and insects, can greatly reduce the chances of exposure. Thoroughly washing any exposed body parts, clothing, and equipment will also protect against infections. Avoiding contact with biological hazards is the best way to prevent potential adverse health effects. Recognition of potential hazards is essential. When avoidance is impractical or impossible, PPE, personal hygiene, good general health and awareness must be used to prevent adverse effects. If working in wooded/grassy areas, use appropriate insect repellants (containing DEET and/or Permethrin) and apply them per the manufacturers' directions. The following is a list of biological hazards that may be encountered while performing field activities at the project site and surrounding areas:

BIOLOGICAL HAZARD and LOCATION	CONTROL MEASURES
<p>Snakes typically are found in underbrush and tall grassy areas.</p>	<p>If you encounter a snake, stay calm and look around; there may be other snakes. Turn around and walk away on the same path you used to approach the area. If a person is bitten by a snake, wash and immobilize the injured area, keeping it lower than the heart if possible. Seek medical attention immediately. DO NOT apply ice, cut the wound or apply a tourniquet. Carry the victim or have him/her walk slowly if the victim must be moved. Try to identify the snake: note color, size, patterns and markings.</p>
<p>Poison ivy, poison oak and poison sumac typically are found in brush or wooded areas. They are more commonly found in moist areas or along the edges of wooded areas.</p>	<p>Become familiar with the identity of these plants. Wear protective clothing that covers exposed skin and clothes. Avoid contact with plants and the outside of protective clothing. If skin contacts a plant, wash the area with soap and water immediately. If the reaction is severe or worsens, seek medical attention.</p>
<p>Exposure to bloodborne pathogens may occur when rendering first aid or CPR, or when coming into contact with medical or other potentially infectious material or when coming into contact with landfill waste or waste streams containing such infectious material.</p>	<p>Training is required before a task involving potential exposure is performed. Exposure controls and personal protective equipment (PPE) area required. Hepatitis B vaccination must be offered before the person participates in a task where exposure is a possibility.</p>
<p>Bees, spiders and other stinging insects may be encountered almost anywhere and may present a serious hazard particularly to people who are allergic.</p>	<p>Watch for and avoid nests. Keep exposed skin to a minimum. Carry a kit if you have had allergic reactions in the past and inform the Project Manager and/or the buddy. If a stinger is present, remove it carefully with tweezers. Watch for allergic reaction; seek medical attention if a reaction develops.</p>
<p>Ticks typically are in wooded areas, bushes, tall grass and brush. Ticks are black, black and red or brown and can be up to one-quarter inch in size.</p>	<p>Avoid tick areas. Wear tightly woven, light-colored clothing with pants tucked into boots or socks. Spray outside of clothing with insect repellent containing permethrin. Check yourself for ticks often. If bitten, carefully remove tick with tweezers. Report the bit to the Project Manager. Look for symptoms of Lyme</p>

	disease that include a rash that looks like a bulls eye and chills, fever, headache, fatigue, stiff neck or bone pain. If symptoms appear, seek medical attention.
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5.0 PERSONAL PROTECTIVE EQUIPMENT

PPE ensembles are used to protect employees and subcontractors from potential contamination hazards while conducting project field activities. Level D is expected to be used for most activities at the site. The following subsections describe the PPE requirements for the field activities.

5.1 Level D Protection

When the atmosphere contains no known hazards and work functions preclude splashes, immersions or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals, Level D protection may be used. Level D does not provide respiratory protection and only provides minimal dermal protection. The Level D ensemble consists of the following:

- Work clothes that may consist of a short or long-sleeved cotton shirt and cotton pants, cotton overalls, or disposal overalls such as Tyvek™
- Steel-toe/steel-shank work boots
- Safety glasses with side shields
- Hearing protection, as necessary
- Hand protection, as appropriate
- Hard hat when working around overhead equipment such as a drilling rig
- Reflective vests when working around heavy equipment or near roadways
- Body harness and life vests when working on or within 6 feet of bulkheads, at heights, or in 3 feet or more of standing water (such as in Tin Mill Canal)

5.2 Modified Level D Protection

This is the level of protection that may be needed for material handling, sampling operations, and operation of remediation equipment when splash hazards are present. Modified Level D protection consists of the following:

- Disposable overalls such as polyethylene-coated Tyvek™
- Latex, vinyl, or nitrile inner gloves when handling liquids/fluids
- Nitrile outer gloves (taped to outer suit)
- Chemical-protective over-boots (taped to outer suit)
- Steel-toe/steel-shank, high-ankle work boots
- Hard hat with face shield
- Safety glasses with side shields or goggles
-) U
- Hearing protection, as necessary

5.3 Level C Protection

Level C protection will be used when site action levels are exceeded and respiratory protection is required. The Level C ensemble consists of Modified Level D with the following modifications:

- Half or full-face air-purifying respirator (APR) equipped with appropriate cartridges/filters
- Chemical resistant clothing such as poly-coated Tyvek™
- Inner and outer nitrile gloves
- Chemical-resistant safety boots or boot covers to go over safety boots

Upgrading or downgrading the level of protection used by EAG employees and subcontractors is a decision made by EAG based on the air monitoring protocols presented in Section 7.0 for respiratory protection, the potential for inhalation exposure to toxic chemicals, and the need for dermal protection during the activity.

5.4 First Aid, Emergency and Safety Equipment

The following first aid, emergency and safety equipment will be maintained onsite at the work area:

- A portable eye wash
- Appropriate ABC-type fire extinguishers (minimum of 10 pounds; remediation systems to house individual 20 pound extinguishers) carried in every vehicle used during field operations
- Industrial first-aid kit (one 16-unit that complies with American National Standards Institute (ANSI) Z308A for every 25 persons or less)
- Bloodborne pathogen precaution kit with CPR mouth shield
- Instant cold packs
- Soap or waterless hand cleaner and towels
- American Red Cross First Aid and CPR Instruction Manuals

6.0 PERSONNEL TRAINING AND STANDARD SAFETY PROCEDURES

Employees must have received, at the time of project assignment, a minimum of 40 hours of initial OSHA health and safety training for hazardous waste site operations. Personnel who have not met the requirements for the initial training will not be allowed in the Exclusion Zone (EZ) or Contamination Reduction Zone (CRZ) of any active work area. A copy of each subcontractor site worker's 40-hour training certificate must be sent to the Project Manager for review prior to the start of the site work.

The 8-hour refresher training course must be taken at a minimum of once per year. At the time of the job assignment, all site workers must have received 8 hours of refresher training within the past year. This course is required of all field personnel to maintain their qualifications for hazardous waste site work. A copy of each subcontractor site worker's most recent 8-hour refresher training certificate must be sent to the Project Manager for review prior to the start of the site work.

A site-specific safety orientation will be conducted by EAG for all EAG employees and subcontractors engaged in fieldwork.

6.1 Onsite Safety, Health and Emergency Response Training

The OSHA 1910.120 standard requires that site safety and health training be provided by a trained, experienced supervisor. “Trained” is defined to mean an individual that has satisfactorily completed the OSHA 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) course and 8-hour site supervisor training. Training will be offered at the time of the initial task assignment and/or whenever new chemicals are introduced into the workplace. Training will include all applicable regulatory requirements, location of the program, inventory and MSDSs, chemicals used and their hazards (chemical, physical, and health), how to detect the presence or release of chemicals, safe work practices and methods employees can take to protect themselves from hazards, how to read MSDSs and site or project specific information on hazard warnings and labels in use at that location. All training will be documented and training certificates will be kept in the employee’s permanent training file. All applicable training will also require annual refreshers.

EAG qualified personnel must also provide safety meetings.

6.2 Standard Safety Procedures

This section describes the standard safety procedures that EAG requires all onsite personnel to follow during site activities.

6.2.1 General Safety Work Practices

All onsite employees and subcontractors will observe the following general safety work practices:

- Health and safety tailgate briefings will occur to introduce new activities, any new safety issues, and emergency egress routes for work areas; any significant change (added personnel, change in scope, or change in field conditions) will trigger a second (or more) tailgate meeting to address whatever change occurred
- No food, drink, or tobacco products will be allowed in the Exclusion and Contamination Reduction Zones
- Loose clothing, hair, and/or jewelry will not be permitted around moving or rotating equipment
- The “buddy system” will be implemented as necessary whereby a pair of co-workers watches out for each other while in proximity of potential physical work hazards
- Good housekeeping of all work areas will be maintained on an ongoing basis

6.2.2 Hand Safety

This standard is intended to protect employees from activities that may expose them to injury. This standard provides information on recognizing those conditions that require personal protective equipment (PPE) or specific work practices to reduce the risk of hand injury.

Appropriate gloves must be worn when persons work with materials or equipment that presents the potential for hand injury due to sharp edges, corrosives, flammable and irritating materials, extreme temperatures, splinters, etc.

Guidelines for Working With and Around Equipment (Hand Tools, Portable Powered Equipment):

- Employees should be trained in the use of all tools.
- Keep hand and power tools in good repair and use them only for the task for which they were designed.

- Inspect tools before use and remove damaged or defective tools from service.
- Operate tools in accordance with manufacturer's instructions.
- Do not remove or bypass a guarding device for any reason.
- Keep surfaces and handles clean and free of excess oil to prevent slipping.
- Wear proper PPE, including gloves, as necessary.
- Do not carry sharp tools in pockets.
- Clean tools and return to the toolbox or storage area upon completion of a job.
- Before applying pressure, ensure that wrenches have a good bite.
- Brace yourself by placing your body in the proper position so you will not fall if the tool slips.
- Make sure hands and fingers have sufficient clearance in the event the tool slips.
- Always pull on a wrench, never push.
- When working with tools overhead, place tools in a holding receptacle when not in use.
- Do not throw tools from place to place or from person to person, or drop tools from heights.
- Inspect all tools prior to start-up or use to identify any defects.
- Powered hand tools should not be capable of being locked in the ON position.
- Require that all power-fastening devices be equipped with a safety interlock capable of activation only when in contact with the work surface.
- Do not allow loose clothing, long hair, loose jewelry, rings, and chains to be worn while working with power tools.
- Do not use cheater pipes.
- Make provisions to prevent machines from restarting through proper lockout/tagout.

Guidelines for using Cutting Tools:

- Always use the specific tool for the task. Tubing cutters, snips, self-retracting knives, concealed blade cutters, and related tools are task specific and minimize the risk of hand injury. For more information about cutting tools, see Supplemental Information A.
- Fixed open-blade knives (FOBK) are prohibited from use. Examples of fixed open-blade knives include pocket knives, multitools, hunting knives, and standard utility knives.
- When utilizing cutting tools, personnel will observe the following precautions to the fullest extent possible:
 - Use the correct tool and correct size tool for the job.
 - Cut in a direction away from yourself and not toward other workers in the area.
 - Maintain the noncutting hand and arm toward the body and out of the direction of the cutting tool if it were to slip out of the material being cut.
 - Ensure that the tool is sharp and clean; dirty and dull tools typically cause poor cuts and more hazard than a sharp, clean cutting tool.
 - Store these tools correctly with covers in place or blades retracted, as provided by the manufacturer.
 - On tasks where cutting may be very frequent or last all day (e.g., liner samples), consider Kevlar® gloves in the PPE evaluation for the project.
 - Do not remove guards on paper cutters.

6.2.3 Respiratory Protection

Based on air monitoring, an upgrade to Level C protection may be indicated. Half or full-face APRs will be utilized for protection against organic vapors and particulates. All employees required to wear respirators will be need to be medically cleared, in writing to do so by a qualified Occupational Physician.

All respirator users must be trained before they are assigned a respirator, annually thereafter, whenever a new hazard or job is introduces and whenever employees fail to demonstrate proper use or knowledge. Training will include, at a minimum:

- Why the respirator is necessary and what conditions can make the respirator ineffective.
- What limitation and capabilities of the respirators area.
- How to inspect, put on and remove and check the seals of the respirator.
- What respirator maintenance and storage procedures are.
- How to recognize medicals signs and symptoms that may limit or prevent effective use of the respirator.
- The engineering and administrative controls being used and the need for respirators.
- The hazards and consequences of improper respirator use.
- How to recognize and handle emergency situations.

Training will be documented and training certificated will be kept in the employee's permanent training file.

6.2.4 Personal Hygiene Practices

The field team must pay strict attention to sanitation and personal hygiene requirements to avoid personal contamination. The following instructions will be discussed and must be followed:

- During field activities, never put anything in the mouth, including fingers
- All employees must wash their hands, forearms, face, and neck before eating drinking, smoking or using the restroom
- Smoking is prohibited except in designated areas outside the work zone
- At the end of the day, all employees will shower upon returning home or to their hotel

6.2.5 Electrical Safety

All extension cords used onsite must be heavy-duty variety and must be properly grounded. All temporary circuitry must incorporate the use of GFCI devices. Refer to electrical safety in Section 4.2.6, Electrical Hazards.

6.2.6 Fire Safety

All flammable liquids will be used only for their intended purpose and stored and handled only in approved containers. Portable containers must be the approved red safety containers equipped with flame arresters and self-closing lids. All transfers of flammable liquids must be made with the containers grounded or bonded. Also, gasoline containers will be clearly labeled and storage areas (if

applicable) will be posted with “No Smoking” signs. Fire extinguishers will be stalled in all areas that contain flammable liquids.

6.2.7 Illumination

All work is planned for daylight hours. No special requirements are anticipated. However, should any work take place outdoors after daylight hours, suitable lighting will be required. In addition, suitable lighting is to be provided in each remediation system building or enclosure.

6.2.8 Sanitation

Potable water and toilet facilities will be provided in compliance with the OSHA 1926.51 standard. Any container used to distribute drinking water shall be clearly marked and not used for any other purpose. Single drinking cups will be supplied, both a sanitary container for the unused cups and a receptacle for disposed of the used cups will also be provided. Port-a-johns will be provided since there are no sanitary sewers on the job site.

7.0 EXPOSURE MONITORING PLAN

This section describes air and personnel monitoring protocols, sampling methods, and instrumentation to be used, as well as the methods and frequency of sampling instrument calibration and action levels for potential work site hazards. When engaged in air monitoring, EAG personnel and subcontractors must use the forms to record air monitoring data and air monitoring instrument calibration records. All monitoring records/forms are to be maintained in the project file by the EAG Project Manager.

7.1 Air Monitoring

The surveillance program is established to detect changes in the ambient air at the work site and to ensure the continuing safety of the work zones and adequacy of the level of worker protection. During field activities, the designated field team member will monitor the work site for combustible gas concentrations and organic vapors. Calibration of all monitoring equipment will be performed in accordance with the manufacturers’ procedures by trained EAG employees and subcontractors. The Project Manager, Project Field Team Leader or representative will be notified immediately of any contaminant levels that could trigger an upgrade in PPE or cause a suspension of site activities.

- One or more of the following direct-reading instruments may be used to aid in this determination. Photoionization Detectors (PID) and Flame Ionization Detectors (FID) will measure non-specific organic gases and vapors. Combustible Gas Indicators (CGI) will detect explosive atmospheres. Oxygen (O₂) meters will detect fluctuations in oxygen concentrations. These instruments should be calibrated or bump tested daily and whenever the readings may be erratic. All readings should be recorded in the field log books.

Air monitoring results obtained from the breathing zone during field activities will be recorded in field log books. All such records will also include the location, date/time, weather conditions, person monitored, background concentration, and identification of specific contaminant whenever possible. Air monitoring information will be utilized to evaluate personnel exposure and assess the appropriateness of PPE for Site conditions.

7.1.1 Combustible Gas and Oxygen Deficiency/Excess Monitoring

Explosive gas concentrations are not expected to exceed 10% of the lower explosive level (LEL). Should the need be indicated for monitoring, action guidance for the CGI/O2 meter responses is contained in **Table 7-1**.

Table 7-1

CGI/Oxygen Meter Action Levels	
Meter Response	Action
CGI response 0%-10% LEL	Continue normal operations
CGI initial response >10% and <20% LEL	Eliminate all sources of ignition from the work area; temporarily retreat from work area for 15-30 minutes and then monitor area again
CGI response after 15-30 minute retreat >10% and <20% LEL	Retreat from work area; notify Project Manager
CGI response >20%	Discontinue operations; retreat from work area
Oxygen level <19.5%	Retreat from work area; notify Project Manager
Oxygen level >23.5%	Retreat from work area; notify Project Manager

7.1.2 Organic Vapor Concentrations

Real-time monitoring for organic vapor concentrations in the breathing zone and down hole will be conducted during field operations (installation of groundwater monitoring and groundwater sampling by EAG and EAG subcontractor personnel) with a PID equipped with a 10.2- or 11.7-electron volt (eV) probe. The PID will be taken into the field and operated during site activities where contaminated soil and/or groundwater may be present. Air monitoring will be conducted during well installation and when a well is opened for groundwater measurements. Measurements will be made at the well head and personnel breathing zones where activities are being performed. The instrument will be calibrated using ultra-high purity air and isobutylene vapor of known concentration before and after use each day. Air calibration measurements will be documented in writing and kept in the project file. Action guidance for PID responses is contained in **Table 7-2**.

Table 7-2

Action Levels for General Site Work	
Meter Response in Breathing Zone (minimum of 3 minutes)	Action Required
<5ppm above background	Use Level D PPE
>5ppm above background	Level C PPE, including half or full-face APR with organic vapor cartridges/P100 filters
>50ppm above background	Stop work
Action Levels for Handling NAPL	
Meter Response in Breathing Zone (minimum of 3 minutes)	Action Required
<1ppm above background	Use Modified Level D PPE
>1ppm to <10ppm	Level C PPE, including half or full-face APR with organic vapor cartridges
>10ppm above background	Immediately withdraw; monitoring will continue until action levels will allow safe re-entry

If air concentrations of organic vapors are greater than 5 ppm above background in the breathing zone for a 3-minute period, personnel will stop work, retreat from site, and allow time (at least 15 minutes) for vapors to dissipate. If monitoring indicates that concentrations still exceed 5 ppm, workers will upgrade to Level C PPE. If monitoring indicates that concentrations exceed 50 ppm, work will be stopped until site conditions can be re-evaluated.

These action levels are based on the assumption that the major component of free product being recovered will be benzene or naphthalene.

Work involving NAPL recovery from monitoring wells will be conducted in Level C PPE. This level may be downgraded based on air monitoring data and actual field conditions. Downgrading of PPE must be approved by the PM and HSE staff. If ventilation is conducted, additional air monitoring will be performed to the resumption of work to determine the level of PPE required.

7.2 Physical Conditions Monitoring

Site workers will be monitored by the Project Manager for signs of weather-related symptoms from exposure to excessive heat or cold.

Whenever the air temperature exceeds 70°F for personnel wearing chemical protective clothing or 90°F for personnel wearing regular work clothes, the Project Manager will assess conditions that may cause heat stress in site workers.

8.0 MEDICAL SURVEILLANCE

This section discusses the medical surveillance program, how the results are reviewed by a physician and how participation is documented.

8.1 Medical Surveillance Program

All personnel who will be performing any task where potential exposure to hazardous material exists will undergo medical surveillance as outlined in OSHA 29 CFR 1910.120(f). All personnel performing tasks in the Exclusion Zone or Contamination Reduction Zone will be required to have passed the EAG medical surveillance examination (or equivalent), performed by a licensed Occupational Physician. The Project Manager will verify that all EAG and subcontractor personnel meet applicable OSHA medical surveillance requirements.

Applicable field employees will undergo an annual comprehensive medical examination, including a comprehensive health history, blood chemistry with complete blood count and differential, urinalysis, medical history, required chest x-rays, audiogram, pulmonary function testing, testing for heavy metals (as needed), and a physician's interpretation of each employee's medical surveillance examination, including the ability of the employee to wear a respirator. A comprehensive medical examination will be performed if an employee develops signs or symptoms indicating possible overexposure to hazardous substances and/or heat or cold stress.

8.2 Physician Review

All medical surveillance and examination results are reviewed by a licensed physician who is certified in Occupational Medicine by the American Board of Preventive Medicine. EAG employee participation in the medical surveillance program is a part of their permanent medical record maintained in the employee's home office. A copy of the current medical clearance signed by the occupational health physician for all EAG employees must be maintained at the home office.

9.0 SITE CONTROL MEASURES AND DECONTAMINATION

To provide for the protection of public health and safety and minimize the possibility of transferring hazardous substances from the site, contamination control procedures are required. These procedures consist of site control measures (which entail the delineation of work zones, communications, and site security) and decontamination procedures (which are necessary for both personnel and equipment). Contaminants that may be uncovered during sampling operations must not be transferred outside the work zone unless properly containerized, and must be removed from clothing, personnel, and equipment prior to relocation from that zone. This section discusses site control measures and decontamination procedures to be used during the collection of samples, the installation of soil borings and/or groundwater monitoring/remediation wells, excavations, and other intrusive work where contact with impacted soils and groundwater could occur by EAG and/or EAG subcontractor personnel.

9.1 Site Control Measures

Site control can be achieved by effectively delineating the work zone, providing appropriate communication, and establishing site security.

9.1.1 Work Zone Delineation

To minimize the transfer of hazardous substances from the site and to ensure proper protection of employees and subcontractors, work zones will be established by the Field Project Team Leader. Applicable site work and the associated requirement for work zones will be determined by the Project Manager. The work area will be divided into an Exclusion Zone (EZ), a Contamination Reduction Zone (CRZ), and a Support Zone (SZ). A typical work zone delineation setup is shown as **Figure 9-1**, below.

Exclusion Zone (EZ)

Contamination does or could exist in this zone. Only properly authorized and trained individuals (refer to Section 6.0) wearing appropriate PPE will be allowed to enter and work in this zone. All people entering the EZ must wear, at a minimum, Level D protection. An entry and exit point for personnel and equipment will be established at the periphery of the EZ (between the EZ and the CRZ) to regulate the flow of personnel and equipment.

Contamination Reduction Zone (CRZ)

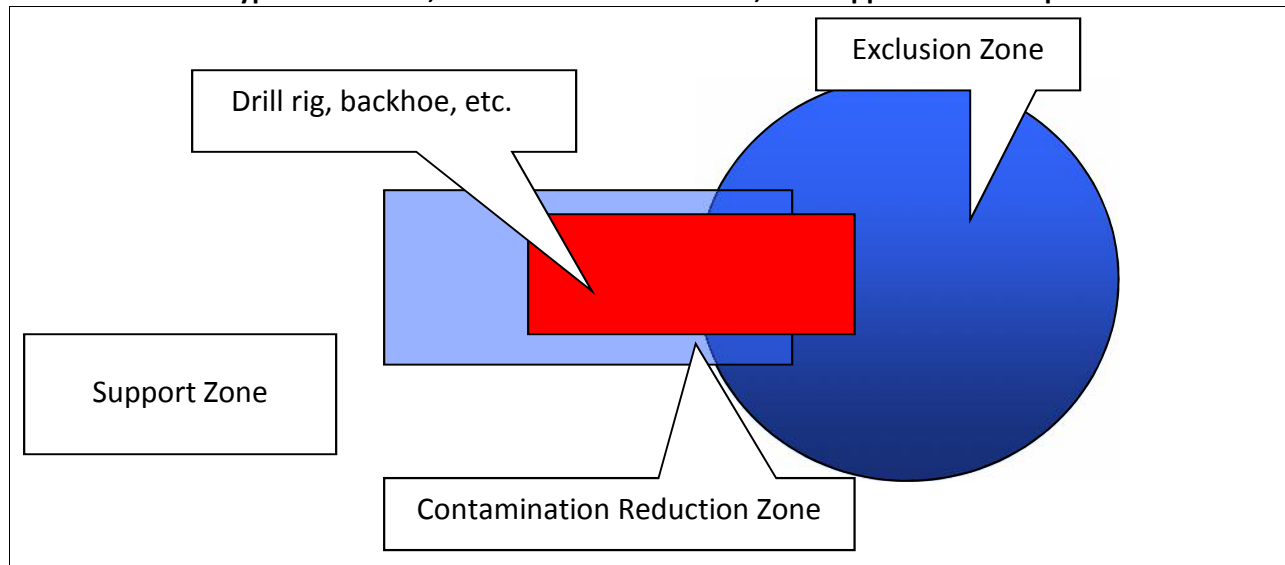
Between the EZ and the SZ will be the CRZ, which will provide a transition between the potentially contaminated EZ and the clean SZ. The CRZ (located upwind of the EZ, if possible) will be a corridor leading from the EZ and will serve as a buffer to further reduce the probability of the SZ becoming contaminated. Exit from the EZ will only be allowed through this CRZ. The CRZ will provide additional assurance that the physical transfer of contaminating substances on people, equipment, and/or in the air will be limited through a combination of decontamination and zone restrictions. Within this zone, employees and subcontractors may perform personal decontamination (e.g., face and hand washing), and certain PPE and small equipment decontamination. Buckets or wash basins for boot

washing and equipment decontamination will be stationed on a sheet of plastic (a minimum of 8 feet by 8 feet), the boundaries of which will constitute the CRZ.

Support Zone (SZ)

The Support Zone will be considered a non-contaminated area. The location of support facilities in the SZ will be upwind of the EZ (where possible) and readily accessible to the nearest road. The field office/support facilities, equipment vehicles, a first aid station and a visitors/personnel entry and exit log for the work site will be located in this zone. Potentially contaminated personal clothing, equipment and samples are not permitted in this zone unless properly containerized.

**Figure 9-1
Typical Exclusion, Contamination Reduction, and Support Zone setups**



9.1.2 Communications

A loud and clear form of communication should be made available for Site personnel entering the work zones. Site communication may be in the form of hand signals, voice, or other communication devices. All forms of communication should be understood by all workers on the Site prior to starting work. Offsite communications may be conducted with mobile phones or walkie-talkies only if the atmosphere has been deemed non-explosive, and the person using the mobile device is in the SZ while placing the call, or inside the cab of a stationary vehicle.

9.1.3 Site Security

The Sparrows Point facility is not open to the public, and there is a strictly monitored main entrance with a security guard on duty at all times who only allows authorized personnel onto the Site. This limited access to the facility should eliminate the need for many requirements for specific site security except those needed to maintain work zone integrity, such as visible barriers around open excavations or EZs and CRZs. No site visitors will be allowed to travel unescorted by EAG or subcontractor personnel around the facility.

Once site visitors arrive at their intended work zone, they must check in with the Field Team Lead. If visitors are authorized to enter the CRZ and/or the EZ, they must have completed OSHA 1910.120 medical surveillance and training requirements (refer to Section 8.0 and Section 6.0). Visitors must wear

appropriate PPE before they will be allowed to enter the CRZ and/or the EZ. They must also be taken through this HASP during a brief tail-gate meeting and sign the Acknowledgement page in the back prior to engaging in any activities inside the CRZ or the EZ. All site visitors must follow the same site control measures and decontamination procedures as EAG personnel and subcontractors. The Project Manager must also be informed of each visitor's name, purpose for their visit, time of entry (and exit), location of tasks they wish to perform, whether they completed their intended task(s), and any other relevant information pertaining to their visit.

9.2 Decontamination Procedures

Decontamination of employees, subcontractors, and equipment leaving the EZ will be performed to minimize human exposure to hazardous substances and to minimize the spread of contamination to surrounding areas. The purpose of the CRZ is to provide a location to perform limited personnel decontamination and certain PPE and small equipment decontamination.

9.2.1 Personnel Decontamination

Persons leaving the EZ must pass through the CRZ and follow decontamination procedures before entering the SZ. Hand tools and other sampling equipment used in the EZ and reusable PPE (boots, safety glasses, etc.) will be appropriately cleaned prior to removal from the site each day. The step-by-step sequence for personnel decontamination is as follows:

- Remove boot covers (if used) at the boot washing station and place them in the disposal container provided
- Wash outer gloves and chemical resistant boots (if used) at the boot washing station
- Remove wrist tape (if used) and outer gloves and place them in the disposal container provided
- Remove ankle tape (if used) and disposable coveralls (if used) and place them in the disposal container provided
- Remove respirators (if used) and place each in designated locations in the CRZ
- Remove inner gloves and discard in the disposal container provided
- Wash hands and face and proceed to the SZ

Respirators must be fully decontaminated after each use by the personnel who previously wore them. All project employees and subcontractors are required to take a thorough soap and water shower in their home or motel room at the end of each workday. If monitoring or a general exposure assessment indicates that an employee has become contaminated, the employee or subcontractor will notify the EAG Project Manager and the Field Team Lead as soon as the contaminated state has been discovered.

9.2.2 Equipment Decontamination

All equipment leaving the EZ must be decontaminated either within the CRZ or at the central decontamination area. Small equipment, such as hand tools, will be thoroughly decontaminated within the CRZ before being placed in the SZ. The field tools may be scrubbed visually clean using a detergent solution (Alconox/Liquinox) with water and a stiff, long-bristled scrub brush. Following the solution scrubbing, the tools may be rinsed with distilled water or isopropyl alcohol. Any vehicle working in an EZ will be decontaminated before leaving the site. The vehicle will be cleaned by sweeping excess soil and debris off the wheels. A high-pressure sprayer will then be used to wash the wheels, if necessary.

Each piece of equipment will be inspected after cleaning for any soil remaining on the tires or elsewhere. All vehicles will be cleaned to the satisfaction of the Field Team Lead or a designated assistant prior to entering the SZ or leaving the site. Employees or subcontractors performing decontamination shall wear the appropriate level of PPE (refer to Section 5.0).

9.2.3 Waste Management

The Project Manager and the Field Team Leads will be responsible for overseeing the containerization and disposal of any field derived wastes. Contaminated or suspected contaminated field derived wastes shall be disposed of in accordance with all local, state, and/or federal regulations. Field derived wastes include decontamination rinse waters and other related decontamination generated wastes.

Soils and groundwater expected to be encountered during any sampling or intrusive work not to be contaminated, based on existing data, may be discharged to the ground surface in the immediate vicinity of the monitoring well. However, any known or suspected to be contaminated soil (in small quantities) or groundwater will be containerized for future removal, likely in 55-gallon drums or other approved storage vessels. Depending on the suspected contaminants, the recovered groundwater may be sent through one of the onsite groundwater treatment units. However, the treatment unit must be designed to address the contaminants of concern in the groundwater being treated. Otherwise, the liquid must be staged onsite for eventual offsite disposal at an approved facility.

Impacted soil, if in drums, will be staged in an area designated by the Project Manager or Field Team Lead for eventual disposal. For large excavations, where excavated soil is stockpiled, it may be necessary to place soils on plastic and cover with plastic to prevent any potential leachable runoff. The Project Manager and/or Field Team Lead will provide the proper guidance necessary for handling bulk soil piles.

Any NAPL recovered via remediation systems or manual recovery efforts will be properly containerized and either disposed of offsite as a recyclable material, if possible, or as a hazardous waste. The receiving facility must be an approved facility.

10.0 EMERGENCY RESPONSE AND CONTINGENCY PROCEDURES

The objective of emergency response and contingency procedures is to ensure that effective actions are implemented in a timely manner to minimize or control the effects of adverse events (e.g., potential chemical exposures, personal injuries, fires/explosions, and spills/releases). The following subsections describe the basic emergency responses required should an emergency take place during field investigation or remedial effort activities.

10.1 Emergency Phone Numbers

Emergency telephone numbers are listed in **Table 10-1**.

**Table 10-1
Emergency Telephone Numbers and Agencies**

Agency	Telephone Number
Security (Sparrows Point facility)	(410) 388-7761
Ambulance	911
Fire	911
Occupational Health Clinic	(410) 633-3600
Hospital	(410) 550-0100 (general) (410) 550-0350 (emergency)
National Response Center	(800) 424-8802
Poison Control Center - Maryland	(800) 222-1222
EAG Main Contact	
VP Remediation, Russ Becker	(314) 686-5611
Project Manager, James Calenda	(314) 620-3056

10.2 Injury/Illness Treatment

In the event of illness or injury, the following steps will be taken:

- Evaluate the extent of injuries or seriousness of illness.
- When employees require urgent medical attention, call for emergency assistance. First aid should be administered while awaiting an ambulance or paramedics. All emergency medical treatment, other than first aid, will be administered by the local paramedics. **Table 10-1** lists site emergency telephone numbers. In all cases, critical injuries must be immediately referred for professional medical attention.
- For a non-critical injury/illness, first aid will be administered by onsite personnel. Anyone sustaining a non-critical injury/illness who continues to work will be monitored by the Field Team Lead for any signs of worsening condition, if it is deemed that the person can return to work by the Team Lead and Project Manager. Injured personnel who later suffer any worsening change in status are to immediately notify the Team Lead or the Project Manager.

10.3 Occupational Health Clinic and Hospital Information

Occupational Health Clinic

The Concentra Medical Center, located at 1833 Portal Street, Baltimore, MD, is the closest occupational health clinic, just over 6 miles away. A map to the clinic is included as **Figure 10-1**. The clinic should be used for non-emergency injuries and illnesses.

Directions:

From Sparrow's Point Road, turn left onto Wharf Road;
Turn left onto MD-158 W/Bethlehem Blvd. (0.4 mile);
Turn right onto MD-157 N/Peninsula Expy. (2.7 miles);
Turn slight left onto Merritt Ave. (0.1 mile);
Merritt Ave. becomes Sollers Point Rd. (0.3 mile);
Turn left to stay on Sollers Point Rd (0.6 mile);
Turn left onto Williams Ave. (0.2 mile);
Turn right onto Dundalk Ave. (<0.1 miles);
Turn left onto Chandlery St. (0.1 mile);
Turn left onto Portal St.

Figure 10-1: Health Clinic (Non-Emergency) Map



Hospital

The Johns Hopkins Bayview Hospital is the closest emergency facility, just over 9 miles away. The hospital is located at 4940 Eastern Avenue in Baltimore, MD. **Figure 10-2** is a map to this hospital. Maps are also included in **Attachment E**.

Directions:

From the Sparrows Point Industrial Complex, go north on Route 151 for approximately one mile.

Take ramp (right) onto I-695 towards I-695/Essex.

At exit 40, take ramp (right) onto Route 151/North Point Boulevard North/MD 150;

Take ramp (right) onto Route 150 (Eastern Avenue).

Continue on Eastern Avenue to hospital on right.

Figure 10-2: Hospital Map



Prior to the start of field activities, the Project Field Team Leader will call to verify the telephone numbers and directions for the clinic and hospital, and then distribute location maps and the emergency telephone list to workers and vehicles.

10.4 Accident and Emergency Medical Response

All field team members will be aware of the location of a first aid kit kept onsite. All vehicles used to transport injured persons to an offsite medical facility will be provided with directions and a map to the medical facility.

If treatment beyond first aid is required, emergency response personnel will be contacted for assistance and transport. Before beginning site activities, the Project Field Team Leader will ensure that each field team member knows where the nearest emergency medical facilities are and how to get there. The closest hospital will be used in cases of life-threatening emergencies at the direction of the Project Field Team Leader. The telephone numbers of the local emergency services will be available in the SZ, and the Project Field Team Leader will brief the field team on the procedures for calling for help in an emergency.

Site personnel will inform the Project Manager of any medications, allergies, or other medical information that may be applicable for their medical treatment. The Project Manager will supply this information to emergency response personnel, and will accompany the victim to the hospital, if possible.

10.4.1 Chemical Exposure

In case of accidental overexposure to a hazardous material (groundwater, soil, and/or off-gas materials), guidelines shown in **Table 10-2** will be used.

Table 10-2
Chemical Exposure Guidelines

Type of Overexposure	First Aid Guidelines
Skin Contact	Skin: Wash/rinse the affected area thoroughly with copious amounts of soap and water.
	Eyes: Eyes should be rinsed for at least 15 minutes following chemical contamination.
	Contact emergency response personnel if required, or transport victim to the hospital.
Inhalation	Move the victim to fresh air.
	Contact emergency response personnel if required, or transport victim to the hospital.
Ingestion	Contact Poison Control Center.
	Contact emergency response personnel, or transport victim to the hospital.

10.4.2 Decontamination During a Medical Emergency

For minor medical problems or injuries, regular decontamination procedures will be followed. If emergency, life-saving first aid and/or medical treatment are required, regular decontamination procedures may need to be abbreviated or omitted:

- Do not attempt to wash or rinse an unresponsive victim unless the victim has been contaminated with an extremely toxic or corrosive chemical that may cause injury or loss of life to emergency response personnel.
- Outer garments can be removed if it does not cause a delay, interfere with treatment, or aggravate the problem.

- PPE can be cut away and respiratory protective equipment must always be removed.
- If contaminated clothing cannot be safely removed, then the victim should be wrapped in a blanket or plastic sheeting to prevent contamination to the inside of the ambulance and/or emergency response personnel.

The Project Manager or Field Team Lead will advise the medical staff as to the type of contamination possibly involved.

10.4.3 Small or Incipient Fire

A small fire is defined as a fire that can be extinguished with an available 20 pound type ABC fire extinguisher. An incipient fire is a fire that is small because it has just started. In the event of a small or incipient fire, the following minimum actions will be taken:

- Evacuate nearby personnel from the area, if possible, to an upwind location or to an area not affected by smoke or hazardous decomposition products if an upwind location is not feasible.
- Attempt to extinguish fire using portable fire extinguisher or by smothering.
- Contact emergency response personnel, as needed, for any injuries or exposures to hazardous decomposition products, or if fire cannot be put out.
- After the fire has been extinguished, or emergency response personnel have been contacted, notify the following project personnel:

The Project Manager

10.4.4 Large Fire or Explosion

An explosion, large fire or a small fire which cannot be extinguished is beyond the first line capabilities of EAG personnel. Professional emergency response personnel would be needed to provide emergency assistance for these types of incidents. In the event of a large fire, explosion or a small fire that cannot be extinguished, the following minimum actions will be taken:

- Evacuate all personnel from the site, if possible, to an upwind location, or to an area not affected by smoke or hazardous decomposition products if an upwind location is not feasible
- Perform a quick role call to account for all site personnel
- Contact the fire department
- Contact emergency response personnel, as needed, for any injuries or exposures to hazardous decomposition products
- After emergency response personnel have been contacted, notify the following project personnel:

The Project Manager

10.4.5 Adverse Weather Conditions

In the event of adverse weather conditions, the Project Manager will determine if work can continue without sacrificing the health and safety of site personnel. Threatening weather conditions will be monitored by the Project Manager and possibly the Team Lead via radio, television, internet, and/ or calls to the National Weather Service. Some of the conditions to be considered include:

- Potential for heat or cold stress
- Limited visibility

- Electrical storms
- Treacherous weather-related working conditions (i.e., heavy rainfall, icy conditions causing slippery footing hazards, etc.).

10.4.6 First Aid for Heat Stress/Cold Stress

First aid treatment for **heat cramps** includes shade, rest and fluid replacement. If available, the individual should drink electrolyte replacement fluids (e.g., Gatorade, Squincher or 10-K). The individual should recover within half an hour.

First aid treatment for **heat exhaustion** includes cooling the victim, elevating the feet and fluid replacement. If the individual has not recovered within half an hour, then transport the victim to the hospital for medical attention.

Heat stroke is a medical emergency, requiring the immediate cooling of the victim and transport to the hospital for medical treatment immediately.

First aid treatment for **frost nip** and **frostbite** includes covering the affected area with warmth and retreating to a warm area. If the individual has not recovered within half an hour, then transport the victim to the hospital for medical attention.

Frozen tissue is a medical emergency and the victim must receive medical attention immediately. Contact emergency response personnel immediately or transport the victim to the hospital.

First aid treatment of **mild hypothermia** includes using heat to raise the individual's body temperature. Heat may be applied to the victim in the form of heat packs, hot water bottles and blankets. If the individual has not recovered within half an hour, then transport the victim to the hospital for medical attention.

Severe hypothermia is a medical emergency and the victim must be transported to the hospital immediately. First aid treatment for severe hypothermia includes handling the victim very gently; rough handling may set off of an irregular heartbeat. **DO NOT** attempt to re-warm the severely hypothermic victim; re-warming may cause the development of an irregular heartbeat.

10.4.7 Snake Bites

If bitten, lower the extremity below the heart to reduce the poison's dissemination through the body. Remain calm, try to keep the heart rate reduced and seek medical attention immediately. Do not cut the wound or attempt to suck out the venom. Note any physical features (e.g., shape of head and color or pattern on body) of the snake.

10.4.8 Animal Bites

All bites should be treated as contaminated soft tissue injuries. Bites should be washed immediately with large amounts of soap and water. If soap is not available, flush the wound with water. The severity and onset of any infection is dependent upon the number of organisms (viruses or bacteria) introduced into the wound. Washing saliva out of the wound immediately will reduce the number of bacteria or viruses that can enter the tissue. Medical attention must be sought if rabies is suspected or the individual has not had a recent tetanus booster.

10.4.9 Insect Bites and Stings

Emergency care for insect bites and stings depends on the individual's reaction. To treat a sting that results in a minor reaction, remove the stinger by gently scraping it off the skin. Do not try to grasp the sac or stinger, because this forces the remaining venom into the skin. Once the stinger has been removed, clean the wound and surrounding area. Apply cold packs to slow the absorption of the venom and reduce pain and swelling. The treatment for a severe reaction to insect stings includes the following:

- Confirm with the victim whether they are highly allergic to the insect that stung them
 - If victim has gone into anaphylactic shock, retrieve their epi pen or other auto-injector and administer per the directions as hastily as possible
- Assuming the victim remains conscious, ask them to refrain from moving around, and to lie down
- Immobilize the injured area immediately
- If an extremity is involved, remove any rings or watch
- Keep the affected part low, below the level of the heart
- Apply cold compresses to the affected area
- If possible, try to identify the type of insect that inflicted the sting
- Transport the victim to a medical facility immediately, continuing supportive measures en route.

All employees and subcontractors must report severe reactions to insect stings prior to the beginning of work to both the Project Manager and Field Team Lead.

10.4.10 Poisonous Plants

Decontamination: Wash the skin immediately after contact with the plant. Proper washing may not be practical in the middle of the woods, but a product such as Technu or a small wash-up kit with prepackaged, alcohol-based cleansing tissues can be effective. Employees and subcontractors should not forget to wash contaminated clothing and clean up contaminated equipment prior to re-use.

Treatment: Options are as follows:

- Home treatment: Calamine lotion and an oatmeal bath (one cup to a tub full of water) can help relieve itching. To prevent secondary skin infection, scratching is not helpful and the fingernails should be cut to avoid damage to the skin. Over-the-counter hydrocortisone cream can decrease inflammation and itching; however, the label should be read and the cream used according to directions.
- When to see the doctor: Severe cases may require further treatment. A physician should be seen if the rash appears infected, is on the face or other sensitive body areas, or is too extensive to be easily treated at home.

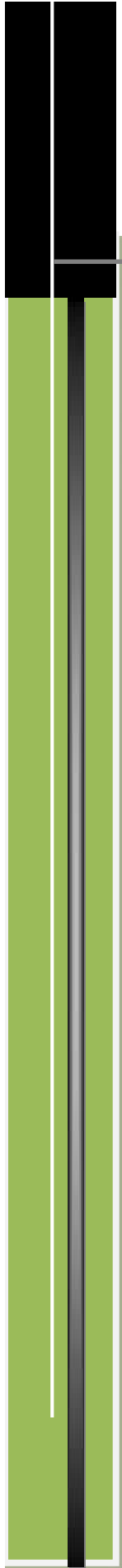
10.4.11 Ticks

To remove an attached tick:

- Use fine-tipped tweezers or a "tick tool" to grasp the tick at the surface of the skin
- If tweezers are not available, use a tissue to protect the fingers (exposure to the tick's body fluid may lead to transmission of disease)
- With a steady motion, pull the tick straight out

Disinfect the bite site and the tweezers. Wash your hands thoroughly with soap and water. Save the tick if you can by placing it in a Ziploc bag in the freezer; this may help with diagnosis in the future.

If flu-like symptoms such as fatigue, headache, neck-stiffness or jaw discomfort begin following a tick bite, seek medical attention.



APPENDICES



Environmental Engineers

ATTACHMENT A
COMPLIANCE AGREEMENT

EAG HEALTH AND SAFETY PLAN

ACKNOWLEDGEMENT FORM

I, _____, have read (or had read to me), EAG's health and safety plan.
(Print Name)

I understand my responsibilities as they are defined in this plan and will abide by these rules and procedures, as well as any regulations or otherwise governing safety. When in doubt concerning safe job performance, I will speak to my immediate supervisor and/or Project Manager.

I understand EAG reserves the right to change or amend the HASP at any time.

I understand any violation to the plan policies or procedures will be cause for disciplinary action up to and including termination.

Employee Signature

Date

EAG Supervisor/Project Manager Signature

Date

ATTACHMENT B

Material Safety Data Sheets (MSDSs)