



ARM Group Inc.

Earth Resource Engineers and Consultants

June 28, 2018

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

Re: Phase II Investigation Work Plan
Area B: Parcel B21 (Revision 1)
Comment Response Letter
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group Inc. (ARM) is pleased to provide the following responses to comments received from the Maryland Department of the Environment (MDE) in an email dated May 8, 2018. The MDE provided comments regarding the previous Phase II Investigation Work Plan submission (Revision 0) for Parcel B21 of the Tradepoint Atlantic property located in Sparrows Point, Maryland. This letter provides responses to the comments, and demonstrates that the requested changes to the sampling plan have been made in a satisfactory manner. ARM has provided an updated Phase II Investigation Work Plan for Parcel B21 (Revision 1) along with this letter. Responses to the comments are provided below; the original comments are included in italics with responses following.

- 1. Add two more borings near pits-blue dots [figure provided with comments].*

Based on the specific agency requests, two additional soil borings have been added at the requested locations in Parcel B21 (B21-073-SB and B21-074-SB). These borings were also added to the sampling plan table (**Appendix E**) targeting the Halogen Lines Trenches/Sumps.

- 2. Add 6 more borings where there are yellow dots [figure provided with comments] to cover areas without engineered barriers and investigate soils near historic wells and piezometers with elevated contaminants (i.e., naphthalene, DRO, DCE, and lead). MDE does not concur with the statement on Pg. 6, Section 1.3.1, "based on the substantial number of borings proposed across the parcel, additional borings in areas without engineered barriers are not warranted."*

Six additional soil borings have been added at the requested locations in Parcel B21 (B21-067-SB through B21-072-SB). These borings were also added to the sampling plan table (**Appendix E**) and listed as providing general Parcel B21 coverage. The density requirements in Section 1.3.1 and in the sampling plan table have been revised to reflect the addition of these soil borings. Please note that in some instances soil borings may need to be shifted in the field due to the presence of railways within the specified areas. If relocation is necessary, the shifts will be kept to a minimum distance, and the shifts will be reported in the Phase II Investigation Report. In addition, the identified statement on Pg. 6, Section 1.3.1 has been removed.

3. *Add PCB analysis in deeper sample in PCB spill area (AOC B). The location of these samples may be altered depending on the outcome of the Agency's review of PCB sampling and cleanup data from TPA.*

In accordance with the comment above, PCB analysis has been added for all sample depths at the locations surrounding AOC B (B21-001-SB, B21-002-SB, B21-039-SB, and B21-040-SB). However, the 10-foot soil sample will still be held pending the results of the overlying samples in accordance with standard protocols. Tradepoint Atlantic personnel have stated that Sunpro conducted the PCB sampling and cleanup activities. Tradepoint Atlantic will coordinate with Sunpro to submit a Completion Report. ARM and EAG request approval to proceed with the proposed boring locations, and acknowledge that the MDE may require additional borings to be added in the future.

4. *The Department may require additional sampling work to trace outfall from Tin Mill Canal in PCB area.*

Tradepoint Atlantic will coordinate with Sunpro to submit a Completion Report regarding the PCB sampling and cleanup activities. In the meantime, ARM and EAG request approval of the remainder of the Parcel B21 Work Plan in order to proceed with the bulk of the investigation work associated with the parcel. We acknowledge that the MDE may require additional borings to be added to the Work Plan in the future.

5. *Provide additional details re: Former 1988 PCB Spill Area (AOC B). It is our understanding that TPA contractors conducted PCB cleanup of this area, however, MDE-VCP received no notification of this work performed in 2016, including: characterization sampling plan and results, materials selected for disposal, disposal locations, details regarding additional remedial activities, etc... All of this information must be provided to the Agency's ASAP.*

In acknowledgement of this comment, we have notified Tradepoint Atlantic of this agency request. Tradepoint Atlantic will coordinate with Sunpro to submit a Completion Report regarding the PCB sampling and cleanup activities.



Additional Revisions:

6. Section 6.0 and Section 7.0 have been revised to reduce the data validation percentage from 50% to 20% for the site-wide parcel dataset. A substantial amount of analytical data collected to date at the Tradepoint Atlantic property has been validated, and the proposed 20% validation will still ensure that a representative dataset will be reviewed by the independent validator. Level IV data packages will still be generated for each laboratory job ID, ensuring that additional data can be validated if the results from the validation of the proposed subset (20%) indicate a significant concern. During a review meeting on May 30, 2018, the USEPA requested a separate detailed justification for reducing the data validation percentage from 50% to 20%. In response to the agency's concern, the Proposed Reduction in Data Validation Rate Letter dated June 26, 2018 was submitted to the MDE and USEPA and is currently under review.

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

Respectfully submitted,
ARM Group Inc.



Taylor R. Smith
Project Engineer



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

