



# ARM Group LLC

Engineers and Scientists

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March 29, 2021

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

Re: Comment Response Letter:  
RADWP Addendum  
Area A: Sub-Parcel A10-1  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the enclosed response to a comment received from the Maryland Department of the Environment (MDE) via email on February 18, 2021 regarding the recent Response and Development Work Plan (RADWP) Addendum: Sub-Slab Soil Gas & Indoor Air Monitoring Plan for the portion of the TPA property designated as Area A: Sub-Parcel A10-1 (the Site). The RADWP Addendum (Revision 1 dated February 2, 2021) was submitted to the MDE and United States Environmental Protection Agency (USEPA) to present proposed plans for sub-slab soil gas and indoor air monitoring following the completion of construction at the Site. A recent Comment Response Letter was prepared and submitted to the MDE and USEPA on February 17, 2021.

The MDE's email on February 18, 2021 indicated the previous arrangement of sub-slab soil gas and indoor air monitoring points (as proposed in the February 17, 2021 Comment Response Letter) was not acceptable. A full revision to the RADWP Addendum is not necessary, but this letter should be maintained with the RADWP Addendum to ensure the proposed changes to the monitoring locations are properly implemented. A response to the MDE's comment is given below; the original comment is included in italics with the response following.

*MDE: While the Agencies acknowledge the previous request for 12 sub-slab soil gas and indoor air monitoring locations, the revised Figure 1 is essentially a grid that ignores the NAPL and elevated CVOC well results. Find attached biased location suggestions on Figure 2 to replace grid-like locations. Provide two figures, with the second overlaying the proposed monitoring locations on the well/piezometer data.*

This Comment Response Letter proposes a revised sampling configuration, consistent with the MDE's request, which is biased toward the eastern edge of the proposed building and also targets the smaller enclosed spaces within the building. The adjusted sampling plan is presented on the attached **Figure 1** and **Figure 2**. The sampling plan includes 12 paired sub-slab soil gas and indoor air sampling points matching the number in the previous submission.

Each sub-slab soil gas monitoring point will be constructed using a manhole cover installed in the floor slab that is H-20 traffic rated (or equivalent). The sub-slab soil gas points will be installed in accordance with the methods given in the RADWP Addendum to ensure foundation penetrations are properly sealed.

TPA requests approval of the proposed changes to the sub-slab soil gas and indoor air monitoring plan. If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

Respectfully Submitted,  
ARM Group LLC



Ryan Clancy, E.I.T.  
Staff Engineer



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



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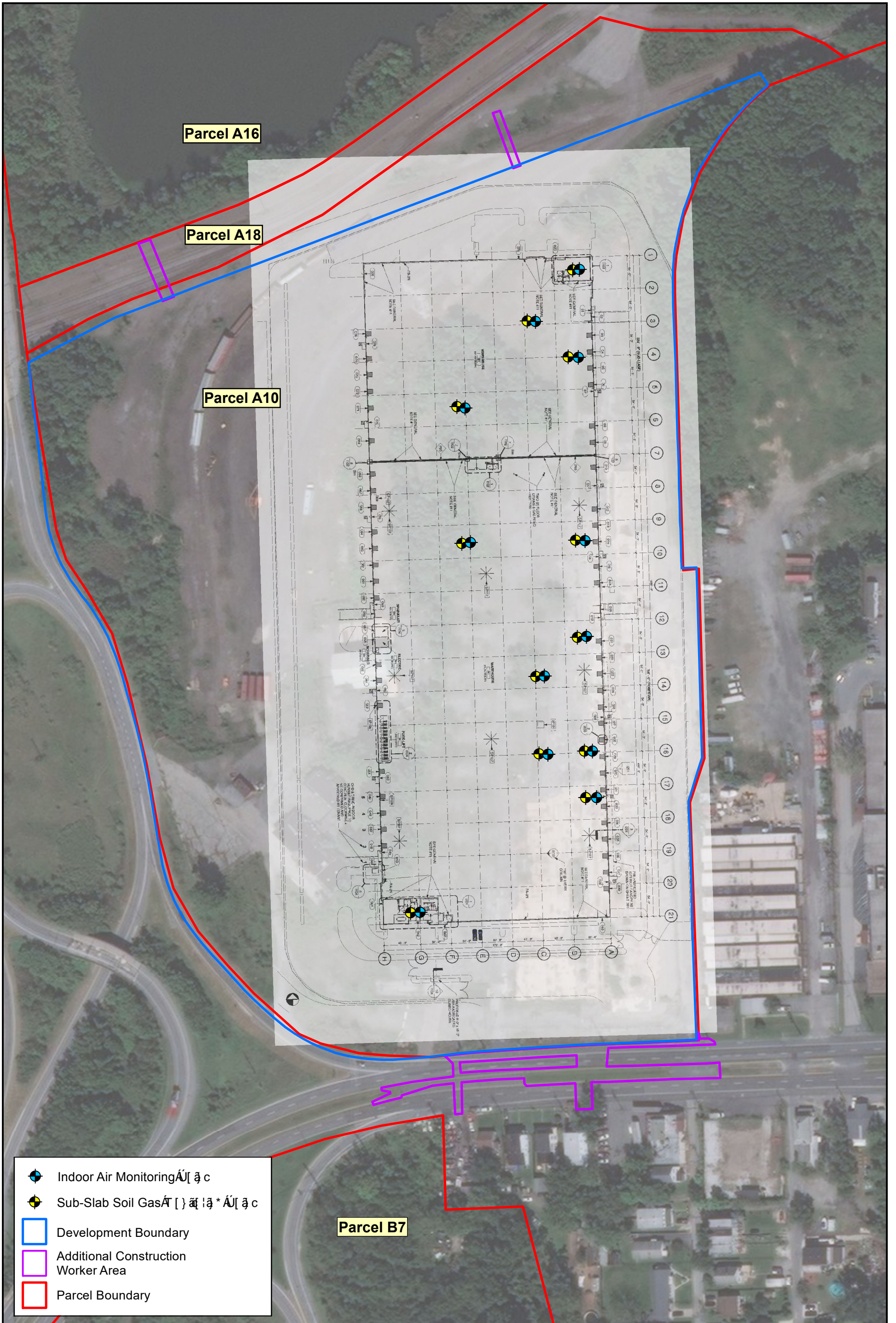
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## **FIGURES**

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-  Indoor Air Monitoring
-  Sub-Slab Soil Gas
-  Development Boundary
-  Additional Construction Worker Area
-  Parcel Boundary



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 Feet

**Sub-Parcel A10-1**  
**Building Layout Monitoring Locations**  
**Proposed Sub-Slab Soil Gas and Indoor Air**  
 March 22, 2021

Tradepoint Atlantic  
 ARM Project 20010110  
 Sparrows Point  
 Baltimore County, MD

**Figure**  
**1**



