



ARM Group Inc.

Engineers and Scientists

October 24, 2019

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

Re: Request for Modifications to Response and
Development Work Plan Addendum (Revision 2)
Royal Farms Station – Retail Area #1
Area B: Sub-Parcel B6-2
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 request for modifications to the previously approved development plans for the Royal Farms Station designated as Retail Area #1. The Royal Farms Station is to be constructed within the larger retail area designated as Sub-Parcel B6-2 (the Site) of the Tradepoint Atlantic property located in Sparrows Point, Maryland. The existing Sub-Parcel B6-2 Response and Development Work Plan (RADWP) Addendum for Retail Area #1 (Revision 2 dated May 22, 2018) was approved by the Maryland Department of the Environment (MDE) and United States Environmental Protection Agency (USEPA) for implementation on June 5, 2018. This request letter will serve to modify the existing RADWP Addendum.

Summary of Work

The construction of the Royal Farms Station as well as the paved ingress and egress roads were covered by the referenced RADWP Addendum dated May 22, 2018. Details related to the approved construction of the Royal Farms Station and the roads can be found in this separate plan. The proposed modifications provided within this request letter include: 1) the installation of temporary caps consisting of MDE-approved certified clean fill in the areas enclosed by the proposed ingress/egress roads to the east and west of the Royal Farms Station; 2) updates to the temporary fencing plan that was previously proposed surrounding the Royal Farms Station; and 3) selection of a preferred marker fabric to be used during the construction of landscaped caps. Pursuant to Paragraph 3 of the first amendment to the Administrative Consent Order (ACO), a cost estimate of the work to be performed at the site is \$50,000.

Temporary Clean Fill Caps

Within the existing RADWP Addendum dated May 22, 2018, the area enclosed by the ingress/egress roads to the east of the Royal Farms Station was designated as a “Future Development Area” to be addressed in a separate development plan. Within this request letter, the enclosed area to the west is similarly designated as a “Future Development Area.” Both of these future development areas are highlighted on the attached **Figure 1**, which was modified from the existing RADWP Addendum. At present, a tenant has not been selected for either area. Tradepoint Atlantic intends to temporarily cap these areas during the interim period before a tenant is selected and/or a formal development plan is designed. The temporary caps will consist of 1 foot of MDE-approved (i.e., certified clean) fill soil meeting the MDE’s requirements for commercial land use. As with other temporary caps on the property, the temporary clean fill caps will be subject to the established inspection and maintenance requirements for this type of cap. Tradepoint Atlantic will maintain responsibility for these inspection/maintenance requirements as well as for any required notifications to the MDE. These specific requirements are outlined below.

Inspections of the temporary clean fill caps will be completed at a minimum frequency of monthly. The responsible party will perform maintenance inspections, perform any maintenance of the temporary caps, and retain cap inspection records. The inspection records will be maintained and available for review at the Site. If the responsible party determines that an exposure risk is present after an inspection (e.g., exposed areas of underlying slag), the MDE must be notified within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If a corrective action is required, the MDE notification will include documentation of the observed conditions as well as the location of any repairs. In addition, the MDE and USEPA will be provided with a written notice at least 30 days prior to any planned removal or modification to the temporary caps once they have been installed.

Modifications to Fencing Plan

In addition to the proposed installation of temporary caps, Tradepoint Atlantic is also requesting to modify the temporary fencing plan that was previously outlined in the RADWP Addendum dated May 22, 2018. The referenced RADWP Addendum stated that the Royal Farms Station would be fenced off from the surrounding uncapped areas using “non-ground intrusive chain link temporary storm fencing”. However, an updated capping plan for the area surrounding the Royal Farms Station has recently been developed. Based on the updated plan, all areas enclosed within the ingress/egress roads associated with the Royal Farms Station will be capped, either with permanent caps (i.e., pavement or landscaping) or temporary caps (i.e., certified clean fill) as shown on the attached **Figure 2**. No areas of uncovered slag will remain exposed within the perimeter of the ingress/egress roads.



Fences are no longer proposed immediately surrounding the Royal Farms Station, but a more comprehensive fencing plan is proposed surrounding the ingress/egress roads. The southernmost road running from east to west parallel to the Tin Mill Canal (TMC) will be bordered on its southern edge by a 4-foot high permanent fence (any nominal space between the road and fence line would be capped with a landscaped cap). The TMC itself has already been capped by the maintenance cleanup work that was recently completed. The 4-foot fence will include protective signage spaced at regular intervals along the TMC. **Figure 2** includes an inset detail with the proposed signage design. Temporary construction fencing will be installed along the eastern and western edges of the ingress/egress roads to prevent access to the remaining uncapped areas of Sub-Parcel B6-2. Other than the proposed ingress/egress roads, there is no additional public access to the Site from Bethlehem Boulevard.

No additional intrusive construction work is anticipated to occur during this project (beyond the original scope outlined in the approved RADWP Addendum), with the exception of minor installation work associated with the 4-foot high fence along the TMC. Standard Level D Personal Protective Equipment (PPE) will be used by the contractor(s) for the full scope of work described herein. Groundwater is not expected to be encountered during fence installation and any dewatering, if required, is expected to be minimal. Any stormwater or groundwater that requires dewatering during construction will be pumped to the nearby TMC through a filter bag.

Selection of Marker Fabric

In accordance with the requirements of the Sub-Parcel B6-2 RADWP, all landscaped caps in the retail area are required to have a geotextile marker fabric placed between the clean fill (the cap) and the underlying soils. In addition to the modifications proposed above, Tradepoint Atlantic is proposing to use the Mirafi® 140N nonwoven geotextile as the preferred marker fabric for this development project. A product sheet for this marker fabric is included as **Attachment 1**. Upon authorization this marker fabric (or an equivalent variant) will be used during the construction of Retail Area #1 for the associated landscaped caps.

Schedule and Reporting

At this time, EAG is requesting approval for Tradepoint Atlantic to proceed with the proposed temporary cap and fence installation work. Tradepoint Atlantic intends to commence work on the identified tasks as soon as practicable, and anticipates that the full scope of work will be completed by the end of the 2nd Quarter 2020. The scope of work described herein shall be included in the Development Completion Report for the Royal Farms Station once complete.



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.



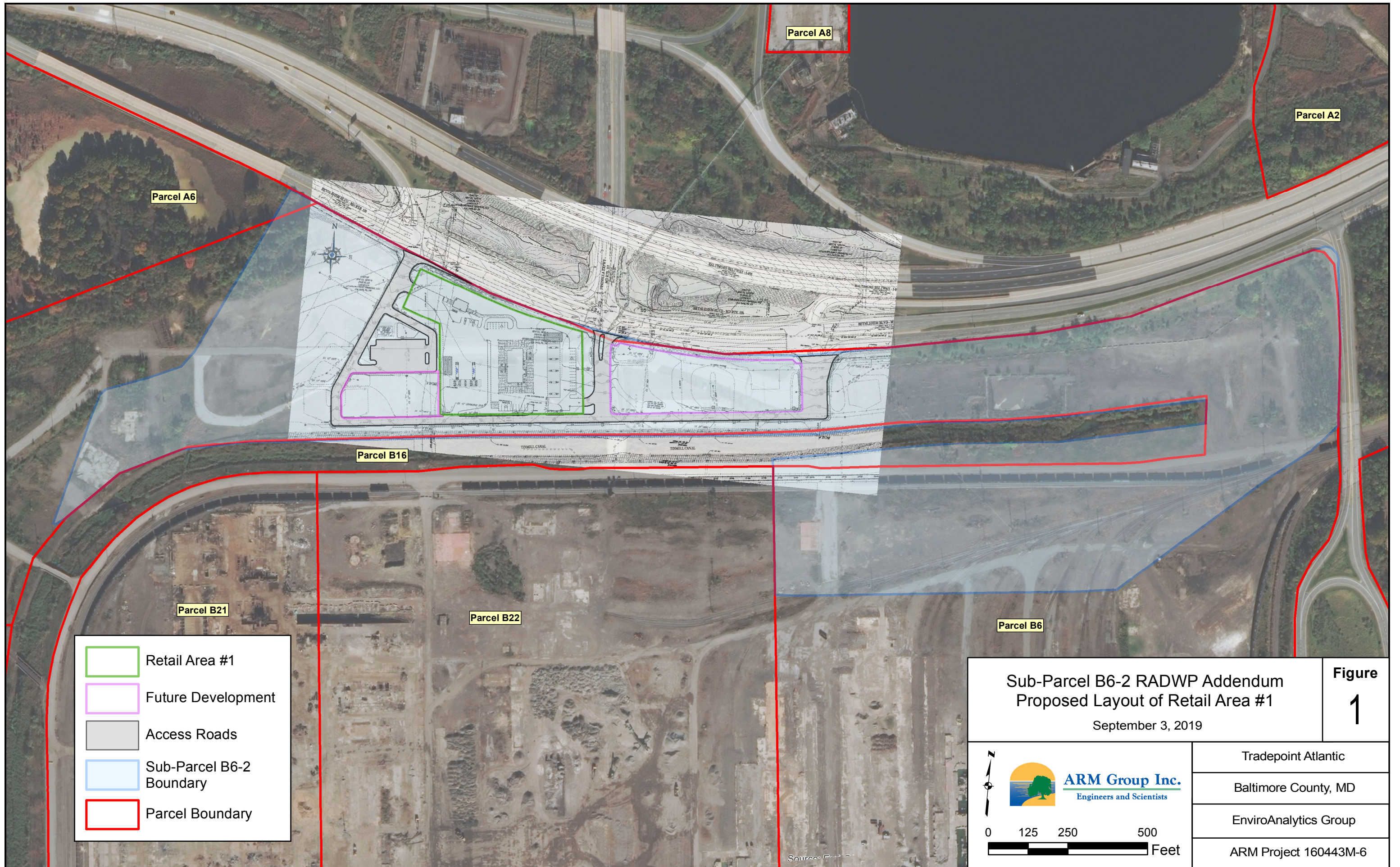
Taylor R. Smith, P.E.
Project Engineer



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



FIGURES



- Retail Area #1
- Future Development
- Access Roads
- Sub-Parcel B6-2 Boundary
- Parcel Boundary

Sub-Parcel B6-2 RADWP Addendum Proposed Layout of Retail Area #1 September 3, 2019		Figure 1
ARM Group Inc. Engineers and Scientists		Tradepoint Atlantic Baltimore County, MD EnviroAnalytics Group ARM Project 160443M-6



Figure G

Attachment 1

Mirafi® 140N



Mirafi® 140N is a nonwoven geotextile composed of polypropylene fibers, which are formed into a stable network such that the fibers retain their relative position. Mirafi® 140N is inert to biological degradation and resists naturally encountered chemicals, alkalis, and acids. Mirafi® 140N meets AASHTO M288 Class 3 for Elongation > 50%.

TenCate Geosynthetics Americas Laboratories are accredited by Geosynthetic Accreditation Institute – Laboratory Accreditation Program ([GAI-LAP](#)). [NTPEP Listed](#)

Mechanical Properties	Test Method	Unit	Minimum Average Roll Value	
			MD	CD
Grab Tensile Strength	ASTM D4632	lbs (N)	120 (534)	120 (534)
Grab Tensile Elongation	ASTM D4632	%	50	50
Trapezoid Tear Strength	ASTM D4533	lbs (N)	50 (223)	50 (223)
CBR Puncture Strength	ASTM D6241	lbs (N)	310 (1380)	
			Maximum Opening Size	
Apparent Opening Size (AOS)	ASTM D4751	U.S. Sieve (mm)	70 (0.212)	
			Minimum Roll Value	
Permittivity	ASTM D4491	sec ⁻¹	1.7	
Flow Rate	ASTM D4491	gal/min/ft ² (l/min/m ²)	135 (5500)	
			Minimum Test Value	
UV Resistance (at 500 hours)	ASTM D4355	% strength retained	70	

Physical Properties	Unit	Roll Sizes	
Roll Dimensions (width x length)	ft (m)	12.5 x 360 (3.8 x 110)	15 x 360 (4.5 x 110)
Roll Area	yd ² (m ²)	500 (418)	600 (502)

Disclaimer: TenCate assumes no liability for the accuracy or completeness of this information or for the ultimate use by the purchaser. TenCate disclaims any and all express, implied, or statutory standards, warranties or guarantees, including without limitation any implied warranty as to merchantability or fitness for a particular purpose or arising from a course of dealing or usage of trade as to any equipment, materials, or information furnished herewith. This document should not be construed as engineering advice.

Mirafi® is a registered trademark of Nicolon Corporation.

Copyright © 2015 Nicolon Corporation. All Rights Reserved.

365 South Holland Drive
Pendergrass, GA 30567

Tel 706 693 2226
Tel 888 795 0808

Fax 706 693 4400
www.tencate.com



FGS000385
ETQR77