

Harbor Point – Parcel 4 Mixed Use
SPILL PREVENTION AND RESPONSE PLAN

*Honeywell Baltimore Works Site
Baltimore, Maryland*

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Prepared For: Environmental Protection Agency – Region III
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1.0 INTRODUCTION

Harbor Point Parcel 4 Development, LLC (HPD; Developer) and its consultants have prepared this Spill Prevention and Response Plan (SPRP) for the Harbor Point – Parcel 4 Mixed Use site, on the former AlliedSignal Baltimore Works Site (or “Site”), located in Baltimore, Maryland. This SPRP has been prepared in support of the Detailed Development Plan (DDP) for the Harbor Point – Parcel 4 Mixed Use project (or “Project”), on the former AlliedSignal Baltimore Works Site (or “Site”), located in Baltimore, Maryland. This SPRP pertains to the construction of the Harbor Point – Parcel 4 Mixed Use project, consisting of Phase 1: an 8-story podium on the western portion of the Project, containing a 1,292-car parking garage, retail spaces, and apartment units, with a 17-story apartment tower atop the southwestern portion of the podium. Phase 1 will also include a linear park constructed adjacently east of the garage/apartment building. In future Phase 2, an 8-story hotel will be built on the eastern portion of the Project, east of the linear park.

1.1 PURPOSE OF SPRP

This SPRP is intended to describe the measures to be implemented by HPD and its Contractors to prevent hazardous material and petroleum product discharges (i.e., spills) from occurring, and mitigate the effects of a discharge, should one occur. Spills are inclusive of solids and liquids.

Solids include, but are not limited to, asphalt, stone aggregates, concrete and wood debris, soil and product residuals from the former chromium ore production facilities. Liquids include but are not limited to groundwater, seeps, fuel, oil, decontamination liquids, liquids generated from subsurface dewatering activities, liquid that may have come in contact with site soils beneath the existing environmental protections exposed by the work, or liquids that may have come in contact with other potentially contaminated material.

Contractors are required to notify HPD’s Representative and Honeywell’s Representative of a spill that occurs and is subject to this SPRP. Examples of spills that could occur that would be subject to this document include the following:

1. Diesel fuel spill from construction equipment or re-fueling tank, either during re-fueling or a fuel line;
2. Hydraulic fluid spilled from a hydraulic line break in construction equipment;
3. Spills of Contact Water and Non-Contact Water during transfer into a temporary Frac tank or tanker for off-site disposal.

The Solid Waste Program within MDE must be notified immediately in the event of a release of hazardous waste or hazardous waste-contaminated materials (See Section 5.0).

1.2 CONSISTENCY WITH OTHER PLANS

This SPRP serves as an Environmental Control Document, as a component of the DDP for the Project. Other Environmental Control Documents include the following.

- The Material Handling and Management Plan (MHMP) addresses the handling and management of solids (asphalt, stone aggregates, concrete and wood debris, and soil) and liquids (groundwater and stormwater) that may be encountered during the intrusive activities at the Site. This Plan also includes dust control measures that describe soil/debris handling practices to be implemented to minimize dust emissions.
- The Construction Air Monitoring Plan (CAMP) and Health and Safety Plan (HASP) specifies air monitoring and response actions to ensure the safety of workers and the public during construction related to potential airborne contaminants.
- The Health and Safety Plan (HASP) Guidance is intended to address worker safety related to potential exposure to environmental constituents of concern and can be used, as appropriate, by Contractors engaged in preparing bids and contractor-specific HASPs.
- The Stormwater Pollution Prevention Plan (SWPPP) provides an evaluation of potential pollution sources at the Project that could come in contact with stormwater and specifies appropriate measures to mitigate or control the discharge of pollutants in stormwater runoff.

1.3 BACKGROUND

The Site is located on a peninsula on the northeast shore of the Patapsco River of the Inner Harbor in the Fells Point section of Baltimore City. The Site consists of three Areas. Area 1 is the principal site of Honeywell's (formerly AlliedSignal) Baltimore Works Facility which included chromium processing production and support buildings on an area that covered approximately 16 acres. Prior to acquisition by Honeywell, Areas 2 and 3 were used for various industrial and warehousing operations, including chrome ore storage (Area 2) and brass foundry casting, oil blending and storage, coating/plastics production, lumber storage, and foundry (Area 3).

The principal contaminant of concern in Area 1 is hexavalent chromium (CrVI). An Environmental Remediation System (ERS) is maintained and operated by Honeywell International Inc. (Honeywell) to contain CrVI-impacted groundwater in Area 1 pursuant to the requirements of the Consent Decree by and between Honeywell, the U.S. Department of Justice, the United States Environmental Protection Agency (USEPA), and the Maryland Department of the Environment (MDE). The ERS consists of a Multimedia Cap (MMC), Hydraulic Barrier (HB), Head Maintenance System (HMS), a groundwater storage and transfer system, and the Outboard Embankment in Area 1; the layered soil cap (LSC) in Area 2; and the soil cap on the former Silver North and Silver South parcels in Area 3.

Historical sampling and analysis data from the Project area (Area 3 and non-designated areas) have identified elevated concentrations of some parameters, mainly including metals (lead and chromium), petroleum, and some polycyclic aromatic hydrocarbons (PAHs). The more significant soil contamination was found on the eastern portion of the Project, which necessitated the Area 3 cap. Some groundwater sampling has also identified elevated total chromium concentrations, although the primary area with chromium impacts is west of the Project, on Area 1.

In September 2019, additional environmental sampling and analysis were performed relevant to the Project footprint, resulting in additional data for the Project. These results are summarized in a report

titled *Groundwater Evaluation and Soil Waste Characterization Summary*, dated September 6, 2019. The evaluation included groundwater samples collected from four soil borings. The results indicated total chromium concentrations ranging from 870 micrograms per liter ($\mu\text{g/L}$) to 47,000 $\mu\text{g/L}$. No detectable hexavalent chromium concentrations were reported.

1.4 EXISTING CONDITIONS

The Project contains an asphalt paved parking lot that was constructed in 2003 for Cirque de Soleil and is currently used for temporary surface parking for nearby developments. Several temporary trailers are located along the western site of the Project, and a stormwater management basin is located on the northern portion of the Project. The southeastern portion of the Project contains a sanitary sewer pump station, situated on the former 950 South Caroline Street parcel. The C-Series DDP Drawings show the Project. Drawing EN1.01 shows including Area 1, Area 3, the existing Environmental Remediation System (ERS), and other pertinent Site features.

2.0 FACILITY CONTACT SUMMARY AND APPLICABLE PERMITS

Honeywell Contact: Eric Christodouloatos (Project Coordinator)
(973) 455-07960
Honeywell International Inc.
101 Columbia Road, P.O. Box 2105
Morristown, NJ 07962

Resident Honeywell Site Manager: Bryn Hansen
(410) 404-9111
Jacobs
1000 Wills Street
Baltimore, MD 21231

Developer: Jonathan Flesher
(443) 463-3937
Beatty Development Group, LLC
1300 Thames Street, Suite 10
Baltimore, MD 21231

The Emergency Coordinator (EC) and contact information are presented in Section 5.1.

Applicable state and local permits and/or approvals required for this project are summarized below:

Jurisdiction	Permits and/or Approvals
MDE	General Permit for Stormwater Associated with Construction Activity

Jurisdiction	Permits and/or Approvals
MDE	Chesapeake Bay Critical Area
MDE	General Tidal Wetlands License (under the Maryland State Programmatic General Permit-4)
MDE	NDPES HT Permit
City of Baltimore	Building Permit
City of Baltimore	Stormwater Management
City of Baltimore	Developer's Agreement

3.0 LIQUID DISCHARGE PREVENTION

Direct discharge of collected liquids to adjacent surface waters or ground surfaces is prohibited. Characterization and proper disposal of captured and stored liquids in accordance with the MHMP is required.

Stormwater will be diverted from excavation zones by installing the required erosion and sediment controls as shown on the C-Series Drawings. Temporary diversion berms must be covered by plastic or other impermeable material to reduce the potential for erosion of the berm material.

Asphalt containment berms will be constructed around controlled storage and equipment decontamination areas. Controlled storage and equipment decontamination areas will be constructed with a low collection area to allow the removal of potentially impacted water, as necessary (see MHMP).

Two types of fuel storage tanks are anticipated during construction activities at the Project: portable generators and small above-ground storage tanks (ASTs) for storage of equipment fuel. A fuel truck is also anticipated to enter and exit the site for refueling equipment. All petroleum product ASTs used at this facility will be double-walled and constructed in accordance with industry specifications and will contain approximately 250-500 gallons of fuel. Alternatively, the ASTs may be placed in secondary containment. The ASTs used will be compatible with the characteristics of the petroleum product they contain and with temperature and pressure conditions.

Emergency generators with integrated fuel tanks having a capacity of approximately 250 gallons will also likely be used at the Project. Connective fuel piping will be placed above ground for easy access and visual monitoring during use. The piping will either be double-walled or be placed in secondary containment. The total volume of petroleum stored on site during the project, including the generator fuel tank and ASTs, is anticipated to be between 500 and 750 gallons. Fueling of equipment will be performed using a portable containment system. HPD's Representative will direct the Contractor to ensure that the fuel truck driver understands the site layout, knows the protocol for entering the Project and unloading product, is familiar with this SPRP, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery

hose. The trucks and/or site contractor will be equipped with a functioning spill kit that meets industry standards exercised by experienced professionals performing the same services under similar circumstances. Those engaged with re-fueling activities will be knowledgeable with the deployment and use of the spill kit.

Two categories of water are anticipated to be managed during construction: Contact Water and Non-Contact Water. These categories are defined in the MHMP and the SWPPP. Transfer of Contact Water, as well as Non-Contact Water that has failed analytical testing, will be conducted within a containment area of sufficient size and construction of appropriate materials to contain materials spilled during transfer. A spill kit will be maintained near the area where the transfer occurs. Spills within the containment area will be managed in a manner similar to the procedures noted in Section 5.0.

4.0 CONSTRUCTION STORAGE AND OPERATION

Stormwater and groundwater that are managed during construction are defined as Contact Water and Non-Contact Water, as discussed in the MHMP and the SWPPP. Contact Water will be contained in two 21,000-gallon Frac tanks (#1 and #2) for proper off-site disposal. Non-Contact Water will be contained in two 21,000-gallon Frac tanks (#3 and #4) for testing to determine if it can be discharged per an MDE discharge permit or must be disposed off-site. Contact and Non-Contact Water testing and disposal requirements are provided in the MHMP.

Contact Water will be collected and conveyed through double-walled pipes, or alternatively pipes located in secondary containment, from the pump location to the designated Frac tank. Double-walled conveyance pipes will drain back to the excavation for recovery.

Tank #	Container Type	Capacity (gal)	Contents
Frac Tanks #1 and #2	Frac Tank	21,000 each	Contact Water
Frac Tanks #3 and #4	Frac Tank	21,000 each	Non-Contact Water

When off-site disposal is scheduled, the Frac tanks will be emptied using a vacuum tanker truck, which will then transport the liquid to the disposal facility. In the event that a vacuum truck is not available, a centrifugal transfer pump may be used to pump water to a transfer tractor-trailer.

Construction equipment will be refueled nearby its working location and, when possible, stationed on a portable “collapse-a-tainer” secondary containment system. In situations where a portable secondary containment system is not used, i.e., stationary equipment such as tower cranes, spill control supplies will be provided during re-fueling. Those engaged with re-fueling activities will be knowledgeable with the deployment of the collapse-a-tainer and use of the spill kit. If a fuel spill occurs outside of the collapse-a-tainer system, other measures in addition to a spill kit may be used to contain and manage the spill. These measures include the following:

- installation of containment berms around the spill;
- installation of swales around the spill;
- construction of a sump(s) for removal of the spill. Spilled fuel liquids that are collected will be conveyed to a storage container specifically designated for spilled fuel or other petroleum materials; spilled fuel will not be mixed with the groundwater storage tanks designated for other purposes;
- other containment measures may be used to immediately stop the migration of the liquids; and,
- removal of soil materials that are impacted by the spill for characterization and off-site disposal. The soil would be excavated at a minimum to a depth at which there is no visual or olfactory evidence of the spill. Soil excavation will not penetrate any part of the ERS not intended to be disturbed as part of development.
- Temporary storage of impacted soil or water will be in designated containers located within the Controlled Storage Areas.

During proposed construction activities, an Emergency Generator will also be maintained at the Project by HDP. The generator will be inspected daily for leaks during use.

The generator will include a double-walled fuel tank (110% containment system) to ensure all fuels are isolated from the surrounding environment. In the event of a fuel leak, sorbent pads or other similar response materials will be used to recovery fuel, and contaminated soil will be promptly excavated and properly disposed off-site, along with the sorbent material. The soil would be excavated at a minimum to a depth at which there is no visual or olfactory evidence of the spill. Depending on the extent of the spill, soil sampling may be required to confirm cleanup. Soil excavation will not penetrate any part of the ERS not intended to be disturbed as part of development.

In the event of a small fuel spill during construction activities (e.g., spills less than 5 gallons) at the Project, fuel will be recovered by the environmental response contractor's employees using absorbent materials from spill kits, or other measures. The Developer's environmental response contractor will be on the Project throughout the site work phase of construction. Any oil-soaked recovered material or wastes resulting from a spill cleanup will be stored in an approved container and then disposed or recycled off-site according to applicable Federal and State regulations.

In addition to the Developer's environmental response contractor, Honeywell's emergency response contractor, Maryland Environmental Services (410-979-8200), Baltimore City, or the MDE's HAZMAT Team may be contacted by the Developer's Representative to respond. Disposal of any recovered materials generated from cleanup by a spill response contractor will be coordinated through the Site Manager to ensure proper disposal of recovered materials in accordance with Maryland regulations.

5.0 DISCHARGE NOTIFICATIONS

The Contractor will immediately commit all necessary manpower, equipment, and materials required to prevent a spill from reaching waterways, shorelines, or sewers. Once the spill, release or discharge is

under control, the Contractor will immediately notify the Developer's Representative and Honeywell's Representative.

The MDE OCP is to be notified by the Developer's Representative in accordance with Code of Maryland Regulations (COMAR) 26.10.08.01 Reporting Of Suspected Releases. The MDE OCP contact number to report a spill is (866) 633-4686 (24 hour) or (410) 974-3551. In the event of a release of hazardous waste or hazardous waste-contaminated materials, the Solid Waste Program (SWP) within MDE must also be notified at (410) 537-3315.

5.1 PROJECT-SPECIFIC EMERGENCY CONTACTS

In the event of a contaminated groundwater spill, material release, fire or explosion, the following Honeywell and Developer personnel should be notified immediately.

Emergency Coordinator (EC)

Developer: Jonathan Flesher: (443) 463-3937
Resident Site Manager: Bryn Hansen: (410) 404-91111

5.2 EMERGENCY NOTIFICATIONS

The following table provides government agency and emergency response contact information in the event of a spill.

U.S. Coast Guard Spill Reporting	National Response Center (Chemtrec)	(800) 424-8802
EPA Region III Reporting	USEPA Region III	(215) 814-5000
State Reporting	Maryland Department of the Environmental Emergency Response Notification	(866) 633-4686 (24 hour) or (410) 974-3551
	Maryland Natural Resources Police	(410) 643-5773
Local Reporting	Baltimore Fire Department	911 (emergency) (410) 396-3083 (non-emergency)
Emergency Response Contractor	Maryland Environmental Services	(410) 729-8200
	EWMI (Developer's response contractor)	(877) 460-1038

5.3 DISCHARGE RESPONSE PROCEDURES

In the event of an oil or contact water spill outside of the containment area, spill response measures will be utilized to minimize migration of contaminated material.

If the EC determines that the facility has had a release, fire, or explosion that could threaten human health or the environment, or if the release is of a quantity which would exceed the Reportable Quantity (RQ) for chromium (1 pound as referenced in 40 CFR 302.4) outside of the tank containment or truck loading area, he shall report his findings as follows:

- Name, address, and telephone number of the person reporting
- Name, address, and telephone number and the responsible party
- Specific location of the incident
- Date and time the incident occurred or was discovered
- Name of the chemical/material released
- Source and cause of the release
- Total quantity discharged
- Medium into which the substance was discharged
- Amount spilled into water
- Weather conditions
- Name of the carrier or vessel, the railcar/truck number, or other identifying information
- Number and type of injuries or fatalities
- Whether an evacuation has occurred
- Estimation of the dollar amount of property damage
- Description of current and future cleanup actions
- Other agencies notified or about to be notified

If the facility stops operations in response to a fire, explosion, or release, the EC shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. Immediately after an emergency, the EC shall provide for storage or disposal of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

If the spill material is flammable, all ignition sources shall be controlled or disabled. Fire extinguishers will be on hand for immediate use. The following actions should be taken as needed:

- Clear the area;
- Keep unnecessary personnel away;
- Identify the spilled material and report to the SM;
- Develop a plan of action;
- Don additional protective equipment;
- Control the source of the spill;
- Dike or apply absorbent material to spill;

- Decontaminate area as necessary; and
- Decontaminate personnel.

The EC shall ensure that, in the affected areas of the site:

- Waste that may be incompatible with the released material is not stored or disposed of until cleanup procedures are completed;
- Treatment or disposal of waste materials may not occur on site; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Material spills may occur during construction from excavation, truck loading, and vehicle accidents. Every effort will be made to prevent or minimize spills to the local surface waters.

Should an on-site spill of contaminated groundwater occur, the immediate response will include closing off the source of the spill, controlling the spilled material, application of a sorbent material or sand bagging, and street sweeping, as appropriate. The spill shall be collected as soon as possible, either manually or with equipment such as pumps. Ground material such as concrete or asphalt, which comes in contact with the spill, shall be cleaned as appropriate. Ground material that comes in contact with the spill that would not or cannot be cleaned will be removed for disposal and replaced with clean material. Removed materials that were in contact with the spilled contaminated groundwater will be stored in roll-off containers for characterization testing. The final disposition of these materials will be determined based on the test results. Spilled contaminated groundwater that is collected will be stored in the designated groundwater tanks and managed with the HMS extracted groundwater.

Records of all spills and releases will be documented in a log. The reported information described above will be included in the log.

5.4 WRITTEN NOTIFICATIONS

If the facility discharges more than 1,000 U.S. gallons of oil in a single discharge, or discharges more than 42 U.S. gallons of oil in each of two discharges that occur within any twelve-month period, into or upon navigable waters, a written report will be sent to the following address within 60 days of meeting the 1,000-gallon or 42-gallon criteria discussed above (these reporting criteria are consistent with 40 CFR 112.4):

U.S. EPA – Region III
Lane, Chemicals & Redevelopment Division
Remediation Branch #1
1650 Arch Street
Philadelphia, PA 19103
Attn: Mr. Moshood Oduwole

A copy of this written report will also be sent to the following State agencies:

Maryland Department of the Environment (MDE) Solid Waste Program

1800 Washington Boulevard
Baltimore, Maryland 21230
Attn: Mr. Edward Dexter

**Maryland Department of the Environment (MDE)
Land Management Administration – Oil Control Program**

1800 Washington Boulevard
Baltimore, Maryland 21230
Phone: 410-537-3442

The written report will include the following information:

- Name and location of the facility and name of the owner/operator;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

6.0 POST-CONSTRUCTION DISCHARGE PREVENTION

This SPRP is limited to construction-related activities for the Project. Once construction is completed, the current spill prevention control and countermeasures (SPCC) plan will continue to be employed at the Site.