



ARM Group LLC

Engineers and Scientists

March 8, 2021

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

Re: Comment Response Letter:
RADWP Addendum
Supplemental Sampling Plan – 2nd Round
Area A: Sub-Parcel A8-2
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the following responses to comments provided by the Maryland Department of the Environment (MDE) via email on January 12, 2021 regarding the previous submission of the Response and Development Work Plan (RADWP) Addendum: Supplemental Sampling Plan – 2nd Round (dated December 14, 2020) for a portion of the TPA property designated as Sub-Parcel A8-2 (the Site) located in Sparrows Point, Maryland.

The Supplemental Sampling Plan has been revised and is provided accompanying this Comment Response Letter. The responses to the MDE's comments are given below; the original comments are included in italics with the response following.

- 1. A separate SLRA will be conducted for the composite and construction worker for EU 2 of A8-2. This should be explicitly stated in the revised text. EU 2 is to consist solely of the access road and unpaved shoulders and median. The Sub-Parcel A8-2 RADWP Revision 1 will be considered EU 1 of A8-2.*

A Screening Level Risk Assessment (SLRA) for both the Composite Worker and Construction Worker will be completed for EU1 (main area) and EU2 (access road). The revised SLRA will supplement the previous Sub-Parcel A8-2 RADWP SLRA.

- 2. Revise Figure 1 to include a total of 10 new sampling locations in EU 2: add 5 locations to the three existing on the shoulders and median; add 5 to the access road. Collect surface and sub-surface intervals per the Tradepoint QAPP, with the exception of*

amending the surface sampling interval from 0-1' bgs to 0 – 2' to define surface intervals, as proposed.

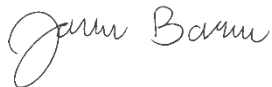
The text and **Figure 1** have been updated to specify 10 new sampling locations, five on the shoulders and median and five on the access road. Surface and sub-surface samples will be collected in accordance with the Quality Assurance Project Plan (QAPP), with the exception of the 0 – 2 foot surface sampling interval. Appropriate changes are reflected in the Supplemental Sampling Plan text. The analysis of each sample will consist of polynuclear aromatic hydrocarbons (PAHs) and metals since these constituents have been indicated as the primary risk drivers (as outlined in the prior submission dated December 14, 2020).

- 3. There is no reason to re-sample A15-003-SB. The sample results from the initial round of sampling, A15-001, 002, and 003, are expected to be included in the new SLRA calculations.*

Location A15-003-SB will not be resampled and data from the initial round of supplemental sampling will be included in the SLRA.

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



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