



# ARM Group LLC

Engineers and Scientists

March 30, 2021

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

Re: Comment Response Letter:  
Sub-Parcel B22-2 RADWP  
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 United State Environmental Protection Agency (USEPA) via email on December 29, 2020 regarding the previous submission of the Sub-Parcel B22-2 Response and Development Work Plan (RADWP) (Revision 0 dated November 9, 2020). The Maryland Department of the Environment (MDE) has not indicated any additional comments beyond those presented by the USEPA. Responses to specific USEPA comments are given below; the original comments are included in italics with responses following. Additional revisions are presented at the close of this Comment Response Letter.

1. *Section 3.2.3, PORI Lagoon Characterization Investigation – Revise to correct the last paragraph of this section regarding the PORI Lagoon remedy.*

Section 3.2.3 has been revised to reflect the remedial excavation of the PORI Lagoon which was completed in December 2020. The PORI Lagoon Corrective Measures Study (CMS) Report (Revision 1 dated February 18, 2021) and the PORI Lagoon Excavation Completion Report (Revision 0 dated January 6, 2021) are referenced in this section. Both identified reports have been approved by the agencies.

2. *Section 3.2.4, Locations of Potential Concern –*
  - a. *Revised the third paragraph of this section to refer to the PORI Lagoon CMS Report, rather than an addendum to the B22-2 RADWP.*

Section 3.2.4 has been revised to reference the PORI Lagoon CMS Report.

- b. *Revised the final paragraph and Figure 9 to indicate the PORI Lagoon remedy.*

**Figure 9** has been updated to indicate the PORI Lagoon excavation area. The final paragraph of Section 3.2.4 has also been updated.

3. *Section 3.3.2, Sub-Parcel B22-2 SLRA Results and Risk Characterization – It is noted that the SLRA used the data available from the PORI Lagoon Investigation, which subsequently was determined to require remediation. The highest PAH data for the Sub-Parcel was collected from the PORI Lagoon. Thus, carcinogenic risk is over-estimated in the SLRA. Revisions are not necessary, but the over-estimation should be clarified in this section.*

Section 3.3.2 has been revised to clarify the assessment was based on pre-remediation conditions and is therefore an over-estimate of risk.

4. *Revise Section 4.1 regarding the PORI Lagoon per the comments above.*

Section 4.1 has been revised to reflect the current status of groundwater investigation and piezometer abandonments in the vicinity of the PORI Lagoon, including reference to the PORI Lagoon CMS Report which presents the future downgradient monitoring plan.

#### **Additional Revisions:**

5. TPA provided a new utility layout and grading plan on March 5, 2021 with minor revisions for Sub-Parcel B22-2. The boundary and general layout of the sub-parcel are unchanged. The updated plans have been incorporated into revised **Figure 2, Figure 3, Figure 9, Figure 10, and Appendix E**. No changes were necessary in the text based on these plans.
6. Dewatering (Section 5.2.2) has been updated to reference the Humphrey Creek Wastewater Treatment Plant (HCWWTP) Constituent Threshold Limits for Dewatering Activities related to Remediation, Development, and Capping letter dated March 3, 2021. The letter established formal methods to evaluate and screen available analytical data to determine appropriateness of discharging dewatering fluids to the Tin Mill Canal (TMC). The letter also established a screening threshold (200 ppm) for TPH-DRO and TPH-GRO which were previously absent.
7. The Schedule (Section 7.0) has been updated to include the contingent RADWP approval received on December 16, 2020 and the anticipated final RADWP approval.
8. The PORI Lagoon CMS Report and the PORI Lagoon Excavation Completion Report have been included as additional electronic attachments to the RADWP.



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

