ARM Group LLC
Engineers and Scientists

September 14, 2020

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

Re: Comment Response Letter:
Slag Characterization Completion Report
Area B: Parcel B13
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) and United States Environmental Protection Agency (USEPA) via email on August 31, 2020 regarding the previous submission of the Slag Characterization Completion Report (dated August 12, 2020) for Parcel B13 of the TPA property located in Sparrows Point, Maryland. A revised Slag Characterization Completion Report (Revision 1) is provided along with this Comment Response Letter. Responses to the comments are provided below; the original comments are included in italics with the responses following.

1. *The area mapped out as suspected slag contamination (in red) should be extended to the boring locations that have data showing no detected contamination. The line drawn to mark contamination is between "clean" points and "contaminated" points. For example, there is no sampling data from soils between B13-095 and B13-096, so drawing the line for suspected contamination between these points is not backed up by the data here. B13-098 could be located just outside of the contaminated area. We do not have data to show whether or not this is the case. More specific sampling would be needed if TPA wants to determine that the contamination area is located approximately 25 feet inside the "clean" borings/test pits.*

   The suspected contaminated area presented on **Figure 3** has been revised to show the red boundary extending to the borings without contamination.

2. *It should be restated that this delineation is strictly for determining the extent of contaminated slag intended for future processing by TPA and does not address NAPL located beneath this area, deeper than the 14' amsl site grade TPA is working toward achieving. That will need to be investigated once this slag is handled and/or treated properly.*

   Language in the report has been updated to reflect that the characterization does not address potential non-aqueous phase liquid (NAPL) impacts below the 14-foot above mean sea level (amsl) final proposed grade. MDE will be provided with any plans for further characterization activities following the completion of slag reclamation.

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

Joshua M. Barna, G.I.T.
Staff Geologist

Eric S. Magdar, P.G.
Vice President