



RESPONSE ACTION PLAN

1401 WOODALL STREET PROPERTY

BMI: MD1741

Baltimore, Maryland

June 25, 2021

Submitted to:

Maryland Department of the Environment

Voluntary Cleanup Program

1800 Washington Boulevard, Suite 625

Baltimore, Maryland 21230

Attn: Ms. Barbara Brocks

Prepared for:

WOODALL GPG, LLC

1414 Key Highway, Suite 300A

Baltimore, Maryland 21230

Attn: Mr. Daniel Goodier and Mr. Jon Selfridge

Prepared by:

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GTA Project No. 171112

GEO-TECHNOLOGY ASSOCIATES, INC.

GEOTECHNICAL AND
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A Practicing GBA Member Firm



June 25, 2021

Maryland Department of the Environment
Voluntary Cleanup Program
1800 Washington Boulevard, Suite 625
Baltimore, Maryland 21230

Attn: Ms. Barbara Brocks

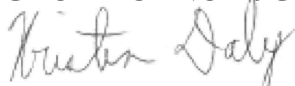
Re: Response Action Plan
1401 Woodall Street Property
1401 Woodall Street, 1446 Stevenson Street, and Unaddressed Parcel
Baltimore, Maryland 21230

Dear Ms. Brocks:

Geo-Technology Associates, Inc. (GTA) has prepared this Response Action Plan (RAP) for the above-referenced property (“subject property”), which is located east of Woodall Street, west of Stevenson Street, and south of Key Highway East in Baltimore City, Maryland. A Maryland Department of the Environment (MDE) Voluntary Cleanup Program (VCP) application for the subject property was submitted on November 5, 2019. The subject property was accepted into the VCP by the MDE on April 27, 2018 with a revision to the application accepted on April 2, 2021. This RAP has been prepared to address soil impacts identified during prior evaluations.

We appreciate the opportunity to be of assistance on this project. Should you have any questions regarding this information, or should you require additional information, please do not hesitate to contact our office at (410) 792-9446.

Sincerely,
GEO-TECHNOLOGY ASSOCIATES, INC.

 for
Paul H. Hayden, P.G., L.R.S., R.S.M.
Vice President

SSW/KBD/PHH

cc: Mr. Daniel Goodier and Mr. Jon Selfridge
Woodall GPG, LLC

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APPENDIX A – FIGURES

- Figure 1 – Site Location Map (*color*)
- Figure 2 – Site Sketch (*color*)
- Figure 3 – Proposed Site Layout (*color, 11" x 17"*)
- Figure 4 – Capping Details

APPENDIX B – TABLES

- Table 1 – Risk Assessment Calculations

APPENDIX C – SUPPORTING DOCUMENTS

- VCP Acceptance Letter and Clarification Letter (*4 pages*)
- Written Agreement (*1 page*)
- Cap Inspection Form (*1 page*)
- Zoning Certification (*1 page*)

RESPONSE ACTION PLAN

**1401 WOODALL STREET PROPERTY
BALTIMORE CITY, MARYLAND
JUNE 25, 2021**

1.0 INTRODUCTION

1.1 Overview and Purpose

On behalf of Woodall GPG, LLC (“Client”), Geo-Technology Associates, Inc. (GTA) has prepared this Response Action Plan (RAP) for the 1401 Woodall Street Property that includes 1401 Woodall Street, 1446 Stevenson Street, and a parcel of unknown address (Map 24/Block 2016/Lot 32) (the “subject property”), which is located east of Woodall Street, west of Stevenson Street, and south of Key Highway East in Baltimore City, Maryland. During previous environmental evaluations, soil impacted above the applicable Maryland Department of the Environment (MDE) criteria was identified.

The Client applied to the MDE Voluntary Cleanup Program (VCP) as an “Inculpable Person” (IP) for the subject property. The IP status was granted to Woodall GPG, LLC, and the subject property was accepted into the VCP by the MDE on April 27, 2018. Modifications to the VCP application based on changing the future land use from residential to high frequency use public recreation areas (Tier 4B) were submitted to the MDE on March 9, 2021 and accepted on April 2, 2021.

This RAP has been prepared to establish a proposed remedy for impacted soil within the site boundary in conjunction with the day care center with a street-level play area. The proposed remedies include capping soils impacted by benzo(a)pyrene to prevent direct contact exposure, and soil screening and management and the use of appropriate health and safety measures during construction. The RAP has been prepared for MDE submittal so that a Certificate of Completion (COC) allowing for high frequency use as a public recreational area development may be obtained following the proposed RAP implementation.

1.2 Limitations

This report was prepared by GTA for the Client under the terms and conditions of GTA's contracts with the Client. GTA acknowledges that this document is being submitted to the MDE and will be part of the public record, and that MDE is expected to use this RAP as part of the VCP process. However, use of this report by any third party is at their sole risk, except pursuant to the terms of reliance letters generated by GTA at the request of the Client. GTA is not responsible for any claims, damages, or liabilities associated with third-party use.

2.0 SUBJECT PROPERTY INFORMATION

2.1 Site Description

The subject property comprises approximately 0.42 acres of land located east of Woodall Street, west of Stevenson Street, and south of Key Highway East, in Baltimore City, Maryland. The subject property formerly contained a 1-story former boiler shop and foundry building (1401 Woodall Street), a 1-story former metal fabrication facility (1446 Stevenson Street), and a vacant grassy lot (Lot 32). The buildings have been razed and the concrete foundations of the buildings remain intact.

According to the records of the Maryland Department of Assessments and Taxation (MDAT), the subject property comprises three lots in Ward 24, Neighborhood 24000.03, Section 10, Block 2016 on Tax Map 24, as summarized in the following table.

PROPERTY SUMMARY			
Property	Owner	Lots	Tax ID Nos.
1401 Woodall Street	Woodall GPG, LLC	Lot 74	Ward 24, Section 10, Block 2016, Lot 074
1446 Stevenson Street	Woodall GPG, LLC	Lot 33	Ward 24, Section 10, Block 2016, Lot 033
Vacant Parcel (No Address)	Woodall GPG, LLC	Lot 32	Ward 24, Section 10, Block 2016, Lot 032

A *Site Location Map* for the subject property is presented as *Figure 1*, and a *Site Sketch* is presented as *Figure 2*.

The ground surface elevation on the subject property ranges from approximately 24 feet above Mean Sea Level (MSL) at the south-southeast corner of the subject property to approximately 12 feet above MSL at the north-northwest corner of the subject property. The subject property slopes downward to the north, toward the Inner Harbor of Baltimore, located approximately 500 feet north of the property. Surficial drainage is collected by stormwater inlets in surrounding roadways.

2.2 Geology and Hydrology

According to the Maryland Geological Survey Geologic Map of Baltimore County and City, Maryland (1976), the site vicinity is situated in the Coastal Plain Physiographic Province. The Coastal Plain is characterized by gravel, sand, silt, and clay deposits from historic marine environments. Specifically, the site is indicated to be underlain by the clay facies of the Arundel Formation, which is characterized as gray, brown, black, and red kaolinitic and illitic clays with quartz silt locally interbedded with quartz sand lenses and pods. The clays are typically poorly bedded to massive with occasional color mottling.

Hydrologically, the Coastal Plain is underlain by both unconfined and confined aquifers of unconsolidated sediments, which overlie consolidated bedrock and dip toward the southeast. Groundwater storage and movement are functions of the primary porosity of the sediments. Larger storage is provided by gravel and sand, with little to no storage provided by clay. Near-surface, unconfined aquifers typically consist of sediments of higher permeability and are recharged locally, primarily through precipitation that permeates through the unsaturated zone into the aquifer. The water table in unconfined aquifers is, therefore, highly variable, fluctuating with the seasons and with rates of precipitation. Variations in the groundwater surface and flow generally reflect the topography and relative locations of surface water features. Intermittent confining layers can locally alter the water table conditions. The deeper, confined aquifers are bound by confining layers above and below, creating an artesian system. Confined aquifers are recharged in areas where the formation crops out, generally in more remote areas to the west.

Groundwater evaluation was performed as part of the Phase II Environmental Site Assessment (ESA) of the subject property performed in February 2018 in support of entrance of

the subject property into the VCP. The evaluation included the installation of three temporary groundwater monitoring wells (MWs) on the property, and the gauging and sampling of these and one additional previously-installed geotechnical MW. Groundwater in the wells was encountered at depths ranging from approximately 4 to 5 feet below the tops of the well casings. Flow direction on the property was calculated to be to the east-northeast.

2.3 Proposed Development

GTA was provided with preliminary site plans indicating that the subject property is proposed to be redeveloped with a two-story daycare building and a playground and parking lot at grade elevation. Proposed development plans are presented as *Figure 3*.

The proposed building will occupy the northern portion of the subject property footprint along Key Highway. The footprint at the south end of the property will be occupied entirely by a playground at grade and a small parking lot along Stevenson Street.

The entirety of the subject property will be capped with limited grading planned during construction, but will otherwise not entail significant earthmoving. Detailed grading plans are in the process of being finalized and are not currently available for review.

2.4 Environmental Background

GTA prepared or reviewed the following ESAs, other evaluations, or documents associated with the subject property. These documents have been provided to the Client and the MDE VCP under separate cover and included assessment of all three separate parcels. Please refer to these documents for further detail. Data tables from the Phase II ESAs are provided in *Appendix B*.

- GTA, *Mercury Vapor Screening Summary, 1401 Woodall Street*, dated March 3, 2020
- GTA, *Phase II ESA, 1401 Woodall Street and 1446 Stevenson Street*, dated February 20, 2018
- GTA, *Phase I ESA, 1401 Woodall Street and 1446 Stevenson Street*, dated October 19, 2017
- GTA, *Phase I ESA, 1401 Woodall Street*, dated June 19, 2017
- Urban Green Inc. (UG), *Phase I ESA Report, 1401 Woodall Street*, dated December 2011, Revised May 2012
- UG, *Phase II ESA Report, 1401 Woodall Street*, dated April 2012

- Penniman & Browne, Inc. (P&B), *Limited Phase II ESA, 1401 Woodall Street*, dated February 8, 2006 (included in UG's 2011 Phase I ESA)
- P&B, *Phase I ESA Report, 1401 Woodall Street*, dated December 21, 2005 (included in UG's 2011 Phase I ESA)

2.4.1 General Site History

The subject property previously contained a former boiler shop and foundry building and grassy land (1401 Woodall Street) and a metal fabrication facility (1446 Stevenson Street). This former boiler shop and foundry building contained offices, bathrooms, and storage areas and has concrete and earthen floors. The building was most recently utilized for minor boat repair and maintenance. The metal fabrication facility was most recently occupied by Arrow Metal Fabrications, Inc., which provides roofing, siding, and sheet metal services and installations. The metal fabrication facility contained offices, a utility closet, a bathroom, locker/storage areas, metal manufacturing areas, and a loading/receiving area. The former buildings on the subject property were razed in 2017, and the subject property currently with a remnant foundation from the razed industrial building and grassy land (1401 Woodall Street), and an additional remnant foundation from the razed industrial building (1446 Stevenson Street).

Historically, the former boiler shop and foundry building has been located on the northeastern portion of the subject property since at least 1902 and expanded by 1914. Prior to 2002, the southeastern portion (former rigger shop) of this building had burned down. From 1914 until 2010, the building was occupied by several foundries, boiler shops, and iron work companies including the Kugler and Shane Foundry, Baltimore Marine Iron Works, Inc., Harvey A. Stambaugh & Son, Inc., and Steel Guys, Inc. The former boiler shop and foundry building was most recently occupied by The Baltimore Sailing Center for boat repairs and maintenance activities. The metal fabrication building was constructed on the southern portion of the subject property in 1953 and was historically occupied by the Steamfitters Joint Training School until approximately 1975. Arrow Metal Fabrications, Inc. most recently occupied the structure since 1979.

The surrounding area currently contains residential, commercial, and industrial developments. Historically, the surrounding area contained residential, commercial, and industrial developments. A reviewed federal and state environmental regulatory database report identified numerous sites of potential environmental concern in the surrounding area.

2.4.2 MDE VCP Involvement

The 1401 Woodall Street property (Lot 74 only) was listed in the VCP/Land Restoration Program (LRP) environmental regulatory database. According to the MDE VCP website, Woodall Street, LLC applied to enter this portion of the subject property into the VCP on May 21, 2012, and was accepted into the program on July 9, 2012 as an Inculpable Person (IP) with the requirement that a RAP be prepared. A RAP was not completed for the site, and this portion of the subject property was removed from the VCP.

An application was submitted to the MDE VCP in June 2017 by Woodall GPG, LLC, and the 1401 Woodall Street property, as currently comprised of three parcels, was granted expedited IP approval. The subject property was accepted into the VCP on April 27, 2018 with a proposed restricted residential use (Tier 1B). Modifications to the VCP application based on changing the future land use from residential to high frequency use public recreation areas (Tier 4B) were submitted to the MDE on March 9, 2021 and accepted on April 2, 2021. This RAP is being prepared to fulfill the requirements of VCP with a Tier 4B use.

2.4.3 Site Investigation Summary

Several environmental evaluations were completed for the subject property in 2005, 2006, 2011, 2012, 2017, 2018, and 2020 within and in the vicinity of the former boiler shop and foundry building. Limited soil sampling was conducted in 2006 as part of a subsurface evaluation, in the area of the steel pipe, the earthen floors, and in the footprint of the former building foundation. Three soil samples were collected and submitted for laboratory analysis of total petroleum hydrocarbons (TPH) diesel range organics (DRO) and TPH gasoline range organics (GRO), priority pollutant (PP) metals, polychlorinated

biphenyls (PCBs), and volatile organic compounds (VOCs). Concentrations of TPH DRO, lead, and mercury were reported in the soil samples, but at concentrations below the Maryland Department of the Environment's (MDE) Residential Cleanup Standards (RCS). Reportedly, due to high laboratory detection limits and long holding times of the soil samples, the laboratory results may not have been an accurate representation of the environmental condition of the subject property. Fill materials were observed to depths up to seven feet bgs. Refusal was encountered in the boring performed in the area of the pipe.

Additional soil sampling was performed at 1401 Woodall Street in April 2012, and analytical results identified detectable concentrations of TPH DRO, metals, and polycyclic aromatic hydrocarbons (PAHs), including several PAHs and metals above the RCS and NRCS. Most of the elevated concentrations were reported in samples collected from the central portion of the property that fronts Key Highway to the north. The report indicated that a UST may have been located beneath the building slab, and it was unknown whether a UST was still present in that location. A steel pipe with a funnel cap was located inside of the former boiler shop and foundry building. The pipe was observed protruding from the earthen floor adjacent to the southern interior wall and is located near a raised concrete platform reportedly associated with a former compressor. During a prior geotechnical evaluation, a subsurface obstruction was encountered approximately three feet below ground surface (bgs) in the vicinity of the pipe. A geophysical survey was conducted in September 2017 to determine if an underground storage tank (UST) was associated with the pipe. The survey did not identify a subsurface anomaly in the vicinity of the pipe. GTA personnel hand dug around the pipe as part of the geophysical survey. The pipe appeared to travel northwest through the surface of the earthen floor and then under the concrete floor located within the central portion of the building. Due to the presence of reinforced concrete, GTA was unable to survey where the pipe terminated. The pipe also branched off and connected to a pressurized water tank. Reportedly, this pipe is associated with condensation drainage from the former compressor.

During the 2017 geophysical survey, a subsurface anomaly was identified approximately two feet bgs within the eastern portion of the former boiler shop and

foundry. The area of the subsurface anomaly was dug using a shovel and a metal pipe was identified. Petroleum staining was observed on portions of the earthen floor, including in the vicinity of the steel pipe. Concrete patches and/or platforms were located on the floor throughout the eastern portion of the building and are likely associated with former boiler shop and foundry equipment.

In January/February 2018 as part of the process of applying to the VCP, GTA performed a Phase II ESA of the 1401 Woodall Street Property building. The work was performed in accordance with GTA's Phase II ESA Work Plan that the MDE approved on November 2, 2017. GTA proposed to perform soil borings and collect and analyze soil and groundwater samples per the requirements of the VCP. GTA's Phase II ESA scope of work addressed recognized environmental conditions (RECs) identified in GTA's October 19, 2017 Phase I ESA and additional potential Areas of Concern (AOCs).

GTA personnel performed seven direct-push (Geoprobe®) soil borings on the subject property, to depths up to approximately 15 feet bgs. Three borings were performed inside of the former boiler and foundry building, including one boring (GTA-2) in an area of apparent floor staining and the former location of an aboveground storage tank (AST). Two borings were performed within the grassy land located on the central portion of the site, and two borings were performed inside of the metal fabrication facility. Soil samples were collected from depth intervals of 0 to 1 foot bgs and 4 to 5 feet bgs. Samples were analyzed for VOCs, TPH DRO, TPH GRO, polynuclear aromatic hydrocarbons (PAHs), and PP metals from the depth interval of 0 to 1 foot bgs.

Benzo(a)pyrene was detected in boring GTA-2 at a concentration of 0.51 milligrams per kilogram (mg/kg) and at a concentration of 0.52 mg/kg in from within the metal fabrication facility (boring GTA-5), both of which are above the current RCS. Benzo(a)anthracene was also reported slightly over the RCS in GTA-5. The remaining PAHs were either not detected above the laboratory reporting limits or were below the RCS. The soil sample collected from soil boring GTA-2 was also analyzed for VOCs, and TPH DRO and GRO. TPH GRO and VOCs were not detected above the laboratory

reporting limits in GTA-2. TPH DRO was detected at a concentration of 42 mg/kg, below the RCS (230 mg/kg).

Arsenic and chromium were detected both below and above the MDE RCS and NRCS values, but most of the detections were consistent with natural soil conditions. Total chromium concentrations ranged from 7.3 to 31 mg/kg. Hexavalent chromium was not detected in the samples, and both concentrations are below the trivalent chromium RCS of 12,000 mg/kg.

Based on the soil analysis results associated with the soil samples collected from 0 to 1 foot bgs, and in accordance with the Work Plan, GTA did not submit the soil samples collected from 4 to 5 feet bgs for laboratory analysis.

GTA also installed temporary groundwater monitoring points in three of the seven borings (GTA-2, GTA-4, and GTA-7). A groundwater sample could not be collected from GTA-2 due to the absence of groundwater. Therefore, a sample was collected from a groundwater monitoring well that had been previously installed by GTA during a prior geotechnical evaluation within the grassed land on the central portion of the subject property, adjacently northeast of the metal fabrication facility. Groundwater samples were analyzed for VOCs, TPH DRO, and TPH GRO.

Concentrations of VOCs, TPH DRO, and TPH GRO were either not detected above the laboratory's reporting limits or were below the MDE Groundwater Cleanup Standard (GCS). Acetone, a common laboratory artifact, was the only VOC compound detected at the site. Acetone was present in the samples collected from two on-site groundwater monitoring wells at concentrations of 40 and 53 micrograms per liter ($\mu\text{g/L}$), below the GCS of 550 $\mu\text{g/L}$.

On December 19, 2019, GTA personnel installed soil vapor probes (SVPs) at three locations (prior borings SB-2/2A, SB-3, and B-10) at depths of four to five feet bgs. Sampling locations SB-2/2A and B-10 were selected due to mercury detected above its

ATC in the soil in those locations during prior evaluations. Sampling location SB-3 was located between SB-2/2A and B-10. Prior to screening the SVPs, a helium leak test was performed on each of the SVPs using laboratory-provided equipment. Each of the SVPs passed the leak test.

GTA purged each soil vapor probe of at least three air volumes using a hand pump prior to screening. On February 12, 2020, the soil vapor points were field screened for mercury vapor using a Jerome 431-X Mercury Vapor Analyzer (Jerome). Ambient air readings were collected from the four corners of the subject property and throughout the property. Ambient air readings in each location reported concentrations of mercury vapor ranging from 0.018 ug/m³ to 0.029 ug/m³.

GTA personnel field screened the vapor probes once every 45 minutes over an approximate two-hour period. The results of the mercury vapor screening are summarized in the table below, compared to the November 2019 United States Environmental Protection Agency (USEPA) Non-Residential (Industrial) Indoor Air Regional Screening Level (RSL). The screening results indicated that of the three SVPs, only one (B-10) yielded mercury vapor concentrations detectable by the Jerome. The concentrations reported in B-10 were below the USEPA Non-Residential (Industrial) Indoor Air RSL of 1.3 ug/m³. Additionally, all concentrations were below the USEPA Residential Indoor Air RSL of 0.31 ug/m³ and with the exception of the final reading at location B-10, mercury vapor concentrations were below those detected in ambient air.

3.0 EXPOSURE ASSESSMENT

3.1 Future Land Use/Occupants

The proposed land use for the subject property is a high-frequency use public recreational area. The site is currently contemplated to be developed with a two-story daycare with a playground and parking lot at grade elevation comprising up to approximately 24,000 square feet (sf), including: approximately 8,000 sf of per floor of the two-story daycare center; 6,360 sf of playground space; and 1,770 sf of parking lot space (see *Figure 3*). The structure will occupy the northern portion of the subject property (1401 Woodall Street). The subject building will also

contain minor utility rooms, stairwells, and elevator lobby. The parking spaces will not be occupied on a full-time basis, but will be periodically visited by building tenants, visitors, and maintenance staff.

3.2 Contaminants of Potential Concern

3.2.1 Soil

Based on the prior reports, the soil Contaminant of Potential Concern (COPC) is PAHs and metals, which was identified in elevated concentrations mainly in the central portion of the northern area of the site fronting Key Highway. The COPCs are only relevant to the planned construction activities, which will include grading across the greater portion of the site. The COPCs are not considered a COPC to the post-construction site conditions due to planned institutional controls and capping of the site.

3.2.2 Groundwater

COPCs were not identified in the site's groundwater.

3.2.3 Soil Vapor

Based on the soil vapor sampling performed in 2020 as described in *Section 2.4.3*, the soil vapor COPC was mercury; however, mercury was demonstrated to be below screening levels and therefore is no longer considered a COPC.

3.3 Exposure Pathway Evaluation

Based on prior evaluations, some potential future environmental exposure risks exist at the site, but only during construction. A site-specific Human Health Risk Assessment has not been prepared for this site, because elimination of the identified exposure pathways to future occupants (child/youth/adult visitor, adult on-site worker, and adult construction worker) is proposed. The potential exposure pathways are summarized in the following table and are discussed in *Sections 3.3.1 through 3.3.3*.

POTENTIAL EXPOSURE PATHWAYS			
Media	Potential Exposed Population	Exposure Pathway	COPCs
Soil	Child Visitor Youth Visitor Adult Visitor Adult On-Site Worker	Dermal Exposure Incidental Ingestion Inhalation of Fugitive Dust	PAHs, metals
	Construction Worker	Dermal Exposure Incidental Ingestion Inhalation and Fugitive Dust	PAHs, metals
Groundwater	No COPCs identified above screening levels		
Soil Vapor	No COPCs identified above screening levels		

3.3.1 Soil Exposure

With regard to soil exposure, potential risks to construction workers may exist through dermal exposure, incidental ingestion, or inhalation of fugitive dust. Management of this potential exposure to construction workers is discussed in *Section 5.1*. Based on the planned site developments, potential risks to future site occupants (tenants, visitors, and workers) from impacted soils will not exist as described in *Section 5.2.1*.

3.3.2 Groundwater Exposure

Exposure to groundwater has not been identified to represent unacceptable risk at this site.

3.3.3 Soil Vapor Exposure

Exposure to soil vapor has not been identified to represent unacceptable risk at this site.

4.0 CLEANUP CRITERIA

The cleanup criteria for the subject property are summarized in the table below. As a simplified, conservative measure, the cleanup criteria for the subject property COPCs reflect the MDE RCS and GCS values, which are the generic risk-based guidance values in MDE's *Cleanup Standards for Soil and Groundwater; October 2018; Interim Final Guidance (Update No. 3.2)*.

The cleanup criterion for arsenic, one COPC at the subject property, was calculated for residential, recreational, and commercial exposure scenarios using USEPA and MDE guidance for risk assessments. Using this approach, the residential risk-based calculated value (RCV) for arsenic for high-frequency use recreational sites is 14.4 mg/kg (see *Table 1*). Considering the potential exposed population to soil impacts at the subject property is the construction worker, these published guidance values are inherently conservative.

CLEANUP CRITERIA			
Media	COPC	Cleanup Criteria	Basis
Soil	Benz(a)anthracene	1.1 mg/kg	RCS
	Benzo(a)pyrene	0.11 mg/kg	
	Benzo(b)fluoranthene	1.1 mg/kg	
	Dibenz(a,h)anthracene	0.11 mg/kg	
	Indeno(1,2,3-cd)pyrene	1.1 mg/kg	
	Arsenic	14.4 mg/kg	RCV
	Lead	220 mg/kg	RCS

Generally, the cleanup criteria that will be applied to any additional COPCs will be the published RCS, GCS, and residential Tier 1 soil vapor screening level values, or site-specific values calculated using the appropriate frequency exposure parameters, as the need arises. The use of cleanup criteria other than those tabulated above will only occur with prior MDE approval.

5.0 REMEDIES AND INSTITUTIONAL CONTROLS

This EMP presents proposed remedial actions to protect against exposure to contaminated soil in conjunction with future site development by way of both institutional controls. The entire site will be capped with the proposed building slab, asphalt paving, a playground, or a landscaping “clean” cap. GTA personnel will be onsite to observe grading, capping of soil, and monitor dust as needed.

5.1 Health and Safety Measures

A site-specific HASP document will be prepared to reduce direct contact exposure to the identified soil contaminants during the performance of construction activities that could involve

impacted media. The HASP provides recommended procedures to reduce the potential for over-exposure. The primary action taken to mitigate potential exposures to construction workers will be the avoidance of direct contact with potentially impacted soil, and the appropriate use of personal protective equipment during construction activities.

The HASP will be submitted to the Client under separate cover and will be provided to the contractors involved in construction activities potentially encountering impacted media, for their information. The contractors should independently assess the available information and implement appropriate measures to protect the health and safety of their employees and subcontractors. Information and recommendations contained in this plan should not in any way be construed as relieving the contractors or their subcontractors of their responsibilities for site health and safety.

5.1.1 Dust Monitoring Procedures

During impacted soil excavation activities, fugitive dust may be produced and air monitoring for particulates will be conducted (twice a day or as needed based on field conditions). The OSHA permissible exposure limit (PEL) for Particulates Not Otherwise Regulated (PNOR), or nuisance dust, is 15 mg/m³. For conservancy, a PNOR/nuisance dust action level of 12 mg/m³ will be used during air monitoring. If greater than 12 mg/m³ are detected, implement dust suppression procedures until dust levels are reduced to below the action level. If dust levels increase while suppression measures are under way and the dust concentration exceeds 12 mg/m³, operations must be shut down and suppression activities continued. When dust concentrations are reduced to 12 mg/m³ or below, operations may resume.

If indications of petroleum or VOC impacts are encountered during construction, such as through soil staining or presence of odors, air monitoring for volatiles will be conducted. The monitoring will be conducted both within the excavation and at the excavation perimeter with a portable photoionization detector (PID). If elevated PID readings are encountered, response actions, as defined in the HASP, will be implemented.

5.2 Soil

The subject property development includes the construction of a new building with a slab-on-grade foundation and a street-level playground. The buildings were demolished in 2017, and demolition-related waste and debris was removed from the subject property for disposal or recycling. The demolition activities first included the removal/abatement and proper disposal of regulated materials, such as asbestos-containing materials, petroleum/ chemicals, etc. No on-site re-use of any demolition materials is proposed. Although the soil concentrations encountered during the prior studies are not sufficiently high to warrant special handling or disposal, the potential exists for isolated locations of impacted soils to be present.

5.2.1 Hardscaped Area Capping

The foundation of the building will act as a cap for the northern section of the subject property. The southern section is proposed to be capped with a playground, new asphalt pavement parking lot, and limited areas of landscaping. The impervious cover is currently planned to generally consist of a minimum of six to eight inches of granular sub-base and four to eight inches of asphalt or concrete over native material or clean fill, as illustrated on the final approved grading plan. Based on preliminary grading estimates, the reuse of onsite materials is anticipated. In areas where fill is required, the onsite soil stockpiles or other excavated material from onsite utility installation etc. will be utilized with approval from the MDE. Details of the capping are illustrated in *Figure 4*.

5.2.2 Landscaped Area Capping

Pervious capping will include the landscaped areas and areas to be covered by stone. These areas will be capped with a minimum of two feet of MDE-approved residential-grade clean fill. The thickness of the cap can be increased during grading or during landscaping following grading as an option to accommodate the planting of different species in order to ensure the minimum clean fill requirements and accommodate the plant's root ball. The pervious capping will eliminate the direct contact exposure risk to future occupants or users of the site. A total of at least two feet of MDE-approved residential-grade clean fill material above a marker barrier will be placed in areas of pervious capping. Details of the capping are illustrated in *Figure 4*.

5.2.3 Soil Removal

Although the soil concentrations encountered during the prior studies are not sufficiently high to warrant special handling or disposal, the potential exists for isolated locations of impacted soils to be present. Therefore, visual observation, periodic PID field screening, and response to reports of suspect impacted soils will be performed as part of the grading process.

If field observations, field screening, odors, or other factors indicate potential environmental impact, the suspect impacted soils will be segregated from un-impacted soils so that proper characterization can be performed. This soil will be stockpiled on-site on plastic sheeting. Samples will be collected from the suspect impacted materials to evaluate whether it should be classified as impacted or un-impacted. If the stockpiled soil is confirmed as impacted, it will be further characterized based on the requirements of the facilities being considered for disposal (e.g., Soil Safe, Clean Earth, etc.). MDE will be provided with the results of the characterization sampling, and disposal manifests identifying the disposal facility and the volume of material removed.

5.2.4 Fill Materials

No imported fill soils are expected to be necessary for the development. Minor areas of the development will utilize topsoil, planting material/medium, and green roof material/medium. These materials will be acquired from standard commercial providers of such materials, with clean fill certifications. The source information will be provided to MDE, and the material will be approved by MDE prior to being transported to the site.

Alternatively, imported soil will be obtained from an import source that will first be sampled and analyzed. Work plans for sampling fill soil source areas will be submitted to the VCP for review and approval prior to sample collection and analysis. No soil will be transported on-site for use as fill without prior written approval by the VCP project manager.

6.0 CRITERIA FOR ISSUANCE OF THE COC

The following RAP implementation milestones are proposed for issuance of a COC.

6.1 Soil

Once the site has been fully capped, the RAP implementation for soil will have been completed.

6.2 Groundwater

Groundwater impacts have not been identified; milestone criteria are not applicable.

6.3 Soil Vapor

Soil vapor impacts have not been identified; milestone criteria are not applicable.

7.0 REPORTING

During implementation of this RAP, GTA will prepare quarterly progress reports summarizing the remedial activities occurring during that quarter. These progress reports will be submitted to MDE by the 15th day of the month following the quarterly period, to demonstrate implementation of this RAP. Typical materials to be included in the quarterly reports are:

- a summary of RAP-related activities (or statements that no RAP-activities occurred),
- a summary of activities planned for the current and future quarters,
- RAP-related permits,
- documentation of imported clean soils or exported impacted soils,
- analysis reports for monitoring or confirmation samples,
- updated contact information, if there have been changes, and
- similar information.

At the conclusion of the RAP implementation, GTA will prepare a RAP Completion Report. Typical materials to be included in the RAP Completion Report (without duplication of documents that were submitted in the quarterly reports) are:

- an overall summary of RAP-related activities,
- tickets for clean imported fill,
- total volumes of soils imported,
- total volumes of impacted soils disposed, and
- summary of monitoring data.

The RAP Completion Report will form the basis for the issuance of a COC.

8.0 PERMITS, NOTIFICATIONS, AND CONTINGENCIES

Contractors involved in RAP-related activities will be provided with a copy of the approved RAP prior to the initiation of site activities.

The participant will comply with all federal, state, and local laws and regulations by obtaining all necessary approvals and permits to conduct all activities and implement this RAP. The VCP will be verbally notified within 48 hours (72 hours in writing) of any changes (planned or emergency) to the RAP implementation schedule, any previously undiscovered contamination, any previously undiscovered storage tanks and other oil-related issues, and citations from regulatory entities related to health and safety practices. All notifications shall be made to the VCP project manager at 410-537-3493. If the project manager is unavailable, the notifications must be made to another VCP staff member.

The MDE VCP must be provided with all documentation and analytical reports generated as a result of any unidentified site contamination. The participant understands that previously undiscovered contamination and/or previously undiscovered storage tanks or other oil-related issues may require an amendment to this RAP.

9.0 IMPLEMENTATION SCHEDULE

The following table summarizes the tentative schedule for work required to implement this RAP. The actual dates of the specific actions will be updated upon MDE approval of this RAP. The performance bond or other security (see *Section 10.4*) will be posted within 10 days of receipt of the RAP approval. The implementation of the RAP will begin within 18 months from the date of final RAP approval.

ESTIMATED CONSTRUCTION SCHEDULE RELATIVE TO RAP		
Milestone	Estimated Schedule	
	Date	Relative to RAP Approval
RAP Approval	August 2021	0 days
Post RAP Performance Bond	August 2021	10 days
Start of construction and start of RAP implementation	October 2021	4 months
2021 4Q RAP Progress Report due	January 2021	7 months
2022 1Q RAP Progress Report due	April 2022	10 months
2022 2Q RAP Progress Report due	July 2022	13 months
Complete building construction	Est. July 2022	14 months
RAP Completion Report submission	September 2022	16 months

The VCP project manager will be notified within 5 calendar days of the beginning of RAP implementation activities. Contact information for on-site construction supervisors and environmental oversight personnel will also be provided to the VCP project manager at that time. Schedule updates will be provided as-needed, via RAP Addenda or separate written submissions to VCP for review and approval.

10.0 ADMINISTRATIVE REQUIREMENTS

10.1 Written Agreement

A Written Agreement relative to RAP implementation, signed by the participant, is included in *Appendix C*.

10.2 Zoning Certification

A Zoning Certification, signed by the participant, is included as *Appendix C*.

10.3 Public Participation

Pursuant to VCP guidelines, Woodall GPG, LLC submitted an MDE-approved RAP public notice in *The Baltimore Daily*, approved daily or weekly newspapers with coverage that includes Baltimore, Maryland. The public notice will be published once per week for two consecutive weeks in June and July 2021.

On July 12, 2021, based on current guidance from MDE, Woodall GPG, LLC will hold a virtual public informational meeting on the proposed RAP. The site history, detected on-site contamination, planned uses of the site, and a description of the proposed remedies will be presented at the meeting.

During the 30-day public comment period after publishing the public notice, a property sign will be placed along Key Highway, depicting the same information provided in the public notice outlined above. The sign will be removed following the 30-day public comment period. Documentation of the sign placement and legibility will be provided to the MDE for approval.

10.4 Performance Bond

As required by the VCP, Woodall GPG, LLC will provide either a Performance Bond or Letter of Credit to MDE in the amount of \$5,000 covering the cost of securing and stabilizing the property. The property is currently vacant and secured, with minimal costs necessary for stabilization. Therefore, activities to be covered by this amount include the following:

- Maintaining the existing fence and locks around the property; and
- Posting any additional necessary warnings and notices about conditions on the property.

The bond, letter of credit, or other security measure may be withdrawn by Woodall GPG, LLC when MDE issues a Certification of Completion for the site. The requirement for the bond, letter of credit, or other security measure remains in effect until issuance of the Certificate of Completion. If the performance bond is not maintained, approval of the RAP will be withdrawn and the application will be deemed withdrawn from the VCP.

10.5 Hardscaped and Landscaped Maintenance

The proposed remedies include the use of capping and MDE-approved clean fill, all which will require periodic maintenance activities. The common-area cap will be inspected annually by the property owner's representative - who may not be a homeowner – such as third-party or HOA personnel. The cap will be inspected for signs of erosion, deterioration, or penetrations. Any cap deficiencies noted during the inspection must be reported to MDE within 10 business days of

discovery. Any repairs to the required caps must be completed within 30 calendar days. The property owner will be responsible for the onsite maintenance inspections, performing maintenance, and maintaining all inspection records. Maintenance records will include, at a minimum, the date of the inspection, name of the inspector, any noted issues, and subsequent resolution of the issues. If the action level is reached, preventative maintenance of the cap is required. If preventative maintenance is required, the property owner will have 30 days to complete the appropriate maintenance.

The current residential land use control policy requires the property owner to retain an environmental professional to perform the annual land use control inspections and perform report submittal to MDE. In addition, the entity responsible for maintaining the land use controls (LUCs) must record an approved operation and maintenance plan in the environmental covenant.

10.6 Emergency Excavation

MDE must be verbally or electronically notified within 24 hours following the discovery of unplanned emergency conditions at the subject property and must be provided with written documentation within 10 days of the repair.

10.7 Planned Excavations

MDE must be notified in writing at least 30 calendar days prior to any planned future excavation in a capped area. MDE will be provided written notice, either by the property owner or a party designated and notified by the property owner, a minimum of five business days prior to planned activities at the site that will penetrate any capped areas, with the repairs completed within 15 days, and written documentation submitted to MDE within 10 days of the repair.

10.8 Site Contingency Plan

In the event that the future soil and/or groundwater COPCs exceed their designated cleanup criteria, or safe concentrations cannot be controlled during the RAP implementation process, or contamination and/or exposure risks/pathways not previously identified are identified, the following contingency measures will be taken:

- Notify MDE within 24 hours;
- Postpone implementation of the RAP;

- Evaluate new site conditions identified; and
- Amend RAP to address new site conditions identified.

Notified departments will include:

MDE Land Restoration Program
Land and Materials Administration
1800 Washington Boulevard
Baltimore, Maryland 21230
(410) 537-3497
Attention: Barbara Brocks

In addition to the above, if there is evidence of an oil discharge at the subject property in violations of applicable regulations, it must be reported within two hours as specified in COMAR 26.10.08.01, to the OCP (410-537-3442) or, if after normal business hours, to the 24-hour Spill Reporting Hotline (1-866-633-4646). The MDE will be verbally notified within 48 hours (72 hours in writing) of changes (planned or emergency) to the RAP implementation schedule, previously undiscovered contamination, and citations from regulatory entities related to health and safety practices. Notifications shall be made to the MDE project manager at 410-537-3493.

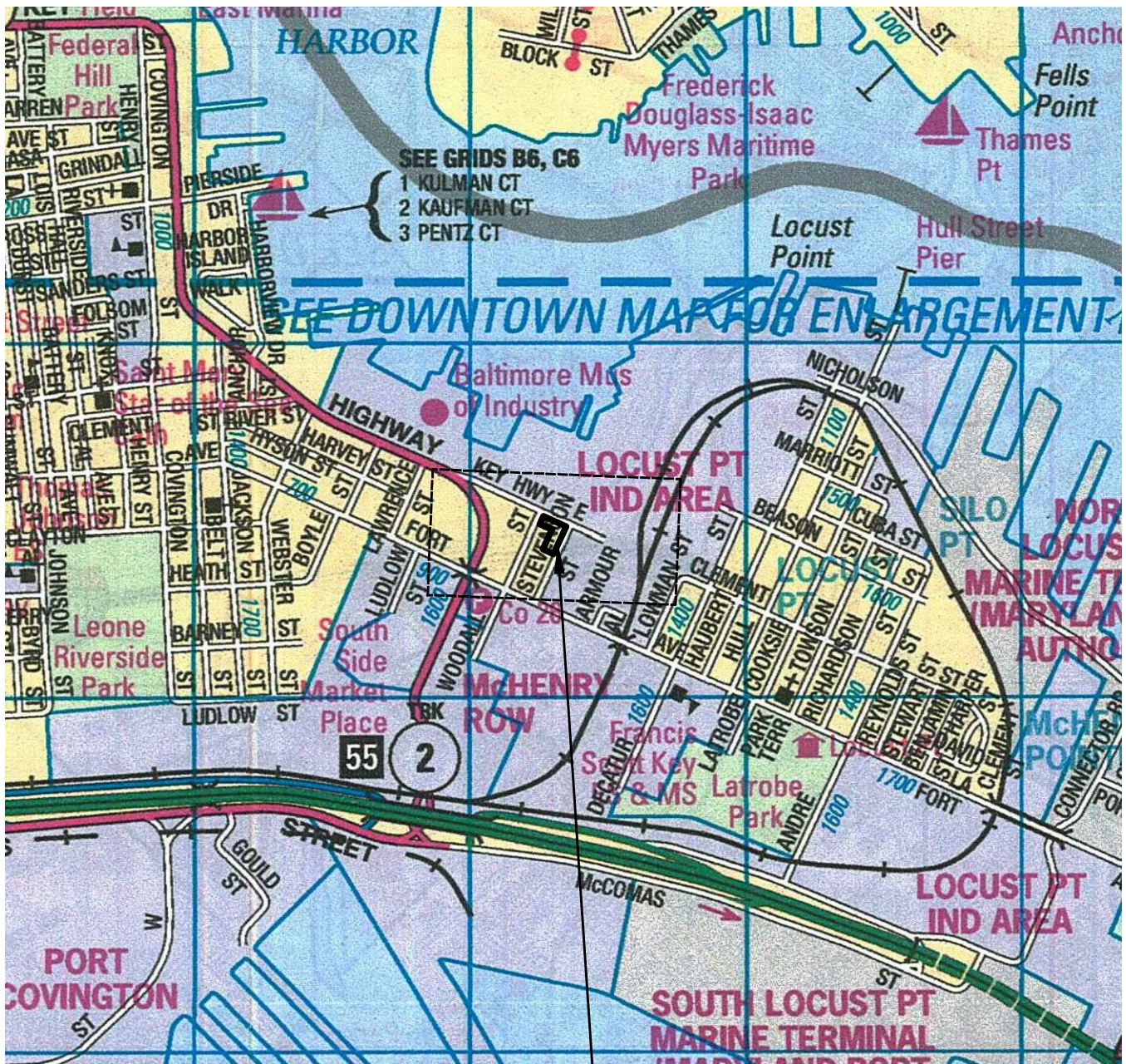
Emergency conditions that cause imminent and substantial endangerment to human health and the environment will require abeyance of the RAP process until the emergency condition has been addressed.

The MDE must be provided with documentation and analytical reports generated as a result of any unidentified contamination. Previously undiscovered contamination may require an amendment to the RAP.

******* END OF REPORT *******



FIGURES



Notes

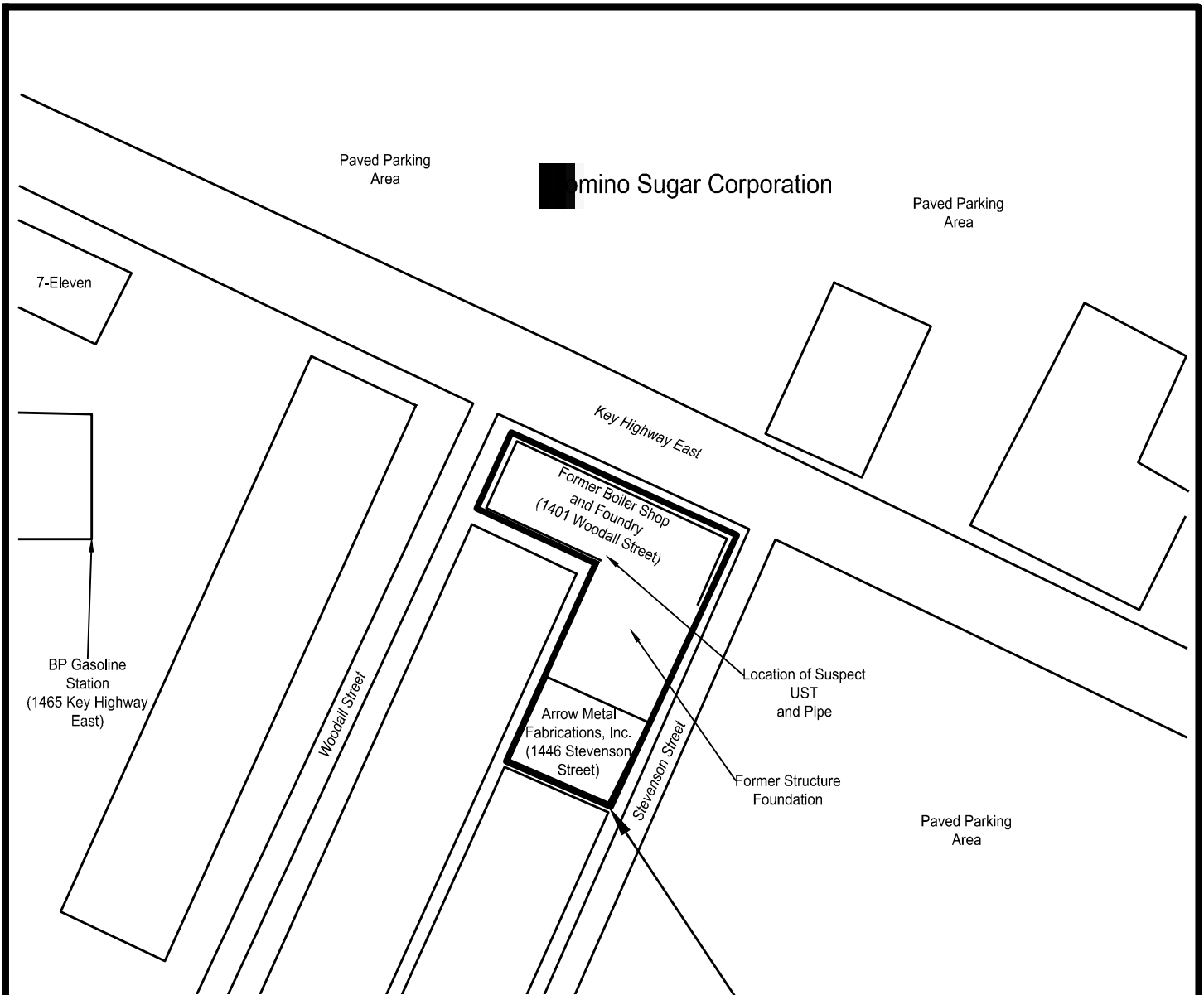
1. Map Copyright © ADC The Map People, (800) 829-6277
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 FAX: (410) 792-7395
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1401 WOODALL STREET AND
 1446 STEVENSON STREET
 BALTIMORE CITY, MARYLAND

SITE LOCATION MAP



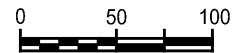
Legend

-  Building
-  Row Homes

Approximate Subject Property Boundary

Notes

1. Based on a 2017 aerial photograph and site observations.
2. Property boundaries and site conditions are approximate.



Approximate Scale
1 inch = 100 feet



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GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

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1401 WOODALL STREET AND
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BALTIMORE CITY, MARYLAND

SITE SKETCH

PROJECT: 171112

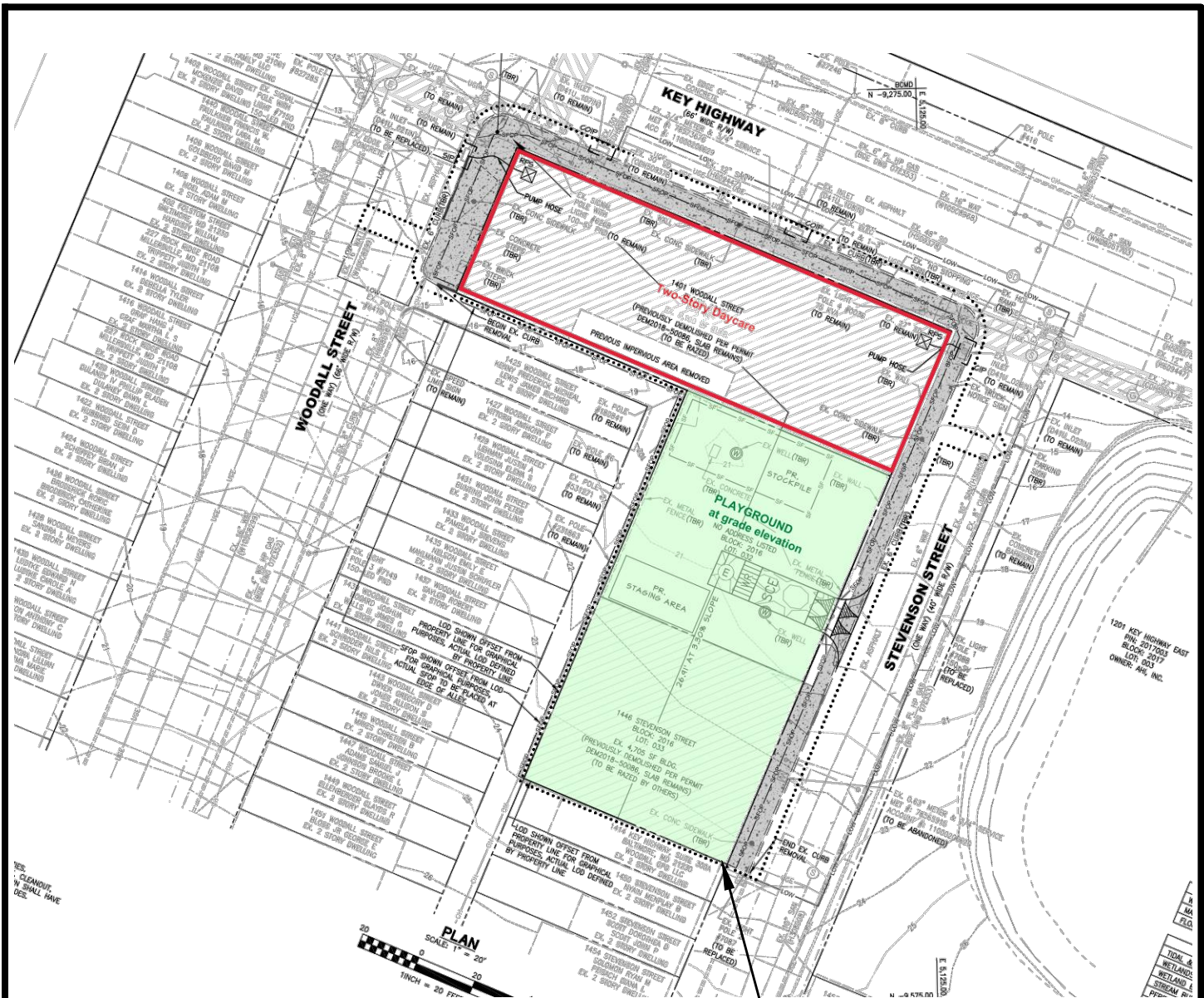
DATE: MAY 2021

SCALE: 1" = 100'

DESIGN BY: AMF

REVIEW BY: KBD

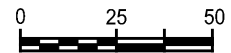
FIGURE: 2



Approximate Subject Property Boundary

Notes

1. Based on a MRA Site Diagram.
2. Property boundaries and site conditions are approximate.



Approximate Scale
1 inch = 50 feet

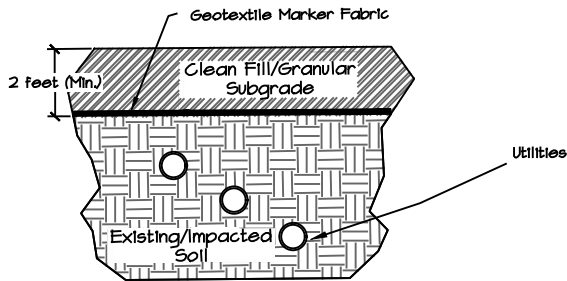


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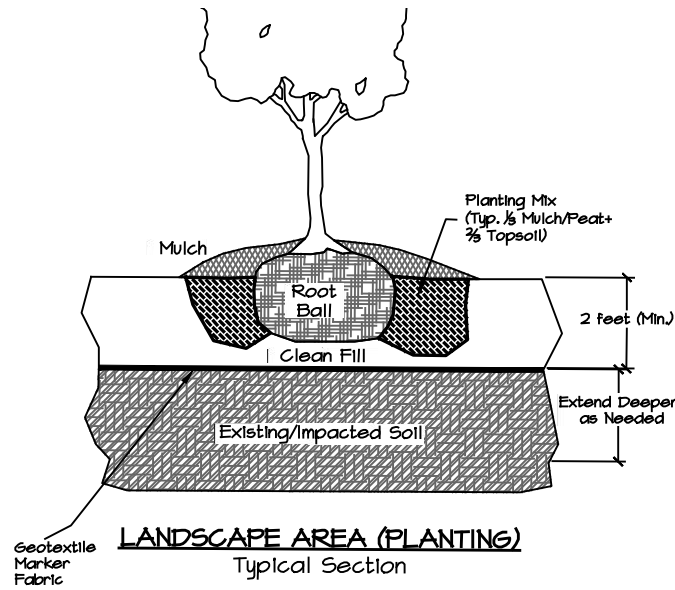
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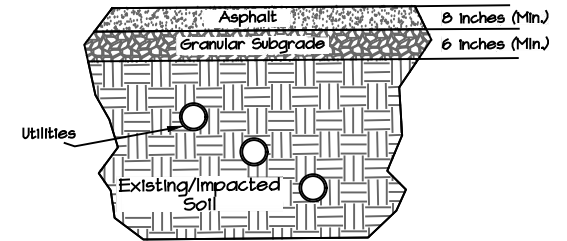
PROPOSED LAYOUT



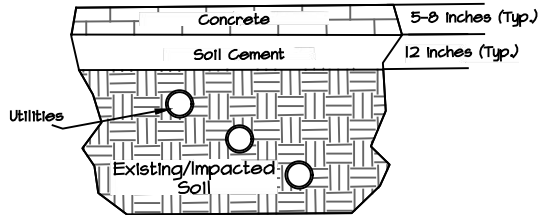
LANDSCAPED AREA (SOIL/STONE)
Typical Section



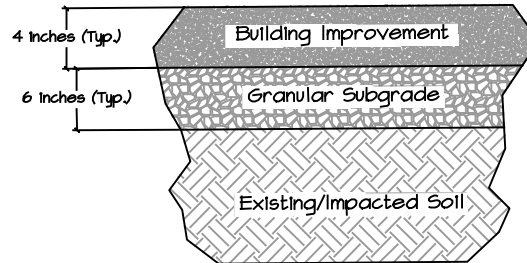
LANDSCAPE AREA (PLANTING)
Typical Section



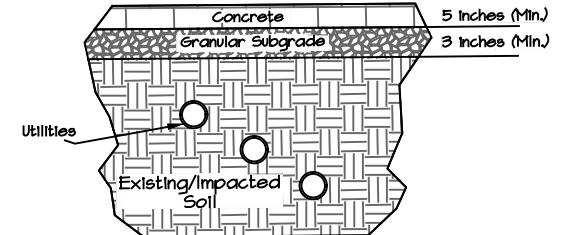
ASPHALT ROADWAY (STABLE SOIL)
Typical Section



HARDSCAPED AREA (SOFT SOIL)
Typical Section



BUILDING SLAB
Typical Section



CONCRETE SIDEWALK (STABLE SOIL)
Typical Section



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1401 WOODALL STREET AND
1446 STEVENSON STREET
BALTIMORE CITY, MARYLAND

CAPPING DETAILS

PROJECT: 171112

DATE: June 2021

SCALE: NTS

DESIGN BY: KBD

REVIEW BY: PHH

FIGURE: 4



TABLES

Risk Assessment Calculations

Goal: Use MDE-supported risk evaluation formulas to calculate remedial goals for chemicals of concern (COCs).

Method: Calculate the target soil concentration (C_{soil}) using four target populations (adult, youth, child, construction worker).

Run calculations for different land uses: residential, recreational (moderate frequency), and commercial.

For each chemical and each land use, select the lowest of these values, which represents the highest risk.

Carcinogenic Risk Formula

$$C_{soil} = (CR \times BW \times AT_c) / (CF \times IR_{soil} \times EF \times ED \times CSF_o \times FI)$$

Non-Carcinogenic Risk Formula

$$C_{soil} = (HI \times RfD_o \times BW \times AT_n) / (IR_{soil} \times CF \times EF \times ED \times FI)$$

Definitions

Variable	Unit	Definition
CR	unitless	Cancer risk (1×10^{-5})
HI	unitless	Hazard index (non-carcinogenic)
C_{soil}	mg/kg	Remedial goal for soil concentration exposure
IR_{soil}	mg/day	Ingestion rate
EF	days/yr	Exposure frequency
ED	yrs	Exposure duration
CSF_o	(mg/kg-day) ⁻¹	Oral cancer slope factor (chemical dependent)
BW	kg	body weight
AT_c	days	Averaging time for carcinogens
AT_n	days	Averaging time for non-carcinogens
RfD_o	mg/kg-day	Non-carcinogenic oral reference of dose (chemical dependent)
CF	kg/mg	Conversion factor
FI	unitless	Fraction Ingested

Chemical Parameters

COC	CSF_o	RfD_o
Arsenic	1.50E+00	3.00E-04

Source: EPA Region III RBC Table, November 2012.

Constant Exposure Parameters

	Adult	Youth	Child	Constr Worker
ED	25	12	6	1
AT_c	25550	25550	25550	25550
AT_n	9125	4380	2190	365
BW	70	40	15	70
CF	1.00E-06	1.00E-06	1.00E-06	1.00E-06
FI	0.60	0.60	0.60	0.60

EPA = 20, 20, 6

EPA = 36750

EPA = 80 instead of 70 and 40

	C_{soil} (mg/kg)				Adult		Youth		Child		CW		Lowest	
	Adult	Youth	Child	CW	CR	HI	CR	HI	CR	HI	CR	HI		
Residential														
C_{soil} (mg/kg)														
EF	350	350	350	250	2.27E+01	3.65E+02	2.70E+01	2.09E+02	1.01E+01	3.91E+01	1.66E+02	1.06E+02	→	10.14
IR_{soil}	100	100	200	480										
Recreational (High Frequency)														
C_{soil} (mg/kg)														
EF	250	250	250	250	3.18E+01	5.11E+02	3.79E+01	2.92E+02	1.42E+01	5.48E+01	1.66E+02	1.06E+02	→	14.19
IR_{soil}	100	100	200	480										
Commercial														
C_{soil} (mg/kg)														
EF	250	132	132	250	6.36E+01	1.02E+03	7.17E+01	5.53E+02	2.69E+01	1.04E+02	1.66E+02	1.06E+02	→	26.88
IR_{soil}	50	100	200	480										



SUPPORTING DOCUMENTS



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

April 2, 2021

ELECTRONIC DELIVERY & POSTAL MAIL

Mr. Dan Goodier, President
Woodall GPG, LLC
1414 Key Highway, Suite 300A
Baltimore, Maryland 21230

Re: Voluntary Cleanup Program
1401 Woodall Street Property
Baltimore, Maryland 21230
BMI Number: MD1741

Dear Mr. Goodier:

The Voluntary Cleanup Program (“VCP”) of the Maryland Department of the Environment (“MDE”) has completed its review of the application package submitted on November 5, 2019 by Woodall GPG, LLC for the 0.42-acre 1401 Woodall Street Property (“Property”) located at 1401 Woodall Street, 1446 Stevenson Street and Unaddressed Lot (Map 24/Block 2016/ Lot 32) in Baltimore, Maryland. The MDE approves the application and the Property for participation in the VCP and reiterates the inculpable person status of Woodall GPG, LLC for this Property pursuant to Title 7, Subtitle 5 of the Environment Article, Annotated Code of Maryland. The MDE’s approval of this application package is based on the future use of the Property for restricted public recreational area – high frequency use (Tier 4B) purposes.

Based on the application package, the MDE has determined that the Property does not qualify for a No Further Requirements Determination and a proposed response action plan (“RAP”) must be developed, approved by the MDE and implemented to our satisfaction. The proposed RAP must address potential risks to human health and the environment resulting from the presence of select polycyclic aromatic hydrocarbons, arsenic and lead in the surface and subsurface soils at the Property. Submission of the proposed RAP and implementation of all statutory requirements must occur within 18 months of receipt of this letter. The guidelines for preparation of the proposed RAP are available on the MDE website and the statutory requirements can also be found in Section 7-508 of the Environment Article.

Simultaneously with submission of the proposed RAP to the MDE for review and approval, you must comply with the public participation requirements by posting a sign at the property and publishing a notice in a daily or weekly newspaper of general circulation in the geographic area where the participating property is located. Both notices for the proposed RAP must include the date and location of the public informational meeting. A summary of the public participation requirements, as well as a template for the public notice in the newspaper and the sign on the property, have also been enclosed.

Mr. Dan Goodier, President

Page 2

You are requested to forward a draft of the sign and newspaper notice for the proposed RAP to the VCP for review and approval prior to publication and posting at the Property. Please contact Barbara Brocks, the project manager, to discuss development of the proposed RAP and the exact date for submitting the proposed RAP, and draft public notice language, to the MDE for review and approval. Upon satisfactory implementation and completion of the requirements set forth in the approved RAP and any subsequent addendums, the MDE will issue a Certificate of Completion and Environmental Covenant for the Property which must be recorded in the land records of Baltimore City within 30 days following receipt.

In accordance with the provisions of Section 7-506(g)(1) of the Environment Article, you are requested to inform the MDE in writing, within 30 days of receipt of this letter, whether Woodall GPG, LLC intends to proceed as a participant in the VCP. If the MDE does not receive the notice of intent to proceed within the 30-day period, the application for participation in the VCP shall be deemed withdrawn pursuant to Section 7-506(g)(2) of the Environment Article.

If you have any questions regarding the requirements, development, of the proposed RAP or other aspects of the program, please contact Ms. Brocks via email at barbara.brocks@maryland.gov; 410-537-3497 or me at barbara.brown1@maryland.gov; 410-537-3212.

Sincerely,

Barbara Brown

Barbara Brown, Section Head
Voluntary Cleanup Program

Enclosures

cc: Ms. Kristen Daly, Geo-Technology Associates, Inc.
Dr. Letitia Dzirasa, Commissioner of Health, Baltimore City
Ms. Barbara Brocks, Project Manager, Voluntary Cleanup Program



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

April 27, 2018

CERTIFIED MAIL

Mr. Daniel Goodier, President
Woodall GPG, LLC
1414 Key Highway, Suite 300A
Baltimore, Maryland 21230

Re: Voluntary Cleanup Program
BMI: MD1741
1401 Woodall Street Property
1401 Woodall Street (Map 24/Block 2016/Lot 74), 1446 Stevenson Street (Map 24/Block 2016/Lot 33) and Map 24/Block 2016/Lot 32
Baltimore City, Maryland

Dear Mr. Goodier:

The Voluntary Cleanup Program (“VCP”) of the Maryland Department of the Environment (“Department”) has completed its review of the application package submitted by Woodall GPG, LLC for the 1401 Woodall Street property. In addition to the application package, the VCP also reviewed the Department’s files which document recognized environmental conditions at this property. Based on our review of all available documents, the Department approves the application and 1401 Woodall Street property, consisting of 0.42-acres and located at 1401 Woodall Street, 1446 Stevenson Street and Map 24/Block 2016/Lot 32 in Baltimore City, Maryland, for participation in the VCP and confirms the inculpable person status of Woodall GPG, LLC for this property pursuant to Title 7, Subtitle 5 of the Environment Article, Annotated Code of Maryland. The Department’s approval of this application package is based on the future use of the property for restricted residential (Tier 1B) purposes.

Since the Department has determined that the property does not qualify for a No Further Requirements Determination, a proposed response action plan (“RAP”) must be developed, approved by the Department and implemented to our satisfaction. The proposed RAP must address risks to human health and the environment resulting from: 1) the presence of select polycyclic aromatic hydrocarbons in the onsite soils; 2) the presence of arsenic and lead in the onsite soils; and 3) potential mercury vapor intrusion risks associated with construction of new buildings onsite.

Submission of the proposed RAP and implementation of all statutory requirements must occur within 18 months of receipt of this letter. The guidelines for preparation of the proposed RAP have been enclosed and can be found on the Department’s website at the following web address: http://mde.maryland.gov/programs/LAND/MarylandBrownfieldVCP/Pages/vcp_info.aspx. Additionally, the statutory requirements for the proposed RAP can be found in Section 7-508 of the Environment Article.

Simultaneously with submission of the proposed RAP to the Department for review and approval, you must comply with the public participation requirements by posting a sign at the property and publishing a notice in a daily or weekly newspaper of general circulation in the geographic area where the participating property is located. Both notices for the proposed RAP must include the date and location of the public informational meeting. A summary of the public participation requirements, as well as a template for the public notice in the newspaper and the sign on the property, has also been enclosed.

You are requested to forward a draft of the sign and newspaper notice for the proposed RAP to the VCP for review and approval prior to publication and posting at the property. Please contact Barbara Brocks, the project manager, to discuss development of the proposed RAP and the exact date for submitting the proposed RAP, and draft public notice language, to the Department for review and approval. Upon satisfactory implementation and completion of the requirements set forth in the approved RAP and any subsequent addendums, the Department will issue a Certificate of Completion for the property which must be recorded in the land records of Baltimore City within 30 days following receipt.

In accordance with the provisions of Section 7-506(g)(1) of the Environment Article, you are requested to inform the Department in writing, within 30 days of receipt of this letter, whether Woodall GPG, LLC intends to proceed as a participant in the VCP. If the Department does not receive the notice of intent to proceed within the 30-day period, the application for participation in the VCP shall be deemed withdrawn pursuant to Section 7-506(g)(2) of the Environment Article.

If you have any questions regarding the requirements, development of the proposed RAP or other aspects of the program, please contact Ms. Brocks at 410-537-3493.

Sincerely,



Brian Dietz, Chief
State Assessment and Remediation Division

BD:blb
Enclosures

cc: Ms. Lisa DeRose, Geo-Technology Associates, Inc.
Dr. Leana Wen, Baltimore City Health Department (w/o enclosures)
Ms. Hilary Miller (w/o enclosures)
Mr. James R. Carroll (w/o enclosures)
Ms. Barbara Brocks (w/o enclosures)

WRITTEN AGREEMENT

“If the RAP is approved by the MDE, the participant agrees, subject to the withdrawal provisions of Section 7-512 of the Environment Article, to comply with the provisions of the response action plan. Participant understands that if s/he fails to implement and complete the requirements of the approved plan and schedule, the Maryland Department of the Environment may reach an agreement with the participants to revise the schedule of completion in the approved response action plan or, if an agreement cannot be reached, the Department may withdraw approval of the plan.”

Woodall GPG, LLC

Dan Goodier

Authorized Representative

Date

CAP INSPECTION FORM

Location:		Date/Time:	
Inspector:	Signature:	Weather:	

PAVEMENT

Overall Condition	
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Specific Areas of Note (use PCI, below, and attach sketches/ photographs, as needed)

Area	PCI	Comments

Pavement Condition Index (PCI)

Response?	PCI	Characterization	Description
Optional	1	New, crack-free surface	Black in color, smooth texture
	2	Oxidation has started	Short hairline cracks start to develop. Dark gray color.
	3	Oxidation in advanced state	Hairline cracks are longer and wider. Gray in color.
Required	4	Oxidation complete	Cracks are 1/4" wide and crack lines have found base faults.
	5	Moisture penetrating through 1/4" cracks. Loose material (stone and sand) evident.	Texture of surface becoming rough. Preventive maintenance.
	6	Cracks widen and join.	Cracks and shrinkage evident at curb and gutter lines.
	7	Potholes develop in low spots.	Gatoring areas begin to break up. Overall texture very rough.
	8	Potholes developing.	Pavement breaking up.
	9	Heaving due to excessive moisture in base.	Distorts entire surface.
	10	General breakup of surface.	

SIDEWALKS, CURBS, GUTTERS

	Sidewalks	Curbs and Gutters
Overall Condition		
Check all that apply	<input type="checkbox"/> Exists <input type="checkbox"/> Sound <input type="checkbox"/> Cracked <input type="checkbox"/> Deteriorated <input type="checkbox"/> Root Intrusion <input type="checkbox"/> Work Completed Since Prior Inspection	<input type="checkbox"/> Exists <input type="checkbox"/> Sound <input type="checkbox"/> Cracked <input type="checkbox"/> Deteriorated <input type="checkbox"/> Root Intrusion <input type="checkbox"/> Work Completed Since Prior Inspection
Other Comments		

LAWNS AND LANDSCAPED AREAS

Overall Condition	Newly planted in many areas. Newly constructed islands appear to be unplanted at this time. Some tire tracks / ruts were observed on the northern perimeter.
Check all that apply	<input type="checkbox"/> Sound <input type="checkbox"/> Erosion <input type="checkbox"/> Healthy Plant Condition <input type="checkbox"/> Mortality <input type="checkbox"/> Animal Burrows
Trees	<input type="checkbox"/> Healthy <input type="checkbox"/> Poor Health <input type="checkbox"/> Dead <input type="checkbox"/> Fallen <input type="checkbox"/> Other _____
Shrubs	<input type="checkbox"/> Healthy <input type="checkbox"/> Poor Health <input type="checkbox"/> Dead <input type="checkbox"/> Fallen <input type="checkbox"/> Other _____

RESPONSE ACTIONS

Responses Required	
Work Completed (Description, Date, Contractor, etc.)	
List Attached Photographs/Sketches	

CERTIFIED STATEMENT RE: COUNTY AND MUNICIPAL ZONING REQUIREMENTS

“The participant hereby certifies that the property meets all applicable county and municipal zoning requirements.

The participant acknowledges that there are significant penalties for falsifying any information required by MDE under Title 7, Subtitle 5 of the Environmental Article, Annotated Code of Maryland, and that this certification is required to be included in a response action plan for the Voluntary Cleanup Program pursuant to Title 7, Subtitle 5 of the Environmental Article, Annotated Code of Maryland.”

Woodall GPG, LLC

Dan Goodier

Authorized Representative

Date