WINDSOR TERMINAL/INLAND LEIDY PROPERTY Ward 15, Section 270, Block 3085, Lots 037, 231, 036A, 036 2225 Evergreen Street Baltimore, Maryland (Voluntary Cleanup Program)

Site Description

This 2.005-acre property is located in a mixed-use area of Baltimore City surrounded by residences and commercial and industrial businesses. A railroad track bounds the property to the east and residences are located approximately 300 yards to the west. Municipal sewer and water service is provided to the site and the vicinity. Overland flow from the site is directed south-southwest towards Gwynns Falls.

Site History

The property consisted of woodland prior to development in the early-1950s. Structural improvements completed in 1974 included two loading racks, a drumming warehouse, three storage warehouse buildings, two parking lots and an office building. Drum Reconditioners Inc., a subsidiary of Inland Leidy, acquired the property between 1991 and 1995 in three separate transactions.

For over 45 years, operations at the site have involved the wholesale distribution of chemicals, organic solvents and petroleum products. A variety of hazardous and non-hazardous substances received from truck tanks and railroad cars are stored in bulk quantities for repackaging and resale. The facility is a major supplier of chemicals and organic solvents to the paint and coating industry.

In May 1987, the Maryland Department of Health and Mental Hygiene, Waste Management Administration issued a site complaint for the discharge of wastewater containing organic contaminants from a diked storage area. On October 3, 1990, 600 gallons of methyl isobutyl ketone (MIBK) and ethylbenzene solvent spilled when an aboveground storage tank was overfilled in the loading rack area. Corrective measures were implemented to remediate the spill. On November 14, 1990, a 10,000 gallon underground diesel fuel storage tank was removed. The underground storage tank was found to have leaked and 196 tons of contaminated soil was excavated.

Environmental investigations conducted in 1997 and 1998 revealed soil and groundwater contamination largely originating from the loading rack area. Several groundwater contaminant plumes were identified in both the shallow and bedrock aquifers and they included tetrachloroethylene, trichloroethylene, ethylbenzene, vinyl chloride, styrene, 1,2 dichloroethene and petroleum hydrocarbons. Other groundwater plumes with contaminants such as benzene, toluene, ethylbenzene, xylene, 1,2-dichloroethene, and MIBK have migrated off-site onto a neighboring church property. In addition to elevated levels of petroleum hydrocarbons and chlorinated solvents in subsurface soils, evidence of free phase toluene and mineral spirits has also been observed at the property.

Voluntary Cleanup Program (VCP) Status

On May 1, 1998, Inland Leidy, Inc. submitted an application to the VCP. The Department reviewed the application and on November 30, 1998, confirmed Inland Leidy's status as a responsible person and accepted the property into the VCP. The participant submitted a proposed response action plan (RAP) that provided for supplemental sampling, and soil and

groundwater remediation. On April 13, 1999, the Department attended a meeting at the request of the Panway Community Association and on June 7, 1999, toured the facility with members of this citizen group.

After evaluating the proposed RAP, the Department requested additional information on the risk assessment and proposed remedial technologies. In July 1999, some of the requested information was provided and the Department was notified of a sale agreement which modified business and ownership interests of the property to Windsor Terminal a wholly owned subsidiary of Drum Reconditioners Inc. The Department requested a copy of the sale agreement, and emphasized the need for a revised RAP. In October 1999, the Department requested certain field activities to aid in the development of a revised RAP (i.e. well replacement, supplemental sampling, aquifer tests). However, these field activities that involved sampling on the adjacent church property raised concerns with the property owner. On January 11, 2000, the Department met with the adjacent property owner to discuss Windsor Terminal's participation in the Voluntary Cleanup Program and to address their concerns.

In May 2000, Windsor Terminal commenced field activities with the installation of well replacements. On June 8, 2000, the Department commissioned a <u>Phase I - Indoor Air</u> <u>Quality Evaluation</u> for buildings on the adjacent church property. Based on the results of air samples and field screen, it was determined that contaminants were not volatizing from the groundwater plume into the buildings. The evaluation confirmed the findings of previous field screenings conducted by the Department in February and March 2000. On June 22, 2000, Windsor Terminal began supplemental sampling, which was completed in late-July 2000. This supplemental sampling data was included in another risk evaluation of the property and submitted to the Department on January 10, 2001. After reviewing the report, the Department requested additional information from the applicant and conducted a risk evaluation for the property.

On June 11, 2002, the Department approved the revised RAP, dated April 24, 2002, and an addendum dated June 3, 2002. The plan was developed to address future risk from soil and groundwater contaminants. On July 2, 2002, the Department issued a Certificate of Completion contingent upon future commercial/industrial use of the property, a groundwater use prohibition, notifications of any future excavation activities and any changes in future operations at the site, soil characterization prior to future disposal and, physical maintenance requirements for existing containment remedies. The Certificate was recorded on the property deed in Baltimore City's land records on July 29, 2002.

Site Contact

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