Baltimore City	
1920s	An oil-refining plant operated on the property.
1929-1945	Property used for ship manufacturing.
1945	Property used by Bethlehem Steel for dismantling and salvaging ships.
1986-1989	Site used by Buffalo Tank Corp. for manufacture and storage of underground and aboveground tanks.
1989	Site purchased by Port Liberty Industrial Center Limited Partnership.
1990	Buffalo Tank Corp. removed transformers and PCB wastes.
1990s	Multiple environmental investigations were conducted.
7/1997	Property owner submitted a VCP application.
8/1997	MDE accepted the VCP application.
10/1998	MDE approved a response action plan for the site.
2/2000	Implementation of the response action plan commenced.

PORT LIBERTY 1900 Frankfurst Avenue Baltimore, Maryland

(Voluntary Cleanup Program)

Site Description

The approximately 24-acre Port Liberty property is comprised of six parcels, which are owned by Port Liberty Industrial Center Limited Partnership (6 acres) and Hobelmann Port Services (18 acres). The contiguous parcels are fenced on three sides, with the Patapsco River defining the northern border. Structures on the property include a warehouse, which is leased to Inner Harbor Recycling, and an abandoned oil refining plant. The remainder of the site is vacant.

Site History

The Port Liberty site has been used for a variety of heavy industrial/manufacturing activities. In the early 1920s, an oil-refining plant operated in the Butterfield Plant Building, located on the northeast portion of the site. Between 1929 and 1945, a contractor for the United States Armed Forces manufactured ships on the property. In 1945, Bethlehem Steel purchased the property and used the site for dismantling ships and salvaging the metal. Between 1986 and 1989, Buffalo Tank Corporation, a metal fabricating division of Bethlehem Steel, manufactured and stored underground and aboveground storage tanks on the

property.

Before purchasing the site in 1989, Port Liberty Industrial Center Limited Partnership executed an environmental site assessment. The site assessment revealed localized areas of concern which were consistent with the locations of historical industrial/manufacturing operations on the property. The areas identified included: six transformers remaining inside the Butterfield Plant; soil contaminated with petroleum hydrocarbons around the aboveground concrete tank near the Butterfield Plant; and an area along the western property boundary with levels of toluene contamination that were significantly below the U.S. Environmental Protection Agency (EPA) Region III Risk Based Concentration levels for soils in a residential scenario.

In April 1990, the previous owner, Buffalo Tank Corporation, removed the six transformers, containing polychlorinated biphenyls (PCBs), from the Butterfield Plant. During the removal, some of the PCB-containing fluids were spilled, contaminating the soil and the transformers' concrete pads. The spilled fluids and the contaminated soil and concrete were excavated and stored in drums. The drums containing the excavated soil and concrete, PCB oil and used personal protective equipment remained on-site after the transformers were removed. In October 1990, the Maryland Department of the Environment/ Hazardous Waste Enforcement Division (MDE/HWED) issued a site complaint to Struever Bros., Eccles & Rouse, Inc. stating that PCB oil and PCB-contaminated wastes were stored on-site in violation of the Code of Maryland Regulations. In March 1991, MDE/HWED notified Struever Bros., Eccles & Rouse, Inc. that the required corrective actions had been completed sufficiently.

In 1991, a prospective tenant performed an additional environmental site assessment. Sample results revealed low levels of benzene, naphthalene, toluene, and arsenic in the shallow groundwater. The

naphthalene, toluene, and arsenic were detected at levels below U.S. EPA Region III Risk Based Concentration levels for tap water. Naphthalene was detected in two of the eight groundwater samples, and toluene, benzene, and arsenic were detected in only one of the groundwater samples collected during the investigation. Currently, the property owner, with oversight from MDE's Oil Control Program, is remediating the area near the Butterfield Plant where benzene was detected in the groundwater and petroleum hydrocarbons were detected in the soil.

Samples collected in April 1992 by EA Engineering, Science, and Technology (EA) revealed elevated lead concentrations in the soil. In 1996, Port Liberty Industrial Center Limited Partnership contracted EA to further define the extent and approximate limits of the lead contamination. EA collected 189 soil samples across the site to define the concentrations of lead in the surface and shallow subsurface. In addition, EA collected sixteen soil samples and six groundwater samples to analyze for priority pollutant metals. The study revealed lead contamination across the property, with elevated levels covering much of the northwestern third of the site, defined as Area 1 in the proposed response action plan. The other area with elevated lead, defined as Area 2 in the proposed response action plan, encompasses the Butterfield Plant on the eastern portion of the property.

On July 20, 1997, Port Liberty Industrial Center Limited Partnership, c/o Struever Bros., Eccles, & Rouse, Inc., submitted an application to participate in the Voluntary Cleanup Program (VCP). Following review of the application, MDE requested additional soil and groundwater samples. Nine soil samples were collected along the waterfront in areas which had not been investigated completely. To further investigate whether or not lead in the soil has affected the groundwater, three additional groundwater samples were collected from Area 1 and Area 2 at locations where high lead concentrations had been detected in the soil.

Voluntary Cleanup Program Status

The Port Liberty application for the VCP was approved on August 29, 1997. On October 23, 1997, a proposed response action plan was submitted and a public informational meeting on the proposed plan was held on December 15, 1997. After the 30-day public comment period, the Department requested additional information before an evaluation of the proposed response action plan could be completed. This information was submitted in April 1998.

In September 1998, the property was subdivided into six contiguous parcels. The response action plan was approved on October 1, 1998. As an interim measure prior to capping the areas of concern, a fence was constructed around the perimeter of the undeveloped property to prevent access to the site.

On January 10, 2000, Hobelmann Port Services, a prospective purchaser of the property, submitted a VCP application for four of the six parcels seeking inculpable person status. The Department approved the application on February 1, 2000 and granted inculpable person status. Hobelmann Port Services purchased approximately 18 acres the property on February 4, 2000.

Implementation of the response action plan began in February 2000 and activities are scheduled to be completed by June 2000.

Site Contact

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