# Fishing Point Public Meeting

Hellenic Cables 3901 Asiatic Avenue Baltimore, Maryland



ARM Group Engineers and Scientists

## MDE Voluntary Cleanup Program



- Maryland Department of the Environment (MDE) established the Voluntary Cleanup Program (VCP) to provide State oversight for the voluntary cleanup of properties contaminated with hazardous substances. The goal of the program is to increase the number of sites cleaned by streamlining the cleanup process while ensuring compliance with existing environmental regulations.
- The VCP defines two types of persons with respect to liability for site contamination:
  - Responsible persons: A person who is the owner or operator of a site contaminated by a controlled hazardous substance (CHS), potentially including property owners, operators, generators, and transporters of the CHS.
  - Inculpable persons: person who has no prior or current ownership interest in an eligible property and has not caused or contributed to contamination at the eligible property.

### Project Status/Schedule

Hellenic Cables Americas Co. (Hellenic) and Wagners Point Properties LLC (Wagners Point) are considering purchase and redevelopment of the approximately 40-acre Fishing Point property located at 3901 Asiatic Avenue in Baltimore, Maryland into a cable manufacturing facility.

- May 26, 2023: Hellenic received inculpable person (IP) status from MDE.
- June 15, 2023: Phase I Environmental Site Assessment (ESA) completed.
- June 22, 2023: Hellenic submitted VCP application to MDE.
- July 21, 2023: USACE and MDE determined that no state or federally regulated resources (wetlands) are present.
- July 28, 2023: Hellenic submitted Phase II ESA to MDE.
- August 24, 2023: Hellenic accepted into the VCP. Wagners Point receives IP status.
- September 11, 2023: Wagners Point submitted VCP application to MDE.
- September 27, 2023: Response Action Plan (RAP) submittal.
- Public Participation
  - Signage posted October 5, 2023
  - Newspaper notices published October 4 and 11, 2023
  - Public Meeting: October 25, 2023

### Site History



- Former petroleum terminal (BP Amoco) developed into an asphalt refinery and later an asphalt terminal
- Groundwater and soil remediation conducted in 2002-2003
- January 2004: No Further Requirements Determination (NFRD) from the VCP
- April 2007: NFRD for Deenah LLC
- Vacant for approximately 20 years

### Phase II ESA Scope



- Objective: Characterize subsurface materials to determine appropriate measures to ensure proper management of excavated materials and protection of workers and the environment
  - Target soil where ground-intrusive activities will occur during proposed redevelopment
  - Assess current groundwater quality due to historical site operations and nearby upgradient industrial operations
- Soil results compared to the MDE non-residential soil cleanup-standards
- Groundwater results compared to MDE groundwater standards for Type I and Type II aquifers and the USEPA Vapor Intrusion Screening Levels (VISLs)

### Phase II Soil Sampling Location and Results



- 32 soil borings
- VOCs and PCBs: no exceedances
- SVOCs: one exceedance (benzo(a)pyrene)
- Metals: two exceedances (arsenic and vanadium)
- Soil samples collected for waste characterization; all results indicated non-hazardous soil
- Petroleum (NAPL) identified in soil in the central portion of the Site

## Phase II Groundwater Sampling Location and Results



- Depth to groundwater ranged from 2-5 feet bgs
- Groundwater flows radially from central portion of Site
- VOCs: four exceedances (benzene, cumene, 1,2,4trimethylbenzene, and 1,3,5-trimethylbenzene)
- SVOCs: two exceedances (2-methynapthalene and naphthalene)
- Metals: three exceedances (arsenic, iron, and manganese)
- Vapor Screening (VISL) Exceedances: benzene at one location only
- Residual Oil, or non-aqueous phase liquid (NAPL), identified in 3 PZs, with maximum thickness in ARM-PZ-008

# Supplemental Phase II



- Methane Survey
  - Conducted throughout entire property. One isolated area with elevated methane, although follow up test pit activities did not identify a potential source or additional methane detections.
- ARM-PZ-008 NAPL Investigation
  - Five test pits advanced and checked regularly for NAPL accumulation.
  - Minimal NAPL identified, NAPL removed via absorbent pads.
  - Little to no NAPL recharge with exception of one test pit. EFR event conducted, 4-inch well installed for continued NAPL gauging/removal in southwest test pit as needed.

#### Proposed Site Layout



### Response Actions - Soil

- NAPL
  - Utilities re-routed to avoid area at ARM-PZ-008
  - Pipe materials will have oil/watertight joints as needed
  - If NAPL is identified during trenching activities, then preventative measures will be taken to inhibit the spread of petroleum products (i.e., plug using low permeability backfill material, pre-fabricated anti-seep collars, or trench plugs)
  - Additional vacuum extraction events at southwest test pit (as needed)
- Groundwater Use Restrictions
  - A restriction prohibiting the use of groundwater for any purpose at the Site for any purpose, other than for environmental testing and monitoring
  - A requirement to characterize, containerize, and properly dispose of any material excavated/pumped at the Site in accordance with applicable local, state, and federal requirements

#### Response Actions - Groundwater

- Engineering Controls
  - Approximately 2 to 4 feet of clean fill will be imported to raise the elevation of the Site to approximately 10 feet amsl;
  - A large majority of the Site will then be paved or covered by buildings.
- Land Use Restrictions
  - Property use is limited to industrial or commercial purposes
  - Submit written notification to the MDE VCP prior to the construction of any buildings on the property, disturbing any existing paved areas, and/or performing any subsurface excavations on the property in the future
  - Complete appropriate characterization and disposal of any material excavated at the Site in accordance with applicable local, state, and federal requirements
  - Requirement to further evaluate vapor control measures if another enclosed structure is proposed in the future on the Site.

#### Response Actions – Vapor Intrusion

- Sub-slab Soil Gas and Indoor Air Monitoring
  - Two sub-slab soil gas monitoring points are proposed to be installed in the office space.
- Sub-slab Vapor Barrier
  - The manufacturing area of the building has been designed with 48- to 52-foot-high ceilings and will be well ventilated.
  - If sub-slab soil gas exceeds MDE criteria, a vapor barrier will be installed beneath the footprint of the proposed offices only, to prevent potential exposures to VOCs that could volatilize from groundwater (or NAPL) by preventing the migration of vapors through the floor slab and into the building.
  - Sub-slab soil gas and indoor air monitoring will be conducted in accordance with the monitoring program outlined in the RAP

### Proposed Plan – Onsite Development

- An Environmental Professional (EP) will be onsite during ground intrusive construction activities
  - Screen and segregate impacted soils as needed (based on elevated PID readings, visual, odor)
  - Collect samples to characterize soil and dewatering fluids for proper disposal
  - PPE requirements
  - Monitor breathing zone with a PID to ensure safety of workers
  - If NAPL is encountered during utility installation, contingency measures will be implemented as needed to prevent migration
- Soil Management
  - Sitewide fill activities (see next slide)
  - Installation of deep foundation piles
  - Some excavations for deep equipment, carousels, and access vaults
  - Utility trenching
  - Impacted soil will be sent to off-site permitted disposal facility

#### Cut/Fill Plan



Precise. Responsive. Solutions.

CUT / FILL RANGE

-7.000'

-6.500'

-5.000'

-4.500'

-4.000'

-3.500'

-3.000'

-2.500'

-2.000"

-1.500'

-1.000'

-0.500'

0.000'

0.500'

1.000'

1.500'

2.000'

2.500'

3.000'

3.500'

4.000'

4.500'

5.000'

5.500'

6.000'

6.500'

7.000'

COLOR

# Utility Plan



- Utilities re-routed to avoid potential NAPL area at ARM-PZ-008.
- EP will monitor soils during all utility trenching activities. Impacted soil will be stockpiled and sampled.
- If NAPL is identified during trenching activities, then preventative measures will be taken to inhibit the spread of petroleum products (i.e., plug using low permeability backfill material, pre-fabricated anti-seep collars, or trench plugs)

#### Anticipated Next Steps

- November 3, 2023: Final date for public comments
- Late November 2023: Anticipated MDE response on RAP
- May 2024: Site preparation activities begin
- June 2024: Site work (including foundations) begins
- When onsite activities are complete (estimated 2025), ARM will:
  - Submit a Development Completion Report/Notice of Completion of Response Actions
  - Record institutional controls in the land records office of Baltimore County
  - Request Certificate of Completion (COC) from MDE VCP

#### **Public Comments**

• To request further information or make comments regarding the proposed RAP, please do so in writing to the attention of the Voluntary Cleanup Program project manager:

Barbara Brown Land and Materials Administration Maryland Department of the Environment 1800 Washington Boulevard, Suite 625 Baltimore, Maryland 21230 Telephone 410-537-3440

• All comments and requests must be received by the MDE in writing no later than November 3, 2023.

## Proposed Development



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# Questions or comments?