

Serena McIlwain, Secretary Suzanne E. Dorsey, Deputy Secretary

CERTIFIED AND ELECTRONIC MAIL

December 21, 2023

Scott Noteboom, Chief Technology Officer Quantum Maryland LLC 500 4th E. Street, Suite 333 Austin, Texas 78701

Re: Environmental Management Plan Pump Station MH 3(Version 3.2) Former Alcoa Eastalco Property 5601 Manor Woods Road Frederick, Maryland 21703

Dear Scott Noteboom:

The Maryland Department of the Environment's (MDE) Land Restoration Program (LRP) has completed review of the December 20, 2023, Environmental Management Plan Pump Station MH 3-Version 3.2 ("EMP V3.2") for utility construction work at the former Alcoa Eastalco Property ("Site") located at 5601 Manor Woods Road in Frederick, Frederick County, Maryland. The EMP V3.2 is approved for implementation by the LRP. Quantum Maryland LLC is responsible for obtaining all required state and local permits and approvals for the construction outlined in this EMP and providing confirmation documentation to the LRP prior to the start of construction activities. Please note that all requirements of the Environmental Covenant ("EC") must be followed during any activity within the EC area.

As noted in the EMP V3.2 this utility construction involves construction of a Pump Station and associated sewer line, a portion of which extends into the existing EC area. This EMP V3.2 outlines the soil and groundwater management during construction in this approximately 150 ft by 120 ft area centered around the sewer manhole MH 3 and identified as the EMP Area. This EMP area will be physically demarcated in the field through stakes and/or signage.

The following is our understanding of the proposed soil and groundwater management activities and restrictions:

- i. During pre-excavation grading activity, approximately 1000 cy of imported stone from an off-Site quarry will be used as fill within the EMP area that lies within the EC, for development of a construction pad. After completion of construction, this clean material will be reused as backfill for the MH 3 support of excavation structure (SOE).
- ii. Approximately 1000 cy of soil will be excavated from the remainder of the EMP area during grading. Approximately 700 cy of that soil will be stored separately and is

proposed for reuse at the original location after testing and approval by LRP, after completion of construction. The remainder will be reused for backfill within the EMP area that is outside the EC.

- iii. All soil/rock (~1500 tons) generated from within the MH 3 secant pile wall and the micro tunnel will be stockpiled, tested and disposed of off-Site, OR tested per MDE guidance and reused as backfill, subject to LRP review and approval of the sampling results.
- iv. All water generated from within the EMP area during construction activity will be containerized, and disposed of off -Site, after limited testing. This includes water used for micro tunnelling or grouting activity as well.
- v. Water from the EMP area will not be discharged on Site or into the surface water.
- vi. MDE must be notified if any waste material or anomalous soil is observed based on field observation and field screening. MDE may have additional requirements regarding waste management.

The soil and water generated outside of the EMP area is outside the purview of the Controlled Hazardous Substance (CHS) Enforcement Section. The management of the water will be handled under 20 CP permits (MDRCK07C7 and MDRCK078V) issued by the MDE's Water and Science Administration ("WSA"). This EMP V3.2 proposes any water generated during the pump station installation will be containerized, tested and disposed of off-Site in same manner as the EMP area. The LRP concurs with this plan.

If you have any questions regarding this matter, please do not hesitate to contact me at 410-537-3466 or via email at anuradha.mohanty@maryland.gov.

Sincerely,

Anuradha Mohanty Anuradha Mohanty, Project Manager Land Restoration Program

- Paul Hlavinka, Project Manager, Water and Science Administration (via email: paul.hlavinka@maryland.gov)
- Jennifer Nitsch, Environmental Compliance Specialist, Water and Science Administration (via email: jennifer.nitsch@maryland.gov)
- Patrick Noyes, Enforcement Section Manager, Compliance Program, Water and Science Administration (via email: patrick.noyes@maryland.gov)
- Brad Metzger, District Manager, Western Division, Water & Science Administration (via email: brad.metzger@maryland.gov)
- Andrew Gosden, Deputy Program Manager, Water & Science Administration (via email: andrew.gosden@maryland.gov)
- Kate Ansalvish, Environmental Compliance Supervisor, Water & Science Administration (via email: <u>kate.ansalvish1@maryland.gov</u>)
- Leonard Cage, Environmental Compliance Specialist, Water & Science Administration (via email: leonard.cage@maryland.gov)
- William Seiger, Chief, Waterway Construction Division, Wetlands and Waterways Protection Program, Water and Science Administration (via email: william.seiger@maryland.gov)
- Douglas Cochran, Environmental Compliance Inspector, Stormwater Engineering & Environmental Compliance (via email: DCochran@frederickcountymd.gov)
- Bryan J. Burke, Department Head, Frederick County Department of Engineering & Planning (via email: bjburke@frederickcountymd.gov)