WSP | PARSONS BRINCKERHOFF

13530 Dulles Technology Drive
Suite 300
Herndon, VA 20171
Main: 703-742-5700
wspgroup.com/usa
pbworld.com/usa

VIA ELECTRONIC MAIL

June 3, 2016

Ms. Richelle Hanson, Project Manager
Land Restoration Program
Land Management Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 625
Baltimore, Maryland 21230-1719

Re: Response Action Plan Addendum
Former Kop-Flex Facility Site, Hanover, Anne Arundel County, Maryland
Brownfield Master Inventory Number MD0286

Dear Ms. Hanson:

On behalf of EMERSUB 16 LLC, WSP USA Corp. is submitting a revised version of page 27 of the Response Action Plan for the Former Kop-Flex Facility Site (Enclosure A), located in Hanover, Maryland (Revision 2.0, dated October 2, 2015), which was approved by the Maryland Department of the Environment on October 9, 2015. The revised page provides clarification on the portions of the existing concrete building slab that need to remain in place as part of the soil response activities.

If you have any questions concerning the above clarification to the soil response action, please contact us at 703-709-6500 or Michael Bell of ECS Mid-Atlantic LLC at 410-859-4300.

Sincerely yours,

Robert E. Johnson
Senior Technical Manager

REJ:kjb
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Enclosure

cc/encl.: Erich Weissbart, U.S. Environmental Protection Agency, Region III
Mr. Stephen Clarke, Emerson Electric Co. (via electronic mail)
Mr. Raymond Goins, Trammell Crow Company (via electronic mail)
Mr. Michael Bell, ECS Mid-Atlantic LLC (via electronic mail)

8 Soil Response Action

As mentioned previously, soil cleanup has been completed and the risk assessment did not identify any unacceptable risk to current and future site occupants. The soil response actions will include the implementation of land use and engineering controls to prevent future exposure to soil containing VOCs that remain at the site, as discussed in this Section. The following soil response actions will minimize the risk of exposure to soil containing VOCs that remain at the site.

8.1 Soil Management Plan

The Soil Management Plan (Appendix E) was developed to identify the procedures for safely conducting soil excavation activities in the area where VOC-containing soil material may still be present in the shallow subsurface. All soil movement, grading and/or excavation activities will be conducted according to the Soil Management Plan.

The final grading plan and utility plan for the proposed commercial development of the site will be provided at a later date, and will indicate areas of soil removal during development. Low concentrations of VOCs (including 1,4-dioxane) remain in the shallow soil (less than 10 feet bgs) underneath the southwestern portion of the former manufacturing building (AOC 1) (see Figure 2). All soil excavation activities in the area of the southwestern portion of the former manufacturing building shall be conducted in a manner that minimizes the exposure of potentially contaminated soil to precipitation and the flow of potentially contaminated storm water runoff to surrounding areas. If excavations are backfilled, clean soil shall be used from an off-site borrow area. Geotextile fabric or composite shall be placed on the bottom and side walls of excavations to serve as a marker and barrier between clean soil/fill and impacted soil. Soil will be disposed of at a properly permitted disposal facility licensed to accept the waste. The procedures described in the plan may be revised, as necessary, to ensure that all soil disturbance activities are conducted in accordance with applicable laws and regulations.

8.2 Engineering Controls

8.2.1 Current and Future Building Floor Slabs

The future development of the property will involve the demolition of the existing manufacturing building and construction of two (north and south) warehouse buildings separated by a truck loading area. In AOC 1, the concrete slab for the existing manufacturing building will remain in place, and will only be penetrated as required for the installation of utilities or foundations. Additionally, the concrete floor slab for the south warehouse building will be installed over the current slab. Outside of AOC 1, the concrete slab for the existing manufacturing building will be removed. A new concrete slab will be poured for the new north warehouse building area, and a new surface pavement consisting of both concrete and heavy-duty asphalt will be emplaced in the new truck loading area between the warehouse buildings to serve as the paved surface for the truck loading and unloading activities. The thickness of the new concrete pavement adjacent to the warehouse buildings will be 6 inches. The asphalt will be installed along both sides of the surface drainage gutter running between the buildings and have a thickness of 4.5 inches.

The concrete floor slab for the planned south warehouse building will serve as a cap for the VOC-containing soils in this portion of the site. A written statement, signed by a Maryland-licensed Professional Engineer, certifying the design of the building floor slab for the south warehouse is appropriate for use as a soil cap is provided in Appendix F. Annual inspections of the south warehouse concrete floor slab will be conducted following completion of the site development. Procedures (including recordkeeping) for the inspection and repair of the building floor slab, as deemed necessary, will be specified in the Site Management Plan, which will be provided to MDE for review and approval with documentation supporting the implementation of the soil response activities.