

11190 Sunrise Valley Drive Suite 300 Reston, VA 20191 Main: 703 709 6500 www.wspgroup.com/usa

May 13, 2015

Erich Weissbart, P.G. Land and Chemicals Division U.S. Environmental Protection Agency, Region III 701 Mapes Road Fort Meade, MD 20755

Re: Quarterly Status Report No. 5

Kop-Flex Voluntary Cleanup Site #31, Hanover, Maryland

Dear Erich:

WSP USA Corp., on behalf of Emerson, is submitting this progress report describing the investigation and remediation activities conducted in the first quarter 2015 at the Kop-Flex Voluntary Cleanup Program (VCP) site in Hanover, Maryland. The report also describes the activities planned for the second quarter 2015. If you have any questions, please do not hesitate to contact us at 703-709-6500.

Sincerely yours,

Robert E. Johnson, PhD. Senior Technical Manager

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cc: Mr. Stephen Clarke, Emerson Electric Co. (electronic copy)

Ms. Richelle Hanson, Maryland Department of the Environment

Enclosures

Progress Report No. 5

Kop-Flex VCP Site #31

January 2015 through March 2015

Site Name: Kop-Flex Facility
Site Address: 7565 Harmans Road

Hanover, Maryland 21076

Consultant: WSP USA Corp.

Address: 11190 Sunrise Valley Dr., Suite 300

Reston, Virginia 20191

Phone No.: (703) 709-6500

Site Coordinator: Eric Johnson Alternate: Jim Bulman

1.0 Onsite Activities

The following activities were conducted during the First Quarter 2015.

- A public informational meeting involving representatives of the Maryland Department of the Environment (MDE) was convened on January 29, 2015, at the Brooklyn Park Community Library in Brooklyn, Maryland. The meeting was held to obtain public input concerning the application for renewal of State Discharge Permit 15-DP-3442 and National Pollutant Discharge Elimination System Permit MD0069094 for the site.
- In February 2015, EMERSUB 16 LLC received a letter from the MDE Water Supply Program requesting additional information in support of the previously submitted application for a Water Appropriation and Use Permit. The permit is for the planned extraction of groundwater from the affected portions of the aquifer system as part of the future remedial activities at the site.
- A meeting between Emerson, WSP, Trammell Crow (property developer) and their consultants, and MDE and U.S. Environmental Protection Agency (EPA), Region III was held at the MDE offices in Baltimore, Maryland on March 3, 2015, to review the status of site investigation and remedial planning activities. At the meeting MDE indicated a comprehensive Response Action Plan (RAP) addressing both soil and groundwater impacts was needed for the site and outlined key points to be included in the RAP. For the off-property area, results of recent groundwater sampling activities were reviewed, and MDE and EPA Region III discussed approaches to a revised groundwater monitoring program to assess the groundwater quality in the area hydraulically downgradient of the site.
- As part of the March 2015 quarterly sampling event for the offsite monitoring wells (see below), water level measurements were obtained from selected deep wells at the site. A contour map of the potentiometric surface for the Lower Patapsco Aquifer based on the contouring of water level data from both on and off-property deep monitoring wells is provided in Figure 1. Evaluation of the hydraulic head data indicates a generally south-southeast flow path for groundwater in this deeper semi-confined aquifer.

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January 2015 through March 2015

2.0 Off-Property Activities

2.1 Offsite Monitoring Wells

Recently installed off-property monitoring wells were sampled the week of March 16, 2015, as requested by MDE. The analytical results are presented in Table 1. (A copy of the laboratory report for these samples is provided in Enclosure A.) Historical sampling data for the off-property wells are summarized in Table 2. No site-related VOCs were detected in the samples from the two Surficial Aquifer wells (MW-25-40 and MW-28-45) (Figure 2). For the wells completed in the Lower Patapsco Aquifer, high VOC concentrations were detected in the sample from well MW-25-130, which is located in the residential area south of the former Kop-Flex facility and Maryland Route 100. The lower concentrations of VOCs in the sample from the deeper well at the MW-25 location (MW-25-192) is consistent with the vertical distribution of constituents determined from groundwater profiling at other on- and off-property deep monitoring well locations. The sampling data for the deep monitoring wells located further south of the MW-25 location contained trace to very low concentrations of the site-related VOCs (Figure 2). Additionally, 1,4-dioxane was not detected in the sample collected from the southeastern-most well (MW-35-298) in the investigation area (Table 1). Although this compound was detected at a concentration of 36.7 micrograms per liter in the September 2014 sample, the most recent data is consistent with the results from the December 2014 monitoring event.

2.2 Residential Well Sampling

WSP continued with the sampling of the Phase 3 residential wells during the first quarter of 2015. These activities included sending, via Federal Express, a second access request letter to property owners on January 12, 2015, and conducting door-to-door visits to homeowners the week of February 9, 2015. As of the end of the reporting period, water samples have been collected from 28 residential wells and the non-potable well at the U.S. Post Office branch on Reece Road. The locations of the properties are shown in Figure 3. Fifteen of the properties either had no potable well on the property or declined access to collect a water sample. Six of the homeowners in the Phase 3 sampling area have not responded to repeated requests for access to conduct sampling, if a water-supply well is present on the property. It should also be noted that well sampling has not been conducted at one property (763 Donaldson Avenue) where access has been granted by the homeowner. WSP will remain in contact with the homeowner and anticipates sampling this well during the second quarter of 2015.

Table 3 summarizes the historical analytical results for the potable wells sampled in the Phase 3 area. Copies of the certified laboratory reports for these well samples collected during the first quarter 2015 are included in Enclosure B. Site-related VOCs were not been detected in any of the private well samples in the Phase 3 area, except for a trace concentration (0.77 micrograms per liter) of 1,2-dichloroethane in the sample collected from the property at 854 Reece Road. Given this detection, MDE requested the collection of additional samples from this well to further characterize the levels of site-related VOCs at this location.

A letter report describing the 2014 quarterly residential well sampling activities was submitted to MDE on March 4, 2015. This report presented the analytical results for the following properties in the Phase 1 and 2 areas:

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Kop-Flex VCP Site #31

January 2015 through March 2015

- 7718 Twin Oaks Road
- 7740 Twin Oaks Road
- 7742 Twin Oaks Road
- 7932 Andorick Drive
- 1227 Old Camp Meade Road
- 1012 Minnetonka Road

The locations of the properties are shown in the enclosed Figure 4. No site-related VOCs were detected at concentrations above the applicable federal or state standards in any of the samples. Based on evaluation of the sampling data, WSP recommended the continued monitoring of the residential wells at 7740 Twin Oaks Road and 7932 Andorick Drive on a semi-annual sampling schedule.

On March 19, 2015, water samples were collected from the potable wells at 7740 Twin Oaks Road and 7932 Andorick Drive, which were identified for continued monitoring in the sampling report submitted to MDE. The residential well located at 854 Reece Road was not sampled due to the inability to schedule the sampling event with the homeowner.

The analytical results for these residential wells samples were received on April 14, 2015. Copies of the laboratory reporting sheets for these samples are included in the certified analytical reports provided in Enclosure B. No site-related VOCs were detected above the applicable groundwater comparative criteria in either of the well samples.

3.0 Planned Activities for Next Reporting Period (April 2015 – June 2015)

3.1 Onsite Activities

- Submittal of the site Response Action Plan (RAP) to MDE and completion of the public notification requirements (property sign and newspaper notice) pursuant to the MDE VCP guidance.
- Participation with MDE in a public informational meeting for the site RAP.
- Respond to information requests from MDE related to agency review of the Water Appropriation and Use Permit application.
- Conduct the first 2015 semi-annual sampling event for the existing onsite monitoring wells (including the deep well on the adjacent Williams-Scotsman property) in mid to late June.

3.2 Off-Property Activities

- Conduct the second quarter 2015 sampling of the off-property monitoring wells in conjunction with the semi-annual onsite groundwater sampling event.
- Submittal of a Groundwater Monitoring Plan for the off-property VOC plume to MDE and EPA Region III.

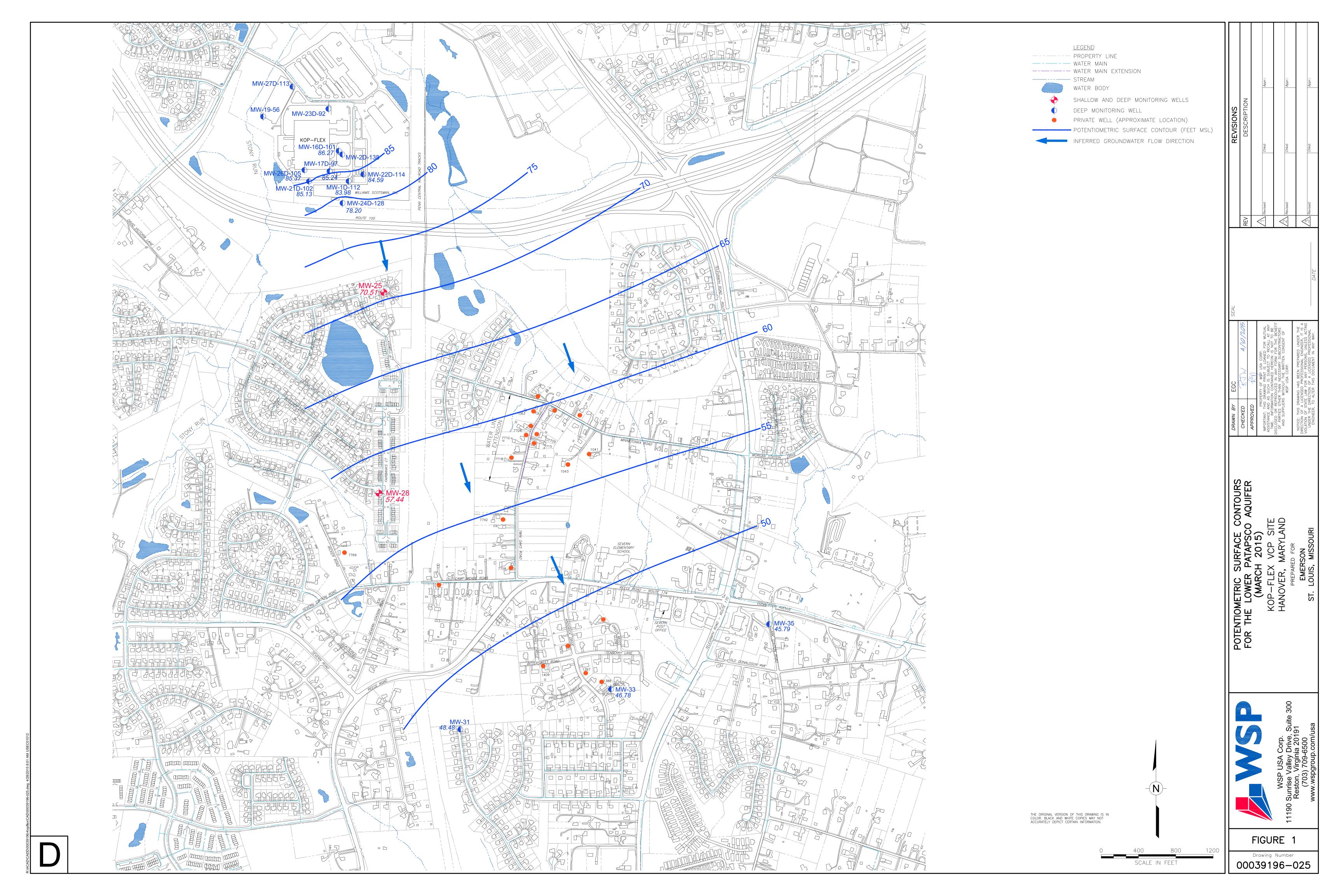
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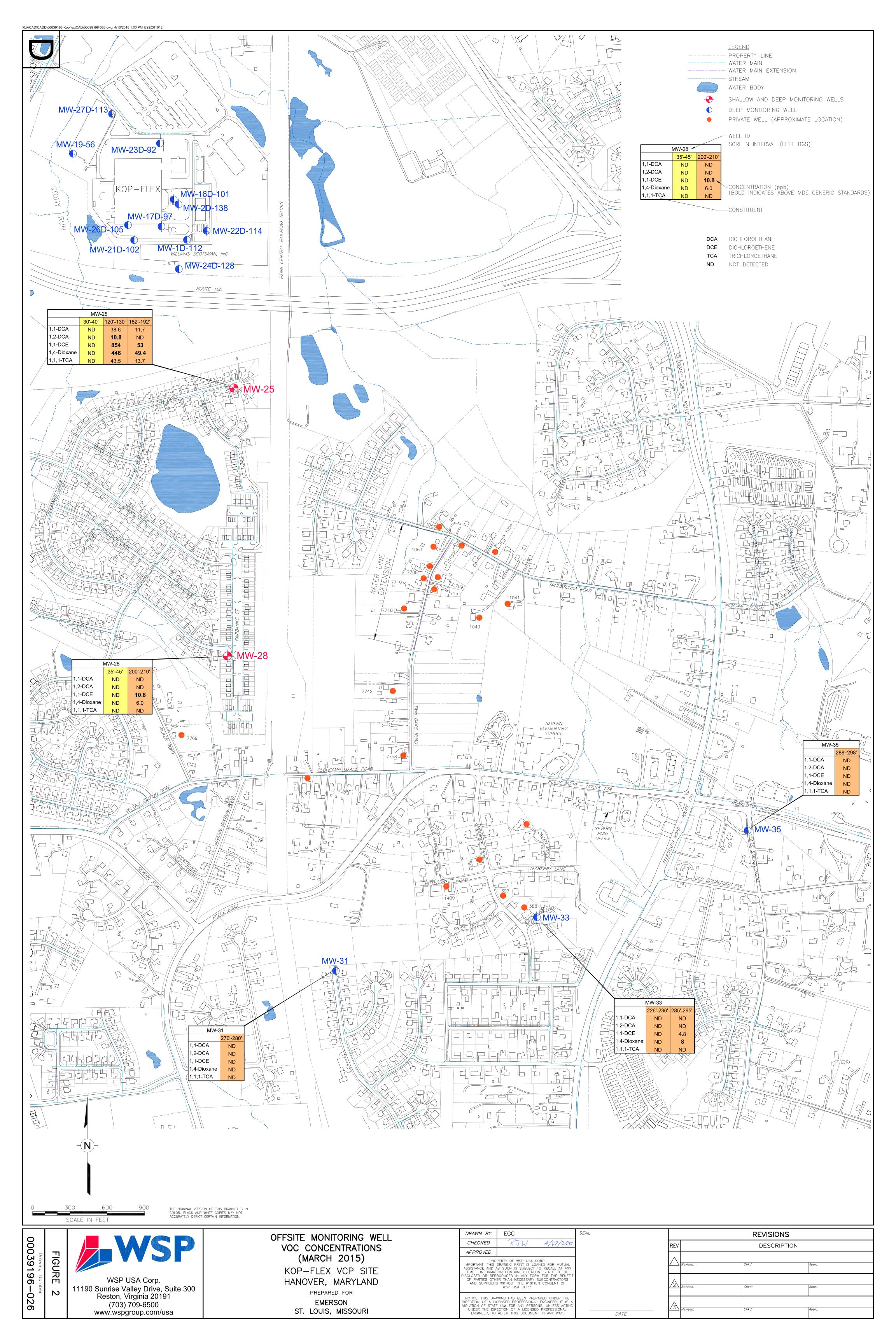
January 2015 through March 2015

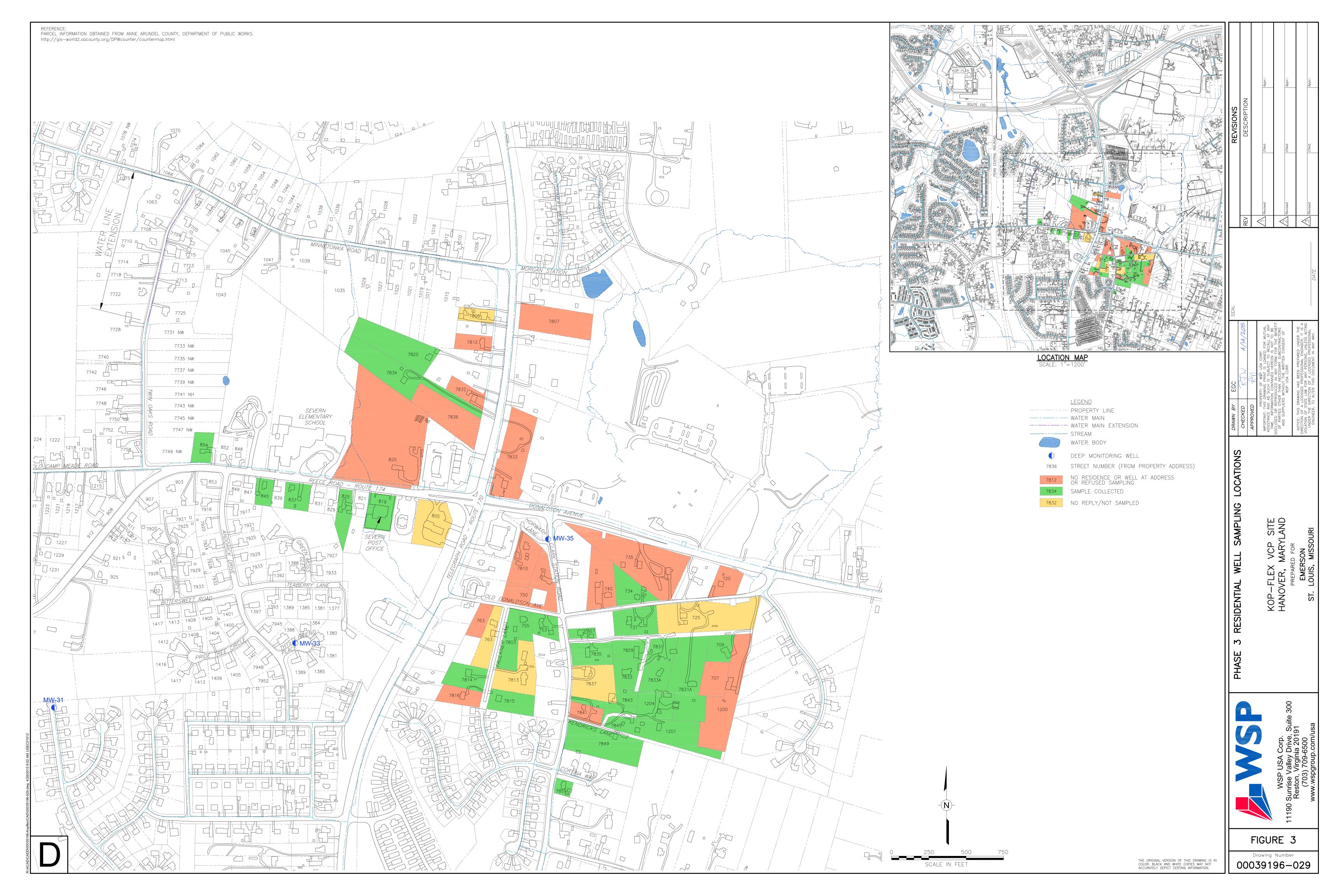
4.0 Key Personnel Changes

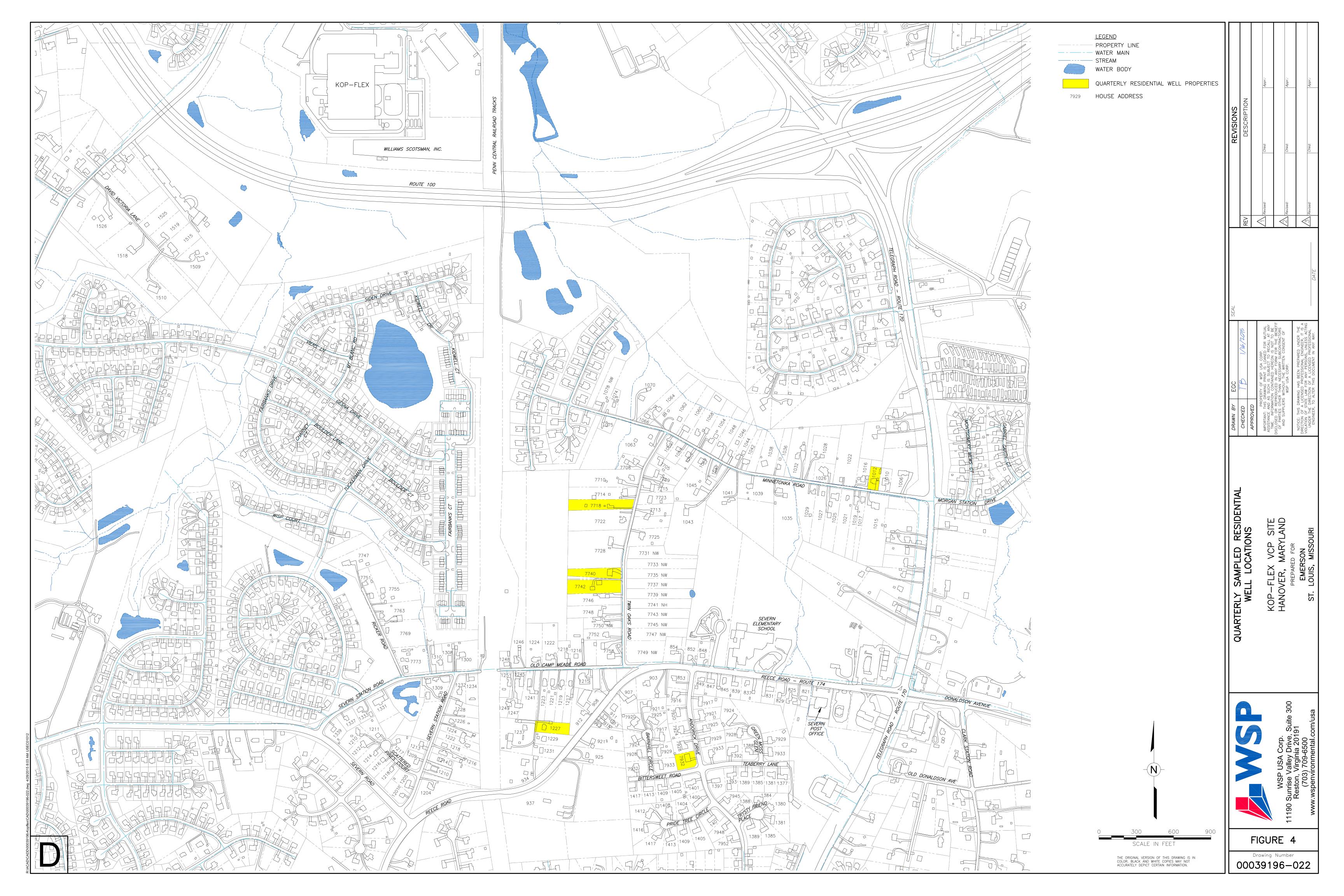
■ There were no changes to key project personnel during the reporting period.

Figures









Tables

Table 1

Summary of Off-Property Monitoring Well Sample Results March 2015 Sampling Event Former Kop-Flex Facility Hanover, Maryland

Analyte (b)	Groundwater Quality Criteria (ug/L)	MW-25-40 3/19/2015	MW-25-130 3/19/2015	MW-25-190 3/19/2015	MW-28-45 3/17/2015	MW-28-210 3/17/2015	MW-31-280 3/17/2015	MW-33-235 3/18/2015	MW-33-295 3/18/2015	MW-35-298 3/18/2015
1,1,1-Trichloroethane	200	1 U	43.5	13.7	1 U	1 U	1 U	1 U	1 U	1 U
1,1-Dichloroethane	90	1 U	38.6	11.7	1 U	1 U	1 U	1 U	1 U	1 U
1,1-Dichloroethene	7	1 U	854	53	1 U	10.8	1 U	1 U	4.8	1 U
1,2-Dichloroethane	5	1 U	10.8	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Trichloroethene	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dioxane	6.7	2 U	446	49.4	2 U	6	2 U	2 U	8	2 U
Tetrachloroethene	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U

a/U = not detected at a concentration above the method detection limit

Bolded number indicates concentration above the groundwater quality criteria

RSLs: http://www.mde.maryland.gov/assets/document/Final%20Update%20No%202.1%20dated%205-20-08(1).pdf

b/ All concentrations in micrograms per liter (µg/l)

c/ Groundwater Quality Criteria sources:

Table 2 Summary of COCs Detected in Off-Property Groundwater Samples Former Kop-Flex Facility Hanover, Maryland (a)

Monitoring Well	Chloroform	1,1-Dichloroethane	1,2-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,4- Dioxane	Methylene Chloride	Methyl-tert-butyl Ether	Tetrachloroethene	Toluene	1,1,1-Trichloroethane	1,1,2-Trichloroethane	Trichloroethene	Total VOCs
MW-25-40															
Sep-14	ND	ND	ND	ND	ND	ND	ND	ND	1.1	ND	ND	ND	ND	ND	1
Dec-14	ND	ND	ND	ND	ND	ND	ND	ND	1.5	ND	ND	ND	ND	ND	2
Mar-15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0
MW-25-130 Sep-14	1.5	47.0	12.30	1,140.0	6.1	ND	492.0	ND	ND	1.1	ND	64.2	2.0	11.2	1,777
Dec-14 (c)	ND	47.0 31.4	12.30 ND	799.0	ND	ND ND	349.0	25.5	ND ND	ND	ND (d)	33.4	ND	ND	1,777
Mar-15 (c)	ND	38.6	10.8	854.0	ND	ND	446.0	66.8	ND	ND	ND (d)	43.5	ND	ND	1,460
MW-25-190		00.0		00	.15			00.0				10.0			.,
Sep-14	ND	10.8	ND	52.2	ND	ND	65.1	ND	ND	ND	ND	14.0	ND	ND	142
Dec-14	ND	13.3	ND	58.2	ND	ND	45.9	ND	ND	ND	ND	15.6	ND	ND	133
Mar-15	ND	11.7	ND	53.0	ND	ND	49.4	ND	ND	ND	ND	13.7	ND	ND	128
MW-28-45	ND	ND	ND	ND	ND	ND	0.5	ND	ND	ND	ND	ND	ND	ND	-
Sep-15 Dec-14	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	6.5 ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	7
Mar-15	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND	ND ND	ND ND	0 0
MW-28-210	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	O
Sep-14	ND	ND	ND	6.8	ND	ND	5.1	ND	ND	ND	ND	ND	ND	ND	12
Dec-14	ND	ND	ND	9.4	ND	ND	4.1	ND	ND	ND	ND	ND	ND	ND	14
Mar-15	ND	ND	ND	10.8	ND	ND	6.0	ND	ND	ND	ND	ND	ND	ND	17
MW-31-280															
Sep-14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0
Dec-14 Mar-15	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	2.4 ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	2 0
MW-33-235	ND	ND	ND	ND	ND	ND	טאו	ND	ND	ND	ND	ND	ND	ND	U
Sep-14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0
Dec-14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	Ö
Mar-15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	Ō
MW-33-295															
Sep-14	ND	ND	ND	3.3	ND	ND	7.2	ND	ND	ND	ND	ND	ND	ND	11
Dec-14	ND	ND	ND	3.5	ND	ND	7.1	ND	ND	ND	ND	ND	ND	ND	11
Mar-15	ND	ND	ND	4.8	ND	ND	8.0	ND	ND	ND	ND	ND	ND	ND	13
MW-35-298															
Sep-14	ND	ND	ND	ND	ND	ND	36.7	ND	ND	ND	ND	ND	ND	ND	37
Dec-14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0
Mar-15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0

a/ all samples measured in ppb (ug/L); all samples collected using low-flow purging techniques

NA = not analyzed ND = not detected

b/sample run at 20x dilution

c/ sample run at a 10x dilution d/sample run at 2.5x dilution

Table 3

	Sample ID: Sample Type: Sample Date:	121014 Pre-Treatment	RW-7815-FN- 121014F Post Treatment 12/10/2014	RW-7831A-CS- 121014 Pre-Treatment 12/10/2014	RW-7833A-CS- 121014 Pre-Treatment 12/10/2014	RW-753-DNS- 121214 Pre-Treatment 12/12/2014	RW-819-REE- 121214 Pre-Treatment 12/12/2014	RW-845-REE- 121214 Pre-Treatment 12/12/2014	RW-7834TEL- 121814 Pre-Treatment 12/18/2014	RW-7834TEL- 121814F Post Treatment 12/18/2014
Parameters (ug/L)	MCL									
Benzene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Chloroform	80 (a)	0.50 U	0.50 U	0.17 J	0.50 U	0.26 J	0.50 U	0.50 U	0.50 U	0.50 U
1,1-Dichloroethane	90 (a)	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1-Dichloroethylene	7	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Methyl Tert Butyl Ether	20 (a)	0.50	0.46 J	1.2	0.50 U	1.1	0.50 U	1.7	0.50 U	0.50 U
Styrene	100	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.17 J
1,1,1-Trichloroethane	200	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Tetrachloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Trichloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,4-Dioxane	6.7 (b)	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U

⁽a) Maryland Department of Environment Action Level

Notes:

MCL - US Environmental Protection Agency (EPA)
Maximum Contaminant Level

⁽b) Maryland Risk Based Level

Table 3

	Sample ID: Sample Type: Sample Date:	121814	RW-7849CS- 121714 Pre-Treatment 12/17/2014	RW-837REE- 121714 Pre-Treatment 12/17/2014	RW-837REE- 121714F Post Treatment 12/17/2014	RW-7090DA- 122214 Pre-Treatment 12/22/2014	RW-7820TELE 123014 Pre-Treatment 12/30/2014	RW-7827CS 123014 Pre-Treatment 12/30/2014	RW-7833CS 11915 Pre-Treatment 1/19/2015	RW-100CS 11915 Pre-Treatment 1/19/2015
Parameters (ug/L)	MCL									
Benzene	5	0.18 J	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Chloroform	80 (a)	0.11 J	0.19 J	0.50 U	0.50 U	0.19 J	0.14 J	0.50 U	0.11 J	0.12 J
1,1-Dichloroethane	90 (a)	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1-Dichloroethylene	7	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Methyl Tert Butyl Ether	20 (a)	4.7	0.37 J	0.80	0.83	0.30 J	0.34 J	1.4	1.5	1.4
Styrene	100	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1,1-Trichloroethane	200	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Tetrachloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Trichloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,4-Dioxane	6.7 (b)	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U

⁽a) Maryland Department of Environment Action Level

Notes:

MCL - US Environmental Protection Agency (EPA)
Maximum Contaminant Level

⁽b) Maryland Risk Based Level

Table 3

	Sample ID: Sample Type: Sample Date:	11915 Pre-Treatment	RW-737DNS 11915 Pre-Treatment 1/19/2015	RW-7803FN 12315 Pre-Treatment 1/23/2015	RW-7843CS 12315 Pre-Treatment 1/23/2015	RW-7831CS 12315 Pre-Treatment 1/23/2015	RW-7831CS 12315 Pre-Treatment 1/23/2015	RW-1201KL 012915F Post-Treatment 1/29/2015	RW-1201KL 12915 Pre-Treatment 1/29/2015	RW-1204KL 012915F Post-Treatment 1/29/2015
Parameters (ug/L)	MCL									
Benzene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Chloroform	80 (a)	0.13 J	0.18 J	0.50 U	0.50 U	0.39 J	0.42 J	0.15 J	0.15 J	0.31 J
1,1-Dichloroethane	90 (a)	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1-Dichloroethylene	7	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Methyl Tert Butyl Ether	20 (a)	0.50 U	0.43 J	2.0	0.50 U	0.66	0.67	3.7	4.20	1.20
Styrene	100	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1,1-Trichloroethane	200	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Tetrachloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Trichloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,4-Dioxane	6.7 (b)	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U

⁽a) Maryland Department of Environment Action Level

Notes:

MCL - US Environmental Protection Agency (EPA)
Maximum Contaminant Level

⁽b) Maryland Risk Based Level

Table 3

	Sample ID:	RW-825REE 12915	RW-7859CS 20515	RW-7847CS 21015	RW-734DNS 021015F	RW-734DNS 21015	RW-824REE 21115	RW-7845CS 21115	RW-7550DA 31915
	Sample Type: Sample Date:	Pre-Treatment 1/29/2015	Pre-Treatment 2/5/2015	Pre-Treatment 2/10/2015	Post-Treatment 2/10/2015	Pre-Treatment 2/10/2015	Pre-Treatment 2/11/2015	Pre-Treatment 2/11/2015	Pre-Treatment 3/19/2015
Parameters (ug/L)	MCL								
Benzene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Chloroform	80 (a)	0.21 J	0.47 J	0.13 J	0.62	0.62	0.22 J	0.19 J	0.14 J
1,1-Dichloroethane	90 (a)	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.77	0.50 U	0.50 U
1,1-Dichloroethylene	7	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Methyl Tert Butyl Ether	20 (a)	0.27 J	1.1	1.7	0.84	0.84	1.7	1	0.96
Styrene	100	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,1,1-Trichloroethane	200	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Tetrachloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Trichloroethylene	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
1,4-Dioxane	6.7 (b)	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U

⁽a) Maryland Department of Environment Action Level

Notes:

MCL - US Environmental Protection Agency (EPA)
Maximum Contaminant Level

⁽b) Maryland Risk Based Level

Enclosure A – Laboratory Report for March 2015 Offsite Monitoring Well Samples

Enclosure B – Laboratory Reports for Residential Well Samples (January – March 2015)