



April 15, 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

ECS Project No. 47-1229-A

Reference: Response Action Plan Amendment 2
Former Kop-Flex Facility,
7555 and 7565 Harmans Road, Hanover, Anne Arundel County, MD
Brownfield Master Inventory Number MD0286

Dear Ms. Hanson,

ECS Mid-Atlantic, LLC (ECS) is pleased to provide you with this Response Action Plan (RAP) Amendment 2 for the above referenced property. Previously a RAP and RAP Amendment 1 for the subject site were submitted to the Maryland Department of the Environment (MDE) by WSP USA Corp (WSP). The previous RAP and RAP Amendment 1 were both approved by the MDE.

Pursuant to our previous conversation, ECS is submitting this RAP Amendment 2 in an effort to modify the provisions for handling stormwater which may accumulate within excavations as outlined in Appendix E (Soil Management Plan) of the previous RAP.

According to the previously approved Soil Management Plan portion of the RAP, stormwater that accumulates within onsite excavations shall be pumped into temporary storage vessels and classified for disposal. Based upon the RAP the only Area of Concern (AOC) onsite where there is a likelihood of encountering impacted soil at a depth of less than 10 feet below existing grade is AOC-1 (See Attached Figure). Soil is considered impacted if it contains contaminants of concern, as identified in the RAP, at concentrations above the applicable MDE soil quality standards. The soil onsite has been thoroughly characterized and it is assumed that the majority of the excavations onsite will not intersect groundwater or impacted soil; therefore, ECS proposes the following with regard to the stormwater management during the RAP implementation:

- In the event that stormwater must be removed from an excavation located within AOC-1, ECS proposes to containerize and sample the stormwater removed from the excavation in accordance with the previously approved RAP.
- In the event that stormwater must be removed from an excavation located outside the bounds of AOC-1 and excavated soils are impacted by the contaminants of concern listed in the approved RAP, ECS proposes to containerize and sample the stormwater in accordance with the previously approved RAP.

- Stormwater removed from excavations exceeding 10 feet in depth below current grade will also be containerized and sampled in accordance with the RAP.

ECS proposes that stormwater removed from excavations shall not require containerizing and analysis provided that each of the following criteria is achieved:

- The excavation is located outside of the bounds of AOC-1,
- No positive field indicators (visual and PID screening) of contaminants of concern in the soil are identified within the excavation,
- The excavations do not exceed a depth of 10 feet below current grade, and
- The excavations do not intersect groundwater.

Additionally, in the event that concentrations of containerized stormwater do not exceed the applicable groundwater cleanup criteria for the contaminants of concern listed for the site in the RAP, ECS proposes to discharge the containerized stormwater onsite in accordance with the established sediment and erosion control plan for the project.

Note, this proposed amendment is not intended to modify the previously approved procedures for handling groundwater that may be encountered during construction activities.

ECS appreciates the opportunity to work with you on this project. If you have any questions regarding this RAP Amendment or other topics, please feel free to contact us at (410) 859-4300.

Respectfully,

ECS Mid-Atlantic, LLC



Michael Bell, CHMM
Project Manager



Gregory L. McIsaac, P.G.
Regional Environmental Manager

Attachments: AOC-1 Figure

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