



**Public Informational Meeting For Response Action Plan  
Maryland Department of the Environment  
Voluntary Cleanup Program**

**400 East Church Street  
Frederick, Maryland 21701**

## 2500 Schuster Drive Public Information Meeting Agenda

Public Informational Meeting For Response Action Plan (RAP)

August 17, 2020

Ox Fibre Apartments

400 East Church Street

Frederick, Maryland 20701

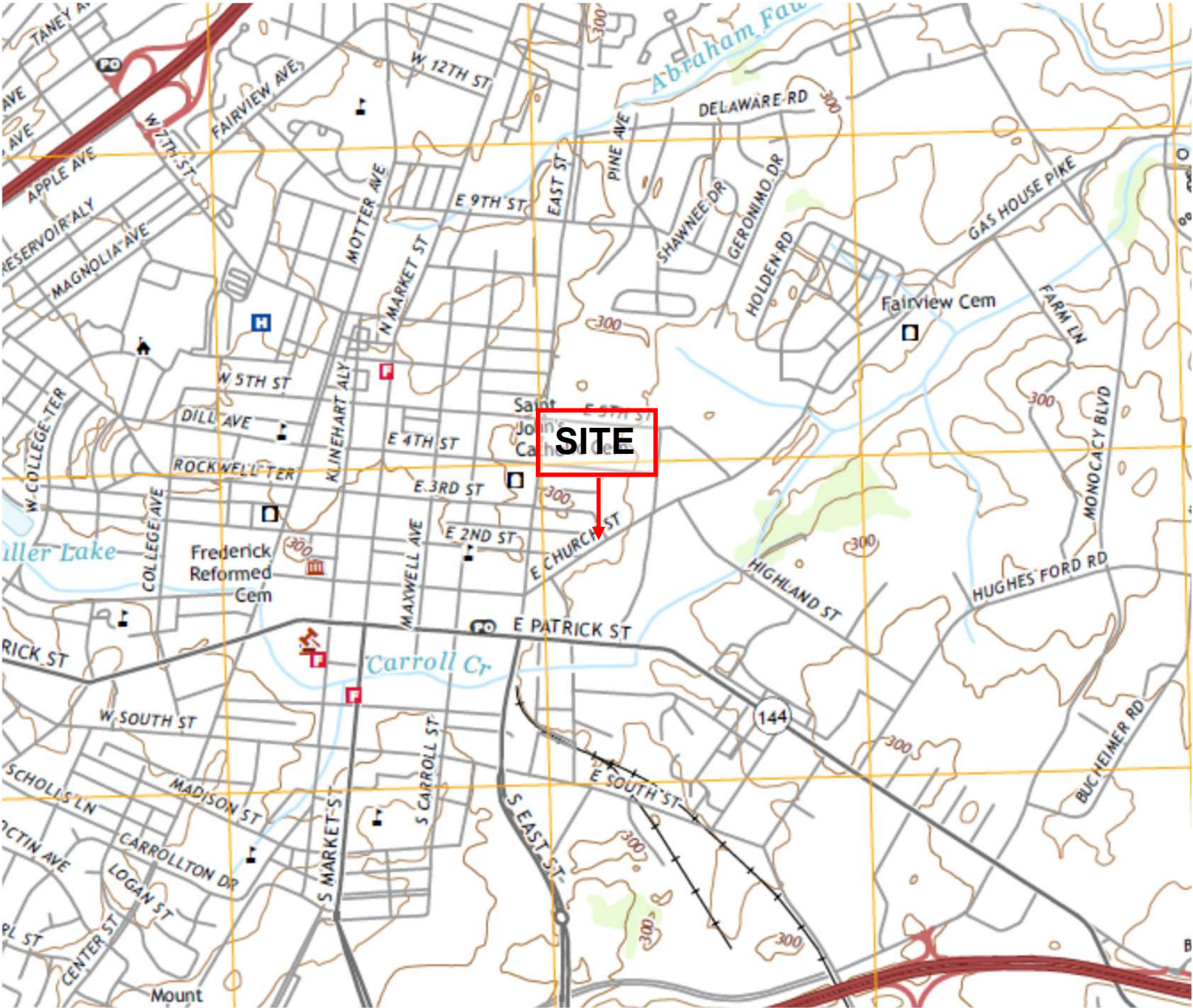
Objective: Discuss the response action plan for 400 East Church Street

- Introduction – Maryland Department of the Environment (MDE)
- Site Introduction/Description – Advantage Environmental Consultants, LLC (AEC)
- Previous Investigation History – AEC
- Identified Potential Risks & Associated Remedial Actions - AEC
- Summary of Proposed Response Actions – AEC
- Criteria for Certificate of Completion (COC) – AEC
- Open Question & Answer

# INTRODUCTIONS

- Regulatory Agency
  - Maryland Department of the Environment (MDE)  
Ms. Anuradha Mohanty, Project Manager
- Participant
  - 400 Church Owner, LLC
- Environmental Consultant
  - Advantage Environmental Consultants, LLC (AEC)  
Mr. Bill Whitty

# SITE VICINTIY MAP



# SITE DESCRIPTION

- Maryland Department of Assessments and Taxation (MDAT)  
Map 0414 Parcel 1329A
- 2.67-acre parcel

## **Current Occupants**

Property is currently a vacant warehouse building.

## **Historic Use**

- Initially developed in 1891.
- Originally occupied by Palmetto Fibre Company, subsequently by Ox Fibre Brush Company. Site was developed for the manufacture of machinery to produce brush filling fiber and for the manufacture of fiber brushes.
- From 1966 through May 2019 served as a donation center for Goodwill Industries
- Between 1974 and 1981 a fire destroyed approximately 100,000 SF of the southern portion of the structure, bringing the property improvements to the present date configuration.

# SITE DESCRIPTION

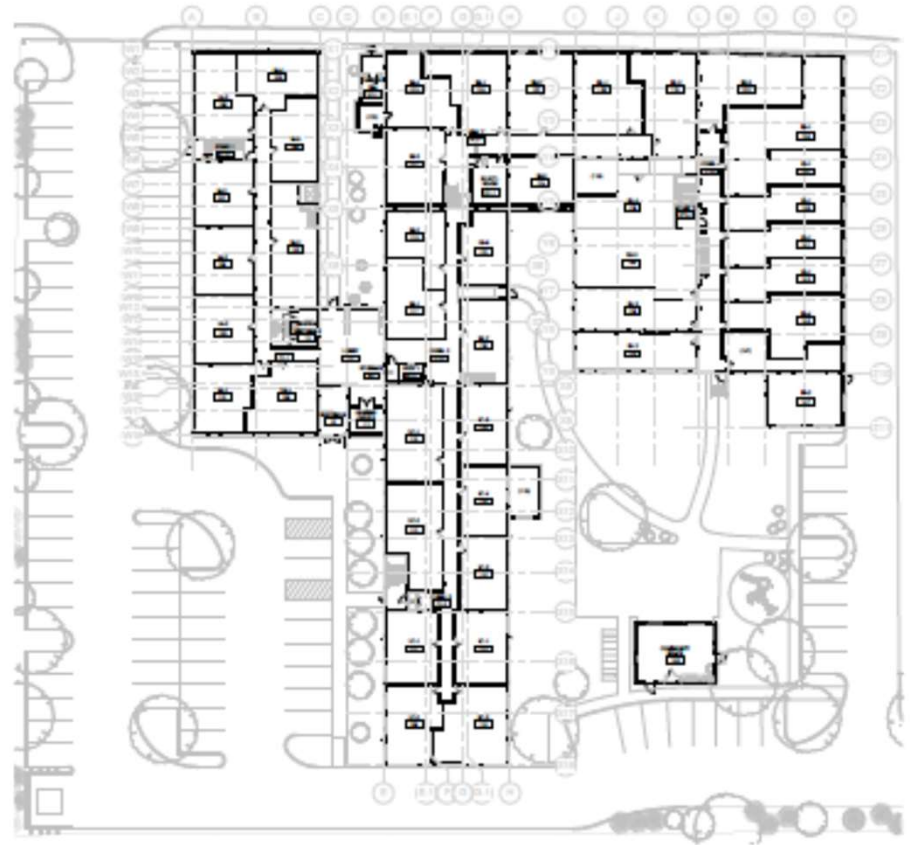
## Utilities

- Municipal water and sewer
- Natural gas and electricity
- No known potable wells

# SITE PLANS



— ORIGINAL SECOND FLOOR  
— 2007 - 11/07



— ORIGINAL FIRST FLOOR  
— 2007 - 11/07

# HISTORICAL PHOTO







# VCP APPLICATION INFORMATION

- Redevelopment for multifamily residential land use is planned. The land use and restriction category for the Site will be Tier 1 (Residential) B (Restricted). The following contaminants of concern have been identified at the Site:
- Volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), and metals in soil.
- VOCs, naphthalene, and TPH in groundwater.
- The Site has been accepted into the MDE's Voluntary Cleanup Program (VCP) and a proposed RAP has been submitted for approval.

# PREVIOUS INVESTIGATION HISTORY

- ICOR, Phase I Environmental Site Assessment, June 27, 2017
- ICOR, Phase II Site Assessment, January 17, 2018
- AEI, Limited Phase II Subsurface Investigation, December 14, 2018
- AEI, Phase I Environmental Site Assessment, March 21, 2019
- AEI, Phase I Environmental Site Assessment, October 29, 2019
- AEI, Limited Phase II Subsurface Investigation, October 29, 2019

# ENVIRONMENTAL INVESTIGATION RESULTS

**Phase I ESA (June 27, 2017)** – The following recognized environmental conditions (RECs) were identified 1.) on-Site railroad spur on southeastern portion of the site, 2.) former 10,000-gallon fuel oil tanks along the western border, 3.) former Frederick Town Gas property adjacent to the west. OCP Case #90-2812FR which is listed as “closed” was identified as an historical REC (HREC).

**Phase II Site Assessment (January 17, 2018)** - The investigation found various VOCs, PAHs, TPH diesel range organics (DRO), and TPH gasoline range organics (GRO) above and below MDE Residential Cleanup Standards in soil samples within the northwestern portion of the Site near the border with the former Frederick Town Gas property. ICOR concluded that petroleum related constituents had migrated to the Site from the adjacent property, as most of the impact was noted within the deeper subsurface (greater than 14 feet bgs).

**Limited Phase II Subsurface Investigation (December 14, 2018)** – Samples were collected from the southeastern portion of the Site. The VOC acetone was found below MDE Residential Cleanup Standards in one soil sample. The SVOC pentachlorophenol was found below the standards in one soil sample. Various metals were found in one soil sample. Only arsenic was above the standards. Various VOCs, SVOCs, and metals were found in the groundwater samples. No constituents were above the MDE Groundwater Standards.

# ENVIRONMENTAL INVESTIGATION RESULTS (Cont.)

**Phase I ESAs (March 21, 2019 and October 29, 2019)** – The historical use of the Site and adjacent property to the west were identified as RECs. The OCP Case #90-2812FR was identified as an HREC.

**Limited Phase II Subsurface Investigation (October 29, 2019)** – Soil samples were collected throughout the Site. Various VOCs were identified in soil samples at below MDE Residential Cleanup Standards. Various PAHs were found above and below the standards. TPH DRO and TPH GRO were detected with TPH DRO above the standard in two samples. Various metals, including hexavalent chromium, were above the residential standard.

# IDENTIFIED POTENTIAL RISKS & ASSOCIATED REMEDIAL ACTIONS

The proposed response actions will resolve any outstanding environmental issues associated with the Site. Based on the identified potential risks, AEC is proposing remedies that have been successfully implemented at similar sites. The identified potential risks, proposed remedial actions, and a rationale for each remedial action are presented in the following table:

Identified Potential Risk	Proposed Remedial Action	Rationale
Ingestion and dermal contact of soil impacted with VOCs, PAHs, TPH, and metals	Maintenance of existing building slab, asphalt and concrete surfaces surrounding the structure, and clean topsoil in landscaped areas and to prevent direct contact with impacted soil	Deep soils (13 to 20 feet bgs) are impacted with VOCs, PAHs, and TPH. Shallow soils (1.5 to four feet bgs) are impacted with PAHs, TPH, and metals. The building slab, paved exterior surfaces, and clean topsoil are effective barriers between impacted soil and building occupants. A Containment Remedy Operations and Maintenance Plan (CROMP) will be developed and used to evaluate the slab and pavement surfaces and condition of topsoil on an annual basis.
	Excavation restrictions	An excavation restriction will apply to the property. Any proposed construction that will breach the building slab, paved exterior surfaces, or landscaped areas will require development and implementation of a soil management plan (SMP) and a Health and Safety Plan (HASP) to ensure worker safety. The SMP and HASP will be included as part of the CROMP.
	Implementation of SMP and HASP	During redevelopment activities utilities will be installed. Development will include grading and landscaping, including the installation of stormwater management ponds
Ingestion and dermal contact of groundwater	Restrict groundwater use at the Site	The depth to groundwater at the Site is approximately 15 feet bgs and it is not anticipated that groundwater will be encountered during intrusive activities that may become necessary (e.g., utility installation or repair and landscaping activities). In addition, municipal water is provided to the Site. In order to further ensure that groundwater will not present an exposure risk, a groundwater use restriction will be implemented.

## SUMMARY OF PROPOSED RESPONSE ACTIONS

The proposed response action will resolve all outstanding environmental issues at the Site as follows.

**Soil** –The building foundation slab, existing or new pavement, and new topsoil will be maintained with yearly inspections as defined in the CROMP. Written records documenting building slab, pavement, and topsoil maintenance will be maintained at the Site and available upon request.

An excavation restriction for soils at the Site will prevent unsupervised intrusive activities. If intrusive activities are necessary, all soil excavated from the Site will be analyzed before disposal, and the laboratory data will determine appropriate disposal in accordance with all applicable local, State, and federal regulations. Laboratory results will be maintained at the Site and available upon request.

Any proposed construction that will require excavation of soils will require development and implementation of a soil management plan and a HASP to ensure worker safety as defined in the CROMP. The MDE will be notified at least 30 days prior to soil excavation activities that require implementation of the soil management plan.

Redevelopment activities will require excavation of soils to install utilities and grading and landscaping including the installation of stormwater management ponds. An SMP and HASP will be developed and approved by MDE prior to this work. The HASP will be implemented to ensure worker safety. The SMP will be implemented to ensure soil is managed in a manner consistent with all applicable local, State, and federal regulations.

**Groundwater** – In order to ensure that groundwater will not present an exposure risk, a groundwater use restriction will be implemented. The groundwater use restriction will not be limited to the shallow aquifer.

# **CRITERIA FOR CERTIFICATE OF COMPLETION**

A COC will be issued by the MDE when all of the following have been met:

- The CROMP has been submitted to the VCP for review and approval at least 60 days prior to the request for the COC.
- A RAP Completion Report is submitted to the VCP that fully and adequately documents all cleanup criteria have been met and all RAP activities have been completed.



Comments, questions, or requests should be submitted to the VCP project manager by August 27, 2020:

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Voluntary Cleanup Program  
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Baltimore, Maryland 21230  
Telephone: 410-537-3493