

MSA - S-1829 - 890

Comments
2/15/2000

Judge John C. North, II
Chairman



Ren Serey
Executive Director

STATE OF MARYLAND
CHESAPEAKE BAY CRITICAL AREA COMMISSION

45 Calvert Street, 2nd Floor, Annapolis, Maryland 21401
(410) 974-2426 Fax: (410) 974-5338

February 15, 2000

Mr. Duncan Stuart
Environmental Planner
Baltimore City Dept. of Planning
417 East Fayette Street, 8th Floor
Baltimore, Maryland 21202

RE: Port Liberty
Local Case Number: 000456

Dear Mr. Stuart:

Thank you for submitting the application for the above project. This project involves the grading and paving of the site. The entire project to be paved lies within the 100-foot Buffer and is adjacent to the Patapsco River.

This office understands that the project is part of the brownfields program; in accordance with the remediation requirements mandated by the Maryland Department of the Environment. The entire Port Liberty site must be encapsulated with impervious material in order to contain lead contaminants that exist within the soil. The paving of the site will reduce the contamination to the Patapsco River by eliminating the possibility that lead from the site will run off into the river. Right now, the paving operations must be completed by May 31, 2000 as part of the remediation requirements.

According to the applicant, there seems to be no practical method of reducing the pollutant load by 10% in accordance with the Critical Area requirements. Accordingly, this office understands that off-set fees will be paid in accordance with the City's requirements. Finally, this office understands:

1. That the applicant will be operating an auto terminal business as well as leasing a cable operation business for underwater work; and,
2. That both businesses will require some form of activity that cannot exist outside the Buffer and is dependent on the water by reason of the intrinsic nature of its operation.

Branch Office: 31 Creamery Lane, Easton, MD 21601
(410) 822-9047 Fax: (410) 820-5093

TTY FOR DEAF ANNAPOLIS-974-2609 D.C. METRO-586-0450



Continued, Page Two
Port Liberty
February 15, 2000

After reviewing this project, this office has determine that the proposed redevelopment and the 10% calculations are correct and consistent with the local Critical Area Program. If there are any questions, please feel free to call met at (410) 260-7072.

Sincerely,



Dawnn McCleary
Natural Resources Planner

cc: Regina Esslinger
BA 39- 00

RESPONSE ACTION PLAN

Port Liberty Site

1. Site Overview

The Port Liberty site is located at 1830 - 1860 Frankfur Avenue in the Fairfield Industrial Park in south Baltimore, Maryland. The site was used from World War I to 1945 to scrap and refurbish ships. Following cessation of those operations, the site has been used for various industrial purposes such as waste oil recovery, UST development, and equipment storage. The property is currently owned by Port Liberty Industrial Center Limited Partnerships and current operations include paper recycling, concrete support manufacture, trailer storage, and temporary docking facilities. The site has been the subject of numerous studies related to contamination characterization and these have indicated that lead in soils is the primary concern at this time. These studies were conducted by EA and by other firms from 1986 through 1996 (including the present assessment) to evaluate existing conditions on the property. These studies include:

- An initial site evaluation by Environmental Resources Management, May 1986
- Remediation work conducted by Bethlehem Steel, 1986-1988 at their Buffalo Tank operation
- Soil Gas Vapor study, 1988
- Phase I Site Assessment, 1988
- Clean-up of PCB Spill at the Butterworth Plant in the NE corner of the site; corrective actions completed and approved by MDE.
- Comprehensive site studies conducted by Groundwater Technology, Inc. in 1991 and 1992 of soil and groundwater to define existing conditions at that time.

All of this information has been submitted to MDE along with a Final Revised Report on the Human Health Risk Evaluation and Screening Assessment at the Port Liberty Site, February 1997. A comprehensive list of the information submitted is included as Attachment A.

These studies indicated some low level contamination by hydrocarbons in several locations but none of environmental significance. The high lead concentrations were determined to be the only significant environmental concern on the site. The results of all of these studies were provided to MDE in November 1996. Following their review MDE staff agreed that the only constituent of concern was lead.

2. Additional Investigatory Information

A phased approach was used to gather data to assess the potential risk to future workers performing both development and post-development activities at the north half of Lot 2 of the

Port Liberty site. Phase I involved sampling over a large grid to define the areas of elevated lead concentrations. In Phase II, the grid was refined based upon the results of Phase I so as to better delineate the boundary of areas of the site where elevated soil concentrations were identified. All samples collected in 1996 were analyzed by wet chemical methods in order to ensure consistency, lower variability, and conformance with current EPA/State methodologies. In 1997, seven additional locations were sampled using XRF with one confirmation sample by wet chemistry. In addition in 1997, three locations were sampled for dissolved lead in groundwater.

The site location is given in Figure 2-1. This figure also shows the sampling locations for the 1996 soil sampling effort. The sampling locations for all samples taken in both 1996 and 1997 and associated soil lead concentrations are given in Figures 3-1 and 3-2.

3. Exposure Assessment

A. Media of concern

The only medium of concern is soil. The results of soil analyses are given in Tables 3-1 and 3-2, and in Figures 3-1 and 3-2. Detailed information on the chemical analyses and the laboratory reports can be found in the Final Revised Report on the Human Health Risk Evaluation and Screening Assessment at the Port Liberty Site (EA, 1997). Fate and transport is restricted to ingestion/inhalation during excavation. The lead is currently in the soil between the surface and approximately 30 inches below existing grade.

Groundwater has been excluded as a significant fate and transport pathway based upon the results of testing conducted in 1996 and a follow-up groundwater assessment in July 1997. These results are provided in Table 3-3 and indicate that the lead is leaching at a very low rate.

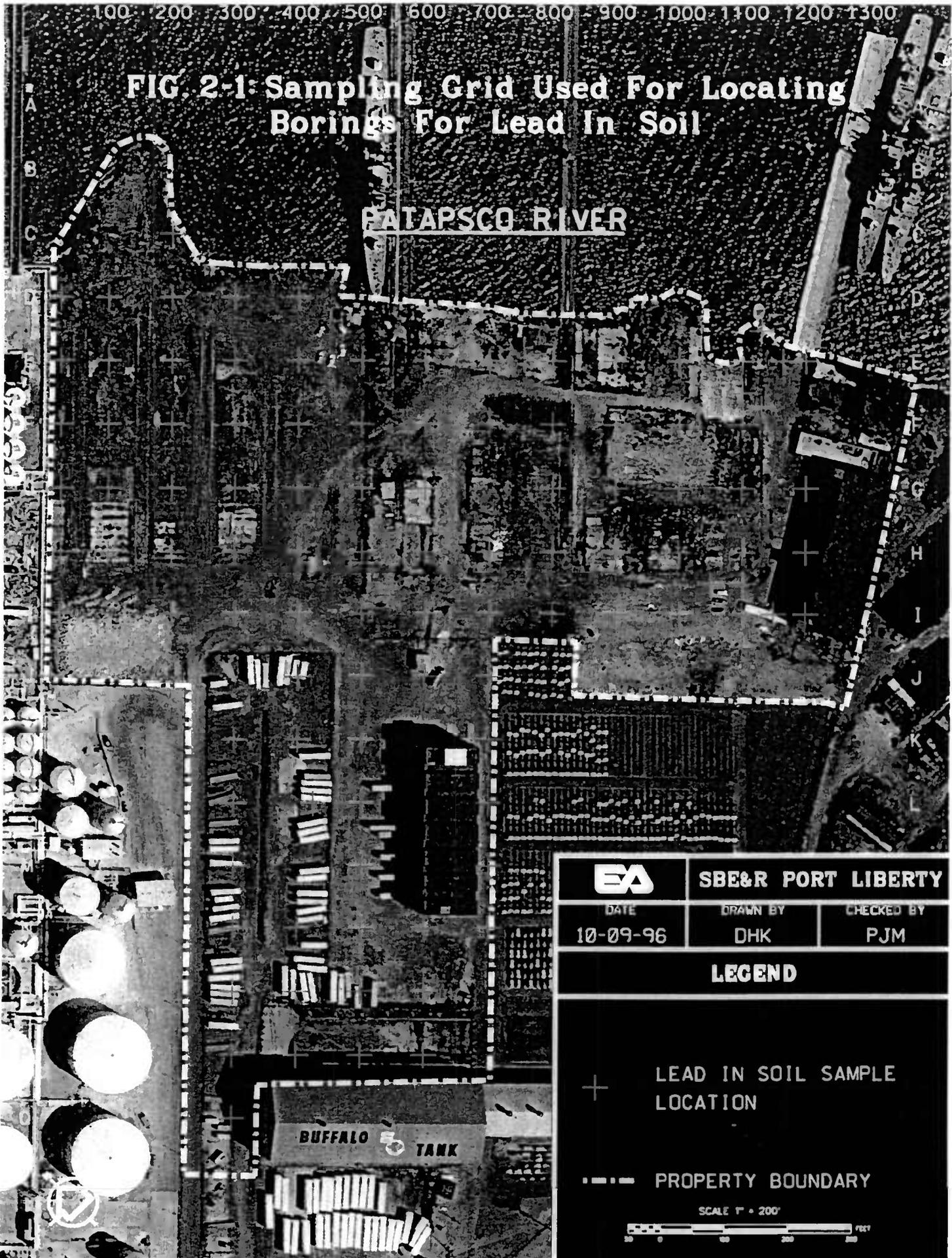
TABLE 3-3. Results of groundwater analyses at Port Liberty.

Sample Number	Date	Lead Concentration ($\mu\text{g/l}$)
E-550-12	1996	3.4
GW-97-1	1997	13.0
GW-97-2	1997	23.0
GW-97-3	1997	<5.0
FB (Field Blank)	1997	<5.0

100 200 300 400 500 600 700 800 900 1000 1100 1200 1300

FIG. 2-1: Sampling Grid Used For Locating Borings For Lead In Soil

PATAPSCO RIVER



EA	SBE&R PORT LIBERTY	
DATE	DRAWN BY	CHECKED BY
10-09-96	DHK	PJM

LEGEND

+ LEAD IN SOIL SAMPLE LOCATION

--- PROPERTY BOUNDARY

SCALE 1" = 200'

TABLE 3-1 TOTAL LEAD CONCENTRATIONS (mg/kg) FOR SOIL SAMPLES COLLECTED IN 1996, 0"-6" AND 7"-30" DEPTH

Field Sample Identification	Construction and Post-Construction Workers	0"-6" (mg/kg)	7"-30" (mg/kg)
C-200-6/-30	Area 3	3250	907
D-25-6/-30	Area 3	1780	3220
D-100-6/-30	Area 3	547	1360
D-200-6/-30	Area 3	2050	8890
D-300-6/-22	Area 3	4740	971
D-400-6/-30	Area 1	993	14000
			NR
E-D-1125-6 *	Area 2	473	473
E-25-6/-15	Area 3	1440	8890
E-100-6/-16	Area 3	1280	3550
E-200-6/-19	Area 3	3570	199
E-300-6/-21	Area 1	1280	3700
E-400-6/-27	Area 1	3190	17000
E-600-6/-30	Area 3	2350	986
E-600-6/-30	Area 3	1.1	4.4
E-700-6/-30	Area 3	2.3	718
E-600-6/-30	Area 3	2	9.9
E-600-6/-30	Area 3	547	NR
E-1000-6/-30	Area 3	564	177
E-1100-20+	Area 2	N/A	13600
E-1100-6/-30	Area 2	1440	12800
E-1175-6 */-30*	Area 2	489	2040
E-1200-6/-30	Area 2	375	615
F-E-1100-6 */-30*	Area 2	2880	22700
F-E-1125-6 */-30*	Area 2	385	2570
F-25-6/-30	Area 3	486	24.2
F-100-6/-30	Area 1	9960	28900
F-200-6/-30	Area 1	9960	10.6
F-300-6/-30	Area 1	6690	328
F-400-6/-27	Area 3	4990	3140
F-500-6/-27	Area 3	480	840
F-600-6/-13	Area 3	145	2020
F-700-6/-15	Area 3	279	848
F-300-6/-30	Area 3	488	30.6
F-300-6/-30	Area 3	1440	38.7
F-1000-6/-27	Area 3	385	22.7
F-1100-6/-30	Area 2	376	592
G-25-6/-30	Area 3	137	12.2
G-100-6/-18	Area 1	830	6850
G-200-6/-30	Area 1	3620	85.1

C-200-6/-30 = Grid Identification (C-200) and sample depth:

-6=depth of 0"-6" sample; /-30 = depth of 7"-30" sample

+ = Reanalyzed Phase I Samples

* = Additional, Phase II Samples

NR = No Recovery

N/A = Not Applicable

Fig. 3-3: Areas of Potential Risk Without Corrective Action During Construction/Post Construction



SBE&R PORT LIBERTY

DATE
02-28-97

DRAWN BY
DHK

CHECKED BY
FWP

LEGEND

- PROPERTY BOUNDARY
- AREA BOUNDARY



CHESAPEAKE BAY CRITICAL AREA COMMISSION
 45 CALVERT STREET, 2ND FLOOR
 ANNAPOLIS, MD 21401

BA 39-00

NOTIFICATION OF PROJECT APPLICATION

Jurisdiction: Baltimore Date: 1/28/00
 Name of Project (site name, subdivision name, or other): Port Liberty
 Local case number: 000456-
 Project location/Address: Frank furst Ave. & Marine St.

Tax map# _____ Block# 7323-C Lot# 1 & 4 Parcel# _____

Type of application:
 (Select all applicable)

- SUBDIVISION
- SITE PLAN
- VARIANCE:
- Buffer Slope
- Imp.Surt. Other
- SPECIAL EXCEPTION
- CONDITIONAL USE
- REZONING
- GRADING PERMIT
- BLDG PERMIT
- INTRAFAMILY
- GROWTH ALLOCATION
- OTHERS _____

Type of Project:
 (Select all applicable)

- RESIDENTIAL
- COMMERCIAL
- WATER DEPENDENT FACILITY/PIER/MARINA
- INDUSTRIAL
- MIXED USE
- REDEVELOPMENT
- SHORE EROSION PROTEC.
- AGRICULTURE
- OTHERS _____
- eg PLD

Current Use:
 (Select all applicable)

- COMMERCIAL
- RESIDENTIAL
- AGRICULTURE
- FOREST/BUFFER/WOODLAND
- INDUSTRIAL
- INSTITUTIONAL
- OPEN SPACE/RECRE.
- SURFACE MINING
- VACANT
- WATER DEPENDENT FACILITY/PIER/MARINA
- OTHERS _____

Describe Proposed use of project site: Power Brownfield Voluntary Compliance site for parking on imperv/expont of lots.

SITE INVENTORY OF AREA ONLY IN THE CRITICAL AREA

TOTAL ACRES IN CRITICAL AREA:	<u>17.88</u>	AREA DISTURBED:	<u>17.88</u>
IDA ACRES	<u>17.88</u>	# LOTS CREATED:	_____
LDA ACRES	_____	# DWELLING UNITS:	_____
RCA ACRES	_____		
AGRICULTURAL LAND:	_____		
EXISTING FOREST/WOODLAND/TREES:	<u>0</u>	FOREST/WOODLAND/TREES REMOVED:	<u>0</u>
FOREST/WOODLAND/TREES CREATED:	<u>0</u>		
EXISTING IMPERVIOUS SURFACE:	<u>17.88</u>	PROPOSED IMPERVIOUS SURFACE:	<u>17.88</u>
TOTAL IMPERVIOUS SURFACE:	<u>17.88</u>		
GROWTH ALLOCATION DEDUCTED:	_____		
RCA to LDA:	_____	RCA to IDA:	_____
		LDA to IDA:	_____

RECEIVED
 FEB 8 2000
 CHESAPEAKE BAY
 CRITICAL AREA COMMISSION

Local Jurisdiction Contact person: Dunbar Stuart
 Telephone number: 410-396-5902
 Response from Commission required by: _____ Hearing Date: _____

Richard Wm. Magnani, P.E.
Douglas F. Suess, P.E.
Wm. Preston Davis, P.E.
Philip Der, P.E.
David G. Mongan, P.E.

WHITNEY BAILEY

COX MAGNANI

Associates
Brian D. Jones, P.E.
Burruss E. Halloway, P.E.
W. Howard Garrett, AIA
John J. Knight, P.E.
James W. Halls, P.E.
Patrick B. Ford
Charles E. Utermahle, III, P.E.
Joseph G. DiCarlo, P.E.
Marco T. Legaluppi, P.E.
David C. Pawlen, R.L.A.
Thomas M. Orsich, P.L.S.
John R. Turner, FMP, IIDA
William T. Baker, Jr., P.E.

Senior Associate:
Leon J. Kriebel, P.E.

Consulting Engineers and Planners

849 Fairmount Avenue
Suite 100
Baltimore, Maryland 21286
410.512.4500
Fax 410.324.4100
www.wbcm.com

January 19, 2000

City of Baltimore
Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, Maryland 21202

ATTN: Mr. Duncan Stuart
City Planner

RE: American Port Services
Port Liberty
Critical Areas
WBCM Job No. 19990437.00.0

RECEIVED

FEB 3 2000

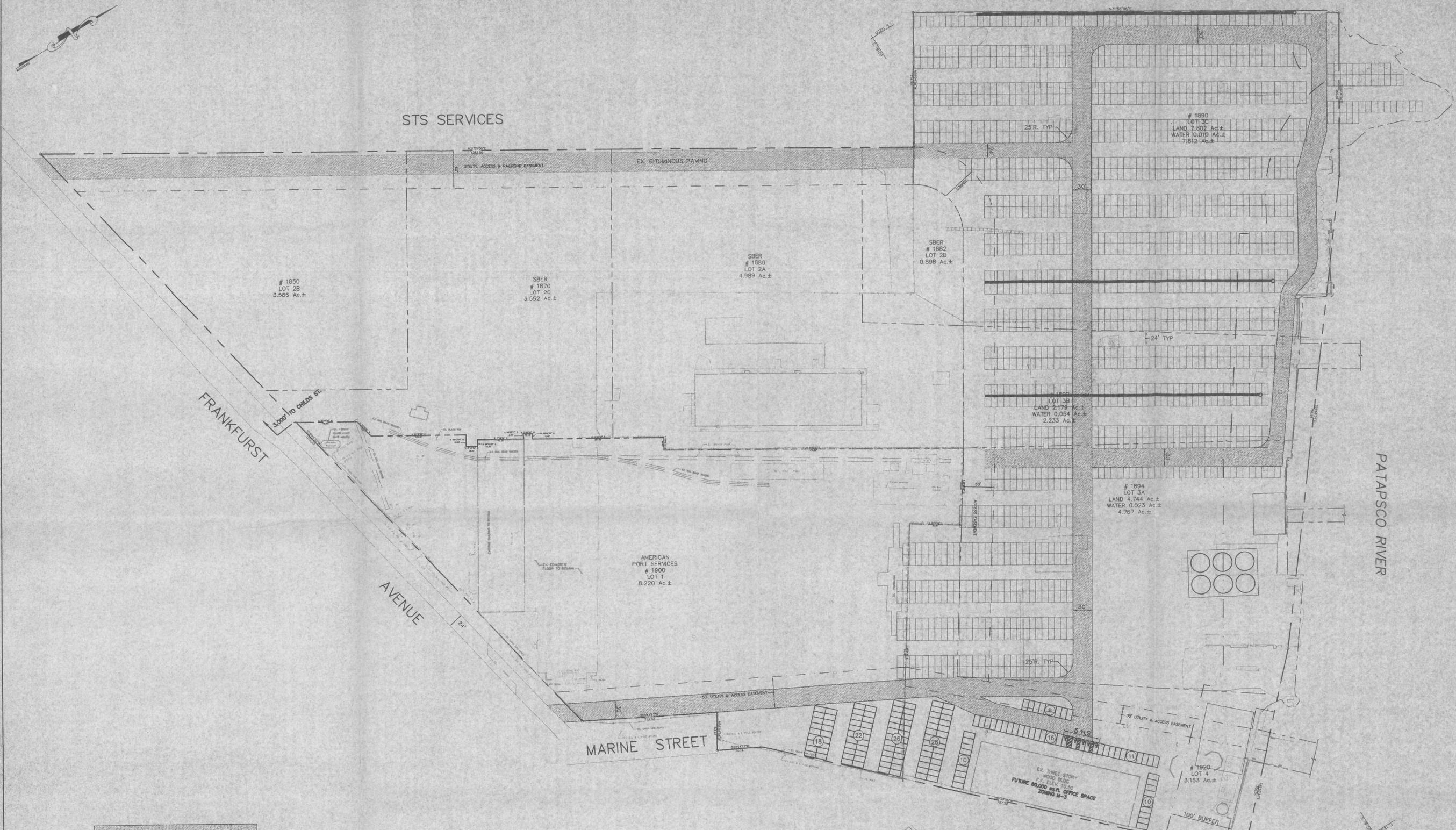
CHESAPEAKE BAY
CRITICAL AREA COMMISSION

Dear Mr. Stuart:

On behalf of American Port Services, we are submitting for approval of plans for work in the Critical Area as required by the City of Baltimore. As you are aware from our previous meeting of January 6, 2000, the proposed project involves the grading and paving of the site known as Port Liberty - Lots 1 and 4 on the City Block Plat 7323-C Ward 25 Section 7. The entire project lies within the 1000' Critical Area as the properties are adjacent to the Patapsco River. In addition to the work within the Critical Area, the 100' Buffer will be paved. (Work within the Buffer is allowable since the project is a water-dependent use - import/export of vehicles.)

The project site is part of the Brownsfield program and, in accordance with the remediation requirements mandated by the Maryland Department of the Environment, the entire Port Liberty site must be encapsulated with impervious materials in order to contain lead contaminants that exist within the soil. As part of the remediation requirements, the paving operations must be complete by May 31, 2000.

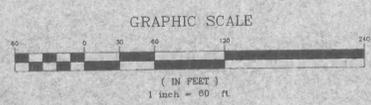
Due to the remediation requirements mandated by the State, there is no practical method of reducing the pollutant load in accordance with the Critical Area requirements. Therefore, as noted in our meeting, offset fees will be paid in accordance with the City's requirements - one fee for meeting the 10% reduction rule and one fee for work in the 100' buffer. While the offset fees will be paid to meet the Critical Area requirements, it should be noted that the



FIRE DEPT. ACCESS AREA

OFFICE PARKING

PARKING REQUIRED: 1 FOR 400 sf. IN EXCESS OF 1000
 $59,000/400 = 147.5 \Rightarrow 148$
 143 REGULAR
 5 HANDICAP



PARKING & CIRCULATION PLAN	
PROJECT TITLE: PORT LIBERTY AMERICAN PORT SERVICES	
ENGINEERS:	 Consulting Engineers 849 Fairmount Avenue Baltimore, Maryland 21286 (410) 512-4500 (410) 324-4100 (FAX) WHITNEY, BAILEY, COX & MAGNANI, LLP
DESIGNED:	M.M.
DRAWN:	C.P.G.
CHECKED:	M.M.
DATE:	1/24/00
SCALE:	1" = 60'
DRAWING NO.:	BA 39-00