

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: Former Ametek Inc. – Specialty Filaments Division
Facility Address: 8335 Telegraph Road, Odenton, MD
Facility EPA ID #: MDD 082612110

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

- If yes - check here and continue with #2 below.
- If no - re-evaluate existing data, or
- if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

The 4.63-acre formerly closed Ametek, Inc. (Ametek) facility is located in a mixed residential, industrial, and commercial area on Telegraph Road. The original site consisted of a main warehouse building and paved parking/ driveway areas on the eastern side of Telegraph Road and a small asphalt parking area (.927 acres of the 4.63 acre site) on the western side of Telegraph Road. The nearest homes are located approximately ½ mile southwest of the facility. I-295 and I-95 are located 5 and 10 miles west of the site.

In the late 1940s, the National Plastic Products Company (formerly Synthetic Products Corporation, Exxon related entity) constructed a building on the eastern portion of the property. This part of the property was formerly a wooded area with railroad spurs leading to the railcar repair facility located on the adjacent Nevamar property. In 1971, Amtech, Inc. purchased the facility from the Enjay Chemical Company (formerly National Plastic Products Company). In 1977, Ametek, acquired Amtech, Inc. through corporate merging; the facility then became Ketema in 1988 through corporate restructuring. In 1996, Specialty Filaments, Inc. acquired the Ketema Corporation Facility. As a result, the name of the facility was changed to Specialty Filaments Incorporated (SFI) (Odenton Plant). SFI ceased manufacturing operations in 2001 and the building's contents were removed. In 2001, the SFI property was purchased by RSN Holdings, LLC. The existing warehouse building was sold to Intercontinental Export Import, Inc. (IEI), and was used for storage of plastic pellets and recyclable plastic products. Prior to IEI's ownership, historically, the building manufacturing operations involved extruding plastic to form thin strands/fibers/threads for such commodities as fishing line, brushes, doll hair; and the use and storage of various chemicals including pigments, colorants, and oils. The building was purchased in 2008 by StonebridgeCarras LLC (StonebridgeCarras), and is being considered for new development. StonebridgeCarras changed the ownership name of the property as S/C Odenton II, LLC.

Fill material containing coal slag/dust generated from the on-site coal-fired boilers was used as fill beneath structures and parking areas during the expansion of the buildings over the manufacturing operating history, resulting in concentrations of lead, arsenic, and mercury concentrations above MDE Non-Residential Cleanup Standards (NRCS)/Anticipated Typical Concentration (ATC) and/or EPA Regional Screening Level (RSL) in the surface and subsurface soil and naphthalene above Maryland Department of the Environment (MDE) Groundwater Cleanup Standards (GWCS/GCS) in the shallow aquifer.

An underground diesel release occurred on the neighboring International Paper facility, (northeast of the facility), which resulted in petroleum-impacted soil and groundwater with light non-aqueous phase liquid (LNAPL) and slight historical exceedences of benzene and naphthalene in the shallow aquifer above MCLs and/or GWCS that has partially migrated onto the Ametek site. This contamination is being remediated by International Paper under the MDE Oil Cleanup Program (OCP) Corrective Action Plan (CAP). Under the CAP, a remediation system was installed in the 1990s. The system is designed to remove LNAPL from groundwater using skimmer pumps and a soil vapor extraction system to remove residual

soil contamination. Operation of the remediation systems ceased in November 2011, when it appeared that the site remediation operations were not an efficient approach, as approved by MDE OCP. Bimonthly gauging and semiannual monitoring of all wells is being conducted to evaluate the recharge and mobility of LNAPL and whether the recovery system should be reactivated.

In October 2006, concurrent with the environmental evaluations and related discussions regarding the adjoining Nevamar facility, discussions were held with MDE officials to submit an application for the subject property to the Voluntary Cleanup Program (VCP) under StonebridgeCarras' ownership. After the initial Phase I and II Environmental Site Assessment (ESA) activities in late 2006 and early 2007, S/C Odenton II, LLC applied to the MDE VCP on May 30, 2007 as an "Inculpable Person" (IP) for the site. The MDE VCP application included the Phase I and II ESA and previous environmental reports. The MDE acknowledged S/C Odenton II, LLC as an Inculpable Person in a June 13, 2007 letter. The site was accepted into the MDE VCP in December 2007. After several rounds of additional Phase II ESA activities, Geo-Technology Associates, Inc. prepared a Response Action Plan (RAP) on the behalf of S/C Odenton II. The MDE VCP approved the RAP on June 23, 2010. The RAP identifies three main areas of concern (AOC) associated with the Ametek site and proposed recommendations for demolition for future redevelopment of the site. The three AOCs identified (See Figure 1) were the Remedial Area 1 (RA-1) where soil with elevated levels of metals due to coal slag fill material were identified below the slab, Remedial Area 2 (RA-2) where subslab vapor were identified, and OCP CAP related petroleum release contamination Area where subsurface petroleum impacts.

In March 2012 the warehouse building roof and side walls were demolished. The slab floor remains and was filled with soil in the fall 2012. On June 29, 2012, a certification statement was submitted from a licensed plumber stating that connections to any potential water source supplied from groundwater were severed. In addition, the certification states that the two water supply wells to the warehouse building were capped and abandoned in July 2008 and that there aren't any other connections at the site. See Attachment 1

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		<p>A light non-aqueous phase liquid (LNAPL) petroleum-impacted shallow groundwater contaminant plume is present at the southeastern corner of the site, associated with a historic International Paper diesel release at the adjacent Nevamar property. Naphtha is also documented as being used as a solvent for the plastic excursion manufacturing process (Ketema ESA).¹ The naphthalene concentrations were detected above EPA Maximum Contaminant Level (MCL) and MDE GWCS/GCS in the shallow aquifer in 3 OCP monitoring wells down gradient of the source area and up gradient of the property boundary. LNAPL was detected in the OCP boundary property wells in the shallow aquifer. For the other constituents monitored in the shallow aquifer, LNAPL was report in the data tables. See Table 2 The concentrations were screened against MDE NRCS Type I and II Aquifer GWCS and/or EPA MCLs. However, the shallow aquifer doesn't meet the definition of a MDE Type I and II Aquifer due to low yield and turbidity, therefore remediation of the groundwater will be addressed only under the MDE OCP and/or VCP and not the EPA RCRA Corrective Action (CA) which requires the remediation of Type I and II aquifers to beneficial use in a reasonable time frame.</p>
Air (indoors) ²			X	<p>A historical vapor intrusion to indoor air exposure pathway within the warehouse building was investigated during the Phase I and II ESA and treated under the MDE VCP and OCP from December 2008 – September 2009. (See reference 1 below) In March 2012 the warehouse building roof and side walls were demolished. The slab floor remains and was filled with soil in the fall 2013. There aren't any other structures on-site.</p>

¹ Phase I and II Environmental Site Assessment Intercontinental Export Import, Inc., May 2007, Geo-Technology Associates, Inc.

Surface Soil (e.g., <2 ft)	X	<p>The metal contaminated fill soil associated with the coal slag/dust fill area Remedial Area -1 (RA-1) beneath the facility is attributing to elevated lead, mercury, and arsenic concentrations above the MDE Non-Residential Cleanup Standards (NRCS)/Anticipated Typical Concentration (ATC) and EPA RSL. This release is being addressed by the MDE VCP. Upon redevelopment of the site under the present ownership, MDE OCP CAP requires a risk evaluation to determine the required mitigation technology to continue to treat and contain the contamination and mitigate any risks.</p>
Surface Water	X	<p>Picture Spring Branch is located directly adjacent to the eastern border of Ametek facility. Groundwater flows toward the Picture Spring Branch. Storm water from the facility drains to a pond that discharges to this branch. No evidence of releases to the surface water was identified based on existing data. Upon redevelopment of the site under the present ownership, MDE OCP CAP requires a risk evaluation to determine the required mitigation technology to continue to treat and contain the contamination and mitigate any risks.</p>
Sediment	X	<p>See the rationale provided for the surface water.</p>
Subsurf. Soil (e.g., >2 ft)	X	<p>Petroleum-impacted subsurface soil is present at the southeastern corner of the site, associated with a historic International Paper underground storage tank/piping line(s) diesel release at the former Nevamar property. The petroleum release (OCP Area) is being addressed by the MDE OCP.</p>
Air (outdoors)	X	<p>There aren't any current activities conducted on-site which would create emissions.</p>

- If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.
- If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.
- If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Groundwater: The site contains three monitoring/recovery* wells (MW-1, MW-7* and MW-14) aligning and up-gradient of the southern boundary of the Ametek Facility; down-gradient of the International Paper underground storage tank (UST) diesel/piping release area. As part of the International Paper facility monitoring and remediation system under the MDE OCP, these monitoring/recovery wells were installed for the remediation of the UST diesel release at the International Paper facility under the MDE OCP. Of the constituents analyzed for under the OCP CAP, naphthalene, benzene, and isopropylbenzene have been detected above EPA Maximum Contaminant Levels and/or MDE NRCS (type I and II aquifer), all other constituents were not sampled because LNAPL product was detected, as documented on Table 1 and 2 and Figure 1. Additionally, the parking lot area located across Telegraph Road was sampled without any contamination detected.

Indoor Air – The facility is non-operational. In addition, in March 2012, the warehouse building walls and roof were demolished. The soil filled subslab floor remains at the demolished warehouse. A plumber's certification (Attachment 1) was submitted and approved by MDE VCP, verifying that connections to any potential water source supplied from groundwater have been removed and/or severed.

Outdoor Air – No activities are conducted on site which would create emissions. No evidence of complaints was found in files reviewed.

Surface Water/Sediment – Picture Spring Branch is located directly adjacent to the site's eastern border. Groundwater flows towards the Picture Spring Branch. Site storm water drains to a pond which discharges to this branch. No evidence of releases to surface water was found in files reviewed, however, groundwater contamination above MDE GCSP and free product in groundwater exist.

In 2007 surface water samples were collected during the Phase I and II Environmental Site Assessment (ESA). The samples were collected from the isolated on-site portion of the smaller (southern pond, from Picture Spring Branch, and from the larger northern pond. The surface water sample results indicated arsenic and copper below GWCS/GCS values, and the remaining analytes were below the laboratory reporting limits. See table 1-4 in the Phase I and II ESA. Initial Arsenic was detected above MDE RSC, NRCS and ATC values in the sediment samples collected during the ESA (See Section 4.4. in the ESA) Additional samples were collected and showed that concentrations of arsenic were consistent with natural conditions, as documented in section 5.4 in the ESA.

Surface/Subsurface Soil – The site is paved with asphalt, and no hazardous waste is currently handled. Fill soil with metals (arsenic, lead, and mercury) concentrations above the MDE NRCS/ATC values are present beneath the southernmost portion of the on-site building. Fill materials containing coal dust and/or coal slag were discovered beneath the southern portion of the building. Elevated lead concentrations were identified, as well as a small amount of mercury. The area is capped with concrete.

References:

1. Response Action Plan Former IEI Property, Second Revision April 22, 2010, Geo-Technology Associates, Inc.
2. Quarterly Hydrocarbon Recovery System Update Report, Former Nevamar – Decorative Products Facility, July – September 2012

3. Phase I and II Environmental Site Assessment Intercontinental Export Import, Inc., May 2007, Geo-Technology Associates, Inc.

4. Plumber's Certification: June 29, 2012 Letter, addressed to Ms. Barbara Brown, MDE Voluntary Cleanup Program from Mr. Robert Williams, Licensed Plumber, Welch & Rushe, Inc.

Footnotes:

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control
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3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

<u>“Contaminated” Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	no	yes	no	yes	yes	no	no
Air (indoors)	_____	_____	_____	_____	_____	_____	_____
Soil (surface, e.g., <2 ft)	_____	_____	_____	_____	_____	_____	_____
Surface Water	_____	_____	_____	_____	_____	_____	_____
Sediment	_____	_____	_____	_____	_____	_____	_____
Soil (subsurface e.g., >2 ft)	no	yes	no	yes	yes	no	no
Air (outdoors)	_____	_____	_____	_____	_____	_____	_____

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors’ spaces for Media which are not “contaminated” as identified in #2 above.

2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.
- If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

The former Ametek facility is currently owned by a redevelopment company, StonebridgeCarras LLC (StonebridgeCarras). The future land use for the property is residential/commercial. Based on this future land use scenario there is a potential for exposure to construction workers, and workers. The property is gated, however, the entrances are not monitored. Also, the adjacent property is currently being redeveloped to residential housing. Subsurface construction equipment is present on the adjacent property. The properties are not segregated with fencing, and the construction workers have full access to the former Ametek property. Therefore, there is a potential for exposure pathway for the construction worker and trespasser to surface soil and disturbed subsurface soil. A groundwater monitoring

program under the MDE OCP is conducted presenting potential exposure to the groundwater by the workers collecting the samples.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Current Human Exposures Under Control
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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?
- If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”
 - If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”
 - If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

Groundwater Exposure Pathway

Worker

Concentrations of benzene, and naphthalene in the shallow groundwater aquifer were detected only slightly above EPA MCLs and/or MDE GWCS/GCS. Exposure frequencies, intensity, and duration by the workers collecting groundwater samples are expected to be within acceptable levels. In addition, the shallow groundwater aquifer doesn't meet the definition of a MDE type I and II aquifer, due to the low yield and total suspended solid concentration. Thus, pursuant to the MDE regulations potable wells cannot be installed in this aquifer and monitoring wells can only be installed with approval by MDE. Moreover, currently, all potable well connections have been severed by a certified plumber (See attachment 1). The groundwater monitoring wells have been clearly marked.

Subsurface Soil Exposure Pathway

Construction Worker/Trespasser

Fill soil with metals (arsenic, lead, and mercury) concentrations above the MDE NRCS/ATC values are present beneath the southernmost portion of the on-site building. Fill materials containing coal dust and/or coal slag were discovered beneath the southern portion of the building. Elevated lead concentrations were identified, as well as a small amount of mercury. Although the property boundaries are not separated by fencing, the soil filled concrete foundation former Ametek warehouse building and the groundwater monitoring wells acts as markers for the Ametek property. In addition, remainder of the site is paved with asphalt, and no hazardous waste is currently handled. Therefore, the adjacent property construction worker's exposure to lead, mercury, and arsenic concentrations in subsurface soil on the Ametek property is expected to be within acceptable levels.

There wasn't any evidence of trespassers on the Ametek property. Although the fenced entries are not monitored, the construction workers on site were alert and actively monitoring activity on the work site. The entry accesses have gates within the brick fenced properties.

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

**Current Human Exposures Under Control
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5. Can the “significant” exposures (identified in #4) be shown to be within acceptable limits?

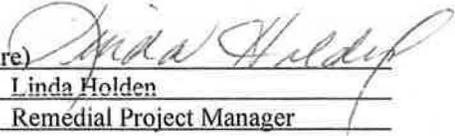
- If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
- If no - (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.
- If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code.

Rationale and Reference(s):

**Current Human Exposures Under Control
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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI (event code CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

- YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" Former Ametek, Inc.- Specialty Filaments Division facility, EPA ID # MDD 082612110, located at 8335 Telegraph Road under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- NO - "Current Human Exposures" are NOT "Under Control."
- IN - More information is needed to make a determination.

Completed by (signature)  Date 2/20/13
(print) Linda Holden
(title) Remedial Project Manager

Supervisor (signature) _____ Date 2/20/13
(print) Luis Pizarro
(title) Associate Director
EPA Region 3

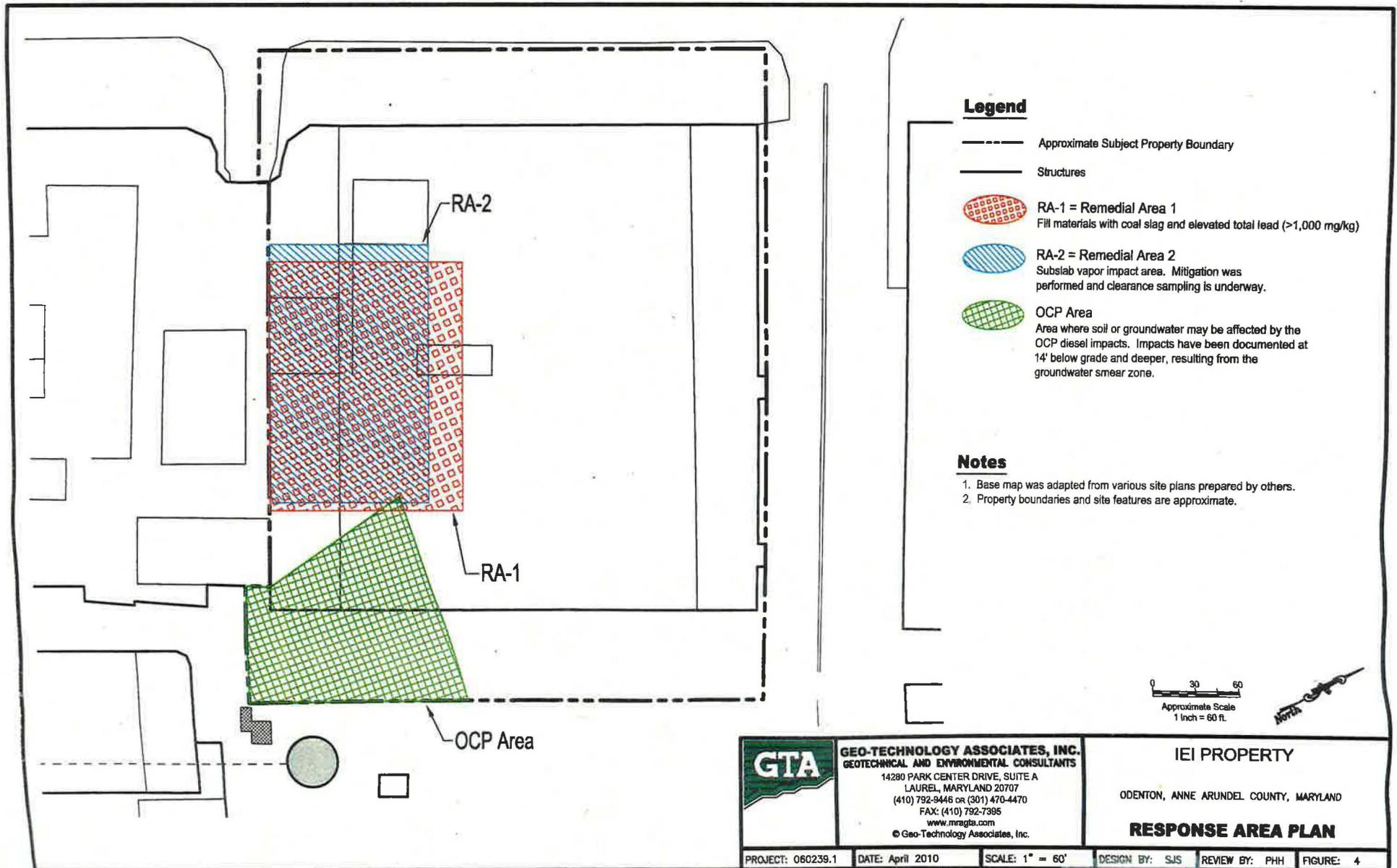
Locations where References may be found:

US EPA Region III
Land and Chemicals Division
1650 Arch Street
Philadelphia, PA 19103

Contact telephone and e-mail numbers

(name) Linda Holden
(phone #) 215 814-3428
(e-mail) holden.linda@epa.gov

FIGURE 1



Legend

- Approximate Subject Property Boundary
- Structures
-  RA-1 = Remedial Area 1
Fill materials with coal slag and elevated total lead (>1,000 mg/kg)
-  RA-2 = Remedial Area 2
Subslab vapor impact area. Mitigation was performed and clearance sampling is underway.
-  OCP Area
Area where soil or groundwater may be affected by the OCP diesel impacts. Impacts have been documented at 14' below grade and deeper, resulting from the groundwater smear zone.

Notes

1. Base map was adapted from various site plans prepared by others.
2. Property boundaries and site features are approximate.

0 30 60
Approximate Scale
1 inch = 60 ft.



	GEO-TECHNOLOGY ASSOCIATES, INC. GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS 14280 PARK CENTER DRIVE, SUITE A LAUREL, MARYLAND 20707 (410) 792-9446 or (301) 470-4470 FAX: (410) 792-7395 www.mnrgta.com © Geo-Technology Associates, Inc.	IEI PROPERTY ODENTON, ANNE ARUNDEL COUNTY, MARYLAND			
	RESPONSE AREA PLAN				
PROJECT: 060239.1	DATE: April 2010	SCALE: 1" = 60'	DESIGN BY: SJS	REVIEW BY: PHH	FIGURE: 4

Table 1
Current Analytical Results of Monitored Contaminants in Groundwater under the MDE Oil Control Program (ug/L)

Contaminant	MDE GWCS*	EPA MCLs*	MW-1	MW-7	MW-14
Benzene	5.0E+00	5.0E+00	NS/LNAPL	NS/LNAPL	NS/LNAPL
Toluene	1.0E+03	1.0E+03	NS/LNAPL	NS/LNAPL	NS/LNAPL
Ethylbenzene	7.0E+02	7.0E+02	NS/LNAPL	NS/LNAPL	NS/LNAPL
Xylenes	1.0E+04	1.0E+04	NS/LNAPL	NS/LNAPL	NS/LNAPL
MTBE (Methyl Tert-Butyl Ether)	2.0E+01		NS/LNAPL	NS/LNAPL	NS/LNAPL
Naphthalene	6.5E-01		NS/LNAPL	NS/LNAPL	NS/LNAPL
Chlorobenzene	1.0E+02	1.0E+02	NS/LNAPL	NS/LNAPL	NS/LNAPL
1,2-Dichlorobenzene	6.0E+02	6.0E+02	NS/LNAPL	NS/LNAPL	NS/LNAPL
Cis-1,2-Dichloroethene	7.0E+01	7.0E+01	NS/LNAPL	NS/LNAPL	NS/LNAPL
Isopropyl benzene (Cumene)	6.6E+01		NS/LNAPL	NS/LNAPL	NS/LNAPL
Tetrachloroethene	5.0E+00	5.0E+00	NS/LNAPL	NS/LNAPL	NS/LNAPL

MDE GWCS/MCS – Maryland Department of Environment Groundwater Cleanup Standards

EPA MCLs – Environmental Protection Agency Maximum Contaminant Levels

*ug/L – Micrograms per Liter

Table 2
Highest Concentrations of Contaminants
Detected in Soil and Monitored Groundwater within the Facility Building

Contaminant	MDE NRCS (mg/kg)	EPA RSL (mg/kg)	Maximum Soil Concentration (mg/kg)	MDE GWCS (ug/L)	EPA MCL (ug/L)	Maximum Groundwater Concentration (ug/L)
OCP Area						
Naphthalene	2.0E+3	1.8E+01	No exceedences	6.5E-01	1.4E-01	40
RA-1 Area						
Arsenic	1.9+00	1.6E+00	25	1.0E+01	1.0E+01	No Exceedences
Lead	1.0E+3	8.0E+02	14,000	1.5E+01	1.5E+01	No Exceedences
Mercury	4.3E+01	6.0E+02	8.6	2.0E+00	2.0E+00	No Exceedences

MDE GWCS/MCS – Maryland Department of Environment Groundwater Clean up Standards

EPA RSL – Environmental Protection Agency Regional Screening Levels

EPA MCLs – Environmental Protection Agency Maximum Contaminant Levels

mg/kg – Micrograms per Kilogram

ug/L – Micrograms per Liter

VIA U.S. MAIL

Maryland Department of the Environment
Voluntary Cleanup Program
Attn: Ms. Barbara Brown
1800 Washington Boulevard, Suite 625
Baltimore, MD 21230

RE: Former IEI Property (8335 Telegraph Road, Odenton, MD 21113)
Licensed Plumber statement that connections to any potential water source
supplied from groundwater have been severed.

June 29, 2012

Dear Ms. Brown,

This letter will certify to Maryland Department of the Environment that, per our examination of the former IEI warehouse building site at 8335 Telegraph Road, Odenton, MD, it has been demolished down to the concrete building slab and all connections to any potential water source supplied from groundwater (i.e., piping from adjacent properties, wells, etc.) have been removed and/or severed.

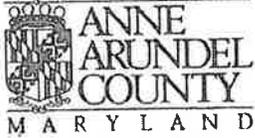
As noted on the attached documents, the two wells previously supplying water to the building were capped and abandoned in July, 2008 and there are no other connections at the site.

Please contact me if you have any questions or comments at the referenced phone number / fax number.

Sincerely,



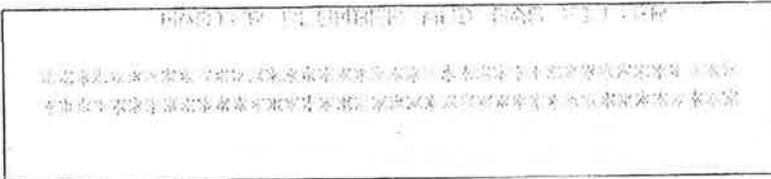
Licensed Plumber
Welch & Rushe, Inc.



ISSUED BY

NUMBER:

ANNE ARUNDEL COUNTY



This is to Certify, That a License
has been granted to:

ROBERT A. WILLIAMS
WELCH AND FISHER, INC.
301 PRINCE GEORGE'S BLVD.
UPPER MARLBOROUGH, MD 20774

to operate in Anne Arundel County, Maryland as defined in
ARTICLE 31

The said license shall remain valid until expiration, provided the said license is not
sooner revoked by Anne Arundel County for violation of its rules as provided in the
Anne Arundel County Codes.

ISSUED

07/24/2012

Donal A. Kane
Director of Inspections and Permits

EXPIRATION

07/23/2012

000098947

000098947

THIS LICENSE MUST BE CONSPICUOUSLY DISPLAYED

DEPARTMENT OF INSPECTIONS
AND PERMITS
ANNE ARUNDEL COUNTY, MARYLAND

This is to certify that:

A LICENSE HAS
BEEN GRANTED TO

ROBERT A. WILLIAMS
WELCH AND FISHER, INC.
301 PRINCE GEORGE'S BLVD.
UPPER MARLBOROUGH, MD 20774

CUT ALONG LINE

SIGNATURE

CUT ALONG LINE

07/24/2012
Expiration

Donal A. Kane
Director of Inspections and Permits