



Maryland
Department of
the Environment

Pikesville Armory

Briefing on Environmental Considerations

Thursday, January 18, 2018

Background

- To ensure environmental compliance, brownfield properties being considered for redevelopment come to MDE for review and approval.
- Typically, new property owners want to have the property deemed “clean” by obtaining a NFA or NFRD/COC, prior to taking title.
- Any investigative or cleanup responsibility can be assumed by new owner as long as there is an understanding of the liability prior to transfer.



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Previous environmental work

- MDE Air and Radiation Administration reports the Armory has 3 boilers that burn #2 fuel oil (heating oil).
- MDE has records showing that 8 cases where UST were removed; these cases are closed.
- One remaining heating oil tank remains onsite.



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Tonight

- **Tonight**, I will speak about the environmental requirements for potential redevelopment of this site.
 - Investigation,
 - Remediation (if needed) and redevelopment



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CHS Assessment and Remediation Activities

- The MDE CHS Program oversees assessment and/or remediation activities in Maryland.
- Projects are typically broken into three categories (**Assessment**, **Remediation** and **Operation/Monitoring**).
- Note: Many projects fall into only one or two categories due to the limited presence of hazardous substances.



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Phase I Environmental Site Assessment

- **Phase I ESA includes** the following:
 - Review of current and historical records’
 - Site reconnaissance;
 - Interviews with past and present owners
- **Objective of the Phase I**
 - Identify recognized environmental conditions (RECs), including current and historic
 - Identify areas of potential concern, such as storage locations for chemical use and disposal, buried tanks, and environmentally-sensitive land uses.



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Phase II Environmental Site Assessment

- Phase II is the first step in evaluating the environmental impacts at the property.
- Results of the Phase II (and any follow-on environmental investigations) serve as the basis for evaluating a remedy that may be required to protect current and future users of the site from the presence of hazardous wastes or petroleum products.



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Develop and Implement Remedial Action Plan

When activities for the Assessment category are complete, **MDE determines if remediation is necessary, based on whether hazardous substances or oil is present at concentrations which represent a risk to future users.**

Remediation typically involves developing a series of plans, including a written evaluation of remedial alternatives including a time schedule

A Remedial Action Plan (RAP) is approved for implementing the selected remedy.

The RAP is usually drafted with the future use and/redevelopment of the site in mind.



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Operation and Monitoring of Selected Remedy

- **After the remedy is installed, the next category is the Operation and Monitoring.**
- If the work is being performed by a Responsible Person, MDE provides oversight, monitoring and enforcement to make sure that it is properly implemented.
- MDE may issue enforcement orders to ensure that the remedial action is properly implemented.



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Asbestos Related Information

- If any renovation or a demolition is to occur, an asbestos survey needs to be conducted
- For a renovation, a survey of the area to be renovated should be conducted.
- If the survey determines there is asbestos and that asbestos will not be impacted by the renovation effort, nothing further is required.
- If any asbestos is to be removed or encapsulated as part of a renovation, the asbestos-related work must be done by a Maryland licensed asbestos contractor and MDE must be notified 10 working days prior to starting the renovation.



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Asbestos Related Information

- For a demolition, a survey for asbestos is also required.
- If no asbestos is found, nothing else is required.
- If asbestos is found, all asbestos needs to be removed prior to demolition, unless there is risk that doing so poses a worker safety risk.

- Any renovation or demolition survey needs to be done by a MD accredited asbestos inspector.
- A demolition notice must be submitted at least 10 working days before demolition begins.
- MDE can help with a walk-through inspection after the survey has been completed.



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