



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

November 15, 2017

Jonathan M. Genn, Esquire
Executive Vice President & General Counsel
Global Lifesci Development Corporation
11900 Tech Road
Silver Spring, Maryland 20904

Re: **Percontee Cherry Hill Road Sand and Gravel Quarry Site – White Oak, Maryland**

Dear Mr. Genn:

The Land Restoration Program (LRP) of the Maryland Department of the Environment (Department) is writing you regarding your November 6, 2017 letter describing the proposed reclamation activities conducted by Percontee, Inc. (Percontee) which will occur onsite at the Percontee Cherry Hill Road Sand and Gravel Quarry in White Oak, Maryland. This letter is prepared in conjunction with the Department's Mining Program (Mining) and Solid Waste Program (SWP). Pending receipt of the recommended modifications described below, the Department views the actions described on pages 2 and 3 of your letter as acceptable and in conformance with the relevant statutes and regulations pertaining to mine reclamation.

The Department has identified the following issues to the November 6, 2017 letter from Global Lifesci Development Corporation (GLDC) which require modification. Upon receipt of the revised document, the Department agrees that the activities described in the plan may be executed as part of the reclamation activities pursuant to the Department's oversight.

- The letter should be addressed jointly to James Carroll, Program Administrator of the Land Restoration Program and Edmon Larrimore, Program Administrator of the Mining Program. The list of individuals copied on the letter should also include Edward Dexter (Program Administrator, Solid Waste Program), Molly Michaelson (Mining), Martha Hynson (Solid Waste), Mark Mank (LRP), Brian Dietz (LRP), Barbara Brown (LRP), and Gary Schold (LRP).
- On page 3, please revise the text to ensure that the plan describes that all areas of the Site where the recycled concrete material is used as subgrade structural fill are fully and properly documented for future reference in the event those areas are sampled at a later date.
- On page 3, please add the following as a separate item. The added text should state that GLDC acknowledges and agrees to provide the Mining Program with a revised reclamation plan for the Site showing grading and proposed contours. The revised reclamation plan should include a description of the projected use of recycled concrete and include the depth(s) of the concrete to be utilized. The submission of the revised mining reclamation grading plan will occur within 45 days and prior to any reclamation activities utilizing the concrete at the facility.

- On the action listed as number one on page 2, please revise the text to read:
"We request MDE permit GLDC to continue the sorting and processing of its current...for redevelopment. ***GLDC affirms that Percontee discontinued accepting any and all building demolition and concrete debris effective as of December 31, 2015 and that only the existing processed and to-be-processed concrete material that is currently on-site shall be used for the proposed subgrade structural fill material.***

Percontee is employing a full time operator, whose sole responsibility is to sort asphalt deposits and unsuitable fill from the raw concrete material into a separate stockpile. The material in this stockpile is destined for offsite disposal at an appropriately permitted disposal facility. In the event the Percontee operator identifies fill material displaying unusual visual or olfactory characteristics that are different from the surrounding materials, the operator or other qualified personnel shall use a photo ionization detector (PID) to field screen the material prior to placement in the separate stockpile described above.

The unsuitable material collected in the separate stockpile shall be transported to a permitted disposal facility and Percontee shall provide the Department with weigh tickets, manifests or other appropriate documentation demonstrating the proper disposal of the material.

The LRP also is taking this opportunity to advise you that it has completed its review of the revised proposed Comprehensive Remedial Action Plan (Comprehensive RAP) dated November 7, 2017. The purpose of the Comprehensive RAP is to establish procedures for managing environmental activities related to the Site's redevelopment once the Mining reclamation activities are complete. Our review has determined that the Department's comments have been adequately addressed. Therefore, the Department is approving the revised Comprehensive RAP as a final plan and requests that you submit the document in final form.

If you have any questions please contact Gary Schold at (410) 537-3437 or Gary.Schold@Maryland.gov.

Sincerely,



James R. Carroll, Program Administrator
Land Restoration Program

cc: Mr. John Gudelsky, Percontee & GLDC
Ms. Christine Pulvino, Arc Environmental
Ms. Hilary Miller, Maryland Department of the Environment
Mr. Edmon Larrimore, Maryland Department of the Environment
Mr. Edward Dexter, Maryland Department of the Environment
Ms. Molly Michaelson, Maryland Department of the Environment
Mr. Brian Dietz, Maryland Department of the Environment