



Collaboration and Innovative Enforcement Supports Economic Revitalization in Baltimore's Inner Harbor

Introduction

In Baltimore, Maryland, the U.S. Environmental Protection Agency has facilitated strong partnerships among interested parties to capitalize on the redevelopment potential of the former Allied-Signal Inc. (now Honeywell) chromium processing facility in Baltimore's Inner Harbor. EPA worked with the state, facility owners, developers and others to investigate contamination at the facility, conduct cleanup work under the authority of the Resource Conservation and Recovery Act, and support property reuse and economic development.

The cleanup work addressed contamination from over 100 years of industrial activity and resulted in cleaner air, land and water for the local Baltimore community, while reenergizing economic activity in the Inner Harbor. The new redevelopment made possible by the cleanup is currently exceeding \$3.3 billion in annual revenue.

Facility History and Cleanup

The Honeywell Baltimore Inner Harbor site includes about 18 acres of waterfront property along the Patapsco River. Beginning in the mid-nineteenth century, the Baltimore Chrome Works factory processed chrome ore for the production of chromium chemicals. Allied-Signal Inc. continued chromium processing at the facility until 1985.

Successive owners expanded the site to its current size and shape by filling nearby portions of the Baltimore Harbor with various materials, including

waste materials from chromium processing. These waste disposal activities as well as the chromium processing activities at the site contributed to soil and groundwater contamination.

Environmental investigations conducted in the 1980s found large quantities of chromium moving from the site into the Harbor and the groundwater. A 1986 investigation found that 50 pounds of chromium was entering the surface water of Baltimore Harbor daily.

In 1989, in response to these investigations, EPA and the State of Maryland Department of the Environment entered into a Consent Decree under RCRA with Allied-Signal Inc. to conduct the cleanup.

Environmental Enforcement Benefits the Community

EPA works to provide strong, effective enforcement support to all communities. EPA's Office of Site Remediation Enforcement makes real differences in communities impacted by hazardous waste contamination. OSRE ensures that responsible parties perform necessary work and pay for prompt and protective cleanups through national consistency in enforcement. OSRE also facilitates revitalization through negotiations and the creation of guidance documents and site-specific tools that address potential liability concerns. As the agency implements environmental and public health improvements across the country, EPA is developing new and innovative ways to assist all communities.

Resource Conservation and Recovery Act Overview

Congress enacted RCRA in 1976. RCRA protects human health and the environment in two ways.

- **Prevention:** Preventing future environmental problems resulting from waste.
- **Hazardous Waste Cleanup:** Cleaning up current contamination at facilities caused by the mismanagement or release of hazardous waste.

RCRA addresses the huge volumes of municipal and industrial waste generated by facilities, including hazardous waste that is generated and disposed of by owners and operators. Under RCRA, owners and operators who contaminate land, water and air are liable for cleaning up the contamination. Hazardous waste cleanup usually takes place at facilities that treat, store or dispose of hazardous waste and can also take place while a facility continues to operate. Hazardous waste cleanup can be required through a RCRA permit, a voluntary agreement, an administrative order or judicial action.

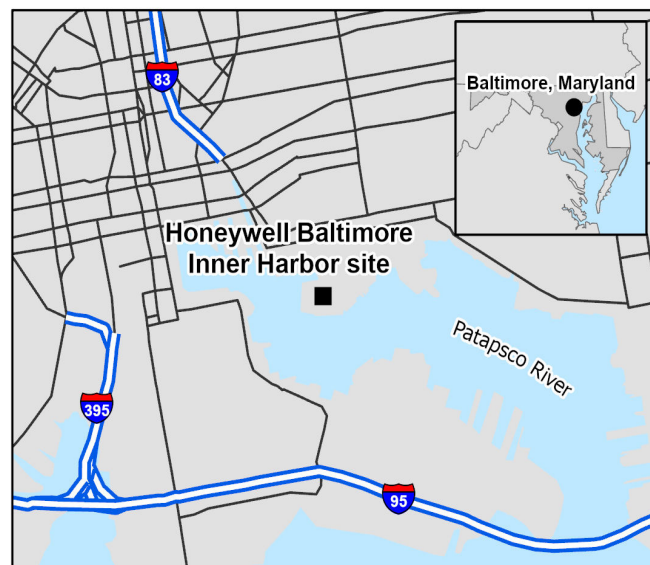
The Consent Decree outlined investigation and cleanup activities, including an impermeable cap, barrier wall, a hydraulic gradient control system and long-term environmental monitoring.

Allied-Signal Inc. (now Honeywell), under oversight by EPA and MDE, cleaned up the site and built a 15-acre synthetic cap, a barrier wall, and a hydraulic gradient control system. Demolition of the facility, preparation of the property, construction of the remedy, and construction of a water transfer station above the cap took over 10 years and \$100 million to complete. The project required extensive coordination between EPA, MDE, and Honeywell. Honeywell is responsible for maintaining the cap and environmental monitoring.

Enforcement Actions

EPA's leadership and groundbreaking enforcement approaches were critical to the cleanup and successful reuse of the site since RCRA cleanup work began. The 1989 RCRA Consent Decree not only laid out cleanup goals, but – in a first for the time – considered the site's future reuse. The Consent Decree outlined that prior to any reuse on the property, redevelopment plans must be reviewed by EPA and MDE. These plans would be approved only if the activities would not interfere with the cleanup or result in increased risks to human health or the environment. This forethought allowed the Baltimore City Council to approve redevelopment plans in 1993 to allow for future mixed use of the site property including office space, retail outlets, residential units, parking, and public space along the waterfront.

Then, in May 2003, EPA and MDE signed the nation's first Federal Prospective Lessee Agreement. This innovative agreement managed



Sources: Esri, DeLorme, AND, Tele Atlas, First American, UNEP-WCMC and USGS.

The site's location in Baltimore, Maryland.

risk and limited potential liabilities for SBER Harbor Point, LLC and Harbor Point Development LLC, the prospective developers for the site. Not only did the PLA provide relief from certain future environmental liabilities for the developer, but it also allowed EPA to ensure the developers complied with requirements relating to institutional controls. Additionally, in August 2003, the developer entered MDE's Voluntary Cleanup Program, which afforded them additional liability protection under state law.

As cleanup and redevelopment work moved forward together, EPA faced a major challenge regarding how to support a \$250 million redevelopment project while ensuring compliance with the Consent Decree requirements. EPA's

site team took a proactive role, attending bi-monthly meetings between Honeywell and the developers, which proved to be the key to success. Through active engagement, EPA developed a positive and successful working relationship between the entities and addressed regulatory issues and potential technical problems in real time. Although not required by the Consent Decree, EPA's willingness to provide technical reviews of design plans significantly supported the redevelopment project's timeline and facilitated a cooperative cleanup.

Additionally, cooperation between developers and EPA allowed for interim use of the site while the developer completed the comprehensive redevelopment plan. The 1989 Consent Decree did not include criteria for approval of interim uses of the site. However, the Consent Decree was amended in 1990 and 1994, and the EPA site team worked to develop the necessary criteria to allow for interim reuse of the site.

Redevelopment Success and Looking Forward

Over 20 years of collaboration and innovation have resulted in outstanding transformations for the community. Site reuse includes a phased redevelopment project, known as Harbor Point. It is anticipated that Harbor Point will be fully complete by 2028 and will include office and residential buildings, retail, hotel space, over 9 acres of parks and open space, and waterfront walkways. Interim uses, including a performance and concert venue, and local community events, have taken place since the early 2000s.

Construction for the first phase of Harbor Point began in 2007 and the first building, an eight-story office building known as the Thames Street Wharf Building, opened in June 2010. The first phase also included construction of the 21-story tower known as the Constellation Building (originally called the Exelon Building). Completed in 2016, it is a LEED

Gold-certified building and home to Constellation Energy Corporation (formerly Exelon) headquarters.

Also in 2016, planning and construction began for phases two and three of the project. Phase two included Point Street Apartments (1405 Point) and Wills Wharf. The 16-story 1405 Point building includes 289 residential units and 18,000 square feet of street-level retail and amenity space. The building was completed in 2018. Wills Wharf, completed in 2020, is another mixed-use building, offering office and hotel space, and waterfront views of the Inner Harbor.

Phase three of the reuse project is partially complete. Allied Harbor Point, completed in 2024, includes residential space, retail amenities, parking, and Allied Row is a pedestrian plaza. Adjacent to Allied Harbor Point and Allied Row, construction of a hotel is underway. Also, as part of phase 3, T. Rowe Price opened its 550,000-square-foot global headquarters at Harbor Point in March 2025. About 2,000 employees occupy the seven-story LEED-certified building. Additional community open space – the 4.5-acre Point Park – opened to the public in May 2025. The park features a main lawn, seating and harbor views.

Looking forward, phase four, the final phase of the reuse project, is planned to be finished by 2028. It will include mixed-use towers for offices, residential space, a hotel, retail and parking.

Redevelopment of Harbor Point includes

- 4.5 million square feet of development.
- 2,500 residences.
- Over 600 hotel rooms.
- 3,300 parking spaces.
- 9.5 acres of green space.

Job Creation and Economic Revitalization

- The developer has met or exceeded local hiring goals for all of the most recent projects at Harbor Point and spent millions of dollars with local companies.

Prospective Purchaser Agreement and Prospective Lessee Agreement

A PPA is a site-specific enforcement tool which addresses the liability concerns of prospective purchasers who want to reuse remediated properties. A PLA is similar to a PPA; however the agreement is reached with a long-term lessee instead of a purchaser. A PPA or PLA provides the developer, or lessee, with relief from certain future environmental liabilities while ensuring that the developer complies with certain requirements.



A view of the Harbor Point redevelopment project.

- The full redevelopment project has been estimated to create 7,100 construction jobs and 6,600 permanent jobs.
- As of 2024, the project is already boosting the local economy with 19 businesses and over 3,100 jobs providing \$595 million in estimated annual income and nearly \$3.3 billion in annual revenue.

Sustainability

- Harbor Point is a sustainable project, supporting the local community and is advertised as Baltimore's first "eco-district" – a neighborhood of environmentally-friendly buildings.
- Each building is required to meet minimum green building standards. Multiple buildings are U.S. Building Council's LEED certified.
- All food waste is converted to soil to be used by local farms, and an on-site urban farm grows produce for nearby restaurants.
- The Constellation Building incorporates elements from the local region with wood reclaimed from 70 Baltimore row homes and includes a rooftop solar array that produces more than 62,000 kilowatt-hours of renewable energy per year. A green roof also manages stormwater and enables water harvesting.
- Along the harbor waterfront, a living shoreline provides a natural habitat for fish and wildlife and waterfront pathways facilitate a more walkable community.



The 21-story Constellation Building (originally called the Exelon Building).

Enforcement Makes a Difference

EPA's cleanup enforcement program has helped make a difference in thousands of communities affected by hazardous waste contamination. At the Honeywell Baltimore Inner Harbor site, EPA worked to ensure parties conducted the RCRA cleanup activities, while simultaneously supporting revitalization using enforcement and reuse tools. Pioneering use of enforcement tools and EPA's commitment to facilitating strong and productive partnerships with the state and developers improved the efficiency of the RCRA cleanup process and enabled transformative redevelopment and beneficial reuse.

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