



MARYLAND DEPARTMENT OF THE ENVIRONMENT

Oil Control Program, Suite 620, 1800 Washington Blvd., Baltimore MD 21230-1719

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Martin O'Malley
Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lieutenant Governor

July 15, 2014

Mr. Herbert M. Meade, Director
Environmental Health and Safety
Carroll Fuel Service
2700 Loch Raven Road
Baltimore MD 21208

RE: APPROVAL OF TRIAL SHUTDOWN

Case No. 2006-0319-BA

Wally's Citgo

19200 Middletown Road, Parkton

Baltimore County, Maryland

Facility I.D. No. 4593

Dear Mr. Meade:

The Oil Control Program recently completed a review of the *On-Site Remedial Activities Work Plan - Trial Shutdown - June 3, 2014*. The proposal is based on the data collected during recovery well system pulsing activities conducted in accordance with the *On-Site Remedial Activities Work Plan - December 23, 2013* and the Department's *Work Plan Approval* letter dated February 18, 2014. Recovery wells RW-1 and RW-2 were turned off for two weeks and then reactivated for two weeks (i.e., "system pulsing"). This was conducted to evaluate rebound conditions and to determine if pulsing the system would increase hydrocarbon recovery. Groundwater sampling was conducted from RW-1, RW-2, and the system influent at the start of each shutdown and restart event. Frequent well gauging was also conducted at surrounding wells and the infiltration gallery. The data was submitted in monthly and quarterly status reports.

Based on the data collected during recovery system pulsing, which showed continued decline in dissolved levels in the recovery wells, system influent concentrations, recovery rates, and little to no rebound in dissolved levels in the monitoring/recovery wells and off-site potable well located at 1606 Rayville Road, your environmental consultant proposes to conduct a trial system shutdown. The *Work Plan* proposes trial system shutdown beginning July 2014 for six months (i.e., through December 2014). Groundwater monitoring will continue to be conducted on a quarterly basis. After the first quarter monitoring event, a letter will be submitted to the Department by September 30, 2014, which will include the results and an evaluation of whether the system should be restarted or trial system shutdown monitoring should continue. Following the second quarter system shutdown sampling event, a letter report will be submitted to the Department by December 31, 2014 with recommendations. Data collected during the shutdown period will be used for further evaluation of subsurface conditions such as continued rebound assessment, contaminant plume stability and migration, and the occurrence of natural attenuation. The system will remain off until the Department directs otherwise after the trial system shutdown period ends.

The Department approves the six-month (two quarters) trial system shutdown contingent upon the following modifications:

1. If quarterly monitoring data collected shows adverse effects during the system shutdown trial period, the Department must be notified immediately and the pumps restarted.
2. Monthly sampling of potable wells at 1608 and 1612 Rayville Road must be conducted during the trial system shutdown. The Department understands from a recent telephone conversation with your consultant on June 20, 2014 that access is still under negotiation for 1608 Rayville Road and that access has not been granted for 1612 Rayville Road. Sampling of these domestic wells has not been allowed. The potable well at 1608 Rayville Road was last sampled in November 2013. The potable well at 1612 Rayville Road was last sampled in February 2014, which showed a slight increase in concentrations. Carroll Fuel Service must make every effort to obtain access to begin sampling at 1612 Rayville Road.
3. The system must be restarted after the six-month trial system shutdown is completed. Prior written approval to permanently shut down the system and conduct post-remedial monitoring must be granted by the Department. A *Report of Results* and a proposal must be submitted within 45 days after completion of the six-month trial period (to be submitted **no later than March 2, 2015**).

Please notify and provide monthly status updates regarding access to these properties (email format is acceptable). Contact the case manager at least five (5) working days prior to conducting any field work associated with this project. If you have any questions, please contact the case manager, Mrs. Jenny Herman, at 410-537-3413 (email: jenny.herman@maryland.gov) or me at 410-537-3482 (email: ellen.jackson@maryland.gov).

Sincerely,



Ellen Jackson, Central Region Section Head
Remediation and State-Lead Division
Oil Control Program

JH/nln

cc: Mr. Richard Martin (1606 Rayville Road)
Mr. Charles Belt (1608 Rayville Road)
Ms. Gail Fissel (1612 Rayville Road)
Mr. Steven Slatnick (GES, Inc.)
Mr. Andrew Applebaum (Environmental Alliance, Inc.)
Dwight Stone, Esquire (Whiteford, Taylor and Preston Law)
Peter G. Angelos, Esquire (Law Offices of Peter G. Angelos, PC)
Mr. Kevin Koepenick (Baltimore County DEPS)
Pricilla Carroll, Esquire
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Mr. Horacio Tablada