



Maryland

Department of the Environment

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

Horacio Tablada, Secretary
Suzanne E. Dorsey, Deputy Secretary

November 15, 2022

Mr. Dharmash Patel
DJS Realty, LLC
2754 Augustine Herman Highway
Chesapeake City, MD 21915

RE: REQUEST FOR ENHANCED MONITORING AND HALF-MILE WELL SURVEY
Case No. 2023-0161-CE
Eagle's Nest / Chesapeake City Valero
2754 Augustine Herman Highway, Chesapeake City
Cecil County, Maryland
Facility I.D. No. 2682

Dear Mr. Patel:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the registration file for the underground storage tanks (USTs) at the above-referenced high-risk groundwater use area (HRGUA) property. In January 1986, four USTs were installed at the site: one 8,000-gallon gasohol, one 4,000-gallon gasohol, one 8,000-gallon diesel, and 1,000-gallon kerosene. The 1,000-gallon kerosene UST was permanently closed-in-place in August 2010. The USTs are cathodically protected steel with an impressed current system and single-walled fiberglass piping. There are three monitoring wells on the station property used for monitoring in compliance with the State's HRGUA regulations. The facility also has a transient non-community drinking water supply well.

On September 23, 2022, the OCP received notification of the detection of 3 inches of liquid phase hydrocarbons (LPH) in groundwater monitoring well MW-2. As a result of a September 30, 2022 site inspection, the OCP required the recovery of LPH and collection of a groundwater sample. On October 20, 2022, the OCP received a report of detections of petroleum constituents above the notification limits in groundwater monitoring well MW-2. The sample collected from MW-2 detected benzene at a concentration of 6,520 parts per billion (ppb), toluene at concentration of 75,200 ppb, ethylbenzene at a concentration of 18,400 ppb, and total xylenes at a concentration of 120,800 ppb. Samples collected from monitoring wells MW-1 and MW-3 were non-detect (ND) for petroleum constituents.

As required in the *Report of Observations*, dated October 26, 2022, a drinking water sample was collected from the on-site supply well on October 27, 2022. The results were non-detect for petroleum constituents. On November 3, 2022, the required 2-hour enhanced fluid recovery (EFR) event was performed on monitoring well MW-2 to remove the LPH. In addition, a drinking water sample was collected from the supply well at 423 Basil Avenue. On November 7, 2022, the monitoring well network was gauged and confirmatory samples were collected from MW-2, TF-1 and TF-2. The analytical results for the confirmatory samples were all either non-detect for

petroleum constituents or below regulatory standards, with the following exception. Benzene was detected in the sample collected from MW-2 at a concentration of 87.5 ppb, which is above the 5 ppb standard.

As a result of the detections of petroleum-related compounds in MW-2 at concentrations exceeding HRGUA notification levels, the OCP has sent notification, via certified mail, to all property owners within a ½-mile radius of the site, as required by Section 4-411.2 of the Environment Article, Annotate Code of Maryland.

Based on the property's location in a HRGUA served by a drinking water supply well and the available information reviewed for this case, MDE requires the following:


1. Perform an updated sensitive receptor survey to identify all drinking water supply wells (i.e., domestic, non-community/community water supply, agricultural) within a half-mile radius of the subject property and plot on a U.S. Geological Survey map or scaled street map. Since the site is in an area served by drinking water supply wells, MDE suggests directing your inquiries to the Cecil County Health Department. Submit the required information to OCP no later than **January 3, 2023**. The submitted survey must include:
 - a. Annotate the 660-ft. (1/8-mile), 1,320-ft. (1/4-mile), and 2,640-ft. (1/2-mile) radii;
 - b. Provide a summary table of well data including, at a minimum: property address, owner name and address, well tag ID, total depth of well, casing depth, screen depth, and current status of well usage;
 - c. Review well completion reports and evaluate whether on-site conditions could potentially impact any off-site drinking water supply wells in the area;
 - d. Submit documentation of which supply wells are historic and have been abandoned;
 - e. For properties served by public water (Artesian Water Company), provide confirmation of this connection in the summary table (this can include confirmation from the Town of Chesapeake City of properties that receive a water bill);
 - f. Submit copies of notes documenting field reconnaissance performed to verify presence/ absence of wells; and
 - g. Provide written documentation of your findings and the list of persons contacted.
2. As required in the October 26, 2022 *Report of Observations*:
 - a. Continue to coordinate with the property owners of 433 Basil Avenue, 2751 Augustine Herman Highway, and 2758 Augustine Herman Highway, to collect a drinking water sample from the supply wells. The sample must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. The sampling results must be provided to the property owners and OCP within 14 days of the sampling event.
 - b. The OCP will review the results of the required sampling event. Based upon the results, additional sampling of off-site private supply wells may be required at a later date.
3. Based upon the results of the November 7, 2022 confirmatory sampling event, **begin monthly gauging of the monitoring well network and tank field monitoring pipes**. Within 24 hours of conducting the gauging event, notify the OCP case manager, Ms. Lindley Campbell of the results.

4. **Beginning in January 2023**, conduct **quarterly (every three months)** sampling of the on-site supply well. The sample must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. Submit a copy of the results to the OCP.
5. **Beginning in January 2023**, conduct **quarterly (every three months)** sampling of the monitoring well network and tank field monitoring pipes. All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for total petroleum hydrocarbons – diesel and gasoline range organics (TPH-DRO and GRO) using EPA Method 8015.
6. All data collected should be submitted in **quarterly** reports detailing the results of the gauging and sampling events, **no later than 45 days following a sampling event**.
7. At a minimum, Quarterly Status Reports must include a summary work performed; data tables showing all gauging data (depth to water, corrected groundwater elevations, depth to LPH, and LPH thickness) and sampling data, to include all events, not just for the current reporting period; laboratory analytical data and chains of custody; scaled site maps that denote corrected groundwater elevations at each monitoring well, groundwater contours, groundwater flow direction, and groundwater concentrations.

This letter is not a waiver or limitation of MDE's right to take enforcement or other action in the future based upon contamination at and around the site. The MDE and State of Maryland retain all authority and rights to see all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, for contamination at and around the site.

If you have any questions, please contact Lindley Campbell at 410-537-3387 (lindley.campbell1@maryland.gov), or me at 410-537-3499 (susan.bull@maryland.gov).

Sincerely,



Susan R. Bull, Eastern Region Supervisor
Remediation Division
Oil Control Program

cc: Mr. Gregory Pelc, Advanced Environmental Concepts, Inc.
Mr. Robert Bernstine, Town Manager, Town of Chesapeake City
Mr. Ed Arellano, Director of Environmental Health, Cecil County Health Dept.
Mr. Robert Peoples, Division Chief, Source Protection and Administration Division
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program