



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

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Anthony G. Brown
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Deputy Secretary

August 24, 2011

Mr. Herbert M. Meade
Environmental, Health and Safety Director
Carroll Independent Fuel Company
2700 Loch Raven Boulevard
Baltimore MD 21208

**RE: APPROVAL OF CORRECTIVE ACTION PLAN IMPLEMENTATION and
EXTENDED PILOT TESTING**

Case No. 2005-0834-FR

Green Valley Citgo

11791 Fingerboard Road, Monrovia

Frederick County, Maryland

Facility I.D. No. 11836

Dear Mr. Meade:

The Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Corrective Action Plan - March 15, 2011* and the *Corrective Action Plan (CAP) Implementation Plan - July 1, 2011*. In June 2011, the Department approved the proposed extended pilot testing activities to further evaluate the use of in-situ chemical oxidation (ISCO) technology at the site. The Department's approval was contingent on the development of a plan to monitor nearby drinking water supply wells and with minor modifications to the proposed pilot testing groundwater sampling plan.

In response, a drinking water sampling plan was developed that includes the monitoring of six off-site private drinking water supply wells (3990, 3992, 3994, 3996, 3997 Farm Lane and 3923 Rosewood Road) and two on-site public supply wells (FR-94-1233 and FR-94-1281) prior to, during, and after completion of the approved extended pilot testing activities. According to the amended *Site Management Schedule*, the above-referenced drinking water supply wells were sampled in July 2011 and analyzed for volatile organic compounds (VOCs), total organic carbon (TOC), chemical oxygen demand (COD), dissolved iron, total iron, and chromium (CR+3 and CR+6). The *CAP Implementation Plan* indicates these supply wells will again be sampled during the second and fifth week of ISCO system operation. Additionally, the identified supply wells will be sampled for the above parameters following completion of the ISCO pilot testing activities. By copy of this letter, the respective property owners have been notified of the additional drinking water well sampling requirements during extended pilot testing activities.

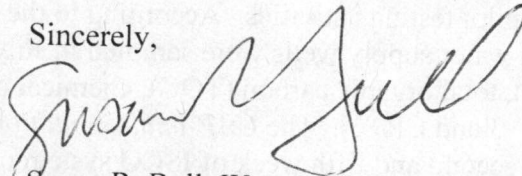
The Department acknowledges that monitoring wells MW-14S and MW-16 have been added to the ISCO pilot testing groundwater monitoring plan. The Department understands that samples will be collected from 11 monitoring wells before, during, and after completion of the ISCO pilot testing activities. The Department reserves the right to require additional on-site and off-site groundwater sampling as is necessary to be protective of public health and to evaluate changing site conditions

Based on our review of the information provided, the Department hereby approves extended ISCO pilot testing for immediate implementation contingent upon the following modifications:

- 1) The Department requires the submittal of an interim progress report after the **third** week and after the **seventh** week of ISCO system operation. Each interim progress report must include all data collected as part of the ISCO system operation and maintenance activities. Additionally, progress reports must include a discussion of how site conditions (e.g., dissolved oxygen concentrations, contaminant concentrations) have changed and if these changes are attributable to the effectiveness of the ISCO technology.
- 2) **No later than thirty (30) days** following completion of the 8-week pilot testing activities, the Department requires the submittal of a comprehensive ISCO pilot test report. The ISCO pilot test report must thoroughly assess existing site conditions and include recommendations regarding the use of ISCO technology and/or the use of supplemental or alternative remedial technologies. **Continued use of the ISCO technology beyond the 60-day pilot testing period and/or the use of supplemental/alternative remedial technologies will require the submittal of an amended *Corrective Action Plan*.** When submitting documentation to the Oil Control Program, provide three (3) hard copies and an electronic copy on a labeled compact disc (CD) to the attention of the case manager at the above letterhead address.
- 3) Notify the Oil Control Program a minimum of five (5) working days prior to initiation of pilot testing so we can be on-site to observe field activities.
- 4) Provide a copy of all drinking water well sampling results to the Oil Control Program, the Frederick County Health Department, and the respective property owner.

If you have any questions, please contact the case manager, Mr. Jim Richmond, at 410-537 3337 (email: jrichmond@mde.state.md.us) or me at 410-537-3499 (email: sbull@mde.state.md.us).

Sincerely,



Susan R. Bull, Western Region Section Head
Remediation and State-Lead Division
Oil Control Program

Mr. Herbert M. Meade
Case No. 2005-0834-FR
Page Three

cc: Ms. Dorothy M. Stevens (3923 Rosewood Road)
Ms. Kitty Lea Bradley (3990 Farm Lane)
Mr. Richard J. Podliska (3992 Farm Lane)
Mr. Kenneth J. Jackson (3994 Farm Lane)
Mr. Santiago Ayala (3996 Farm Lane)
Mr. Leonard G. Szeliga (3997 Farm Lane)
Mr. Steven M. Slatnick (Groundwater and Environmental Services, Inc.)
Ms. Judy Gloyd (Green Valley Shopping Center)
Ms. Jennifer Andrawos (Resident Agent)
Mr. Norman Handler (Resident Agent)
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