



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

June 6, 2018

Mr. Clarke Bozeman
Project Manager
ExxonMobil Environmental Services
1900 East Linden Avenue, Building 28A
Linden NJ 07036

**RE: APPROVAL OF PROPOSED MODIFICATIONS TO PRIVATE SUPPLY WELL
SAMPLING PROGRAM
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland**

Dear Mr. Bozeman:

The Maryland Department of the Environment's (the Department) Oil Control Program (OCP) has completed its review of ExxonMobil's *Proposed Modifications to Private Supply Well Sampling Program*, dated July 16, 2016 and the *Proposed Modifications to Private Supply Well Sampling Program rev1*, dated December 8, 2017. The documents provided a proposed revision to the private supply well sampling program, including reductions in the number of wells to be sampled and a reduction in the sampling frequency of some wells which continue to be sampled.

In general, the Department is in agreement with the private supply well sampling program proposed by ExxonMobil. The Department's review of the data took into consideration:

- Proximity of properties to the 2006 release area and areas of documented petroleum-related impacts (liquid, adsorbed, and dissolved phase hydrocarbons);
- Current concentrations in private supply wells;
- Historical sampling results / trends; and
- Proximity to groundwater monitoring / recovery wells and remediation systems.

A summary of ExxonMobil's proposed modifications to the private supply well sampling program and the Department's responses are provided below and are further detailed in Table 1 (attached).

1. Semi-Annual Sampling

- ExxonMobil proposes to discontinue sampling for all 127 private supply wells currently sampled semi-annually.
- Additionally, ExxonMobil proposes semi-annual sampling of 21 private supply wells that were previously sampled on a monthly or quarterly basis.

The Department approves discontinuing sampling of the 127 private supply wells currently sampled semi-annually, and approves changing the sampling frequency for the proposed 21 private supply wells to semi-annual sampling. The Department also requires that the following 10 additional properties (11 private supply wells) be included in the semi-annual sampling group.

- 3507 Hampshire Glen Court – Continue sampling post point of entry treatment (POET) system removal / conveyance. (Note that the property has two wells and each is to be sampled.)
- 3510 Hampshire Glen Court – In close proximity to area of known impact and falls within area of other wells proposed to be sampled on a semi-annual basis.
- 3604 Hampshire Glen Court – Continue sampling post POET system removal / conveyance.
- 3608 Hampshire Glen Court – Continue sampling post POET system removal / conveyance.
- 14355 Hampshire Knob Drive – Continue sampling due to proximity and tertiary butyl alcohol (TBA) detections.
- 14232 Jarrettsville Pike – Continue sampling due to close proximity to spill location.
- 14243 Jarrettsville Pike – Continue sampling due to close proximity to spill location. Sampling may be coordinated with the current station owner in conjunction with high risk groundwater use area (HRGUA) compliance sampling.
- 14405 Jarrettsville Pike – Continue sampling post POET system removal / conveyance.
- 14406 Katie Road – Continue sampling post POET system removal / conveyance.
- 3235 Paper Mill Road – Continue sampling due to TBA detections.

2. Quarterly Sampling

- ExxonMobil proposes to discontinue sampling 75 private supply wells currently sampled on a quarterly basis.
- ExxonMobil proposes to continue quarterly sampling of seven (7) private supply wells that are currently sampled quarterly.
- Additionally, ExxonMobil proposes quarterly sampling of nine (9) private supply wells that were previously sampled on a monthly basis.

The Department approves discontinuing sampling of the 75 private supply wells currently sampled quarterly (except as noted above), and approves quarterly private supply well sampling for the proposed 16 private supply wells.

3. Monthly Sampling

- ExxonMobil proposes to discontinue sampling of 18 private supply wells currently sampled on a monthly basis.
- ExxonMobil proposes continued monthly sampling of one private supply well.

The Department approves discontinuing sampling of the 18 private supply wells currently sampled monthly (except as noted above), and approves monthly private supply well sampling for the proposed property.

4. POET Systems

- ExxonMobil proposes the removal or conveyance of ownership for 5 of the 14 POET systems currently maintained by ExxonMobil.

The Department approves removal / conveyance of the five POET systems, but requires continued sampling of each private supply well semi-annually as discussed in item 1 above. The Department will re-evaluate this requirement after review of one year of semi-annual data following the removal / conveyance of the POET systems. The remaining nine POET systems will continue to be maintained by ExxonMobil and sampled as approved.

Table 1 (attached) provides a detail of the Department-approved modifications to the private supply well sampling program. The following table summarizes the Department's approved reductions to the number of private supply wells to be sampled.

Approved Sampling Program Summary

Sampling Frequency	Number of Private Supply Wells Sampled		
	Current	Proposed	Department Approved Changes
Semi-Annual	127	21	32
Quarterly	86	16	16
Monthly	45	1	1
Total	258	38	49

Required POET Systems

	Current	Proposed	Department Approved Changes
POET Systems	14	9	9

The Department approves the proposed revisions to the private supply well sampling program as described above effective June 6, 2018.

The Department will send a general project update to affected property owners to notify them of changes to the sampling program within fifteen (15) days of the date of this letter. ExxonMobil will notify individual property owners of changes to their sampling schedule (including no further sampling) and if a POET system is to be removed/ conveyed within fifteen (15) days of the date of this letter.

While MDE agrees to these modifications to sampling pursuant to the Consent Decree and its negotiated requirements with respect to this case involving Former Exxon R/S No. 2-8077, the State of Maryland, including all of its departments, reserves all rights against Exxon Mobil Corporation with respect to all other past, present, and future cases in the State. The Department reserves the right to require additional sampling based on new information, changing site conditions, or as a final sampling event prior to issuing case closure.

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If you have any questions, please contact the case manager, Ms. Ellen Jackson, at 410-537-3482 (email: ellen.jackson@maryland.gov) or the OCP Program Manager, Mr. Christopher Ralston, at 410-537-3470 (email: chris.ralston@maryland.gov).

Sincerely,



Hilary Miller, Director
Land and Materials Administration

HM/chr

Enclosure – Table 1

cc: Joseph Perez, Esquire (ExxonMobil)
Mr. Mark Schaaf (Kleinfelder East, Inc.)
Mr. Kevin Koepenick (Baltimore County DEPS)
Stephanie Cobb Williams, Esquire
Mr. Andrew Miller
Mr. Christopher Ralston

**Table 1. Approved Private Supply Well Sampling Program
Exxon Jacksonville, MDE Case No. 2006-0303BA
May 30, 2018**

	Address	Lot ID	Current Sampling Frequency	ExxonMobil Proposed Sampling Frequency	MDE Approved Proposal OR Required Sampling (Bold Type)	Comment
1	3500 Hampshire Glen Court	M35P356L01	M	SA	Approved	
2	3502 Hampshire Glen Court	M35P356L02	M	SA	Approved	
3	3503 Hampshire Glen Court	M35P356L24	M	Q	Approved	POET System remains ExxonMobil responsibility.
4	3504 Hampshire Glen Court	M35P356L03	M	SA	Approved	
5	3505 Hampshire Glen Court	M35P356L23	M	SA	Approved	
6	3506 Hampshire Glen Court	M35P356L04	M	Q	Approved	POET System remains ExxonMobil responsibility.
7	3507 Hampshire Glen Court *	M35P356L2201	M	-	SA	Continue sampling post POET system removal / conveyance. *
8	3507 Hampshire Glen Court *	M35P356L2202	M	-	SA	Continue sampling post POET system removal / conveyance. *
9	3508 Hampshire Glen Court	M35P356L05	M	Q	Approved	POET System remains ExxonMobil responsibility.
10	3510 Hampshire Glen Court	M35P278L02H	M	-	SA	Property is in close proximity to area of known impact and falls within area of other wells proposed to be sampled on a semi-annual basis
11	3600 Hampshire Glen Court	M35P356L06	M	SA	Approved	
12	3604 Hampshire Glen Court	M35P356L09	M	-	SA	Continue sampling post POET system removal / conveyance.
13	3606 Hampshire Glen Court	M35P356L11	M	SA	Approved	POET System remains ExxonMobil responsibility.
14	3608 Hampshire Glen Court	M35P356L12	M	-	SA	Continue sampling post POET system removal / conveyance.
15	14355 Hampshire Knob Drive	M35P356L20	Q	-	SA	Continue sampling due to proximity and tertiary butyl alcohol (TBA) detections.
16	14232 Jarrettsville Pike	M35P210LNA	Q	-	SA	Continue sampling due to close proximity to spill location.
17	14240 Jarrettsville Pike *	M35P182LNA	Q	Q	Approved	
18	14240 Jarrettsville Pike *	M35P182LNA02	Q	Q	Approved	
19	14242 Jarrettsville Pike	M35P183LNA	M	Q	Approved	POET System remains ExxonMobil responsibility.
20	14243 Jarrettsville Pike	M35P217LNA	M	-	SA	Continue sampling due to close proximity to spill location; annual sampling performed by Amoco/BP for high risk groundwater use areas (HRGUA); therefore, ExxonMobil would only need to sample one-time per year if coordinated with Amoco/BP.
21	14258 Jarrettsville Pike	M35P185LNA	Q	Q	Approved	
22	14300 Jarrettsville Pike	M35P123LNA	M	SA	Approved	
23	14301 Jarrettsville Pike	M35P031LNA	M	Q	Approved	POET System remains ExxonMobil responsibility.
24	14307 Jarrettsville Pike *	M35P151LNA	M	Q	Approved	POET System remains ExxonMobil responsibility. *
25	14307 Jarrettsville Pike *	M35P151LB	M	Q	Approved	POET System remains ExxonMobil responsibility. *
26	14315 Jarrettsville Pike	M35P152L01	Q	Q	Approved	
27	14320 Jarrettsville Pike	M35P243LNA	M	SA	Approved	
28	14330 Jarrettsville Pike	M35P174LNA	M	SA	Approved	
29	14333 Jarrettsville Pike	M35P152L02	Q	Q	Approved	
30	14335 Jarrettsville Pike	M35P280LNA	Q	SA	Approved	
31	14405 Jarrettsville Pike	M35P314LNA	M	-	SA	Continue sampling post POET system removal / conveyance.
32	14406 Katie Road	M35P224L08	M	-	SA	Continue sampling post POET system removal / conveyance.
33	3235 Paper Mill Road	M35P310L08	Q	-	SA	Continue sampling due to TBA detections.
34	3313 Paper Mill Road	M35P054LNA	M	Q	Approved	POET System remains ExxonMobil responsibility.
35	3320 Paper Mill Road	M35P123LNAP	M	SA	Approved	
36	14208 Robcaste Road	M35P322L17	Q	SA	Approved	
37	14210 Robcaste Road	M35P322L18	M	SA	Approved	
38	14217 Robcaste Road	M35P322L05	Q	Q	Approved	
39	14219 Robcaste Road	M35P322L04	Q	SA	Approved	
40	14221 Robcaste Road	M35P322L03	M	SA	Approved	
41	14223 Robcaste Road	M35P322L02	M	Q	Approved	
42	14225 Robcaste Road	M35P322L01	M	SA	Approved	
43	3525 Southside Avenue	M35P277L03	Q	SA	Approved	
44	3605A Southside Avenue	M35P221L01	M	SA	Approved	
45	3605B Southside Avenue	M35P221L02	M	SA	Approved	
46	3605C Southside Avenue	M35P221L03	M	SA	Approved	
47	3605D Southside Avenue	M35P221L04	M	SA	Approved	
48	3627A Southside Avenue	M36P122LNA	M	M	Approved	POET System remains ExxonMobil responsibility.
49	3635 Southside Avenue	M36P226LNA	Q	Q	Approved	

Notes:

* = two private supply wells on property

SA = semi annual

Q = quarterly

M = monthly

There are 46 properties in the PSW Program.