



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

May 6, 2014

Mr. Donald Bull
Hess Corporation
One Hess Plaza
Woodbridge NJ 07095

RE: APPROVAL OF REVISED CONTINGENCY PLAN
Case No. 91-2100-BA
Hess Station No. 20204
1613 East Joppa Road, Towson
Baltimore County, Maryland
Facility I.D. No. 545

Dear Mr. Bull:

The Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Ridgely Manor Park Contingency Plan - Revised - April 10, 2014*. The Department required re-submittal of the *Contingency Plan* in the *Contingency Plan Comments* directive letter dated April 2, 2014 to address the time line for sampling and implementation of the groundwater treatment in the event an exceedance of NPDES standards occurs: benzene at 5 parts per billion (ppb); total BTEX (the summation of benzene, toluene, ethylbenzene, and xylene) at 100 ppb; and total petroleum hydrocarbons (TPH) at 15 parts per million (ppm). The *Revised Plan* addresses the Oil Control Program's comments, thus, the Department hereby approves the *Revised Contingency Plan* contingent upon the following modifications:

Discharge Sampling Schedule:

1. The bi-monthly sampling schedule cannot revert back to the monthly sampling schedule until six consecutive sampling results (i.e, three consecutive months) of sampling data are below the criteria levels (not two sample events as proposed). Therefore, if a discharge sample exceeds criteria levels and the confirmatory sample exceeds criteria levels, bi-monthly sampling must be conducted and carbon infiltration units must be installed and in operation within 60 days of receiving the confirmatory results. Sampling must continue on the bi-monthly schedule until six consecutive influent samples are below criteria levels, at which time it may be reduced to monthly.

Implementation of Carbon Treatment:

2. If a monthly sampling event is above criteria levels and the subsequent sampling event results are above criteria levels, carbon filtration units must be installed and activated within 60 days after receiving the confirmatory sampling results. At that time, bi-monthly sampling will be initiated and conducted as above (i.e., continue until six consecutive influent sampling results are below criteria levels, at which time the influent samples may revert back to monthly).
3. A Discharge Permit must be obtained from the Department prior to activating a treatment system.

Continued Monitoring and Treatment System Operation:

4. During operation of the carbon filtration units, samples will continue to be collected before and after treatment to ensure the treatment is effective. If influent sampling results are below criteria levels for six consecutive sampling events (not two sampling events as proposed), the system may be bypassed and influent sampling revert back to a monthly schedule. If an influent sample shows exceedances, a confirmatory sample must be collected, per established guidelines. If that sample also exceeds criteria levels, water must be treated through carbon units and bi-monthly influent sampling must be initiated.

As stated in the Department's April 2, 2014 directive letter, a separate *Work Plan* must be submitted detailing the alternative treatment method to be used. If MDE or Hess receives a citizen complaint of petroleum odors emanating from groundwater at the park, additional assessment and remediation may be required. Any modifications to the approved *Revised Contingency Plan* and this directive letter must receive written approval.

Notify the case manager at least five (5) working days prior to conducting any field work associated with this project. When submitting documentation to the Oil Control Program, include three hard copies and an electronic copy on a labeled compact disc (CD) to the attention of the case manager at the above letterhead address. 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: Stephen L. Leifer, Esquire (Baker Botts)
Mr. Keith Green (WSP Environmental & Energy, LLC)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Priscilla N. Carroll, Esquire
Mr. Horacio Tablada