



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

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1-800-633-6101, ext. 3442

Martin O'Malley
Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lieutenant Governor

April 2, 2014

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

RE: CONTINGENCY PLAN COMMENTS

Case No. 91-2100-BA

Hess Service 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 - January 21, 2014*. The Department required submittal of the *Contingency Plan* in the *Approval of CAP Addendum* directive letter in November 2013. The *Contingency Plan* was to detail the remedial measures that will be taken in the event dissolved phase petroleum hydrocarbon concentrations from discharged groundwater exceed the following typical NPDES permit standards: 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 Department does not approve the proposed time line in the *Contingency Plan* for sampling and groundwater treatment in the event an exceedance of NPDES standards occurs. Given the deficiencies in the *Contingency Plan*, Hess must resubmit a plan to rectify an exceedance in a shorter time period. The *Revised Contingency Plan* must include, at a minimum, the following:

1. The Department must be notified in writing within 24 hours after the laboratory data is received noting any exceedance of the groundwater discharge standards. Copies of the analytical laboratory data must be submitted to the Oil Control Program (email format is acceptable).
2. The groundwater discharge must be re-sampled within 48 hours after the initial exceedance is detected, and the laboratory analysis must be expedited for a 48-hour turnaround time. This laboratory data must be provided to the Oil Control Program immediately (i.e., within 24 hours) upon receipt by Hess.
3. If the analytical results from both samples (initial and confirmatory) exceed any of the discharge standards, sampling of the discharge must be increased to bi-monthly. This means any exceedance, not an exceedance of an order of magnitude or more, as proposed.

4. If discharge standards are exceeded for three consecutive sampling events, treatment of discharged groundwater will be required. Hess must propose a treatment technology that can be installed and activated within 60 days after receipt of the third consecutive round of sampling data indicating an exceedance.
5. Provide a detailed description of the treatment method that will be implemented, if needed, within the time period required. The Department understands that the initial treatment technology may not be appropriate for a long-term basis and that a different technology may be implemented at a later date once additional data is obtained. However, the Department requires a contingency treatment technology that can be implemented within a short period of time (60 days).
6. Treatment via GAC filtration, or an alternative method, may be used as an interim remedy while alternative remedial technologies for the long-term treatment of dissolved phase levels, as described in the *Contingency Plan*, are evaluated and proposed. If the use of weir plates and/or air sparging is considered, the Department is concerned that this may create a petroleum odor issue in the vicinity of the treatment area and may not be the most appropriate treatment method. If warranted, a separate *Work Plan* must be submitted detailing the alternative treatment method to be used.
7. If MDE or Hess receives a citizen complaint of petroleum odors emanating from groundwater at the park, additional assessment and remediation may be required.

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). 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