



January 25, 2021

Mr. Kehat Falik
Project Manager
ExxonMobil Environmental Services
38 Varick Street
Brooklyn, NY 11222

RE: RESPONSE TO REQUEST TO STOP SAMPLING POTABLE WELLS
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland

Dear Mr. Falik:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the *Request to Stop Sampling Potable Wells*, dated October 7, 2020, and the additional data requested by MDE via email and received October 30, 2020 (copy enclosed). The request included a proposal to stop sampling 33 of the 47 drinking water supply wells in the Jacksonville study area. The proposal is based on the concentrations of methyl tertiary-butyl ether (MTBE) in meeting criteria established in accordance with Flowchart 3 included in the 2018 Court Order.

In general, MDE agrees with the private well sampling program proposed by ExxonMobil. The following items were considered as part of MDE's data review:

- 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.
- Proximity to groundwater monitoring /recovery wells and remediation systems.

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

1. Quarterly/Semi-annual Sampling – Properties with active monitoring or recovery wells
In accordance with the Flowchart 3, ExxonMobil proposes to continue sampling at 14 properties where there are active recovery wells, recovery wells that are in post-operation (rebound) monitoring, and/or where monitoring wells are currently being sampled.

The MDE approves continued sampling of the 14 identified properties. Additionally, the private well at 3320 Paper Mill Road is required to be sampled since MW-146C, located on the property, is currently being sampled on a semi-annual basis.

2. Quarterly / Semi-Annual Sampling – No active recovery or monitoring wells
ExxonMobil proposes to discontinue sampling at 33 properties that meet the Flowchart 3 criteria and are currently sampled on a quarterly or semi-annual basis.

Based on the available information considered and reviewed, MDE approves discontinuation of sampling at 19 of the 33 proposed properties. The private supply wells on the following 14 properties must continue to be sampled, as specified below:

- 14102 Robcaste Road. Sample on a semi-annual basis to monitor MTBE concentrations first documented in September 2018.
- 14217 Robcaste Road. Continue sampling on a quarterly basis due to the recent (September 2020) MTBE detection of 4.6 parts per billion (ppb).
- 14232 Robcaste Road. Continue sampling on a semi-annual basis due to the proximity to the spill location and the absence of any sampling data since July 2019.
- 14240 Jarrettsville Pike. Continue sampling both supply wells on a reduced semi-annual basis due to the proximity to the spill location. Ensure the historical result table clearly defines which well the sample was obtained from. If the original well can no longer be sampled, provide documentation to MDE.
- 14243 Jarrettsville Pike. Continue sampling on a semi-annual basis due to the proximity to the release site.
- 14355 Hampshire Knob Drive. Continue to sample on a semi-annual basis to monitor tertiary-butyl alcohol (TBA) concentrations and confirm the reduced levels observed during the last two sampling events are sustained.
- 3235 Paper Mill Road. Continue to sample on a semi-annual basis to monitor TBA concentrations and confirm the reduced levels observed during the 2018 sampling events are sustained. No samples have been collected since January 2019.
- 3313 Paper Mill Road. Continue to sample on a quarterly basis to comply with the October 2019 requirement for one year of sampling following removal of the point of entry treatment (POET) system. Only two of the four required quarterly sampling events were performed (Q4-19 and Q2-20). The MDE will consider approval to discontinue sampling following one additional sampling event.
- 3320 Paper Mill Road. As discussed above, continue to sample on a semi-annual basis because monitoring well MW-146C is located on the property.

- 3504 Hampshire Glen Court. Continue sampling on a semi-annual basis due to the proximity of active recovery well MW-138D.
- 3505 Hampshire Glen Court. Continue sampling on a semi-annual basis due to the absence of required sampling. No sampling has been performed since Q1-19.
- 3510 Hampshire Glen Court. Continue sampling on a semi-annual basis due to the proximity to area of known impact.
- 3605-C Southside Avenue. Continue sampling on a semi-annual basis due to the absence of recent sampling data. No sampling performed since June 2018.
- 3606 Hampshire Glen Court. Continue sampling on a semi-annual basis to comply with the October 2019 requirement for one year of sampling following removal of POET. A minimum of one additional sampling event is required.

Approved Sampling Program Summary

Sampling Frequency	Number of Private Supply Wells Sampled		
	Current	Proposed	MDE Approved Changes
Semi-Annual	32	3	15
Quarterly	14	10	12
Monthly	1	1	1
Total	47	14	28

The MDE approves the proposed revisions to the private well sampling program as described above effective immediately.

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 its departments, reserves all rights against ExxonMobil Corporation with respect to all other past, present, and future cases to the State. The MDE 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 (ellen.jackson@maryland.gov) or me at 410-537-3442 or andrew.miller@maryland.gov.

Sincerely,



Andrew B. Miller, Chief
Remediation Division
Oil Control Program

Enclosures: Table 1

cc: Alicyn Craig, Esquire, ExxonMobil Corp.
Mr. Mark Schaaf, Kleinfelder East, Inc.
Mr. Kevin Koepnick, Manager, Groundwater Management Sect., Baltimore County DEPS
Ms. Ellen Jackson, Case Manager, Remediation Division, Oil Control Program
Ms. Julie Kuspa, Esquire, MDE Office of Attorney General
Mr. Christopher H. Ralston, Program Manager, Oil Control Program