



**Maryland**  
Department of  
the Environment

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

Ben Grumbles, Secretary  
Horacio Tablada, Deputy Secretary

January 16, 2019

Mr. Herbert M. Meade  
Environmental, Health and Safety Director  
Carroll Independent Fuel Company  
2700 Loch Raven Road  
Baltimore MD 21218

**RE: SITE STATUS AND MODIFICATIONS TO RESIDENTIAL SAMPLING PROGRAM**  
**Case No. 2006-0319-BA**  
**Former Citgo/ Carroll Wally's**  
**19200 Middletown Road**  
**Baltimore County, Maryland**  
**Facility I.D. No. 4593**

Dear Mr. Meade:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Post-Remediation Evaluation Report*, dated October 1, 2018, and the *Third Quarterly Monitoring Report*, dated October 30, 2018. The Oil Control Program required Carroll Independent Fuel Company (CIFC) to continue post-remedial monitoring of the network of groundwater monitoring wells located on site, adjacent to and hydraulically down-gradient from the subject underground storage tank (UST) system. Sampling of a defined network of private off-site drinking water supply wells was also required.

The *Request for Monitoring Reduction* proposed several changes to the sampling program including: a reduction in the sampling frequency of specific monitoring wells; proper abandonment of select monitoring and recovery wells; and the discontinuation of sampling for specified off-site private drinking water supply wells. CIFC also requested that they no longer be responsible for operation of the granular activated carbon (GAC) filtration system at 1612 Rayville Road. In addition, a request to sample all monitoring wells via low-flow sampling protocol, in lieu of conventional three well volume purge and sample collection methods, was proposed. This letter responds to the proposed sampling modification of the network of private drinking water supply wells and remediation system decommissioning request. The Department will provide a separate response letter regarding the monitoring well modification proposal request after the fourth quarter sampling data is received and evaluated by the Department.

The time-series sampling data from the off-site drinking water supply wells demonstrate a decreasing trend in dissolved phase petroleum contaminants, particularly methyl tertiary-butyl ether (MTBE) and benzene. All recent sampling results for the off-site water supply wells identified by CIFC for discontinuation of sampling were either non-detect for all analyzed compounds or below the

laboratory reporting limit of 0.5 ppb. Currently, two off-site private drinking water supply wells remain protected with GAC filtration systems (1606 and 1612 Rayville Road). The most recent sampling results reported pre-treatment concentrations MTBE concentrations of 2.2 parts per billion (ppb) and 0.3 ppb (estimated value below laboratory reporting limit), respectively.

Based on the current data and land use information, the Oil Control Program approves amendments to the drinking water sampling program as outlined below. The on-site and off-site Drinking water supply wells at which sampling has been amended remain in the study area. The Department reserves the right to require additional sampling based on changing site conditions.

- 1) Continued sampling of the three on-site drinking water supply wells (PW-01, PW-02, and PW-03) located at 19200 Middletown Road must be performed on a bi-annual (twice per year) basis. All samples collected must be analyzed for the approved *Target List of Compounds*, as reported in the Third Quarter 2018 report, including fuel oxygenates, in accordance with EPA Method 524.2.
- 2) Continue quarterly sampling of the off-site private drinking water supply well equipped with a POET filtration system at 1606 Rayville Road. All samples collected (pre-, mid-, and post-filtration) from the referenced off-site private drinking water supply well must be analyzed for the approved *Target List of Compounds*, as reported in the Third Quarter 2018 report, including fuel oxygenates, in accordance with EPA Method 524.2.
- 3) Continue quarterly sampling of the off-site private drinking water supply well equipped with a POET filtration system (pre-, mid-, and post-filtration) at 1612 Rayville Road for one additional quarter (February 2019). Following receipt and review of the last required sample collection, the Department will evaluate the request for removal of the POET system. Through separate written correspondence, the Department will communicate this pending modification to the respective property owner.
- 4) The Department requires at least one final collection of quarterly samples from the private drinking water supply wells at 19119, 19124, 19201, and 19222 Middletown Road and 1614, 1616, 1620, 1624, and 1717 Rayville Road. Through separate written correspondence, the Department will communicate this pending modification to the respective property owners. Sampling must not be performed until the notifications are made.
- 5) The Department approves the request to decommission the remediation system.
- 6) Continue to submit groundwater monitoring reports as required by the *Administrative Consent Order*. Continue to evaluate and discuss the data obtained as part of the *Revised CAP* activities and determine if groundwater conditions warrant initiation of the remediation system.

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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](mailto:ellen.jackson@maryland.gov)) or me at 410-537-3443 (email: [andrew.miller@maryland.gov](mailto:andrew.miller@maryland.gov)).

Sincerely,



Andrew B. Miller, Chief  
Remediation and State-Lead Division  
Oil Control Program

EJ/nln

Enclosure: Sampling Results Summary

cc: Mr. Peter Reichardt (Groundwater and Environmental Services, Inc.)  
Mr. Kevin Koepenick (Groundwater Management Section, Baltimore County DEPS)  
Stephanie Cobb-Williams, Esquire (Office of the Attorney General)  
Mr. Christopher H. Ralston (Program Manager, Oil Control Program)  
Ms. Kaley Laleker (Acting Director, Land and Materials Administration)