



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

February 6, 2018

Mr. Thomas Ruszin, III
Fuel and Environmental Leader
Two Farms, Inc. t/a Royal Farms
3611 Roland Avenue
Baltimore MD 21211

RE: REQUEST FOR MONITORING WELL ABANDONMENT

Case No. 2011-0729-CE
Royal Farms No. 96
500 Mechanics Valley Road, North East
Cecil County, Maryland
Facility I.D. No. 13326

Dear Mr. Ruszin:

The Maryland Department of the Environment's (the Department) Oil Control Program (OCP) recently completed a review of the case file for the above-referenced property, including the *Rebound Soil Investigation Report*, dated August 8, 2017, and the *Quarterly Progress Report, 4th Quarter 2017*, dated January 11, 2018. This case was opened on June 8, 2011 when the OCP received notification that liquid phase hydrocarbons (LPH) were detected in monitoring well MW-3. The site was investigated, characterized, and actively remediated. On January 25, 2013, Two Farms, Inc. and the Department entered into a *Settlement Agreement and Consent Order*.

In April 2017, a total of eleven direct-push soil borings were advanced to a depth of approximately 25 feet below the ground surface (bgs) to delineate current subsurface conditions and to determine if remediation activities were effective in removing liquid and dissolved phase petroleum contaminants from the subsurface. All soil borings were logged and field screened with a photo-ionization detector and soil samples were collected. The soil samples were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons - diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015B. All soil sampling results were either non-detect or below the Department's non-residential soil cleanup standards with the following exception. TPH-GRO were detected at 750 parts per million (ppm) in soil boring B-1 at approximately 12 feet bgs and at 2,530 ppm in soil boring S-6 at approximately 12 feet bgs.

The network of 34 monitoring and recovery wells was most recently sampled in November 2017. The groundwater samples were analyzed for full-suite VOCs using EPA Method 8260 and TPH-DRO and GRO using EPA Method 8015. Groundwater samples collected from 28 of the 34 wells were either non-detect or below the Department's groundwater standards. The analytical results for the groundwater samples collected from the remaining six monitoring wells detected the following petroleum constituents at concentrations above the Department's groundwater standards:

- Benzene ranging from 5.5 to 84.6 parts per billion (ppb), which is above the 5 ppb standard
- Naphthalene ranging from non-detect to 2.7 ppb, which is above the 1.4 ppb standard
- TPH-GRO ranging from 0.428 to 2,850 ppb, which is above the 0.047 ppb standard; and
- TPH-DRO ranging from 0.57 to 2.37 ppb, which is above the 0.047 ppb standard.

LPH were last detected in the monitoring well network in December 2013. The site and vicinity are supplied by private drinking water supply wells that have been monitored since June 2011. Petroleum constituents have never been detected in the on-site supply well at or above established action levels. The most recent sample collected from the supply well on December 5, 2017 was non-detect for all petroleum constituents with the following exception. Methyl tertiary-butyl ether (MTBE) was detected at a concentration of 2.63 ppb, below the State action level of 20 ppb.

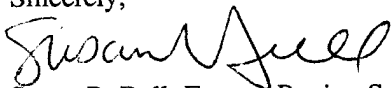
Based on the nature and extent of the petroleum contamination currently known to the Department and decreasing post-remedial groundwater data trends, the OCP does not require further corrective action or monitoring at the subject property and is considering this case for closure under Code of Maryland Regulations (COMAR 26.10.02.03-4). Prior to the issuance of a case closure letter, the following must be completed:

1. The Department concurs with continued monitoring on a semi-annual basis and the collection of groundwater samples from MW-1R, MW-2, MW-4, MW-6, MW-8, and MW-9 for compliance in accordance with COMAR 26.10.02.03-4.
2. All other monitoring and recovery wells must be abandoned by a Maryland-licensed well driller in accordance with all applicable requirements of COMAR 26.04.04.34. Provide copies of the required well abandonment reports to both the Oil Control Program (Attn: Ms. Susan Bull) and the Cecil County Department of Health (Attn: Ms. Angie Scramlin) **no later than March 30, 2018**.
3. Properly decommission and remove all remediation system components. All underground recovery piping must, at a minimum, be triple rinsed and filled with concrete slurry.
4. Following proper abandonment of the remediation system and wells, provide proper documentation to the OCP. Upon receipt of this documentation, the OCP will issue case closure correspondence for the site.

This site status letter should not be construed as a waiver or limitation of the Department's right to take enforcement or other action with respect to activities not addressed by this letter or unknown to the Department at this time, including newly discovered contamination or the exacerbation of existing contamination. The Department and the State of Maryland retain all authority and rights against any persons in any way responsible for causing the contamination present at or migrating from the site, including the right to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, resulting from the release of any contamination at the site.

If you have any questions, please contact me at 410-537-3499 (email: susan.bull@maryland.gov).

Sincerely,



Susan R. Bull, Eastern Region Section Head
Remediation and State-Lead Division
Oil Control Program

SRB/nln

cc: Mr. Jeff Stein (Advantage Environmental Consultants, LLC)
Mr. Fred Von Staden (Cecil County Health Dept.)
Mr. Andrew Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller