



Maryland
Department of
the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

October 12, 2018

Mr. Dwayne Stambaugh
Trustee and Project Manager
Stambaugh's, LLC
222 South Springdale Road
New Windsor MD 21776

RE: RESPONSE TO SUBMITTALS
Case No. 2007-0096-CL
Administrative Consent Order OCP-081564
Little George's Deli & Gas (Formerly Little George's Market)
602 Deer Park Road, Westminster, Carroll County, Maryland

Dear Mr. Stambaugh:

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 former gasoline station, including the *Search for Potable Wells and Summary Table of Drinking Water Sampling Results*, received July 27, 2018, and the *June 2018 Sampling Event* report, dated August 8, 2018. The well survey information was submitted in response to the Department's directive letter, dated March 29, 2018. In the *June 2018 Sampling Event* report, on behalf of the Responsible Party Group (RP Group), your environmental contractor, Chesapeake Geosciences, Inc. (CGS), requested an amended sampling frequency and approval to properly abandon select monitoring and lot wells.

Potable Wells and Summary Table of Drinking Water Sampling Results

The Department's March 29, 2018 correspondence required a potable water supply well survey within a half-mile radius of 602 Deer Park Road be submitted to the OCP by April 30, 2018. Although the deadline established was not achieved, the Department understands the drinking water survey data took considerable time to obtain and compile by CGS. CGS communicated with the Carroll County Health Department to obtain the data. The information package submitted included summary data tables of property locations with potential supply wells within a half-mile of the site, a tax map that identifies parcels with available well data, and a table with limited historic drinking water sampling results. The provided tax map identified properties with parcel numbers; however, many of the parcel numbers are not legible. Therefore, the summary data table of property locations with potential supply wells and the tax map could not be cross-referenced. Based on our review of the report, the following items were not provided:

- All drinking water supply wells within a half-mile plotted on a U.S. Geological Survey topographic map or similar scaled map; and
- Annotation on a map the 500-ft., 1,000-ft, and 0.5-mile radii.

In order to complete our evaluation for future project requirements, the Department requires the following:

- A. Field verification of the presence and location of all potential wells within 1,000 feet of the site and accurately plot all wells identified on a US Geological Survey topographic map or similar scaled map. Annotate on the map the 500-foot, 1,000-foot, and 0.5-mile radii. Each property must be clearly identified with either a parcel number and/or address that can be cross-referenced with the summary data table.
- B. Provide the field verification and updated map in a stand-alone report that includes the well survey information submitted July 27, 2018 with an evaluation of whether site conditions could potentially impact any off-site drinking water supply wells in the area.

June 2018 Sampling Event Report

The monitoring well network, including the Lot 4 Well, the Lot 7 Well, and the Sentinel well was sampled in June 2018. The analytical results reported the presence of methyl tertiary-butyl ether (MTBE) above the State action level of 20 parts per billion (ppb) in 3 of the 17 wells sampled at concentrations ranging from 161 to 734 ppb. Additionally, drinking water samples were collected in June 2018 from the on-site drinking water supply well and the private drinking water supply wells at 2173 Sykesville Road and 2040 Don Avenue. Of the three supply wells sampled, MTBE was detected in the on-site supply well at a concentration of 0.86 ppb and at the 2040 Don Avenue supply well at a concentration of 0.77 ppb. The influent sample from the supply well at 2173 Sykesville Road was non-detect for all analytes.

The time-series groundwater sampling data document a decreasing trend of MTBE; therefore, CGS proposes a reduction in the sampling frequency of the monitoring well network from quarterly (every three months) to semi-annually (every six months) and to reduce the number of wells sampled from 17 to 4 (MW-1A, MW-7A, Lot 7 Well, and Sentinel Well). CGS proposes to properly abandon all monitoring wells that would no longer be sampled (MW-1, MW-4, MW-7B, MW-7R, MW-2, H-1A, H-6, MW-6, H-4A, H-3, MW-3, MW-5, and Lot Wells 2 through 6).

The Department understands Lot Wells 2 through 6 are located within a cluster, with the Lot 4 Well closest to the dissolved phase plume. Lot 4 Well samples have been considered a representative sample for the Lot Well cluster. The Department understands Mr. Sweeney intends to sell the Victories Farm Property as a single lot, rather than his original intention of subdividing the property into 12 to 14 lots.

Based on the current data, the Department approves amendments to the groundwater sampling program as outlined below, but reserves the right to require additional sampling based on changing site conditions.

1. Begin semi-annual sampling of H-1A, H-6, MW-1, MW-1A, MW-2, MW-4, MW-6, MW-7A, MW-7B, MW-7R, Lot 7 Well and the Sentinel Well. All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260
2. Begin semi-annual gauging of H-3, H-4A, MW-3, MW-5, and Lot Well 4.
3. Properly abandon Lot Wells 2, 3, 5 and 6. The wells must be abandoned by a Maryland-licensed well driller in accordance with all applicable requirements of Code of Maryland Regulation (COMAR) 26.04.04.34-.36. Provide copies of the required well abandonment reports to both the Oil Control Program (Attn: Matthew Mueller) and the Carroll County Health Department (Attn: Leigh Broderick).

4. Continue to collect representative samples from the on-site drinking water supply well and the supply wells at 2173 Sykesville Road and 2040 Don Avenue on a bi-annual (twice a year) basis. The samples must be collected no later than June and December of each calendar year. All samples collected must be analyzed for full-suite VOCs using EPA Method 524.2. If granular activated carbon (GAC) filtration systems are installed, the samples must be collected pre-, mid-, and post-filtration. The RP Group is responsible for the operation and maintenance of the GAC filtration systems at 2173 Sykesville Road and 602 Deer Park Road.
5. Provide semi-annual monitoring reports that document the groundwater sampling analytical results (monitoring wells and potable wells). The report must include a scaled site map with groundwater contours and sampling locations, laboratory reports, and data summary tables. When submitting documentation to the OCP, submit three hard copies and a digital copy on a labeled compact disc (CD). The monitoring reports are **due no later than the 15th of August (June sampling) and the 15th of February (December sampling) of each calendar year.**
6. Formal documentation must be provided from Mr. John Sweeney regarding detailed future site plans for the Victories Farm Property.
7. Continue to collect groundwater samples from the specified on-site and off-site monitoring well network and private supply wells until otherwise directed by the Department in writing.

The Department will re-evaluate the site status and potential case closure timeframe following receipt of the updated private supply well data and upcoming semi-annual sampling data. If you have any questions, please contact the case manager, Mr. Matthew Mueller, at 410-3574 (email: matthew.mueller@maryland.gov) or me at 410-537-3482 (email: ellen.jackson@maryland.gov).

Sincerely,



Ellen Jackson, Northern Region Supervisor
Remediation and State-Lead Division
Oil Control Program

MKM/nln

cc: Mr. Kevin Howard (Chesapeake GeoSciences, Inc.)
Mr. John Sweeney (Sweeney Builders, Inc.)
Ms. Catherine Ader (Current Property Owner/Operator)
Ms. Patricia Mezardash (Former Property Owner/Operator)
Mr. Melvin Higgs (Little George's Markets, Inc.)
Margaret M. Witherup, Esquire
Clark Shaffer, Esquire
Mr. Leigh Broderick (Carroll County Health Department)
Mr. Tom Devilbiss (Carroll County Government)
Mr. Andrew B. Miller (Chief, Remediation and State-Lead Division, Oil Control Program)
Mr. Christopher H. Ralston (Administrator, Oil Control Program)
Stephanie Cobb Williams, Esquire (Office of the Attorney General)
Ms. Kaley Laleker (Director, Land and Materials Administration)