



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

410-537-3442 410-537-3092 (fax)

1-800-633-6101, ext. 3442

Martin O'Malley
Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lieutenant Governor

January 30, 2014

Mr. Thomas Ruszin, III
Two Farms, Inc. dba Royal Farms
3611 Roland Avenue
Baltimore MD 21211

RE: APPROVAL OF WORK PLANS
Case No. 2010-0339-BA
Royal Farm Store No. 64
7950 Pulaski Highway, Rosedale
Baltimore County, Maryland
Facility I.D. No. 3975

Dear Mr. Ruszin:

The Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Request for Reduction in IAQ Sampling - October 6, 2013*; the *Work Plan for Post Building Demolition Subsurface Investigation - November 11, 2013*; and the *Request to Expand Remediation System - November 26, 2013*. Below are the Departments comments to each of the submittals.

Indoor Air Sampling

The *Request for Reduction in IAQ Sampling* proposes to reduce indoor air sampling completed at the 1207 Chesaco Avenue residential property. Currently, indoor air samples are collected from the basement, first floor, and second floor of the residence. Indoor air samples have been collected on a quarterly basis since August 2010. In March 2012, sub slab soil vapor gas samples were collected from beneath the residence. The *Request for Reduction*, submitted by Royal Farms, requests eliminating sampling of the first and second floors of the residence and continuing quarterly sampling of the basement. Based on the data collected to date, the Department approves this request. If sampling data collected exceeds regulatory standards in the future, additional indoor air or soil vapor gas sampling may be required.

Building Demolition and Subsurface Investigation

The *Work Plan for Post Building Demolition Subsurface Investigation* proposes razing of the former residential structure at 1205 Chesaco Avenue, which is owned by Royal Farms, and the advancement of test pits beneath the basement slab to assess subsurface conditions. The Department requested additional detail be provided regarding the work proposed in an email correspondence on December 4, 2013. An email response to this request was submitted by your environmental consultant on January 7, 2014.

The Department approves the *Work Plan for Post Building Demolition Subsurface Investigation – November 11, 2013* contingent upon the following modifications:

1. If liquid phase hydrocarbons (LPH) are observed on groundwater in the excavation, a vacuum extraction truck must be mobilized to the site to remove LPH to the maximum extent practicable.
2. The locations of the test pits should be biased to areas with known LPH contamination, such as the former sump and areas adjacent to monitoring/recovery wells that have contained LPH.
3. A calibrated photo ionization detector (PID) and lower explosive limit (LEL) meter must be operational for the duration of excavation activities to monitor for petroleum odors/vapors.
4. At least one soil sample must be collected from each test pit location for laboratory analysis.
5. Notify the case manager at least five business days prior to implementation of the *Work Plan* to schedule excavation activities.

Expansion of Remediation System

The *Request to Expand Remediation System* proposes to expand the system by converting groundwater monitoring well MW-6 to a multi-phase extraction recovery well. LPH were historically detected in MW-6. This well has been shown to be in an area not currently influenced by the remediation system. LPH have been periodically removed from MW-6 by connecting the well to the recovery system, via above grade piping, while your environmental consultant was on-site. The November 2013 report proposes to install sub-grade piping that will be connected to the dual-phase recovery system. The Department approves connection of the well to the recovery system.

Notify the Oil Control Program at least five (5) working days prior to conducting any field activities associated with this project. When submitting documentation to the Oil Control Program, provide three hard copies and a digital copy on a labeled compact disc (CD). If you have any questions, please contact the case manager, Ms. Jenny Herman, at 410-537-3413 (email: jenny.herman@maryland.gov) or me at 410-537-3482 (ellen.jackson@maryland.gov).

Sincerely,



Ellen Jackson, Central Region Section Head
Remediation and State-Lead Division
Oil Control Program

JH/nln

cc: Mr. Jeffery Stein (Advantage Environmental Consultants, LLC)
Mr. Robert Rinehart (Royal Farms)
Daniel J. Miller, Esquire
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Priscilla N. Carroll, Esquire
Mr. Horacio Tablada