

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

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

December 6, 2017

Mr. Clarke Bozeman Project Manager ExxonMobil Environmental Services 1900 East Linden Avenue, Building 28A Linden NJ 07036

RE: APPROVAL OF SOUTHWEST GROUNDWATER MONITORING REDUCTION

Case No. 2006-0303-BA Former Exxon R/S No. 2-8077 14258 Jarrettsville Pike, Phoenix Baltimore County, Maryland

Dear Mr. Bozeman:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the *Groundwater Monitoring Reduction Proposal - Southwest Monitoring Area*, dated May 20, 2017. The proposal describes a reduction of groundwater monitoring (i.e., groundwater sampling and/or gauging) in the southwest area, which is defined as the area southwest of the former ExxonMobil station at 14258 Jarrettsville Pike and not including ExxonMobil-owned property. Currently, there are 83 monitoring wells in the southwest area that are gauged and/or sampled on a routine basis.

Remediation in the southwest area terminated in August 2015. Since shut-down of the southwest area remediation system, all monitoring wells and potable water supply wells in this area exhibit dissolved phase petroleum concentrations that were non-detect or below State groundwater standards with the exception of two monitoring wells, MW-29 and MW-40. Based on the dissolved groundwater concentration levels, ExxonMobil proposes a monitoring reduction, specifically to abandon 37 monitoring wells, discontinue sampling but continue gauging 21 monitoring wells, and reduce sampling and/or gauging frequency of 4 monitoring wells.

The Oil Control Program approves the proposed schedule of monitoring well modifications and proposed abandonment of select wells with modifications and exceptions as noted in the enclosed table. Based on our review of the monitoring well network construction details, historical and current dissolved phase hydrocarbon concentrations, and locations of the monitoring wells, the Department requires that, of the 83 monitoring wells, 60 monitoring wells are to be retained for continued monitoring and 23 monitoring wells are approved for proper abandonment. Please note that all well clusters that include a "C" deep zone well must be retained for long-term monitoring. These network monitoring wells were installed to monitor dissolved phase groundwater levels throughout the Jacksonville study area during the course of the case. For monitoring wells that are retained for gauge only, the Department may require groundwater sampling as warranted or when the remediation system at the station is approved for shut-down and required post-operation monitoring is performed.

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The monitoring wells approved for abandonment must be properly abandoned by a Maryland-licensed well driller in accordance with Code of Maryland Regulations (COMAR) 26.04.04.34-36. Upon completion of monitoring well abandonment activities, copies of the well abandonment reports must be submitted to both the Oil Control Program (Attn: Ms. Ellen Jackson) and the Baltimore County Department of Environmental Protection and Sustainability (Attn: Mr. Kevin Koepenick). Notify the Oil Control Program at least five (5) working days prior to performing monitoring well abandonment activities so that Department staff has an opportunity to view the work activities. If you have any questions, please contact the case manager, Ms. Ellen Jackson at 410-537-3482 or by email at <u>ellen.jackson@maryland.gov</u>.

Sincerely,

Andrew B. Miller, Chief

Pemediation and State-Lead Division

Oil Control Program

EJ/nln

Enclosure: Table of Southwest Monitoring Well Reduction

cc: Carlos Bollar, Esquire (Archer & Greiner, P.C.)

Properties, Inc. (c/o Mid-Atlantic Properties)

Dr. Mirza Baig (14223 Robcaste Road)

Mr. Steven Griffin (14219 Robcaste Road)

Dr. Michael Lynch (Jacksonville Veterinary Hospital)

Mr. Aaron Monroe (14217 Robcaste Road)

Mr. Kurt Vacovsky (14208 Robcaste Road)

Mr. Mark Schaaf (Kleinfelder East, Inc.)

Mr. Kevin Koepenick (Baltimore County DEPS)

Stephanie Cobb Williams, Esquire

Mr. Christopher H. Ralston

Ms. Hilary Miller

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Table. Southwest Groundwater Monitoring Reduction

		Current Sampling	ExxonMobil Proposed Monitoring	MDE Approved Proposal OR Required Sampling	
Well ID	Address	Frequency	Activity	(Bold Type)	Comment
MW-20	3313A Paper Mill	Bi-annual	Gauging Only	Approved	
MW-29	3313A Paper Mill	Quarterly	Unchanged	Approved	
MW-30	3313A Paper Mill	Quarterly	Unchanged	Approved	
MW-30P	3313A Paper Mill	Gauging Only	Gauging Only	Approved	
MW-31	3313A Paper Mill	Quarterly	Unchanged	Approved	
	3313A Paper Mill				
MW-33	Road	Quarterly	Abandon Well	Approved	
	3313A Paper Mill				
MW-33P	Road	Gauging Only	Gauging Only	Approved	
	3313A Paper Mill				
MW-34	Road	Quarterly	Abandon Well	Approved	
	3313A Paper Mill	<u> </u>			
MW-34P	Road	Gauging Only	Gauging Only	Approved	
	3313A Paper Mill				
MW-35	Road	Quarterly	Abandon Well	Approved	
	3313 Paper Mill				
MW-39	Road	Quarterly	Abandon Well	Approved	
	14223 Robcaste				
MW-40	Road	Quarterly	Unchanged	Approved	
MW-41A	Robcaste Road	Bi-annual	Gauging Only	Approved	
19194-417	1 toboacto 1 toac	D. armaa	Gaaagiiig Giiiij		Retain Well for continued
MW-41B	Robcaste Road	Bi-annual	Abandon Well	Bi-Annual	sampling
10100-410	11000aste 110au	Dramaa	7 Ibandon 17 on		Retain Well for continued
MW-41C	Robcaste Road	Quarterly	Abandon Well	Bi-Annual	sampling
MW-42A	Robcaste Road	Bi-annual	Gauging Only	Approved	
IVIVV-42A	Nobcaste Hoad	Dirailiuai	Cauging Only	Approved	Retain Well for continued
MW-42B	Robcaste Road	Bi-annual	Abandon Well	Bi-Annual	sampling
10100-420	Tiobcaste Hoad	Drainuai	Abandon Weii	Di Ailliau	Retain Well for continued
MW-42C	Robcaste Road	Quarterly	Abandon Well	Bi-Annual	sampling
10100-420	14240 Jarrettsville	Quarterly	Abandon Won	Di Annoui	
MW-44	Pike	Quarterly	Gauging Only	Approved	
10100-44	14240 Jarrettsville	Quarterly	dauging Only	Apploved	
NAVA 46	Pike	Quarterly	Gauging Only	Approved	
MW-46	14223 Robcaste	Quarterly	Gadging Only	прриоточ	
MM 40	Road	Quarterly	Unchanged	Approved	
MW-49	3313 Paper Mill	Quarterly	Unichanged	Аррготов	
A414/ 50	Road	Quarterly	Gauging Only	Approved	
MW-50	Hoad	Quarterly	Cauging Only	Лррготса	Retain Well for continued
MIN FOR	3313 Paper Mill	Quarterly	Abandon Well	Bi-Annual	sampling
MW-50B	3313 Paper Mill	Quarterly	Aballuoti vveii	Di-Alliua)	Retain Well for continued
MALEOO	Road	Quarterly	Abandon Well	Bi-Annual	sampling
MW-50C	14223 Robcaste	Quarterly	ADMINUOTI WEIL	DI-Amidai	
ARAI CA	14223 Hobcaste Road	Quarterly	Abandon Well	Approved	
MW-51			Gauging Only	Approved	
MW-53A	Robcaste Road	Quarterly	<u> </u>	Approved	
MW-53B	Robcaste Road	Quarterly	Unchanged Reduce Sampling to Bi-	Approved	
104/500	Bohoosto Bood	Oug-to-ti-	annual	Approved	
MW-53C	Robcaste Road	Quarterly	ariiluai	Approved	
104/55	14223 Robcaste	Ouganity.	Abandan Mali	Approved	1
MW-55	Road	Quarterly	Abandon Well	Approved	
MW-56A	Robcaste Road	Quarterly	Gauging Only	Approved	
MW-56B	Robcaste Road	Quarterly	Unchanged	Approved	
MW-56C	Robcaste Road	Quarterly	Unchanged	Approved	
	14219 Robcaste		16	A	
MW-60	Road	Quarterly	Unchanged	Approved	

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Table. Southwest Groundwater Monitoring Reduction

MW-71 Road Quarterly Abandon Well Bi-Annual sampling MW-72 Road Quarterly Unchanged Approved MW-96A Road Road Monthly Gauging Only Approved MW-96B Road Quarterly Abandon Well Bi-Annual Sampling MW-96B Road Quarterly Abandon Well Bi-Annual Sampling MW-97 Robcaste Road Quarterly Abandon Well Bi-Annual Sampling MW-102 Robcaste Road Quarterly Abandon Well Approved MW-102 Road Quarterly Abandon Well Approved MW-111 Robcaste Road Quarterly Abandon Well Approved MW-112 Robcaste Road Quarterly Abandon Well Approved MW-113 Robcaste Road Quarterly Abandon Well Approved MW-11421 Robcaste Road Quarterly Abandon Well Approved MW-115 Robcaste Road Quarterly Abandon Well Approved MW-116 Road Quarterly Abandon Well Approved MW-117 Robcaste Road Quarterly Abandon Well Approved MW-118 Road Quarterly Abandon Well Approved MW-119 Robcaste Road Quarterly Abandon Well Approved MW-118 Road Quarterly Abandon Well Approved MW-119 Robcaste Road Quarterly Abandon Well Approved MW-119 Robcaste Road Quarterly Gauging Only Approved MW-120 Road Quarterly Gauging Only Approved MW-121 Robcaste Road Quarterly Gauging Only Approved MW-122 Robcaste Road Quarterly Abandon Well Approved MW-123 Robcaste Road Quarterly Abandon Well Approved MW-124 Robcaste Road Quarterly Abandon Well Approved MW-125 Robcaste Road Quarterly Abandon Well Approved MW-126 Road Quarterly Abandon Well Approved MW-127 Robcaste Road Quarterly Abandon Well Approved MW-128 Robcaste Road Quarterly Abandon Well Approved MW-129 Robcaste Road Quarterly Abandon Well Approved MW-120 Robcaste Road Quarterly Abandon Well Approved MW-121 Robcaste Road Quarterly Abandon Well Approved MW-122 Robcaste Road Quarterly Abandon Well Approved MW-123 Robcaste Road Quarterly Abandon Well Approved MW-124 Robcaste Road Quarterly Abandon Well Approved MW-125 Robcaste Road Quarterly Abandon Well Approved MW-126 Road Robcaste Road Quarterly Abandon Well Approved	1				-	
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MW-126 Road Quarterly Abandon Well Approved 14223 Robcaste	MM.125		Quarterly	Unchanged	Approved	
MW-126 Road Quarterly Abandon Well Approved 14223 Robcaste	GZI-AAIAI		Quarterly	Giorangeu	Approved	
14223 Robcaste	MW-126		Quarterly	Abandon Well	Approved	
	120					
MW-127 Road Quarterly Abandon Well Approved	MW-127		Quarterly	Abandon Well	Approved	
	MW-126	14223 Robcaste Road 14223 Robcaste	Quarterly	Abandon Well	Approved	

Exxon Jacksonville. MDE Case No. 2006-0303BA

Table. Southwest Groundwater Monitoring Reduction

Well ID	Address	Current Sampling Frequency	ExxonMobil Proposed Monitoring Activity	MDE Approved Proposal OR Required Sampling (Bold Type)	Comment
	14209 Robcaste				
MW-128C	Road	Quarterly	Unchanged	Approved	
MW-130	14225 Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-140A	14219 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-140B	14219 Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
WW FIOD	3313A Paper Mill				
MW-145P	Road	Gauging Only	Gauging Only	Approved	
MW-146	3320 Paper Mill	Quarterly	Unchanged	Approved	
MW-146B	3320 Paper Mill	Monthly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-146C	3320 Paper Mill	Monthly	Abandon Well	Bi-Annual	Retain Well for continued sampling
	14240 Jarrettsville				
MW-149	Pike	Bi-annual	Abandon Well	Approved	
MW-153A	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-153B	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
WW-135B	3313A Paper Mill	Guarterry	Reduce Sampling to Bi-		
MW-154	Road	Quarterly	annual	Approved	
MW-156	14223 Robcaste Road	Quarterly	Reduce Sampling to Bi- annual	Approved	
MW-157P	14223 Robcaste Road	Gauging Only	Gauging Only	Approved	
10100 1071	14223 Robcaste				
MW-158P	Road	Quarterly	Abandon Well	Approved	
MW-159	14223 Robcaste Road	Quarterly	Unchanged	Approved	
4.044.400	14223 Robcaste	O	Linchanged	Approved	
MW-160	Road 14223 Robcaste	Quarterly	Unchanged	Approved	
MW-161	Road	Quarterly	Abandon Well	Approved	
MW-163B	14208 Robcaste	Quarterly	Abandon Well	Approved	
MW-172C	3313A Paper Mill Road	Monthly	Abandon Well	Approved	
	North Robcaste			Bi-Annual	Retain Well for continued sampling
MW-174B	Road North Robcaste	Quarterly	Abandon Well		Retain Well for continued
MW-174C	Road North Robcaste	Quarterly	Abandon Well	Bi-Annual	sampling Retain Well for continued
MW-175C	Road	Quarterly	Abandon Well	Bi-Annual	sampling