

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

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

September 3, 2019

Ms. Calista Campbell Project Manager ExxonMobil Environmental & Property Solutions 22777 Springwoods Village Parkway, W3.2A.581 Spring, Texas 77389

RE: WORK PLAN APPROVAL
Case No. 1986-1205-CE
Former Bayview Mobil Service Station #16-G1R
285 Old Bayview Road, North East
Cecil County, Maryland
Facility I.D. No. 2615

Dear Ms. Campbell:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *Work Plan for Area Potable Well Sampling*, dated Aug. 8, 2019. The *Work Plan* summarizes the planned connection of 259 and 261 Old Bayview Road to the municipal waterline. The drinking water supply wells at 259 and 261 Old Bayview Road will continue to be sampled in accordance with MDE requirements until municipal waterline connections are completed. The *Work Plan* proposes to collect groundwater samples from select nearby drinking water supply wells and analyze all samples collected for full-suite volatile organic compounds (VOCs), including fuel oxygenates, using EPA Method 524.2. Copies of all sampling results will be provided to MDE, the Cecil County Health Department, and the property owners and/or tenants.

The MDE approves the Work Plan for Area Potable Well Sampling contingent upon the following modifications:

- 1) The OCP approves sampling of the select drinking water supply wells identified in the *Work Plan* and the proposed Draft Access Letter, contingent upon shifting the sampling dates as appropriate. The OCP understands the site is located in a mixed public water and domestic well use area.
- 2) No later than Oct. 18, 2019, submit a half-mile-radius water use survey identifying all drinking water supply wells (i.e., domestic, non-community/community water supply, agricultural) within a half-mile radius of the subject property and plot on a U.S. Geological Survey map or scaled street map.

- a. Annotate on this map the 500-ft., 1,000-ft., and 0.5-mile radii.
- b. Provide a summary table including, at a minimum, property address, property owner name, property owner address, depth of well, casing depth, screen depth, and current status of well usage.
- c. Review well completion reports and evaluate whether on-site conditions could potentially impact any off-site drinking water supply wells in the area.
- d. Submit documentation of which supply wells are historic and have been abandoned.
- e. For properties served with public water, provide confirmation of this connection in the summary table (this can include confirmation from Cecil County Water and Sewer authority of properties that receive a water bill).
- f. Submit copies of field notes documenting reconnaissance performed to verify the presence/ absence of wells.
- g. Provide written documentation of your findings and the list of persons contacted.
- 3) Historically, additional nearby drinking water supply wells have been sampled as part of this open case. Based on our review of the results of the half-mile-radius water use survey, additional well sampling may be required.
- 4) Continue conducting semi-annual sampling of the monitoring well network pursuant to MDE's *Reduced Sampling Approval* letter, dated May 31, 2017 (copy enclosed). All samples collected must be analyzed for full-suite 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 8015.
- Within 45 days of completing a sampling event, submit a Groundwater Monitoring Report. When submitting sampling results, include detailed data summary tables and scaled site maps showing actual sampling locations. In the discussion of supplemental sampling events, include details on sampling procedures and describe analytical results in terms of media sampled. Reports must also include: groundwater contour maps; site-specific detailed hydrogeologic groundwater flow, product thickness(es), and dissolved concentration maps; cumulative amount of LPH recovered; and qualitative and/or quantitative discussions.

When submitting documentation to the OCP, provide 3 hard copies and an electronic copy on a labeled compact disc (CD). If you have any questions, please contact Ms. Lindley Campbell, at 410-537-3387 (*lindley.campbell1@maryland.gov*) or me at 410-537-3499 (*susan.bull@maryland.gov*).

Sincerely,

Susan R. Bull, Eastern Region Supervisor Remediation and State-Lead Division

Oil Control Program

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cc: Mr. Mark C. Steele, Senior Project Manager, Kleinfelder

Mr. Fred von Staden, Director, Environmental Health Services, Cecil County Health Dept.

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

Mr. Christopher H. Ralston, Program Manager, Oil Control Program

Ms. Kaley Laleker, Director, Land and Materials Administration