



Maryland

Department of
the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Crumbles
Secretary

December 20, 2016

Mr. Kenneth D. Kozel
President and CEO
Shore Regional Health
219 South Washington Street
Easton MD 21601

RE: SITE STATUS LETTER
Case No. 1987-2534-KE
Chester River Hospital Center
100 Brown Street, Chestertown
Kent County, Maryland
Facility I.D. No. 3168

Dear Mr. Kozel:

The Maryland Department of the Environment's (the Department) Oil Control Program has reviewed the case file for the above-referenced property, including the *Action Plan Summary Report*, dated June 6, 2016, the *Subsurface Investigation Work Plan*, dated September 27, 2016, and the *3rd Quarter Monitoring Report*, dated October 24, 2016. In June 2016, six monitoring wells were installed to characterize subsurface conditions in areas most likely to present residual quantities of liquid phase hydrocarbons (LPH) from the formerly leaking underground storage tank, should any quantities remain.

To fully delineate the vertical extent of petroleum impacts, all borings were advanced as continuous soil cores. The recovered cores were logged for lithologic characteristics and field screened for the presence of petroleum with a photo-ionization detector (PID). In addition, soil samples were collected for analysis at a fixed laboratory. Field screening of the soil cores revealed minor to non-detect levels of petroleum vapors around the soil/water interface; however, approximately 5 feet into the water table, impacts diminished to non-detect based on the PID readings. Soil samples were collected from each boring at the terminal depth. A second soil sample was collected from each boring at either the depth of the highest PID reading or at the soil/water interface. Following soil sampling, permanent monitoring wells were installed (MW-51, MW-52, MW-53, MW-54, MW-55, and MW-56) for the collection of groundwater during routine quarterly monitoring events.

The soil sample collected from MW-52 just above the water table at 42 to 43 feet below ground surface (bgs) exhibited the highest detection of total petroleum hydrocarbons-diesel range organics (TPH-DRO) at 11,000 parts per million (ppm). Because this boring is hydraulically down-gradient and in close proximity to the point of the fuel release, the results were not unexpected. The terminal depth soil sample was collected from 57 to 58 feet bgs. The analytical results for this sample were non-detect. The groundwater sample collected from MW-52 exhibited a TPH-DRO concentration of 1.5 ppm.

All groundwater samples were non-detect for the presence of surfactant. Overall, none of the soil cores exhibited LPH and the highest detection of TPH-DRO in groundwater was 6.9 ppm. The results of this assessment demonstrated that there are no significant residual concentrations of LPH remaining in the soils at this site. It also demonstrated that the existing well network adequately assessed and monitored site conditions and the long term LPH and groundwater recovery substantially remediated the subsurface from the historic release.

Based upon the recent site assessment, the post surfactant injection data, and long term monitoring record, the Department hereby requires the following:

1. The presence of surfactant remains in monitoring wells MW-13, MW-20, MW-43, and MW-45. Sampling for the presence of surfactant via EPA Method 5540D must continue until the results are non-detect for surfactant.
2. Upon receiving non-detect levels of surfactant in these remaining four monitoring wells, a final complete round of surfactant sampling, via EPA Method 5540D, must be conducted to confirm that all surfactant is below detection levels.
3. All monitoring wells will revert to a monthly gauging and quarterly sampling frequency (every three months). All groundwater samples submitted for laboratory analysis must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for TPH-DRO using EPA Method 8015B.
4. **Within 45 days of each sampling event**, submit a *Quarterly Monitoring Well Sampling Report* detailing the results of gauging and sampling events. At a minimum, the reports must include: a discussion of the supplemental sampling events and details on sampling procedures; data summary tables for time series groundwater gauging, groundwater analytical results and LPH thicknesses; scaled site map denoting all current wells and previously abandoned wells, groundwater surface contour map, dissolved-phase concentration map (including benzene, naphthalene, and TPH-DRO concentrations), and LPH thickness map; and any LPH recovery data, if applicable during that quarter, in a format consistent with the *Maryland Environmental Assessment Technology for Leaking Underground Storage Tanks* guidance document.
5. The Department is aware that three sentinel monitoring wells (MW-S1, MW-S2, and MW-S3) have been installed in accordance with an agreement between the Town and the Hospital. These wells are to be incorporated into the monthly gauging and quarterly sampling program. The Department noted that the *Monthly Monitoring Report for October 2016* has been updated to include sampling data from these wells within the quarterly reporting tables and the site map has been updated to include the well locations. Please submit the well drilling logs and any field and/or analytical screening results performed during the completion of these wells.
6. Any future work plans, reports, correspondence, and other submissions relating to or required for this site must be submitted in accordance with the Consent Agreement executed between the Department and Chester River Hospital Center.
7. If a new occurrence of LPH is observed, or there is an uncharacteristic increase in the amount of LPH observed relative to historic site data, report the findings to the Department within 2 hours of discovery by calling the OCP Baltimore Headquarters at [410-537-3442](tel:410-537-3442) during standard business hours, or the Emergency Response Division hotline at [1-866-633-4686](tel:1-866-633-4686). Reports should not be made solely to OCP case managers.

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If you have any questions, please contact the case manager Ms. Susan Bull, at 410-537-3499 (email: susan.bull@maryland.gov) or me at 410-537-3389 (email: andrew.miller@maryland.gov).

Sincerely,



Andrew Miller
Remediation Division Chief
Oil Control Program

SRB/nln

cc: Mayor Chris Cerino (Town of Chestertown)
Mr. Bill Ingersoll (Town of Chestertown)
Mr. Bob Sipes (Town of Chestertown)
Mr. Michael Forlini, Esquire (Funk & Bolton, PA)
Mr. John Beskid (Kent County Health Dept.)
Mr. Dane Bauer (H&B Solutions, LLC)
Mr. James Sines (EBA Engineering, Inc.)
Mr. Michael Powell, Esquire (Gordon-Feinblatt, LLC)
Mr. John Grace
Sari Levin, Esquire
Ms. Hilary Miller
Mr. Christopher Ralston
Ms. Susan Bull