



October 5, 2006

Ms. Ellen Jackson  
Waste Management Administration  
Oil Control Program  
1800 Washington Boulevard  
Baltimore, Maryland 21230

RE: Soil Vapor Extraction System Shutdown  
BP Service Station #03033  
14243 Jarrettsville Pike, Phoenix MD  
Case No. 2005-0326BA2  
Facility ID No., 0007079

Dear Ms. Jackson:

On behalf of BP Products North America Inc. (BP), URS Corporation (URS) is submitting this Letter Report to present the status of the soil vapor extraction (SVE) system currently operating at the BP service station located at 14243 Jarrettsville Pike, Phoenix, MD (Figure 1) and to request a temporary shut down of the SVE system to remove piping inadvertently installed within the Coldwell Banker (neighboring property) property boundary. While the SVE system is shut down, URS will continue to sample potable drinking water wells located on-site (monthly) and off-site (weekly) and on-site monitoring wells (quarterly) to evaluate the effectiveness of the SVE system at removing methyl tertiary butyl ether (MTBE) vapors from the tank field.

On May 31, 2005, the Maryland Department of the Environment (MDE) directed BP to install a SVE system to abate high dissolved phased concentrations of MTBE. To comply with this directive a SVE system was installed and brought on-line on May 30, 2006. Since this system was brought on-line it has operated at 100 percent efficiency. To monitor the effectiveness of this system, URS collected weekly air bag samples were for a period of one month (June 2006) and monthly thereafter (July through September 2006). Each of the air bag samples were analyzed for benzene, toluene, ethyl benzene, and total xylenes (BTEX), MTBE, total petroleum hydrocarbons (TPH) by EPA Method T0-3, and methane. Results of these samples indicate that approximate totals of 15.07 pounds (lbs) of TPH, 1.99 lbs of BTEX, 0.23 lbs of MTBE, and 4.5 lbs of methane were removed from the tank field on or before June 12, 2006. Since June 12, 2006, the SVE system has removed a total of 1.64 lbs of methane from the tank field (Table 1). The laboratory analytical results show that the volatile organic compound (VOC) concentrations of BTEX and MTBE have been below method detection limits since June 26, 2006.

On September 22, 2006, an associate of Coldwell Banker notified BP that a portion of the SVE system was encroaching on the Coldwell Banker property. During a subsequent site visit between BP and Coldwell Banker it was determined that a portion of the SVE system was inadvertently installed on the Coldwell Banker property. Coldwell Banker has since requested that BP reconfigure the SVE system to eliminate all components from their property. To comply with their request, URS scheduled to temporarily shut down the SVE system on October 9, 2006 to relocate the SVE system components from the Coldwell Banker property.

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Based on the SVE Performance Worksheet data presented in Table 1, URS on behalf of BP is requesting a temporary shutdown of the SVE system for a period of 8 to 10 weeks. This shutdown will aid in evaluating the effectiveness of the SVE system at removing MTBE vapors from the tank field; and in determining whether the recent decline in MTBE concentration in the on-site potable drinking water well can be attributed to: 1) dewatering activities at a nearby Former Exxon/Mobil service station or 2) the fact that MTBE is no longer being used as a fuel additive at this service station.

The effectiveness of the SVE system will be determined based on the following criteria (observed during the temporary shut-down):

- Dissolved phase MTBE concentrations in the on-site potable drinking water well remain below 20 micrograms per liter ( $\mu\text{g/L}$ ).
- Dissolved phase MTBE concentrations in the off-site Jacksonville Veterinary Hospital drinking water well remain at or below recent MTBE concentrations detected in this well since June 2006 (200 to 500  $\mu\text{g/L}$  of MTBE).
- Dissolved phase MTBE concentrations in the on-site groundwater monitoring wells remain relatively the same between the third quarter (July 24, 2006) and fourth quarter (scheduled for mid-November) groundwater sampling events.

Based on these potable and monitoring well analytical data, URS will propose the following action items regarding the SVE system currently installed at the Jarrettsville Pike Site:

- System shutdown based on data that show compliance with the May 31, 2005 MDE directive (abatement of MTBE concentrations at this site);
- Reinstall the SVE system on a temporary basis while the long term fate of this site is determined (potential site shutdown) or collect additional data required to determine the effectiveness of the SVE system; or,
- Permanently install (trench through the parking lot) the SVE system based the ability of the SVE system to effectively remove MTBE vapors from the site.

If you have any questions regarding this letter or require additional information for consideration of this request, please do not hesitate to contact Mr. Shane Cranford, the Supplier Performance Manager for BP at (215) 367-2539, or the undersigned at (301) 258-9780.

Best Regards,  
**URS CORPORATION**

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