



Maryland

Department of
the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

August 24, 2017

Mr. Clarke Bozeman
Global Remediation SouthCentral Region
ExxonMobil Corporation
7715 Crittenden Street, #309
Philadelphia PA 19118-4421

RE: NEAR NE OPTIMIZATION WORK PLAN APPROVAL
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland
Facility I.D. No. 12342

Dear Mr. Bozeman:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the *Near Northeast Optimization Work Plan*, dated June 6 2017. Kleinfelder, on behalf of ExxonMobil, proposes to modify groundwater pumping at select recovery and/or monitoring wells on the 3501 Hampshire Glen Court and 14301 Jarrettsville Pike properties to optimize recovery efforts of dissolved phase petroleum impacts in groundwater in the near northeast area.

Kleinfelder proposes to install a pump in monitoring well MW-168, located at 3501 Hampshire Glen Court, a property owned by ExxonMobil. A groundwater recovery pump will be installed to a depth of approximately 125 to 150 feet below ground surface (bgs). The purpose of utilizing this monitoring well as a recovery well is to address dissolved levels of petroleum constituents observed in off-site monitoring well MW-138D. In addition, pumps in groundwater recovery wells MW-187C and MW-183 will be lowered from 150 to 200 feet bgs to increase the hydraulic gradient and potential recovery of dissolved phase petroleum constituents. Following initial pumping from MW-168 and lowering of pumps at MW-178C and MW-183, surrounding monitoring wells MW-43B, MW-91, MW-91D, MW-138D, MW-167, MW-168, MW-176CC, MW-177, MW-178C, and MW-183 will be gauged and sampled on a weekly basis for the first month, then revert to the current monthly gauging and sampling schedule. After a three-month period, data will be evaluated to assess if pumping should continue at MW-168, which would require burying of the temporary piping and permanently connecting the well to the groundwater recovery system.

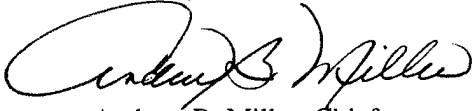
Kleinfelder also proposes to remove the pump at recovery well MW-181B and deploy it in monitoring well MW-181A, located at the 14301 Jarrettsville Pike property owned by M&T Bank. This proposal is based on the concentration trends of dissolved phase petroleum constituents observed in MW-181A, which are not showing a declining trend, and MW-181B, which has declined to below groundwater standards. Gauging and sampling of these two wells will remain at the current monthly frequency. Sampling results will be included in the quarterly status update monitoring reports.

The Department hereby approves the proposed *Work Plan* contingent upon the following modifications:

1. ExxonMobil must receive written approval by the Department prior to lowering any of the pumps below what is noted in the scope of work.
2. Notify the Oil Control Program immediately and turn off pumps for these wells if any adverse effects are observed.
3. Redevelop monitoring well MW-181B after the pump is removed and prior to use as a monitoring point.
4. Notify the Oil Control Program when pumping is initiated (via email is acceptable).
5. A report must be generated and submitted to the Oil Control Program **no later than 45 days** following completion of the third round of gauging and sampling of the select monitoring well network. The report must include all data with summary tables collected and conclusions and recommendations for our approval.
6. The report shall also include analytical summary tables for the monthly sampling data from the potable well supply at 3506 Hampshire Glen Court, MW-73C, and all "C" zone wells sampled on the 3501 Hampshire Glen property on a monthly basis.

If you have any questions, please contact the case manager, Ms. Ellen Jackson, at 410-537-3482 or via email at ellen.jackson@maryland.gov.

Sincerely,



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

EJ/nln

cc: Carlos Bollar, Esquire (Archer & Greiner, P.C.)
Mr. and Mrs. Kevin and Ann Cory (3506 Hampshire Glen Court)
Ms. Cindy Allen (M & T Bank)
Mr. Mark Schaaf (Kleinfelder East, Inc.)
Mr. Kevin Koepenick (Baltimore County DEPS)
Stephanie Cobb Williams, Esquire
Mr. Christopher H. Ralston
Ms. Hilary Miller