



Maryland

Department of the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

December 13, 2016

Mr. John Messler
Budget and Finance, Property Management
Baltimore County Government
12200-A Long Green Pike
Glen Arm MD 21057

RE: REQUEST FOR WORK PLAN
Case No. 2016-0467-BA
North Point Government Facility
1747 Merritt Boulevard / 7701 Wise Avenue
Dundalk, Baltimore County, Maryland
Facility I.D. No. 3893

Dear Mr. Messler:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Site Assessment Report* and the *Summary of Observations Stream Inspection Report*, both dated September 26, 2016. These reports provide the results of the required assessment activities conducted in accordance with the *Work Plan for Site Assessment*, dated June 16, 2016, and approved by the Department in a letter dated July 21, 2016.

Ten direct push soil borings were installed to delineate the extent of petroleum contamination identified at the former heating oil piping area. One soil sample from each boring location was collected based on the highest field photo-ionization detector (PID) reading, field observance of contamination such as odors or visual observations, and/or the water table interface if no petroleum contamination was observed. Ten temporary 3/4-inch diameter well points were installed and left in place for a two-week period to gauge for the presence of liquid phase hydrocarbons (LPH) and, if absent, for the collection of groundwater samples. The three monitoring wells installed by others prior to the release were redeveloped and groundwater samples were collected for laboratory analyses. In addition, four storm drain manways, previously impacted from the release as well as the storm water outfall area, were inspected and water samples were collected for laboratory analysis. All data generated were provided in the *Site Assessment Report*. In addition, the Department required Baltimore County to perform an inspection of the Lynch Cove Run from the storm drain outfall area to the area where the stream enters Lynch Cove. A stream inspection was performed by APEX personnel along the length of the stream, which extended from the outfall approximately 0.5 miles.

All soil and groundwater samples collected during the investigation were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for total petroleum hydrocarbons - diesel range organics (TPH-DRO) using EPA Method 8015. In addition, Baltimore County elected to analyze soil samples collected for polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270. All soil sampling results were below the Department's non-residential cleanup standards with the following exception. TPH-DRO were detected in samples from soil borings SB-5-S and SB-9-S at concentrations ranging from 1,860 to 2,380 parts per million (ppm), which exceed the 620 ppm cleanup standard. All groundwater samples were below the Department's groundwater standards with the following exceptions.

Naphthalene was detected in samples collected from SB-4-GW, SB-5-GW, and SB-8-GW at concentrations ranging from 1.8 to 52.9 parts per billion (ppb), which exceed the 1.4 ppb groundwater standard. TPH-DRO were detected in samples SB-2-GW, SB-4-GW, SB-5-GW, SB-8-GW, and MW-1-GW at concentrations ranging from 0.217 to 5.47 ppm, which exceed the 0.047 ppm groundwater standard.

Of the ten well points installed, two (SB-5 and SB-8) contained measurable LPH thicknesses ranging from 0.37 to 1.65 feet. The water sample collected from the storm drain manway at the former product piping area detected TPH-DRO at a concentration of 0.169 ppm. All other constituents were below regulatory levels or non-detect. The surface water sample collected from the storm drain outfall area was non-detect for all VOCs and TPH-DRO.

The stream inspection report identified two locations with a suspected petroleum sheen: one approximately 0.1 mile from the outfall area near the church parking lot; and one at a location approximately 0.24 miles, in close proximity to a neighboring parking lot. The Department contacted Baltimore County after reviewing the inspection report and performed a follow-up inspection on October 24, 2016. Department personnel walked the length of the stream with representatives of APEX Corporation, who performed the inspection for Baltimore County. No petroleum sheens or observations of petroleum impact were observed at the previously identified locations.

In a letter dated September 8, 2016 (copy enclosed), the Department required additional information regarding the on-site monitoring wells and information regarding placement of the booms after the release was identified. The Department has not received a formal response to address these issues. Due to the detection of LPH in the product piping area in close proximity to the Building and the observance of petroleum sheen and staining in the adjacent manway, the Department requires the following:

1. **No later than January 31, 2017**, submit a *Work Plan* to install a minimum of at least three 4-inch diameter monitoring wells (see enclosed Figure showing locations). The *Work Plan* must address any data gaps and further delineation of the extent of LPH (i.e., to areas east of the piping run and in the court yard area, if possible). The *Work Plan* must include cleaning of the impacted storm drain manway (SW manhole) that contained odors, PID readings, and residual petroleum contamination (sheen).
2. **No later than January 31, 2017**, all basement sumps in the building must be identified and inspected for the presence of petroleum impact. If water is identified in any of the sumps, the *Work Plan* must include the collection of sump samples. Samples must be analyzed for full-suite VOCs using EPA Method 8260 and for TPH-DRO using EPA Method 8015. A map identifying all basement sump locations and the sampling results must be included with the *Work Plan*.
3. **No later than January 31, 2017**, address information not yet provided but required in the Department's September 8, 2016 letter. Specifically, documentation regarding monitoring and maintenance of booms in the storm drain has not been provided. Additionally, information from the previous site assessment activities performed by others is still outstanding. The report provided to the Department via e-mail on September 12, 2016 documents geotechnical testing performed in 2014. The information in the report does not correspond to the areas of assessment where the existing monitoring wells are located. According to the well logs provided, the wells were installed in 2015.

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If you have any questions, please contact me at 410-537-3482 (email: ellen.jackson@maryland.gov) or Mr. Andrew Miller at 410-537-3389 (email andrew.miller@maryland.gov).

Sincerely,



Ellen Jackson, Central Region Section Head
Remediation and State-Lead Division
Oil Control Program

EJ/nln

Enclosures: Request for Information - September 8, 2016
Figure Showing Monitoring Well Locations

cc: Mr. Greg Doran (Baltimore County Budget and Finance, Property Management)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller



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Budget and Finance, Property Management
Baltimore County Government
12200-A Long Green Pike
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RE: REQUEST FOR INFORMATION
Case No. 2016-0467-BA
North Point Government Facility
1747 Merritt Boulevard / 7701 Wise Avenue
Dundalk, Baltimore County, Maryland
Facility I.D. No. 3893

Dear Mr. Doran,

Thank you for taking the time to speak with Department representatives on August 24, 2016 regarding the North Point Government Center petroleum release. This correspondence is provided to formalize the request for additional information included in an e-mail from Chris Ralston, dated August 26, 2016.

As stated in the Department's May 18, 2016, Request for Work Plan (attached), the presence of monitoring wells and abandoned boreholes indicated that site assessment activities were previously conducted at the facility. Wells and borings are often done to support a property transaction as part of a Phase II investigation. We understand that the final sale of the property is currently held in the courts, but it is presumable that an environmental study was conducted as part of that effort. The Department requires that Baltimore County provide all available documents from this previous site assessment activity(ies) **no later than September 30, 2016.**

In a Report of Observation, dated February 24, 2016, the Department required that Baltimore County hire an environmental consultant/contractor to monitor and maintain booms in the storm drains and across the outfall at Merritt Boulevard. Who was hired to perform the work and what documentation is available regarding monitoring of the outfall and sorbent boom? Provide field inspection reports, photographs, or any other documentation that you may have to the Department **no later than September 30, 2016.**

The Department has received inquiries that indicate impacts to the stream system from the release may continue to exist. An inspection of the stream is required to be performed to assess the current status. The inspection must start at the storm drain outfall and extend to the where the stream enters Lynch Cove. A written report, along with photo documentation, must be submitted to the Department **no later than September 30, 2016.** The inspection should concentrate on stream impacts that may be related to petroleum (stressed or dead vegetation, petroleum staining and/or odors, petroleum sheen, etc.).

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If you have any questions, please me at 410-537-3482 (email: ellen.jackson@maryland.gov) or Andrew Miller at 410-537-3389 (email andrew.miller@maryland.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Ellen Jackson".

Ellen Jackson, Supervisor
Central Region, Remediation Division
Oil Control Program

EJ/nln

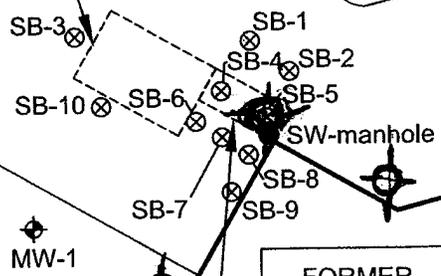
cc: Mr. John Messler (Baltimore County)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller



Wise Ave.

FORMER UST FIELD

FORMER PIPING RUN



LOCATIONS FOR MONITORING WELLS REQUIRED.

LEGEND:

- ⊗ Soil Boring Location
- Storm Drain Water Sample
- ◆ Monitoring Well Location

FIGURE 2
PROPOSED SAMPLE LOCATIONS



APEX COMPANIES, LLC
 15850 CRABBS BRANCH WAY, SUITE 200
 ROCKVILLE, MD 20855
 PHONE: (301) 417-0200
 FAX: (301) 975-0169

Date: 8-29-16	Project Title: NORTH POINT GOVERNMENT FACILITY 1747 MERRIT BLVD-7701 WISE AVE DUNDALK, MD		
Drawn By: MJO	Project Number: AMORT-004	CAD File: AMORT-004	Client: A MORTON THOMAS
Approx. Scale: 1"=50'			