



Maryland
Department of
the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Crumbles
Secretary

May 18, 2016

Mr. John Messler
Budget and Finance, Property Management
Baltimore County Government
12200-A Long Green Pike
Glenarm, 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 *Tank Closure Report*, dated March 28, 2016, prepared by Petroleum Services, Inc. This case was opened in response to the release of #2 heating oil to a storm drain system and outfall (tributary to Lynch Cove Run), reported to the Department on February 20, 2016 by citizens of the local neighborhood. Two 10,000-gallon heating oil underground storage tanks (USTs) were identified near a Baltimore County storm drain manhole that contained fuel oil. Precision testing of the UST system could not produce passing results.

The County was required to perform additional precision testing if the UST, conduct a subsurface investigation to delineate the extent of contamination, maintain booms in the storm drain and outfall, and other additional compliance corrective actions. The USTs were pumped out and cleaned on February 26, 2016. The County submitted a 30-day notification for removal of the two 10,000-gallon USTs on February 29, 2016 and the UST system was removed on March 11, 2016. Perforations in both tanks and the product supply piping were observed. Based on observed petroleum impacts, it appears that the release of fuel oil occurred primarily from the supply piping. Approximately 51 tons of petroleum impacted soil was removed from the area surrounding the piping. The storm drain manway was located adjacent to the piping, and a terracotta drain pipe connected to the storm drain manway ran under the product piping. The soils removed from the top of the tank excavation were permitted to be used as backfill material based on field screening results, obtained using a photoionization detector, that document the absence of petroleum impacts.

Four post-excavation soil samples were collected from approximately 2 feet below the tank bottoms and three soil samples were collected along the piping run after excavation of approximately 3 feet of impacted soil. All soil samples were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates, using EPA Method 8260 and for total petroleum hydrocarbons-diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015. All analytical results were below the Department's non-residential soil cleanup standards, with the following exceptions. TPH-DRO results for all three samples collected beneath the supply piping reported concentrations ranging from 1,600 to 13,000 parts per million (ppm), which exceed the

620 ppm Department cleanup standard.. TPH-GRO results for all three samples collected beneath the supply piping reported concentrations ranging from 1,400 to 4,800 ppm, which exceed the 620 ppm Department cleanup standard.

Based on the elevated analytical results, the Department hereby requires the following:

- 1) **No later than June 30, 2016**, submit a *Work Plan* for assessment activities to delineate the vertical and horizontal extent of contamination detected along the product piping run. The *Work Plan* must be submitted to the Oil Control Program, Suite 620, 1800 Washington Boulevard, Baltimore, Maryland 21230-1719 (Attn: Ms. Ellen Jackson).
- 2) The Department observed nearby monitoring wells at this facility that were gauged during the initial release investigation, as well as abandoned boring locations surrounding the UST system. Provide well logs, soil boring logs, well construction diagrams/completion reports and associated sampling data and any reports generated (i.e., Phase II Environmental Assessment Reports, if they exist) for our review.
- 3) Perform follow up inspections all storm drain manways impacted from the release, in addition to the storm drain outfall. If any petroleum sheen or fuel oil is observed, it must be reported to the Department immediately. As needed, install and maintain sorbent booms at the storm drain outfall. Provide results of the inspection findings in the *Work Plan*, along with photo documentation.
- 4) Collect water samples from the storm drain manway, located near the former piping run, and from the storm drain outfall. Analyze samples for TPH-DRO using EPA 8015.

The *Work Plan* must be submitted with the Phase II Environmental Assessment Reports (or any of the information per Bullet Item 2) and include all sampling results and the results of the manway inspection. When submitting future reports, provide two hardcopies and an electronic copy on a labeled compact disc (CD). If you have any questions, please contact Ms. Ellen Jackson, Central Regional Section Head at 410-537-3482 (email: ellen.jackson@maryland.gov) or me at 410-537-3389 (email andrew.miller@maryland.gov).

Sincerely,



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

EJ/nln

cc: Mr. Rainier Viera (Chevron)
Mr. Mathew Dower (Stantec)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller