Maryland
Department of
the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

July 21, 2016

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

RE: WORK PLAN APPROVAL
Case No. 2016-0467-BA
North Point Government Facility
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 *Work Plan for Site Assessment*, dated June 16, 2016. The *Work Plan* was submitted in response to the Department's May 18, 2016 written requirements for assessment around the area of the removed product piping where petroleum impacts above Department cleanup standards were documented, information pertaining to the three on-site monitoring wells, storm drain inspection, and sampling of the storm drain manway at the former product piping area and the storm water outfall impacted from the initial release.

The *Work Plan* details a proposal to perform a direct push subsurface investigation by advancing up to ten soil borings around the former piping area and underground storage tank (UST) field to the depth of groundwater or 30 feet, whichever comes first. Soils exhibiting the highest field photo ionization detector (PID) reading or at the capillary fringe, if no elevated PID readings are detected, will be collected for laboratory analysis. Temporary 1-inch diameter well points will be installed in three borings if groundwater is encountered. Soil and groundwater samples will be collected and the temporary well points will be abandoned. Samples collected will be analyzed for total petroleum hydrocarbons - diesel range organics (TPH-DRO) using EPA Method 8015 and polynuclear aromatic hydrocarbons (PAH) using EPA Method 8270. Select samples are proposed to be analyzed for methyl tertiary-butyl ether (MTBE) using EPA 8260. In addition, the on-site monitoring wells will be redeveloped via surge and purge techniques and subsequently sampled via low-flow technology and analyzed as noted above. The storm drain manways and outfall will be inspected, as previously required by the Department, and samples will be collected from the manway at the piping area and outfall area and analyzed for TPH DRO using EPA Method 8015M.

The *Work Plan* is hereby approved for immediate implementation contingent upon the following modifications / requirements:

1. All soil and groundwater samples collected 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 8015. If groundwater is encountered, all boring must be advanced at least 8 feet into groundwater or until the vertical limits of impacted are documented. All borings must be converted to temporary well points using 10 to 20-ft well screens to properly screen across the water table. The must be left in place for at least two weeks to monitor for the presence of liquid phase hydrocarbons (LPH). If no LPH are detected after a two-week period, groundwater samples will be collected and the well points properly abandoned. Please note that the well points must be constructed to eliminate any surface runoff from entering them and be protected from traffic and pedestrians.

2. All soil and groundwater must be properly containerized and disposed. All disposal receipts must be submitted with the *Report of Results*.

3. The Department approves the proposal for re-development and sampling of the on-site monitoring wells; however, sampling may not be performed sooner than two weeks after re-development. Samples must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 8260 and for TPH-DRO using EPA Method 8015. Investigations must be performed to determine the well construction details of the wells with findings included in the assessment report. Wells that are screened below the water table may not be useful in evaluating for the presence/absence of LPH.

4. Coordinate a site meeting with the case manager, Ms. Ellen Jackson, to field mark the soil boring locations after subsurface utilities are marked and prior to performing the work.

5. A *Report of Results* must be submitted within 60 days upon completion of all field activities to the: Oil Control Program, Suite 620, 1800 Washington Boulevard, Baltimore, Maryland 21230-1719 (Attn: Ms. Ellen Jackson). Two hardcopies and an electronic copy on a compact disc (CD) must be provided of all future reports.

If you have any questions, please contact the case manager, Ms. Ellen Jackson, 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. Matthew Neigh (Apex Corp., LLC)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Christopher H. Ralston
Ms. Hilary Miller