



April 21, 2020

Mr. Joseph Ogren  
Project Manager  
ExxonMobil Environmental Services  
38 Varick Street  
Brooklyn, NY 11222

**RE: APPROVAL OF CONVERSION OF DUAL PHASE EXTRACTON TO  
GROUNDWATER EXTRACTION  
Case No. 2006-0303-BA  
Former Exxon R/S No. 2-8077  
14258 Jarrettsville Pike, Phoenix  
Baltimore County, Maryland**

Dear Mr. Ogren:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the *Recovery Well Conversion Report of Results and Work Plan* (Work Plan), dated January 22, 2020. The Work Plan includes the results of the last sequential shutdown and conversion of select recovery wells to monitoring wells pursuant to the *Sequential Conversion of Select Wells Report of Results and Proposed Work Plan*, dated March 25, 2019, and the MDE approval letter dated May 24, 2019. The proposed *Work Plan* includes the following:

- Dual-Phase Extraction (DPE) system shutdown;
- Sequential recovery well conversion of 16 additional recovery wells; and
- A reduction in groundwater monitoring (i.e., groundwater sampling and/or gauging), select monitoring well abandonment, and the cessation of monitoring at certain wells with retention for post-remedial monitoring (i.e., inactive status).

This letter only responds to the request for DPE system shutdown. The MDE will provide a separate response letter regarding the other work plan proposals. Kleinfelder, on behalf of ExxonMobil, proposes to terminate the DPE system based on the decline of petroleum vapor recovery at this portion of the recovery operations, which have been performed at the facility since startup in 2006. There are currently seven recovery wells connected to the DPE system: four at the former gasoline station (MW-3, MW-13, MW-16, and MW-27); and three in the traffic circle (MW-187A, MW-187B, and MW-187C). DPE recovery will cease and the recovery wells will be converted to groundwater pumping wells using pneumatic pumps. The DPE recovery system is currently used to extract only vapors from wells MW-187A, MW-187B, and MW-187C while groundwater is extracted from the three wells using pneumatic pumps, which will continue. As proposed, the DPE stinger tubes in MW-3, MW-13, MW-16, and MW-27 will be removed and pneumatic pumps installed for groundwater recovery.

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Based on the current residential land use in the area and available information reviewed for the case, the OCP approves the proposal to shut down the DPE system and continued groundwater recovery from all seven recovery wells using pneumatic pumps. Groundwater monitoring (gauging and sampling) will continue based on the current groundwater monitoring frequency schedule.

If you have any questions, please contact Ms. Ellen Jackson at 410-537-3482 or [ellen.jackson@maryland.gov](mailto:ellen.jackson@maryland.gov).

Sincerely,



Andrew B. Miller, Chief  
Remediation Division  
Oil Control Program

cc: Joseph P. Perez, Esquire, ExxonMobil Corporation  
Carlos Bollar, Esquire, Archer & Greiner, P.C.  
Mr. Mark Schaaf, Kleinfelder East, Inc.  
Mr. Kevin Koepenick, Manager, Groundwater Management Section, Baltimore County DEPS  
Ms. Ellen Jackson, Case Manager, Remediation Division, Oil Control Program  
Mr. Christopher H. Ralston, Program Manager, Oil Control Program