



September 23, 2020

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

RE: REQUEST FOR MONITORING WELL ABANDONMENT
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 (MDE) Oil Control Program completed a review of the case file for the above-referenced property, including the *Quarterly Monitoring Report - July 2020 Gauging*, dated July 20, 2020, which included a request for case closure. This case was opened in February 2016 in response to liquid phase hydrocarbons (LPH) observed in a storm drain system and outfall (tributary to Lynch Cove Run). Spill response investigations identified two 10,000-gallon heating oil underground storage tanks (UST) near a storm drain manhole on the North Point Government Center Facility. Precision testing of the UST systems could not produce passing results; therefore, they were removed in March 2016. Perforations in both tanks and their associated product piping were observed. During removal activities, evidence of a leaking fuel line near a storm drain manhole was identified, which is presumed to be the source of LPH observed in the stream. Approximately 51 tons of petroleum-impacted soil was removed from the area surrounding the USTs and product piping trenches.

A subsurface investigation performed in August 2016 identified LPH on the groundwater in the vicinity of the former product piping trenches. In March 2017, the storm drain system in the vicinity of the former product piping trenches was cleaned to remove residual fuel oil and three groundwater monitoring wells were installed (MW-4 through MW-6), in addition to three existing monitoring wells on site (MW-1 through MW-3). According to the well completion reports for MW-1 through MW-3, the wells were installed in 2015; however, according to Baltimore County, the purpose for well installation was unknown. During the installation of MW-5, a nearby stormwater drain line was compromised and stormwater subsequently caused damage to the well casing and collapse of the surface pavement. In February 2018, the stormwater drain line was repaired, MW-5 was abandoned and replaced (MW-5A).

Monitoring wells MW-1, MW-4, MW-5/MW-5A, and MW-6 were gauged on a monthly basis and sampled on a quarterly basis from April 2017 through March 2019. The monitoring frequency was reduced to quarterly gauging and annual sampling from March 2019 through April 2020. Monitoring wells were sampled and analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons - diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015. Based on the groundwater sampling data collected, all sampling results were either non-detect or below groundwater standards, with few exceptions. TPH-DRO were detected in MW-1, MW-5, MW-5A, and MW-6 at concentrations ranging from 123 parts per billion (ppb) in MW-6 to 3,520 ppb in MW-5 (September 2017), which exceed the 47 ppb standard. Naphthalene was detected in MW-5 at concentrations ranging from 1.3 ppb to 3.0 ppb (April 2017), which exceed the 0.17 ppb standard. The most recent sampling data collected in April 2020 detected TPH-DRO concentrations up to 425 ppb in MW-5A.

LPH have not been detected in MW-1, MW-4, or MW-6 since gauging began in April 2017 and LPH have not been detected in MW-5A since gauging of the replacement well began in April 2018. The presence of LPH was documented in former monitoring well MW-5 during three monthly gauging events (July 2017, December 2017, and January 2018) at thicknesses ranging from 0.03 feet in July 2017 to 0.75 feet in January 2018. The last gauging event in January 2018 was conducted prior to MW-5 sustaining damage and having to be abandoned.

Since the initial discovery of petroleum impacts in the storm drain system and tributary to Lynch Cove Run in February 2016, measureable LPH have not been observed in either location. Petroleum sheens have been reported on two occasions since commencement of this case; however, the sheens were not attributed to the release from the site. The OCP understands petroleum impacts have not been detected in the building (product has not been observed in the basement sump or odors detected in the building). Based on the absence of impacts to the building, the absence of LPH in the monitoring well network, the depth to groundwater, which ranges from 13 to 20 feet bgs, and petroleum concentrations detected in the groundwater, vapor intrusion risk to the building is not considered to be a concern. The OCP understands the site and vicinity are supplied by municipal water.

Based on the sustained absence of LPH on the groundwater, the absence of LPH in the storm drain system including the outfall (Lynch Cove Run), and groundwater sampling data collected from the monitoring wells, OCP is considering this case for closure. Prior to case closure, all monitoring wells (MW-1 through MW-6) must be properly abandoned by a Maryland-licensed well driller in accordance with COMAR 26.04.04.34-.39. Provide copies of the well abandonment reports to OCP (Attn: Mr. Matt Mueller) and the Baltimore County Department of Environmental Protection and Sustainability (Attn: Mr. Bill Ensor). A report documenting the monitoring well abandonment activities, including pre- and post-abandonment well photographs and completed monitoring well abandonment reports must be submitted to OCP **no later than November 30, 2020**. Following proper abandonment of the wells and receipt of all required documentation, OCP will issue case closure correspondence for the site.

This *Request for Monitoring Well Abandonment* is not a waiver or limitation of MDE's right to take enforcement or other action in the future based upon contamination at and around the site. The MDE and the State of Maryland retain all authority and rights to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, for contamination at and around the site.

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Notify the case manager, Mr. Matt Mueller, at least five (5) days prior to well abandonment activities. When submitting documentation to OCP, provide three hard copies and one electronic copy via email. If you have any questions, please contact Mr. Matt Mueller at 410-537-3584 (matthew.mueller@maryland.gov) or me at 410-537-3482 (ellen.jackson@maryland.gov).

Sincerely,



Ellen Jackson, Northern Region Supervisor
Remediation Division
Oil Control Program

cc: Mr. Aaron Smith, AMT Engineering
Mr. Kevin Koepenick, Manager, Groundwater Management Section, Baltimore County DEPS
Mr. Matt Mueller, Case Manager, Remediation Division, Oil Control Program
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program