



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Crumbles, Secretary
Horacio Tablada, Deputy Secretary

April 17, 2020

Mr. Thomas Ruszin, III
Two Farms, Inc.
t/a Royal Farms
3611 Roland Avenue
Baltimore, MD 21211

**RE: APPROVAL OF SELECT MONITORING WELL ABANDONMENT and
REMEDICATION SYSTEM REMOVAL
Case No. 2010-0339-BA
Royal Farms No. 64
7950 Pulaski Highway, Rosedale
Baltimore County, Maryland
Facility I.D. No. 3975**

Dear Mr. Ruszin:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *Monitoring Well Abandonment Request*, dated March 13, 2020; the *System Removal Request*, dated March 13, 2020; and the *Quarterly Progress Report - Second Quarter 2019*, dated August 16, 2019. Advantage Environmental Consultants, LLC, on behalf of Two Farms, Inc., requested the abandonment of 12 monitoring wells based on a Mann-Kendall statistical analysis for each well that showed either a "decreasing", "probably decreasing", "stable", or "no-trend" trends for dissolved phase groundwater concentrations of benzene, methyl tertiary-butyl ether (MTBE), and naphthalene. According to the proposal, the monitoring wells selected were not part of the former recovery well network or part of the semi-annual or quarterly sampling frequency. In addition, Two Farms, Inc. requested removal of the remediation system and capping of the subsurface remediation lines. Two Farms, Inc. will retain the system off site so it can be mobilized back to the site, if warranted.

As approved in the *Correction Action Plan (CAP)*, dated October 7, 2010, the *CAP Addendum (CAPA)*, dated June 27, 2013, and MDE's *CAP Addendum Approval* letter, dated September 4, 2013, one of the remedial end goals for the project was the achievement of stable or decreasing trends for the dissolved phase hydrocarbon concentrations in groundwater monitoring wells using Mann-Kendall statistical analyses. Based on the OCP's March 4, 2020 letter, the OCP may also consider allowing exceptions to the stated statistical trend goals (i.e. accepting a no-trend outcome) if trends are based on low level concentrations.

In review of the most recent Mann-Kendall analyses provided in the March 13, 2020 report, 7 of the 12 monitoring wells proposed for abandonment met the CAP goals for statistical trends of dissolved phase concentrations (i.e. decreasing, probably decreasing, and/or stable) at monitoring wells MW-10,

MW-11, MW-12, MW-13, MW-19, MW-20, and MW-25. A no-trend outcome was noted for monitoring wells MW-3, MW-6, MW-9, and MW-30 for MTBE concentrations and MW-9 and MW-18 for naphthalene concentrations. However, the concentrations in these wells were considered low-level detections or otherwise below levels of concern for the site; therefore, OCP is accepting the no-trend outcome in considering the wells for abandonment.

Based on the current commercial and residential land use and the available information reviewed for the case, including the fact that area is served by public water, the OCP approves abandonment of the monitoring wells listed in the table below and the request to remove the remediation system. Per the March 4, 2020 letter, monitoring well MW-30 is part of the semi-annual monitoring well network and must be retained for that purpose. The remediation system piping must be purged of all liquid prior to being capped. The OCP concurs with Two Farms, Inc. to store the system off site in the event the system needs to be brought back for re-activation.

Monitoring Wells Proposed for Abandonment	Approved	Not Approved
MW-3, MW-6, MW-9, MW-10, MW-11, MW-12, MW-13, MW-18, MW-19, MW-20, and MW 25	X	
MW-30		X

The 11 approved monitoring wells must be properly abandoned by a Maryland-licensed well driller in accordance with all applicable requirements of Code of Maryland Regulations (COMAR) 26.04.04.34-.36. Provide copies of the well abandonment reports to both the OCP (Attn: Ms. Ellen Jackson) and the Baltimore County Department of Environmental Protection and Sustainability (Attn: Mr. Bill Ensor).

If you have any questions, please contact Ms. Ellen Jackson at 410-537-3482 (ellen.jackson@maryland.gov) or me at 410-537-3389 (andrew.miller@maryland.gov).

Sincerely,



Andrew Miller, Chief
Remediation Division
Oil Control Program

cc: Mr. Kevin Koepenick, Manager, Groundwater Management Section, Baltimore County DEPS
Julie Kuspa, Esquire, MDE Office of the Attorney General
Ms. Ellen Jackson, Northern Region Supervisor, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program