



October 28, 2016

Maryland Department of the Environment  
1800 Washington Blvd.  
Baltimore MD 21230  
Attention: Ms. Jeannette DeBartolomeo, Case Manager

**RE: Response to MDE Notice of Non-Compliance Letter**  
Calvert Citgo  
2802 Northeast Road (Harrison Residence)  
2794 Northeast Road (O'Brien Residence)  
North East, Maryland 21901  
Facility No. 5678  
**REPSG Project Reference No. 005977.130**

Dear Ms. DeBartolomeo,

Country Stores, Inc. and the Patel's are in receipt of the MDE's Notice of Non-Compliance Letter dated October 12, 2016. This response indicates Country Stores, Inc. and the Patel's intent to comply with the requirements set forth in the letter.

**Corrective Action Plan Implementation**

As of the date of this letter, REPSG is in the process of securing all permits necessary to facilitate compliant installation of the approved CAP. These permits include the Notice of Intent (NOI) for the Discharge of Treated Groundwater, National Pollutant Discharge System (NPDES), Soil Vapor Extraction (SVE), and all associated construction permits needed for system installation. REPSG anticipates full approval/receipt of these permits by December 1, 2016.

Following receipt of all approved permits, REPSG will oversee the installation of the approved remediation system at the Calvert Citgo Site. This installation is anticipated to commence no later than December 31, 2016. As the various components of this system are in the process of being manufactured by a third-party, the final date of installation may change as a result of manufacturing delays. REPSG will notify the MDE within 72-hours of such a manufacturing delay with an updated installation date.

While REPSG's March 28, 2016 Response to MDE Pilot Test Approval Letter had proposed that the treatment system be installed in a small-scale, step-wise manner, a determination has since been made to instead install the larger-scale system as detailed in the approved CAP. This larger-scale system installation will limit the need for multiple system component mobilizations, thereby providing a cost-reduction over that of the smaller scale step-wise system, and providing fewer disruptions to the operations of the service station present at the Site. As per the October 12<sup>th</sup>, 2016 MDE directive letter, a report documenting system installation specifics will be submitted to the MDE within 30 days following the completion of system installation.

The larger-scale system installation will include trenching and placement of necessary associated subsurface system piping which will connect to monitoring wells MW-005R and MW-001. In addition, subsurface piping will be laid out for the most likely locations of future proposed soil vapor extraction points SVE-001, SVE-002, and SVE-003. As per email correspondence between REPSG and the MDE on August 1, 2016, the treatment system will initially be run at monitoring well MW-005R only. MW-005R has been selected as the initial well for treatment as it is the well with the highest levels of contamination at the Site. Treatment operations are planned on MW-005R for approximately 3 months in order to allow for a full evaluation of the success rate of the system at this well, prior to the expansion of the operation of the system to include additional wells at the Site.

It is REPSG's professional opinion that this more limited operational treatment period will allow for the system to be adjusted in a more effective and cost-efficient manner than an immediate initiation of a Site-wide system. This will assure that the clean-up strategy at the service station will be the most effective, long term, and will optimize remedial design, making any adjustments, based on real time data. This will also insure that the available project funds aren't exhausted on an in-effective method.

Evaluation metrics for the success rate of the treatment system will include influent/effluent air sampling and GW sampling and analysis for contaminants of concern on a monthly (at a minimum) basis to determine the success rate of the system. A written report (*Remedial Action Progress Report*) of the ongoing progress for the system, which will include results of ongoing testing, tabulated dissolved phase contamination information, vapor phase recovery data, and recommendations for next steps, will be prepared on a monthly basis following install. The first *Remedial Action Progress Report* will be submitted to the MDE no later than 60 days following system installation.

### **Ozone Treatment Study**

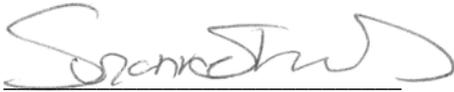
On August 23, 2016, REPSG conducted an ozone treatability in-lab bench-scale study at the 2794 Northeast Road residence. As per email correspondence between REPSG

and the MDE on August 1, 2016, this in-lab bench scale study was conducted in order to make sure that the planned field-based pilot-test ozone treatment study would be appropriately calibrated, allowing for a more effective pilot-test and subsequent full-scale system installation.

Complete details pertaining to the process and results of this bench-scale study are being supplied concurrently under separate cover with this response letter. In summary, the results of this treatability study indicate that a combination of ozone and ultraviolet oxidation will be a viable remedial method for addressing ongoing tert-butyl alcohol (TBA) concentrations present in drinking water at the off-Site residences.

If you have any questions or concerns, please do not hesitate to contact our offices at 215-729-3220.

Sincerely,



Suzanne Shourds  
Project Manager



Brenda MacPhail Kellogg  
Senior Project Manager

**React Environmental Professional Services Group, Inc.**

Cc: Susan Bull, MDE  
Andrew Miller, MDE  
Country Stores, Inc.  
James A. Johnson, Esquire (Semmes, Bowen & Semmens)  
Prag Patel, Calvert Citgo  
Robert Valliant Jones, Esquire (Law Offices of Robert Valliant Jones)