



**Maryland**  
Department of  
the Environment

Larry Hogan  
Governor

Boyd Rutherford  
Lieutenant Governor

Ben Grumbles  
Secretary

November 1, 2016

Mr. John Wear  
Elkton Fair Hill Services, LLC  
4428 Telegraph Road  
Elkton MD 21921

**RE: REQUEST FOR ADDITIONAL INFORMATION**  
**Case No. 2017-0053-CE**  
**Notice of Non-Compliance NNC-OCP-2017-009**  
**Fair Hill Shell**  
**4428 Telegraph Road, Elkton**  
**Cecil County, Maryland**  
**Facility I.D. No. 13160**

Dear Mr. Wear:

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 September 20, 2016 *Report* for the above-referenced property. In 2009, three groundwater monitoring wells were installed in accordance with Code of Maryland Regulations (COMAR) 26.10.02.03-4. Sampling of the monitoring well network conducted in September 2016 detected increasing levels of petroleum constituents (benzene at 147 parts per billion [ppb] and naphthalene at 16.8 ppb). Sampling of the station's on-site drinking water supply well was below regulatory levels for petroleum constituents. Based on the increasing levels of petroleum constituents in the monitoring well network and detections in more than one monitoring well, the Department requires completion of the following:

**Groundwater Monitoring:**

- 1) Please note that the requirements issued in Notice of Non-Compliance NNC-OCP-2017-009, dated August 29, 2016, are still in effect. The Department has received the confirmatory groundwater sampling results for the September 2016 sampling event but the required half-mile well survey remains outstanding at this time.
- 2) **Conduct quarterly (every three months) sampling** of the monitoring well network and tank field monitoring pipes. Sampling events must be conducted in **December, March, June, and September**. All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for total petroleum hydrocarbons – diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015.
- 3) **Conduct quarterly (every three months) sampling** of the on-site drinking water supply well. Sampling events must be conducted in **December, March, June, and September**. All samples collected must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. If a

granular activated carbon (GAC) filtration system is present, samples must be collected pre-, mid-, and post-filtration.

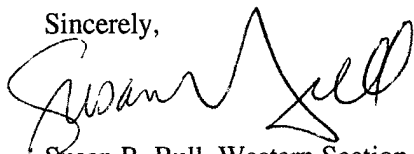
- 4) Within 45 days of each sampling event, submit a quarterly report to the Oil Control Program detailing the results of the event.
- 5) When submitting reports, include data summary tables and scaled site maps showing actual sampling locations (i.e., monitoring well and tank field well locations). In the discussion of supplemental sampling events, include details on sampling procedures and describe analytical results in terms of media sampled. Reports should also include groundwater contour maps, site-specific detailed hydrogeology, product thickness and dissolve concentration maps, groundwater flow, and qualitative and/or quantitative discussions regarding the sampling results and trends.
- 6) The Department strongly suggests that you retain the services of a qualified environmental consulting firm to assist in the planning and execution of these and subsequent tasks. The Department will not provide technical assistance in complying with these or subsequent directives. If you elect to not retain the services of an environmental consultant and fail to perform the required activities or provide the required documentation, the Department may elect to invoke its regulatory authority to take over the investigation and seek cost recovery.

**Compliance Issues:**

- 7) Submit the most recent helium testing results for Department review. Helium testing must be conducted on the gasoline underground storage tank (UST) system on a **biennial basis (every two years)**. If testing has not been completed in the last two years, conduct testing immediately and submit a copy of the test report to the Oil Control Program within twenty (20) days of completion of the test.
- 8) Submit documentation to the Oil Control Program (Attn: Ms. Jeannette DeBartolomeo) regarding any repairs or upgrades to the UST system completed within the last 12 months.

When submitting documentation to the Oil Control Program, provide three hard copies and a digital copy on a labeled compact disc (CD) for updating the Oil Control Program's *Remediation Sites* list on the MDE website. If you have any questions, please contact the case manager, Jeannette DeBartolomeo, at 410-537-3427 (email: [jeannette.debartolomeo@maryland.gov](mailto:jeannette.debartolomeo@maryland.gov)) or me at 410-537-3499 (email: [susan.bull@maryland.gov](mailto:susan.bull@maryland.gov)).

Sincerely,



Susan R. Bull, Western Section Head  
Remediation and State-Lead Division  
Oil Control Program

JD/nln

cc: Mr. Fred von Staden (Cecil County Health Dept.)  
Mr. Andrew B. Miller  
Mr. Christopher H. Ralston  
Ms. Hilary Miller