

Town of Chestertown



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May 4, 2015

Christopher Ralston
Program Administrator
Oil Control Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

RE: Chestertown Concerns about the University of Maryland Shore Medical Center at Chestertown's Ivey-sol® Implementation Plan; MDE Oil Control Program Case No. 1987-2534-KE

Dear Mr. Ralston

The Town of Chestertown ("the Town") sincerely appreciated the Maryland Department of the Environment's ("MDE's") comments regarding the Ivy-sol® Pilot Test Evaluation report and Proposed Action Plan (dated March 27, 2015). As was evident by the Town's comments submitted on March 4, 2015, many of the issues discussed by MDE in its March 27th letter to University of Maryland Shore Medical Center at Chestertown were also expressed by the Town in its March 4th letter. The Town also appreciated MDE's review of the Pilot Test Evaluation report, with particular regard to MDE's decisions to require ongoing pump and treat for the proposed 2015 Action Plan. Pump and treat is vital to ensure the protection of the Town's water production wells.

The Town would like to include several other important concerns/issues that need to be addressed by the University of Maryland Shore Medical Center at Chestertown. The Town has expressed numerous times the value of a site characterization plan/model and the opportunity to review the plan and model(s) and how they interface with the full scale implementation of this new remediation technology. Such a review is of the utmost importance in serving the public's interest, given this project's proximity to all of the Town's water production wells.

It is foreboding to note that the most recent Quarterly Site Monitoring results show a linear migration of fuel byproducts (namely ethyl benzene, xylene and BTEX) below and beyond Brown Street in a direction and at a speed that threatens the Town's water production wells. The Town would appreciate MDE's Source Protection and Appropriation Division's immediate review of the University of Maryland Shore Medical Center at Chestertown's groundwater data with respect to this phenomenon and to oversee the Ivy-sol® remedial plan and proposed action.

Here again, a site characterization plan/model is warranted in order to accurately monitor this potential concern during full scale implementation.

Additionally, an analysis of surfactant residuals needs to be evaluated for any potential migratory impact on the contaminated groundwater that residuals may have over a period of time. The initial surface tensions samples data revealed no detection of Ivey-sol® residual surfactant levels; however, follow-up lab results detected levels over 50 ppm for each well used during the push and pull application of the surfactant. The Town requests further analysis of surfactant residuals to determine if there are any additional risks associated with the residuals.

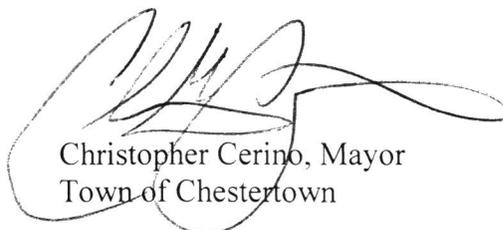
We are truly concerned that the monitoring points used during the Pilot Study might not provide a true representative sample of the remediation's progress. The monitoring points need to include monitoring points beyond the injection and extraction wells, especially in light of the location of the Town's production wells to the impacted area. Having the monitoring area expanded to require bore samples farther away from the injection and extraction wells provides technical insight on the remediation's progress, as well as additional protection of the Town's water source.

The Town also has several concerns related to the sampling and monitoring activities conducted during the Pilot Study. One major concern is how monitoring activities will be expanded during full scale implementation, to evaluate the Ivey-sol® technology in a protective manner. For example, what is the modelling and sampling approach and how is this approach analyzing the aquifer as a whole?

The Town of Chestertown hereby requests that MDE's Oil Control Program and the University of Maryland Shore Medical Center at Chestertown address the Town's current and previously stated concerns and recommendations prior to the approval or implementation of a Final Action Plan. The Town further requests that a meeting of all parties be held on site immediately to go over any proposed Final Action Plan to insure that any and all potential impacts to the Town's public water supply are addressed to our satisfaction.

Thank you for your time and consideration. We look forward to hearing from you soon.

Sincerely,



Christopher Cerino, Mayor
Town of Chestertown

Cc: Ms. Susan Bull, MDE Oil Control Program
Mr. John Grace, MDE Source Protection and Appropriation Division
Mr. Saeid Kasraei, MDE
Mr. Kenneth Kozel, Chester River Hospital Center

Mr. William Ingersoll, Town Manager
Mr. Bob Sipes, Utilities Department Manager
Mr. Michael Forlini, Esq.
Secretary Ben Grumbles, MDE
Mr. Mark Eisner, ALWI
Ms. Priscilla Carroll, Esq.
Mr. Michael Powell, Esq. ✓