

# **DRAFT**

# **RESPONSE ACTION PLAN**

107 N. Cross Street  
Chestertown, MD 21620

**October 2021**

*Prepared For:*

**Maryland Department of the Environment**  
Environmental Restoration and Redevelopment Program  
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## INTERNAL QUALITY CONTROL SHEET

This Response Action Plan has been prepared by BrightFields, Inc. (BrightFields) following practices and policies as required by the Maryland Department of the Environment for the preparation of a Response Action Plan under the Voluntary Cleanup Program. The information presented within this report represents BrightFields' knowledge of conditions on the subject site at the time of preparation. This report was prepared and reviewed by the following BrightFields' personnel:

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# RESPONSE ACTION PLAN

**107 N. Cross Street**

**Chestertown, MD**

## 1.0 INTRODUCTION

BrightFields, Inc. (BrightFields) was retained by 107 N. Cross Street, LLC, the developer, to prepare a Response Action Plan (RAP) for environmentally impacted soil, groundwater, and soil vapor associated with the 107 North Cross Street Site (Site) located in Chestertown, Maryland (**Figure 1**). The Site previously operated as a dry cleaning business. Several environmental investigations have been performed that indicate residual contamination associated with dry cleaning chemicals used at the facility are present in the subsurface.

BrightFields has prepared this RAP consistent with Section 7-508 of the Environment Article, Annotated Code of Maryland. The purpose of this RAP is to provide an overview of the Site and previous investigations, address supplemental investigations performed/required, assess current and future exposure pathways, develop cleanup criteria, select cleanup technologies/land use controls, set criteria for selected technologies, proposed response actions, and satisfy permitting, scheduling, and administrative requirements. The Site developer, 107 N. Cross Street, LLC, intends to redevelop the property/structure as a commercial market.

## 2.0 SITE OVERVIEW

The Site is located approximately 100 feet south of the southern corner of the intersection between North Cross Street and Maple Avenue in Chestertown, Maryland (**Figure 1**). The Site was historically operated as a dry cleaning business from 1963 through 2011 and utilized tetrachloroethene (PCE) as the primary dry cleaning solvent from 1963 through 1998. The Site is currently vacant and consists of a two-story building, a tin shed, a paved driveway with drive-thru, and a parking lot. The proposed future use of the Site is a commercial market.

Investigations performed at the Site indicated chlorinated solvent contamination is present in soil, groundwater, and sub-slab soil gas at concentrations exceeding Maryland Department of the Environment (MDE) standards. Based on the proposed use of the Site, the criteria for soil cleanup are not exceeded and only groundwater and soil vapor have unacceptable impacts under MDE Groundwater / Tier 2 Commercial Target Soil Vapor Values. The approximate extent of the subsurface environmental impacts in groundwater and soil vapor are identified in **Figures 2 and 3**, respectively. The Site was accepted into the Maryland Voluntary Cleanup Program (VCP) on November 29, 2018.

## 2.1 INVESTIGATION & COMPLIANCE HISTORY

The Site has been the subject of several environmental investigations since the early 1990's. Green Street Environmental provided the 2008 Report of Indoor Air Quality Sampling and the 2018 Supplemental Phase II Environmental Site Assessment (ESA) to BrightFields in 2018. Note that these reports summarized several other investigations; however, BrightFields was not able to obtain full copies of the individual reports for review. On April 29, 2021, BrightFields submitted a Public Information Act (PIA) request to MDE to obtain additional Site information. Copies of the missing reports were not included in the PIA response. All investigations and findings known to BrightFields at the time of this report are summarized below. Relevant tables, figures, and oversight documentation available to BrightFields at the time of this report are included as **Appendix A**.

### **2.1.1 June 1991 Release and Associated Documents**

These documents were obtained from the PIA request. An Underground Leak Summary and Tank Closure form documented a groundwater release at Park Rug & Dry Cleaners observed during removal of a 1,000-gallon #2 fuel oil tank that was abandoned in place. One monitoring well was installed in September 1991 between the building and the adjacent gas station. MDE requested sampling for benzene, toluene, ethylbenzene, and xylenes (BTEX), naphthalene, and PCE. In October 1991, PCE was detected at 5,200 µg/L and benzene was detected at 1 µg/L. Naphthalene and all other BTEX compounds were not detected above the method detection limit. Based on documents provided by MDE from the PIA request, measured PCE concentrations in the onsite monitoring well were 112 µg/L in October 1993 and 3 µg/L in April 1994. A June 1994 Notice of Compliance letter from MDE stated that the low level of dissolved petroleum in groundwater did not warrant any corrective action and the case was closed.

### **2.1.2 September 1992 Release**

These documents were obtained from the PIA request. An Underground Leak Summary and Tank Closure form documented a surface spill from Park Rug & Dry Cleaners that affected the sidewalk, driveway, and road. The substance was described as an unknown dark, oily substance. The dry cleaner manager stated that the substance was residual soap (Soft Kleen) removed from the dry cleaning system. The National Pollutant Discharge Elimination System (NPDES) inspector instructed the manager to clean up the spill.

### **2.1.3 October 1993 Phase II Investigation (Environmental Consulting Services, Inc.)**

This investigation was summarized in the 2008 Report of Indoor Air Quality Sampling and BrightFields was not able to review the full report. One well was installed onsite and sampled during the Phase II Investigation. Results showed evidence of low levels of PCE contamination.

### **2.1.4 October 1999 Inspection**

The inspection report was obtained from the PIA request. An assessment of the Park Rug & Dry Cleaners, Corp. facility was performed on October 21, 1999. The record indicates that PCE was used onsite and the facility generated old PCE and filters as wastes. The floor drains and trench

system drained water and wash water to the Publicly Owned Treatment Works (POTW) and waste generated onsite was removed by a waste contractor.

### **2.1.5 August 2006 Phase II Investigation (BlueRidge Environmental, Inc.)**

This investigation was summarized in the 2008 Report of Indoor Air Quality Sampling and BrightFields was not able to review the full report. PCE and its breakdown products, including trichloroethene (TCE) and cis-1,2-dichloroethene (DCE), were detected in soil and groundwater onsite.

### **2.1.6 September 2007 Membrane Interface Probe (MIP) Investigation (BlueRidge Environmental, Inc.)**

This investigation was summarized in the 2008 Report of Indoor Air Quality Sampling and BrightFields was not able to review the full report. In June 2007, a MIP investigation was performed on the Site and the adjoining gasoline station property. The plume containing PCE and associated breakdown products was identified in the shallow groundwater underneath both properties.

### **2.1.7 March 2008 Report of Indoor Air Quality Sampling (BlueRidge Environmental, Inc.)**

This report was provided to BrightFields by Green Street Environmental in 2018. Indoor air samples were collected from three locations within the Site building and one location in the gas station office. Samples were analyzed for PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, 1,1-DCE, and vinyl chloride (VC). PCE was detected in all three samples collected from the Site and TCE and cis-1,2-DCE was detected in two of the samples collected from the Site. No unacceptable indoor air impacts to commercial workers were identified based on the sampling. Site closure was requested at the time but was not granted.

### **2.1.8 May 2014 Hazardous Waste Inspection (MDE)**

The inspection report was obtained from the PIA request. MDE performed an inspection of the Admiral Inc. #63 site based on the active site status. At the time of the inspection, the inspector was informed that dry cleaning operations were no longer performed onsite as of early 2013. The

inspector recommended removal of the site from the Resource Conservation and Recovery Act (RCRA) database.

### **2.1.9 November 2017 Limited On-Site Subsurface Investigation (Chesapeake GeoSciences, Inc.)**

Sample location figures and boring logs from this investigation were provided to BrightFields by Green Street Environmental in 2018. Note that BrightFields was not able to review the full report. During the Limited On-Site Subsurface Investigation, soil samples and grab groundwater samples were collected from six locations. Groundwater was encountered between 15.5 and 18 feet below ground surface (bgs). PCE was present in soil and groundwater on the property above the respective screening levels. Additional volatile organic compounds (VOCs) detected include cis-1,2-DCE, TCE, and VC.

### **2.1.10 September 2018 Supplemental Phase II ESA (Green Street Environmental)**

This report was provided to BrightFields by Green Street Environmental in 2018. During the Supplemental Phase II ESA, six sub-slab vapor samples were collected from within the building footprint. PCE and TCE exceeded the MDE Commercial Target Soil Vapor Standards in three sample locations (SV-1, SV-2, and SV-3). The consultant concluded that reductive dechlorination was occurring based on the presence of other chlorinated VOCs associated with the degradation of PCE and TCE.

### **2.1.11 May 2021 Facility Summary for Facility ID #11148 (MDE)**

Information was obtained from the PIA request. The Facility Summary printout lists that one 1,000-gallon heating oil tank was installed in January 1964 and closed in place in June 1991.

## **2.2 FUTURE LAND USE**

The proposed future use of the Site is a commercial market, which is considered Tier 2B – Restricted Commercial Use. It will be an open market utilizing the existing building structure. Redevelopment plans do not include disturbing the existing buildings, asphalt, or concrete on the property or regrading. However, the concrete floor will be cut, removed, and replaced during implementation of the proposed response action.

## 2.3 PROPOSED RESPONSE ACTIONS

To reduce human health risk to levels acceptable for commercial use, BrightFields recommends implementing the following to provide ongoing protection to building occupants:

- Installing a sub-slab depressurization system (SSDS) system within the existing building footprint to reduce migration of soil vapor into the building and to reduce the residual contaminant mass over time.
- Utilizing the existing cap (building footprint, asphalt, and concrete) to prevent contact with impacted soil and groundwater.
- Implementing deed restrictions to restrict groundwater use, restrict future site usage to commercial type uses, require continued operation of the SSDS system until cleanup criteria is met, and require inspection and maintenance of the cap.

### 3.0 ADDITIONAL INVESTIGATORY INFORMATION

Based on the results of the previous investigations, MDE requested delineation of chlorinated solvents in soil gas around the exterior of the building and additional assessment of the sub-slab soil gas beneath the building. A total of nine exterior soil gas points and nine interior sub-slab points were installed in August 2019. Exterior soil gas points were sampled by BrightFields, while MDE collected samples from all interior and exterior sub-slab points/soil gas points. Laboratory analytical results from this most recent sampling event indicated that unacceptable concentrations of PCE and TCE were detected in the subsurface soil vapor. The elevated concentrations of PCE and TCE exceeded their respective MDE Commercial Soil Vapor Values and concentrated in the center and east-central portions of the Site, below the building and extending outward. A draft report summarizing the soil gas point installation, sampling methods, and results was transmitted to MDE in March 2021. **Appendix B** includes results from the most recent soil gas sampling events.

## **4.0 EXPOSURE ASSESSMENT & PROPOSED REMEDY**

### **4.1 MEDIA OF CONCERN**

#### **4.1.1 Soil**

Previous investigations have indicated that soil at the Site is impacted. The Site is currently covered by asphalt parking and driving areas, concrete building slabs and curbs, and a brick parking area.

Construction workers will come in contact with impacted soil during implementation of the SSDS system. A site-specific Health and Safety Plan (HASP) will be used to protect construction workers and minimize risks associated with impacted soil. The current cap will prevent exposure to future site workers and visitors/patrons. Implementation of a deed restriction to inspect and maintain the cap will ensure that the remedy remains protective.

#### **4.1.2 Groundwater**

Previous investigations have indicated that groundwater at the Site is impacted. Water to the Site is publicly supplied and there are no onsite wells.

It is not anticipated that construction workers will come in contact with impacted groundwater during implantation of the SSDS system. A site-specific HASP will be used to protect construction workers and minimize risks associated with impacted groundwater. Implementation of a deed restriction to restrict use of groundwater beneath the Site will prevent future site workers and visitors/patrons from contacting groundwater.

#### **4.1.3 Soil Gas**

Previous investigations have indicated that soil gas at the Site is impacted. The primary exposure route for Site users to contaminants is in the form of soil vapor migrating into enclosed structures.

Construction workers will come in contact with impacted soil gas during implementation of the SSDS system. A site-specific HASP will be used to protect construction workers and minimize risks associated with impacted soil gas. A vapor mitigation system (SSDS) will be installed to minimize vapor intrusion into the building to protect future site workers and visitors/patrons.

Additionally, deed restrictions will require continued operation of the SSDS system until cleanup criteria is met and restrict future land use to commercial type uses.

#### **4.1.3 Sediment/Surface Water**

Sediment and surface water are not present on the Site. Therefore, they are not evaluated in this RAP.

### **4.2 POTENTIALLY EXPOSED POPULATIONS**

Current exposed populations are limited to Site trespassers who may cross the property. Construction workers will be exposed for a limited time during future construction. Based on the proposed future use (Tier 2B – Restricted Commercial Use), future Site users include Site workers and visitors/patrons. These future users may include sensitive populations (children and the elderly). There are no known current or future on-site ecological receptors.

### **4.3 POTENTIAL EXPOSURE PATHWAYS**

Potential exposure pathways include incidental ingestion, inhalation of dust particulates from soil, dermal contact with soil and groundwater, and inhalation of soil gas.

Redevelopment plans do not include any intrusive activities. Therefore, construction workers are not likely to come in contact with soil or groundwater during redevelopment. However, during implementation of the SSDS system as a remedy, construction workers will be exposed to impacted soil and soil gas. It is not anticipated that construction workers will come in contact with impacted groundwater due to the shallow installation depth of the SSDS system. In the absence of a remedy, future Site workers and visitors/patrons may be exposed to impacted soil, groundwater, and soil gas.

### **4.4 COMPLETE EXPOSURE PATHWAYS**

The exposure pathways are identified below with the proposed response actions. As shown in the table, BrightFields recommends preparing and implementing a site-specific HASP, installing a vapor mitigation system (SSDS system), utilizing the existing cap, and implementing deed restrictions. Because most of the Site will remain paved, the primary exposure route will be indoor

air. While the SSDS will be designed to minimize vapor intrusion into the building, it will also function as a soil vapor extraction (SVE) system enhancing remediation of site soils, soil gas, and groundwater.

Summary of Exposure Pathways and Proposed Remedies		
Exposure Pathway	Receptor	Proposed Response Actions
Ingestion of Soil	Future Construction Workers	<i>Administrative Control</i> – A written site-specific HASP to outline risks associated with exposure and how to minimize them using work practices and personal protective equipment.
	Current Trespassers, Future Site Workers, and Future Visitors/ Patrons	<i>Engineering Control</i> –The existing cap surrounding the existing Site structure will prevent further exposure via soil. <i>Institutional Control</i> – A deed restriction requiring inspection and maintenance of the cap to prevent future exposure.
Inhalation of Fugitive Dust	Future Construction Workers	<i>Administrative Control</i> – A written site-specific HASP to outline risks associated with exposure and how to minimize them using work practices and personal protective equipment. The HASP will include a dust monitoring program.
	Current Trespassers, Future Site Workers, and Future Visitors/ Patrons	<i>Engineering Control</i> –The existing cap surrounding the existing Site structure will prevent further exposure via soil. <i>Institutional Control</i> – A deed restriction requiring inspection and maintenance of the cap to prevent future exposure.
Dermal Contact with Soil	Future Construction Workers	<i>Administrative Control</i> – A written site-specific HASP to outline risks associated with exposure and how to minimize them using work practices and personal protective equipment.
	Current Trespassers, Future Site Workers, and Future Visitors/ Patrons	<i>Engineering Control</i> –The existing cap surrounding the existing Site structure will prevent further exposure via soil. <i>Institutional Control</i> – A deed restriction requiring inspection and maintenance of the cap to prevent future exposure.
Dermal Contact with Groundwater	Future Construction Workers	<i>Administrative Control</i> – A written site-specific HASP to outline risks associated with exposure and how to minimize them using work practices and personal protective equipment.
	Future Site Workers and Future Visitors/ Patrons	<i>Institutional Control</i> – A deed restriction restricting use of groundwater beneath the Site.
Inhalation of Subsurface Gases during Construction	Future Construction Workers	<i>Administrative Control</i> – A written site-specific HASP to outline risks associated with exposure and how to minimize them using work practices and personal protective equipment.



Summary of Exposure Pathways and Proposed Remedies		
Exposure Pathway	Receptor	Proposed Response Actions
Inhalation of Subsurface Gases in Indoor Air	Current Trespassers, Future Site Workers, and Future Visitors/ Patrons	<p><i>Engineering Control</i> – A vapor mitigation (SSDS system) in the existing structure to prevent vapor intrusion into the existing Site structure and reduce subsurface contaminant mass.</p> <p><i>Institutional Control</i> – A deed restriction requiring that future land use conform to commercial type uses.</p>

## 5.0 CLEANUP CRITERIA

Commercial cleanup standards for sub-slab soil gas and indoor air, established by MDE in the Technical Guidelines for Vapor Intrusion (MDE, 2019), will be used as the cleanup criteria for the Site. At these concentrations, the hazard index does not exceed 1 and the carcinogenic risk does not exceed  $1 \times 10^{-5}$  for either compound. The operational goal is to maintain indoor air contaminants below the threshold for unacceptable risk. 107 N. Cross Street, LLC will elect to adopt sub-slab soil gas target levels at or below 100 times the indoor air criteria to reduce long term monitoring requirements. Target cleanup concentrations for PCE and associated degradation products are shown in the table below.

<b>Target Cleanup Goals</b>		
<b>Analyte</b>	<b>Indoor Air Commercial Concentration (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Sub-Slab Soil Gas Concentration (<math>\mu\text{g}/\text{m}^3</math>)</b>
1,1-DCE	880	88,000
cis-1,2-DCE	154	15,400
trans-1,2-DCE	310	31,000
PCE	180	18,000
TCE	8.8	880
VC	28	2,800

During construction of the SSDS system, all work will be conducted in accordance with the site-specific HASP to ensure that construction workers are not exposed to an unacceptable risk. During operation of the SSDS system, 107 N. Cross Street, LLC proposes conducting quarterly effluent monitoring and comparing the analytical results to the sub-slab soil gas cleanup goals. Criteria for shutting down the system and post-treatment sampling is discussed in Section 7.2.

## 6.0 SELECTED TECHNOLOGIES & LAND USE CONTROLS

The proposed future use of the Site is considered Tier 2B – Restricted Commercial Use. Redevelopment plans do not include disturbing the existing buildings, asphalt, concrete, or brick hardscaping on the property, regrading, or filling.

### 6.1 SSDS SYSTEM

BrightFields proposes installation of a SSDS system to depressurize the sub-slab environment (thereby preventing vapor intrusion and protecting building occupants) and reduce existing contaminant mass through enhanced volatilization and treatment of chlorinated solvent vapors.

An SSDS system represents an appropriate remedy due to the relative risk associated with soil vapors within the building and the restrictive nature of the slab and sub-slab environment. Chlorinated solvents are volatile by nature, and the creation of a low-pressure region in the vadose zone will aid in the volatilization of contaminants sorbed to soil particles and dissolved in shallow groundwater. The effectiveness of SVE systems for addressing solvent contamination in the subsurface is thoroughly documented; the technology and its suitability/applicability is summarized in a United States Environmental Protection Agency (USEPA) document titled “Engineering Issue – Soil Vapor Extraction (SVE) Technology” (USEPA, 2018).

#### 6.1.1 SSDS System Design

Seven extraction points or “sumps” are proposed below the building slab; each sump is connected to a lateral collector pipe that terminates in a manifold at the blower. The proposed SSDS system layout is depicted on **Figure 4**. The system piping design is shown in greater detail on **Figure 5** and a cross section is shown on **Figure 6**; each sump is connected to an individual pipe and vapors collected from the sumps are directed through a manifold that can be adjusted to change the relative draw from each location. From the manifold, vapors are drawn through a water knock-out which protects the downstream equipment from excessive moisture. The blower, a regenerative blower with a nominal power rating of three horsepower and 212 standard cubic feet per minute (scfm), provides the suction power for the system. At the blower discharge, drums of activated charcoal act as scrubbers to reduce the chlorinated solvents emissions. The manifold,

knock-out tank, blower, and activated carbon vessels will be secured in a locked shed/fence to prevent unauthorized tampering with the system.

Installation of the SSDS system will require saw cutting the concrete building slab and excavating along the lengths of the lateral collector pipes. Excavations will consist of 18-inch wide and 18-inch deep trenches for the lateral collector pipes and 3-foot cubic pits around each sump location. Lateral collector piping will be installed at approximately 18-inches below the top of the slab and backfilled with clean sand. Each sump will be installed at approximately 3 feet below the top of the slab with a metal screen to prevent drawing sediment into the system. Sump pits will be backfilled with clean #57 stone. All piping for the lateral collector piping and the sumps will be 2-inch diameter Schedule 80 polyvinyl chloride (PVC) piping. A 6-inch layer of concrete will be poured over the trenches and sump pits and then a sealer will be applied along the concrete seams to prevent breakthrough.

### **6.1.2 Soil Management and Disposal**

Based on the proposed SSDS system design, approximately 25 tons of potentially chlorinated solvent-impacted soil will be excavated for SSDS system installation. Excavated soil will be staged securely onsite in a manner which will prevent offsite migration by wind or water erosion. One composite sample will be collected and analyzed based on the requirements for the selected disposal facility. It is anticipated that analysis requirements will consist of the following parameters: toxicity characteristic leaching procedure (TCLP) metals, polychlorinated biphenyls (PCBs), total VOCs, ignitability, corrosivity, and reactivity. Soil excavated from the Site will be disposed in accordance with applicable local, State, and federal laws and regulations. All waste manifests and the total volume of soil disposed will be included with the Response Action Completion Report and submitted to MDE.

Following excavation of chlorinated solvent-impacted soil, the excavator will be decontaminated by scraping off soil. Soiled personal protective equipment (PPE), such as disposable gloves, will be disposed along with other construction debris.

### **6.1.3 Excavation Backfill**

All sand and #57 stone used to backfill the trenches and sump pits will be from MDE-approved clean fill sources. Fill material will not be transported to the Site unless it has been approved in writing by MDE.

### **6.1.4 SSDS System Monitoring**

Continued protectiveness of the SSDS system will be ensured through a process of routine monitoring on a quarterly basis. Prior to beginning SSDS system monitoring, an Operations & Maintenance (O&M) Plan outlining procedures will be submitted to MDE for approval. At startup, pressure differentials between the indoor air and sub-slab environment will be evaluated to ensure that the system is effective. Ongoing routine monitoring will include measuring system parameters, preventative maintenance of the blower system, and evaluation/replacement of the carbon treatment units. 107 N. Cross Street, LLC will be responsible for performing routine SSDS system monitoring. If the person responsible for performing monitoring changes, the VCP project manager must be notified at 410-537-3493. All inspections will be documented on the form included as **Appendix C** and maintained for a minimum of five years.

Quarterly sampling of the recovered vapor will also be performed to determine overall changes in recovered contaminant mass over time and to evaluate the continued need/efficacy of the SSDS system. Samples will be analyzed at a laboratory for PCE and associated degradation products, including 1,1-DCE, cis-1,2-DCE trans-1,2-DCE, TCE, and VC. Once concentrations meet the sub-slab soil gas cleanup criteria for two consecutive quarters, 107 N. Cross Street, LLC may request from MDE approval to shut down SSDS system. Following system shutdown, post-treatment indoor air monitoring will be conducted at 30, 60, 180, 365, and 720 days after system shutdown to ensure treatment effectiveness.

## **6.2 MAINTENANCE OF THE EXISTING CAP**

The Site is currently covered by impervious material, including buildings, asphalt, and concrete. There are currently no landscaped areas on the Site and redevelopment plans do not include landscaped areas in the future. This existing cap will be used to prevent exposure to impacted soil. The extent of the cap, as shown on **Figure 4**, must be inspected and maintained to ensure

long term protection of human health and the environment. A cross section is shown on **Figure 7**.

107 N. Cross Street, LLC will be responsible for performing annual cap inspections. If the person responsible for performing cap inspections changes, the VCP project manager must be notified at 410-537-3493. Prior to beginning annual cap inspections, an O&M Plan outlining procedures will be submitted to MDE for approval. All inspections will be documented on the form included as **Appendix D** and maintained for a minimum of five years. Any damaged areas will be repaired within five business days and MDE will be notified within ten business days following repair completion. MDE will be notified in writing at least 15 days prior to planned excavation activities that will penetrate the cap.

### **6.3 INSTITUTIONAL CONTROLS (FUTURE LAND USE CONTROLS)**

The SSDS system should be implemented in tandem with a deed restriction requiring that future land use conform to commercial type uses only, which will aid in preventing long-term exposure to impacted indoor air that might occur under a residential use scenario. Water is publicly supplied to the Site and groundwater is not used. To ensure that future Site users do not come in contact with impacted groundwater, a deed restriction will restrict groundwater use. In addition, deed restrictions will require continued operation of the SSDS system until cleanup criteria is met and require inspection and maintenance of the cap.

### **6.4 POST-REMEDATION REQUIREMENTS**

Post-remediation requirements will include compliance with conditions placed on the COC and compliance with the deed restrictions recorded for the Site. Deed restrictions will be recorded within 30 days of the issuance of the COC.

Ongoing SSDS system monitoring and annual cap inspections will be conducted, as discussed in Sections 6.1.4 and 6.2 and in accordance with the O&M Plan.

## 7.0 EVALUATION CRITERIA FOR THE SELECTED TECHNOLOGIES

### 7.1 CRITERIA FOR CERTIFICATE OF COMPLETION (COC)

The following criteria must be met and documented prior to issuance of the COC:

- **Implementation Schedule:** Submission of the RAP implementation schedule to MDE prior to starting RAP activities.
- **Health and Safety Briefing:** Prior to beginning work onsite, all contractors that will encounter impacted media will receive a health and safety briefing and sign the site-specific HASP. Documentation will be maintained with the HASP onsite during intrusive RAP activities.
- **SSDS System Installation:** Installation of the SSDS system as described in this Report. Environmental health and safety oversight will be conducted during all intrusive RAP activities.
- **SSDS System Testing:** The SSDS system will be tested for 30 days prior to occupancy to ensure that the system is effective. Testing will consist of evaluating pressure differentials between the indoor air and sub-slab environment.
- **Sampling:** The SSDS system effluent will be sampled at least once prior to requesting a COC.
- **O&M Plan:** Submission of an O&M Plan to MDE to outline long-term monitoring requirements, including SSDS system monitoring until remediation completion and inspection and maintenance of the cap.
- **Cap Inspection and Repair:** Inspection of the cap to ensure that it is in good condition. Repair damaged areas if necessary.
- **Completion Report:** Submission of a Response Action Completion Report to MDE for review and approval.
- **Deed Restrictions:** Documentation of the recorded deed restrictions will be submitted to MDE within 30 days of issuance of the COC.

### 7.2 CRITERIA FOR REMEDIATION COMPLETION

During operation of the SSDS system, 107 N. Cross Street, LLC proposes conducting quarterly effluent sampling and comparing the analytical results to the sub-slab soil gas cleanup goals. Once concentrations meet the sub-slab soil gas cleanup criteria for two consecutive quarters, 107 N. Cross Street, LLC may request from MDE approval to shut down SSDS system. Following system shutdown, post-treatment indoor air monitoring will be conducted at 30, 60, 180, 365, and 720 days after system shutdown to ensure treatment effectiveness. Remediation will be considered complete if all monitoring results meet the indoor air cleanup criteria in Section 5.0.

### **7.3 CRITERIA FOR CONTINGENCY MEASURES**

If the SSDS system remains operational, changes in subsurface concentrations (including increasing concentrations of contaminants) will not result in an increased risk to Site users. However, if the SSDS system is unable to maintain sufficient negative pressure across the building footprint relative to the indoor air pressure, contingency measures will be enacted. First, the Department will be notified. Additional measures may include increasing the output of the blower system, more frequent monitoring/adjustment of the suction points to target withdraw areas, and additional indoor air sampling to ensure building occupant health and safety. If deemed necessary, a RAP addendum will be prepared to outline additional measures.

The Department must be notified immediately of any previously undiscovered contamination, changes to the RAP schedule, previously undiscovered storage tanks and other oil-related issues, and citations from regulatory entities related to health and safety practices. 107 N. Cross Street, LLC will notify MDE within one business day and discuss appropriate measures. All documentation and analytical reports generated as a result of any previously unidentified contamination will be submitted to the Department. Note that previously undiscovered contamination and/or previously undiscovered storage tanks or other oil-related issues may require an amendment to this RAP. If a RAP amendment is required, all work onsite will be stopped and 107 N. Cross Street, LLC will work with MDE to determine a schedule to complete the amendment and proposed additional RAP activities.

## **8.0 PROPOSED RESPONSE ACTION IMPLEMENTATION**

### **8.1 GENERAL HEALTH AND SAFETY PROTOCOLS**

All applicable Occupational Safety and Health Administration (OSHA) regulations will be followed during the implementation of this RAP. A site-specific HASP for all personnel will be developed, implemented, and maintained onsite. All onsite personnel must be made aware of and sign the HASP. The development of the HASP is the responsibility of the participant. Onsite records of HASP signatures must be available to the Department upon request.

Information in the HASP will include, but not be limited to, the following:

- Appropriate PPE and monitoring devices that must be utilized by workers to ensure that all worker protection requirements are met, and the rationale for the PPE selected.
- Site control measures that will be maintained during RAP implementation to restrict access (e.g., security guards, warning fences).
- Dust abatement or suppression methods.
- Compliance by all on-site workers with OSHA guidelines for managing contaminated material regardless of its characterization as hazardous or nonhazardous waste. The remedial contractor must possess the necessary certification for the transportation of any controlled hazardous substance.

### **8.2 REPORTING REQUIREMENTS**

Reporting required for the Site include RAP addendums (if necessary), the initial notification and construction schedule, HASP, O&M Plan, monthly status reports, quarterly SSDS operation reports, and the Response Action Completion Report. Monthly status reports will be submitted during RAP implementation activities and will summarize activities completed during the previous month and activities anticipated for the next month. Once the SSDS system is operating, quarterly operation reports will replace monthly status reports. Quarterly reports will detail ongoing operations of the SSDS system, including results of routine inspections, pressure monitoring, discharge vapor sampling, and used carbon disposal/knock-out water disposal. Quarterly reports will include laboratory data from sampling and disposal documentation. If contact information for the participant or environmental consultant changes, it will be documented in the monthly or quarterly report.

MDE will be provided with 30-day notice prior to the shut-down of the SSDS system for major service or closure sampling. MDE will be notified within 72 hours of any system malfunction or upset resulting in an extended (greater than 48 hour) shutdown of the SSDS system.

### **8.3 INSPECTION AND MAINTENANCE REQUIREMENTS**

Inspection and maintenance requirements will be outlined in the O&M Plan and submitted to MDE for approval.

Concurrent with routine pressure inspections and discharge vapor sampling, the SSDS system will be visually inspected and the blower will be serviced at regular intervals according to the manufacturer's specifications. The water knock-out drum will be drained and the carbon treatment units will be refreshed as required.

The existing cap will be inspected annually and maintained as outlined in Section 6.2.

### **8.4 GROUNDWATER MANAGEMENT**

Groundwater dewatering is not anticipated as part of the SSDS installation or redevelopment plans. Intrusive activities are limited to trench and sump pit excavation, to a maximum depth of 3 feet bgs.

### **8.5 ASBESTOS, LEAD, AND OIL**

Demolition is not planned as part of redevelopment, therefore contact with asbestos and lead-based paint is not anticipated.

Previously undiscovered contamination, storage tanks, and other oil-related issues must be reported to the VCP project manager at 410-537-3493. Contact the MDE Oil Control Program at 410-537-3442 for guidance on the proper abandonment and removal of storage tanks.

## **9.0 PERMITS, NOTIFICATIONS, & CONTINGENCIES**

The participant will comply with all federal, State, and local laws and regulations by obtaining all necessary approvals and permits to conduct all activities and implement this RAP. The VCP will be verbally notified within 48 hours (72 hours in writing) of any changes (planned or emergency) to the RAP implementation schedule, any previously undiscovered contamination, any previously undiscovered storage tanks and other oil-related issues, and citations from regulatory entities related to health and safety practices. All notifications shall be made to the VCP project manager at 410-537-3493. If the VCP project manager is unavailable, the notifications must be made to another VCP staff member.

The VCP must be provided with all documentation and analytical reports generated from previously unidentified contamination. The participant understands that previously undiscovered contamination and/or previously undiscovered storage tanks or other oil-related issues may require an amendment to this RAP.

Due to the anticipated volume of the blower and existing concentrations of subsurface contaminants, an air emissions permit may be required. MDE will be provided with supporting documentation and calculations once the blower specifications are finalized to assist with deciding on the need for an emissions permit.

Although unlikely, in the event conditions not previously identified by past environmental investigations are encountered, the Site will be temporarily secured and MDE will be notified of the nature of the unexpected condition. The RAP will then be revised to incorporate the new information and work will resume as soon as possible.

### **9.1 IMPLEMENTATION SCHEDULE**

The proposed implementation schedule is shown in the table below. Upon RAP approval, the schedule will be finalized with actual anticipated dates for each phase of work. If these timelines must be adjusted, MDE will be given advance notice in writing along with a new proposed timeline.

<b>RAP Milestone</b>	<b>Start Date</b>	<b>Completion Date</b>
Submit Performance Bond	Within 10 days of RAP Approval	Within 10 days of RAP Approval
Develop site-specific HASP	Within 30 days of RAP approval	Within 60 days of RAP approval
Notify VCP Project Manager	At Least 5 days Prior to Start of Activities	At Least 5 days Prior to Start of Activities
Perform Health and Safety Meeting	Prior to SSDS Installation	Prior to SSDS Installation
Install SSDS System	Within 90 days of RAP Approval	120 days from RAP Approval
Test SSDS System for 30 Days Prior to Occupancy	120 days from RAP Approval	150 days from RAP Approval
Develop O&M Plan	120 days from RAP Approval	150 days from RAP Approval
Conduct Quarterly SSDS Monitoring	Within First Quarter from Completion of SSDS System Testing	Ongoing Until System Shutdown (Two Consecutive Quarters of Meeting Cleanup Criteria)
Prepare and Submit Completion Report	Upon Completing First Quarter of SSDS Monitoring	Within 60 days of Completing First Quarter of SSDS Monitoring
Issue COC (MDE)	Following Approval of Completion Report	Following Approval of Completion Report
Sign and Return Certification to MDE	Within 10 days of Receiving COC	Within 10 days of Receiving COC
Record the COC in the Land Records and File Deed Restrictions	Within 30 days of Issuing COC	Within 30 days of Issuing COC
Conduct Post-Treatment Indoor Air Monitoring	30 days after SSDS Shutdown	30 days after SSDS Shutdown
Conduct Post-Treatment Indoor Air Monitoring	60 days after SSDS Shutdown	60 days after SSDS Shutdown
Conduct Post-Treatment Indoor Air Monitoring	180 days after SSDS Shutdown	180 days after SSDS Shutdown



RAP Milestone	Start Date	Completion Date
Conduct Post-Treatment Indoor Air Monitoring	365 days after SSDS Shutdown	365 days after SSDS Shutdown
Conduct Post-Treatment Indoor Air Monitoring	720 days after SSDS Shutdown	720 days after SSDS Shutdown

**9.2 ADMINISTRATIVE REQUIREMENTS**

Pursuant to the Section 7-508 of the Environment Article, Annotated Code of Maryland, 107 N. Cross Street, LLC agrees to comply with the provisions of the RAP approved by MDE and certifies that the proposed use of the Site meets all applicable zoning requirements. Signed certifications are included as **Appendix E**.

Consistent with Maryland Code, 107 N. Cross Street, LLC will issue a performance bond in the amount of \$10,000. If the remedial action(s) specified in this RAP cannot be executed, the performance bond will cover costs required to stabilize and secure the Site. Activities to be covered under the performance bond include the following:

- Posting appropriate warnings and notices about conditions on the property.
- Restricting access to the SSDS system.
- Importing and placing crushed stone within open trenches.

## 10.0 REFERENCES

BlueRidge Environmental, Inc, 2008, Report of Indoor Air Quality Sampling, March 2008.

BrightFields, Inc. (BrightFields), 2019, Soil Gas Sampling Report, October 2019.

Chesapeake GeoSciences, Inc., 2017, Figures 2 through 7 and Table 1: Photoionization Detector (PID) Readings in Macrocore Soil Sample Cores from Limited On-Site Subsurface Investigation, December 2017.

Green Street Environmental, 2018, Supplemental Phase II Environmental Site Assessment, September 2018.

Maryland Department of the Environment (MDE), 2021, Facility Summary for Facility ID #11148, May 2021.

MDE, 2019, Technical Guidelines for Vapor Intrusion, September 2019.

MDE, 2017, Facts About: Voluntary Cleanup Program Response Action Plans, August 2017.

MDE, 1999, Assessment Record, Document Number 1999-1021aWH, October 1999.

MDE Hazardous and Solid Waste Management Administration, 1994, Underground Leak Summary and Tank Closure and Associated Documents, May 1994.

MDE Hazardous and Solid Waste Management Administration, 1992, Underground Leak Summary and Tank Closure, September 1992.

MDE Land Management Administration, Hazardous Waste Program, 2014, Hazardous Waste Field Inspection Report, May 2014.

United States Environmental Protection Agency (USEPA), 2018, Engineering Issue - Soil Vapor Extraction (SVE) Technology, February 2018.

# FIGURES



 Site Boundary

 **BrightFields, Inc.**  
Environmental Services

801 Industrial Street  
Wilmington, Delaware 19801

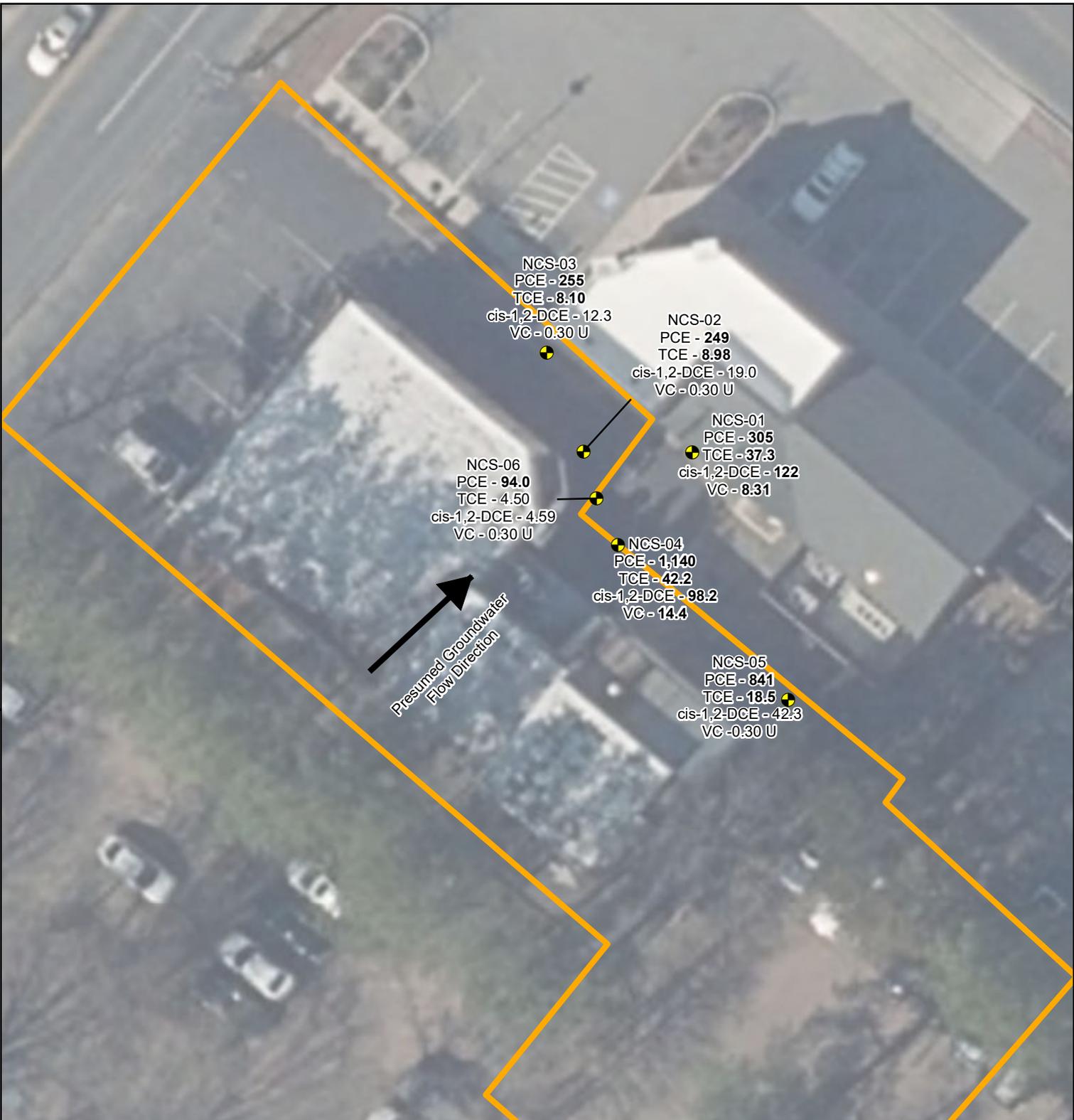
302-656-9600  
302-656-9700 fax

Site Location/Topographic Map  
107 N Cross Street  
Chestertown, Maryland

	By	Date	Scale:	File Name:
Drawn	ADS	2/18/2021	1:12,000	Fig1SiteLoc.mxd
Checked	VMB	2/18/2021	Fig. No.	
Project #	3880.01.51		Figure 1	



Source: © 2013 National Geographic Society, i-cubed.



NCS-03  
**PCE - 255**  
**TCE - 8.10**  
 cis-1,2-DCE - 12.3  
 VC - 0.30 U

NCS-02  
**PCE - 249**  
**TCE - 8.98**  
 cis-1,2-DCE - 19.0  
 VC - 0.30 U

NCS-01  
**PCE - 305**  
**TCE - 37.3**  
 cis-1,2-DCE - 122  
 VC - 8.31

NCS-06  
**PCE - 94.0**  
**TCE - 4.50**  
 cis-1,2-DCE - 4.59  
 VC - 0.30 U

NCS-04  
**PCE - 1,140**  
**TCE - 42.2**  
 cis-1,2-DCE - 98.2  
 VC - 14.4

NCS-05  
**PCE - 841**  
**TCE - 18.5**  
 cis-1,2-DCE - 42.3  
 VC - 0.30 U

Presumed Groundwater  
 Flow Direction

Notes:  
 Maryland Department of the Environment  
 Cleanup Standard for Groundwater  
 Type I & II Aquifers  
 U - Compound not detected.  
**Bold** - Exceeds Tier II criteria.  
 Tetrachloroethylene - (PCE) > 5.0 ug/L  
 Trichloroethylene - (TCE) > 5.0 ug/L  
 cis-1,2 Dichloroethene - (cis-1,2-DCE) > 70 ug/L  
 Vinyl Chloride - (VC) > 2.0 ug/L  
 Previous sample locations are based  
 on georeferenced sample locations  
 provided in the Supplemental Phase II  
 Environmental Site Assessment  
 (Green Street Environmental, 2018)

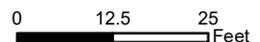
Source:  
 Maryland Department of Planning,  
 Planning Data Services - Tax Parcels.



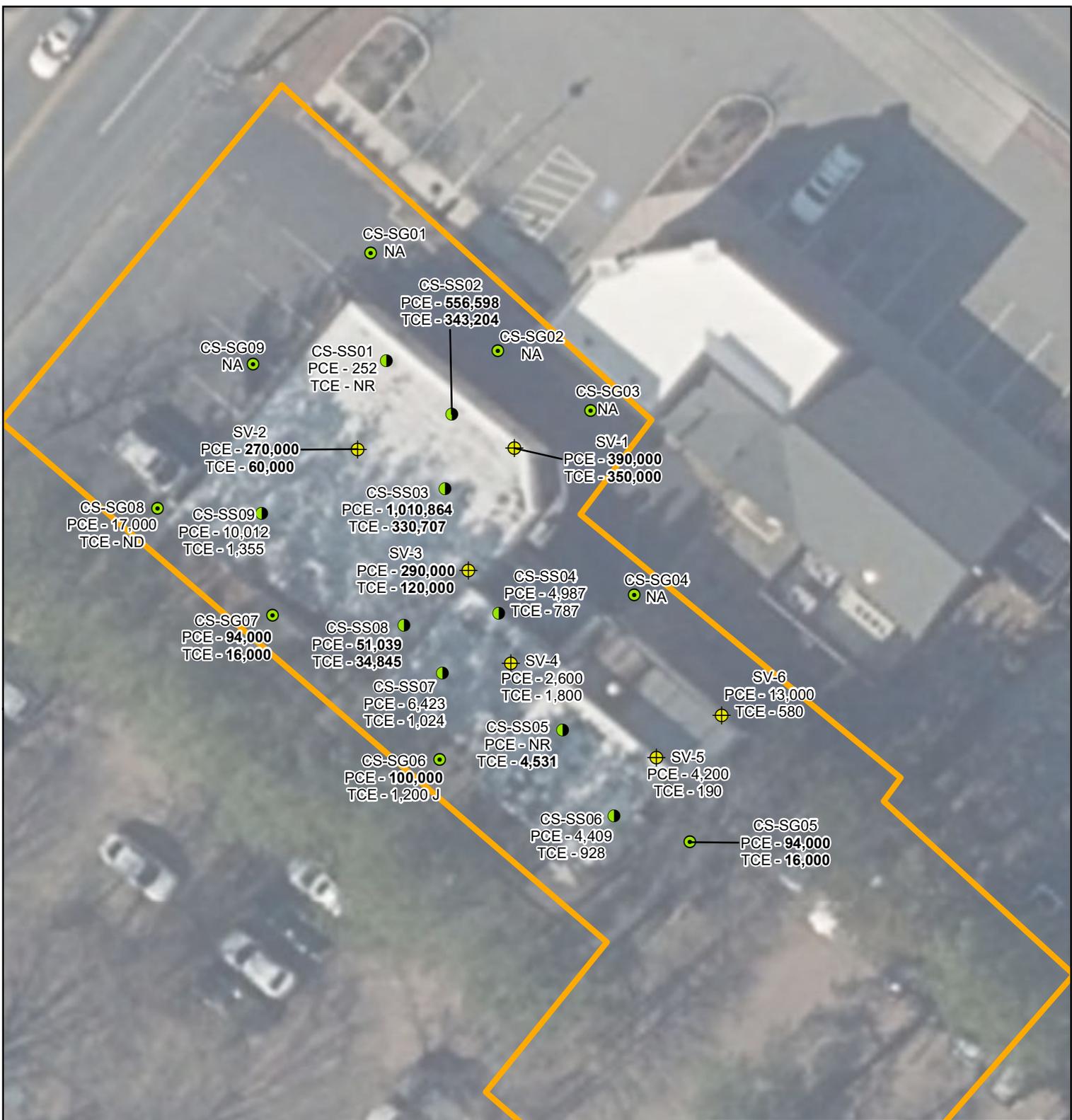
801 Industrial Street 302-656-9600  
 Wilmington, Delaware 19801 302-656-9700 fax

Extent of Environmental Impacts – Groundwater  
 107 N Cross Street  
 Chestertown, Maryland

	By	Date	Scale:	File Name:
Drawn	ADS	3/11/2021	1:300	Fig2EnvImpGrdwtr.mxd
Checked	VMB	3/11/2021	Fig. No.	
Project #	3880.01.51		Figure 2	



- Previous Soil Boring/Grab Groundwater Sample Location
- Site Boundary



-  August 2019 Soil Gas Sample Location (BrightFields - Confirmatory Analysis)
-  August 2019 Sub Slab Soil Gas Sample Location (MDE - Screening Analysis)
-  August 2018 Previous Sub-Slab Vapor Sample Location (Green Street Environmental - Confirmatory Analysis)
-  Site Boundary

Notes:  
 NA - Not Analyzed  
 ND - Not Detected  
 NR - Not Reported  
 Maryland Department of the Environment  
 Tier II Commercial Soil Gas Criteria  
 Tetrachloroethylene - (PCE) > 90,000 ug/m<sup>3</sup>  
 Trichloroethylene - (TCE) > 4,400 ug/m<sup>3</sup>  
**Bold** - Exceeds Tier II Criteria  
 J - Estimated value  
 Previous sample locations are based on georeferenced sample locations provided in the Supplemental Phase II Environmental Site Assessment (Green Street Environmental, 2018)

Source:  
 Maryland Department of Planning,  
 Planning Data Services - Tax Parcels.

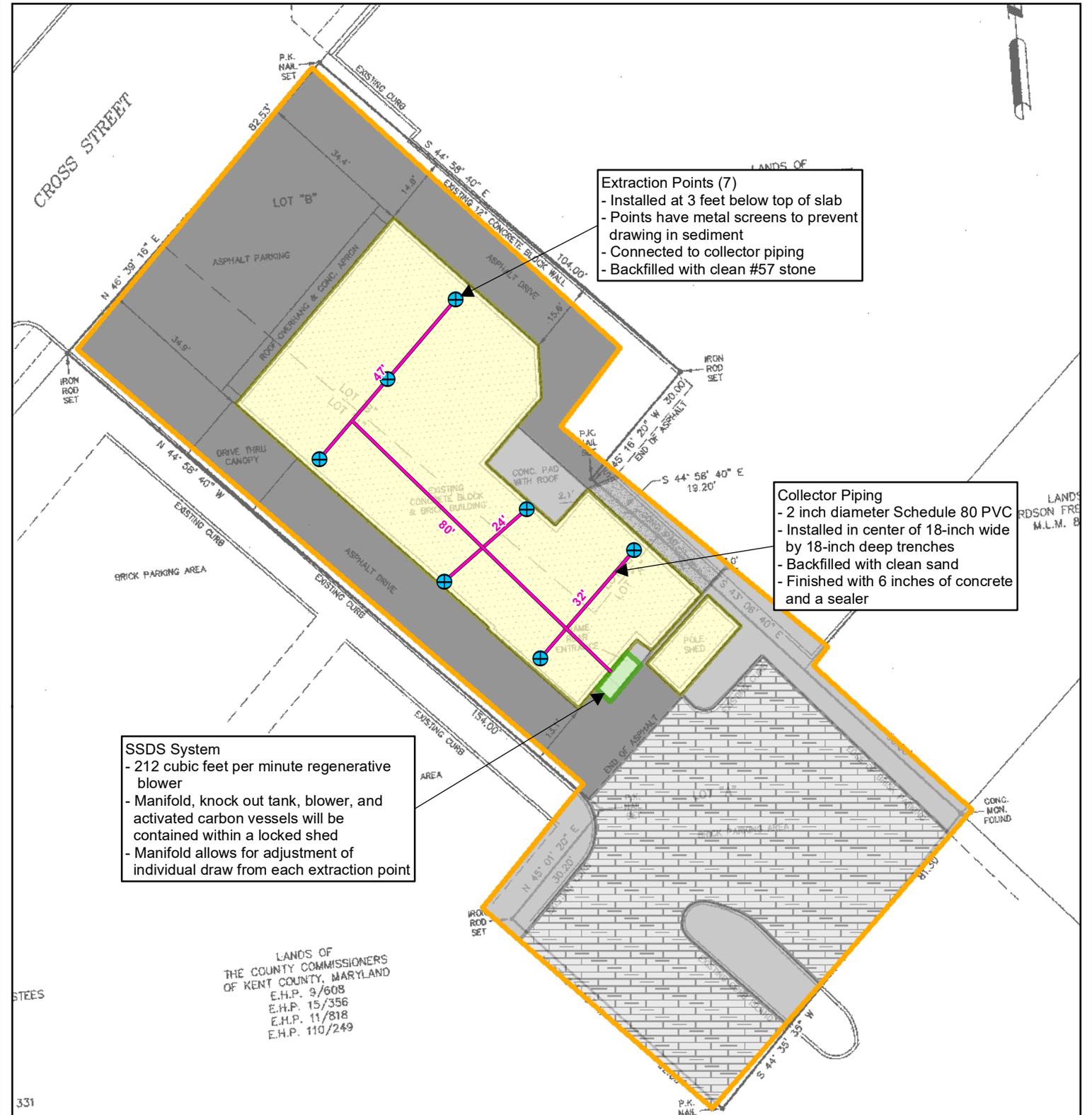


**BrightFields, Inc.**  
 Environmental Services

801 Industrial Street 302-656-9600  
 Wilmington, Delaware 19801 302-656-9700 fax

**Extent of Environmental Impacts – Soil Vapor**  
 107 N Cross Street  
 Chestertown, Maryland

Drawn	By	Date	Scale:	File Name:
ADS	ADS	3/15/2021	1:300	Fig3EnvImpSoil.mxd
Checked	VMB	3/15/2021	Fig. No.	
Project #	3880.01.51		Figure 3	
				



**Extraction Points (7)**

- Installed at 3 feet below top of slab
- Points have metal screens to prevent drawing in sediment
- Connected to collector piping
- Backfilled with clean #57 stone

**Collector Piping**

- 2 inch diameter Schedule 80 PVC
- Installed in center of 18-inch wide by 18-inch deep trenches
- Backfilled with clean sand
- Finished with 6 inches of concrete and a sealer

**SSDS System**

- 212 cubic feet per minute regenerative blower
- Manifold, knock out tank, blower, and activated carbon vessels will be contained within a locked shed
- Manifold allows for adjustment of individual draw from each extraction point

LANDS OF  
THE COUNTY COMMISSIONERS  
OF KENT COUNTY, MARYLAND  
E.H.P. 9/608  
E.H.P. 15/356  
E.H.P. 11/818  
E.H.P. 110/249

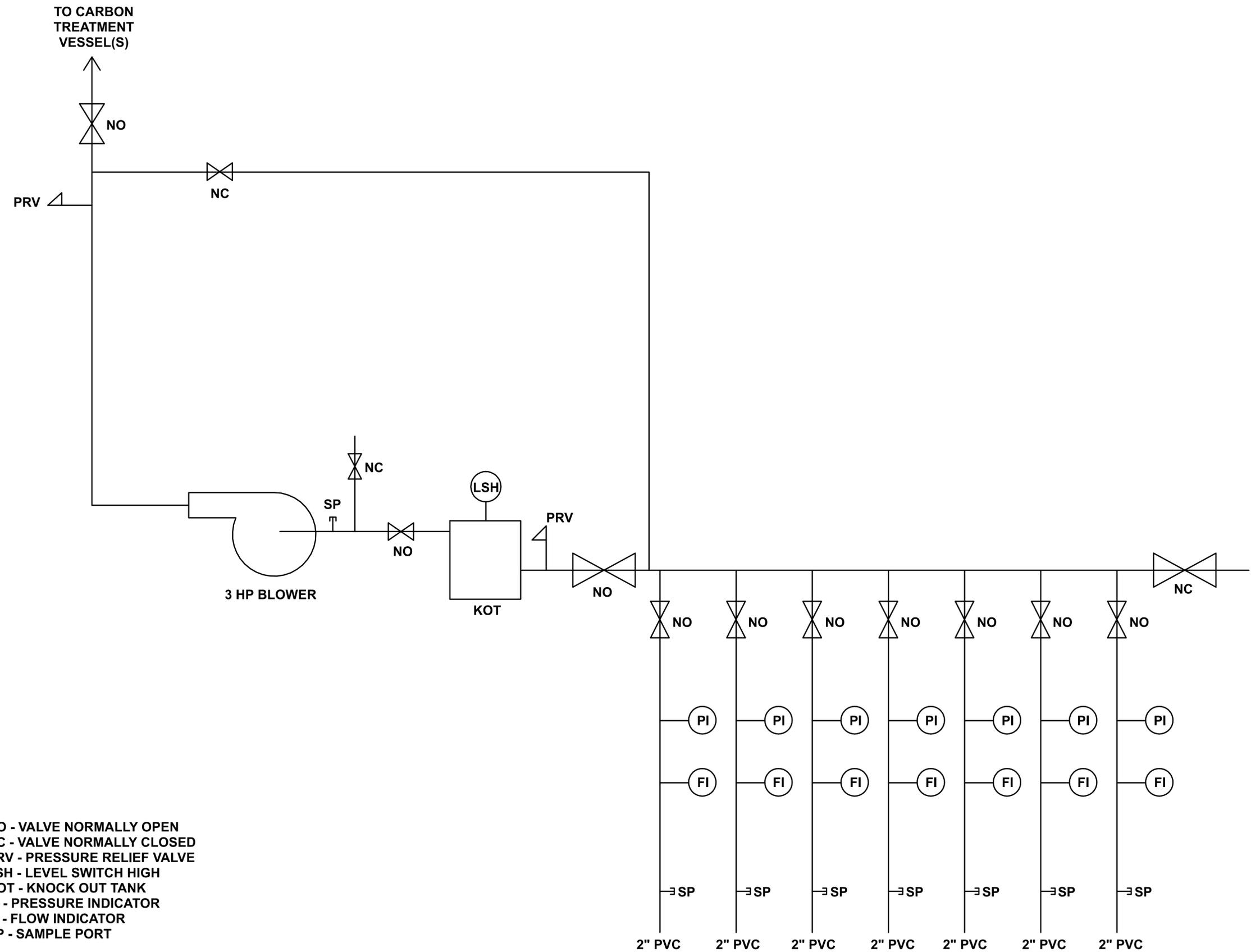
	Extraction Point (Sump) Location
	Collector Pipe
	SSDS Shed
	Site Boundary
	Building
	Brick
	Asphalt
	Concrete

**Note:**  
Locations of the extraction points (sumps) are approximate and will be located in the field based on observations during construction.

Capped areas in the vicinity of the sub-slab depressurization system (SSDS) extraction points and collector pipes will be disturbed for system installation. Disturbed areas will be properly sealed following the SSDS system installation. All other existing buildings, asphalt, and concrete on the property will not be disturbed as part of redevelopment.

**Source:**  
Base map provided by Schrader Surveys, LLC.

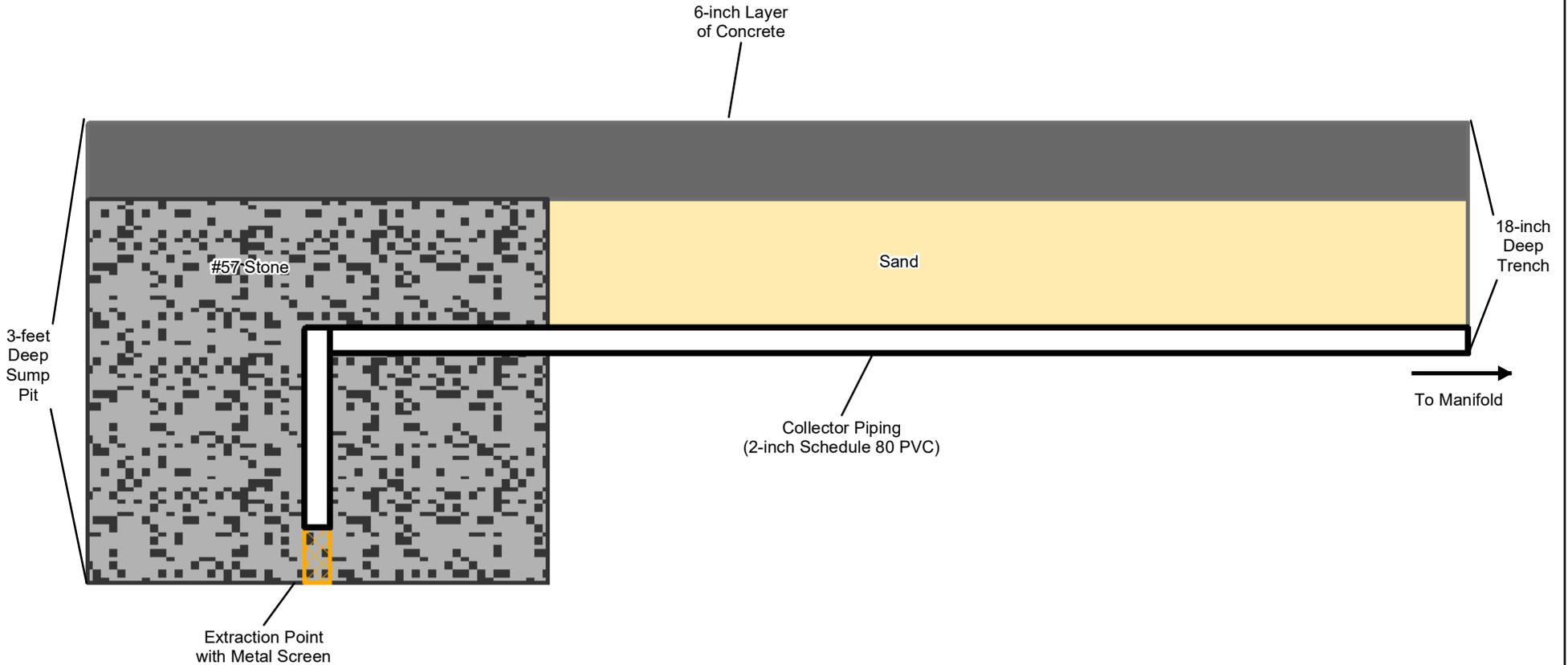
		801 Industrial Street		302-656-9600
		Wilmington, Delaware 19801		302-656-9700 fax
<b>SSDS System Layout</b> 107 N Cross Street Chestertown, Maryland				
By	Date	Scale:	File Name:	
Drawn	ADS	8/30/2021	1:360	Fig4SVE_Sys.mxd
Checked	KPW	8/30/2021	Fig. No.	
Project #	3880.01.51		Figure 4	



NO - VALVE NORMALLY OPEN  
 NC - VALVE NORMALLY CLOSED  
 PRV - PRESSURE RELIEF VALVE  
 LSH - LEVEL SWITCH HIGH  
 KOT - KNOCK OUT TANK  
 PI - PRESSURE INDICATOR  
 FI - FLOW INDICATOR  
 SP - SAMPLE PORT

**DRAFT**

		801 Industrial Street Wilmington, Delaware 19801		302-656-9600 302-656-9700 fax	
		SSDS System Design Details 107 N Cross Street Chestertown, Maryland			
Drawn	By	Date	File Name:		
Checked	KPW	9/24/2021	Fig5Diagram.mxd		
Project #	3880.01.51	Drawing No.		Figure 5	
NOT TO SCALE					



-  Collector Piping (2-inch Schedule 80 PVC)
-  Extraction Point with Metal Screen
-  #57 Stone
-  6-inch Layer of Concrete
-  Sand



**BrightFields, Inc.**  
Environmental Services

801 Industrial Street  
Wilmington, Delaware 19801

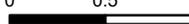
302-656-9600  
302-656-9700 fax

**SSDS System Cross Section**  
107 N Cross Street  
Chestertown, Maryland

	By	Date	Scale:	File Name:
Drawn	ADS	8/30/2021	1:12	Fig6XSect.mxd
Checked	KPW	8/30/2021	Fig. No.	Figure 6
Project #	3880.01.51			

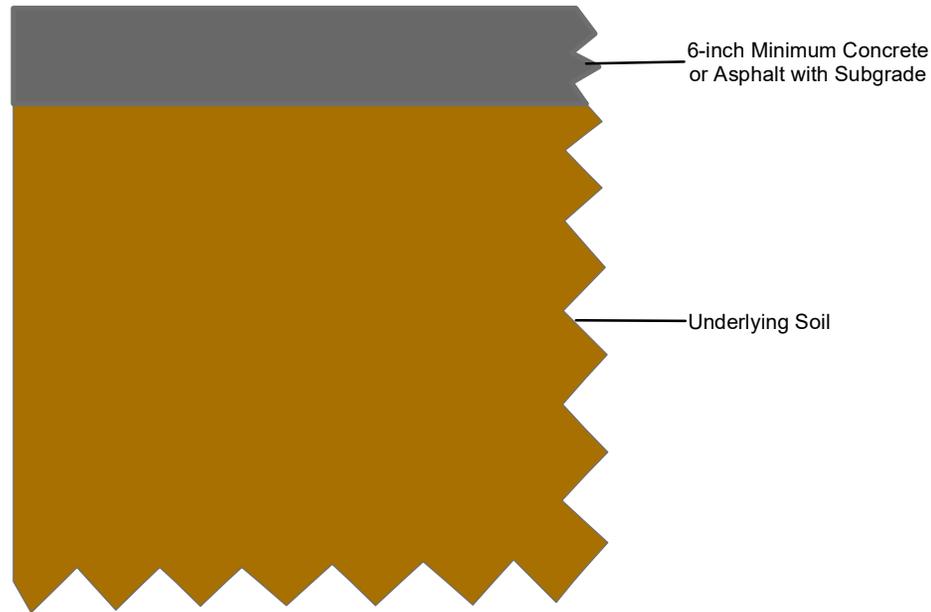
0      0.5      1

Feet





N  
W    E  
S



Note: Detail not for Construction

	6-inch Minimum Concrete or Asphalt with Subgrade
	Underlying Soil



801 Industrial Street  
Wilmington, Delaware 19801

302-656-9600  
302-656-9700 fax

Cap Repair Cross Section  
107 N Cross Street  
Chestertown, Maryland

	By	Date	Scale:	File Name:
Drawn	ADS	8/30/2021	1:12	Fig7CapXSect.mxd
Checked	KPW	8/30/2021	Fig. No.	
Project #	3880.01.51		Figure 7	
				

# APPENDICES

# Appendix A

## Documentation from Previous Investigations

UNDERGROUND LEAK SUMMARY & TANK CLOSURE

CASE # 91-2420 KE DATE OPENED 6/13/91 DATE CLOSED 5/4/94  
 FILE NAME Park Rug + Dry Cleaners INSPECTOR'S INITIALS SCJ

TYPE OF CASE:

- A) PULL X
- B) INSTALLATION \_\_\_\_\_
- C) SURFACE \_\_\_\_\_
- D) LEAK INVESTIGATION \_\_\_\_\_
- E) COMPLIANCE CHECK \_\_\_\_\_
- F) TANK TEST FAILURE \_\_\_\_\_
- G) ABANDONMENT IN PLACE \_\_\_\_\_
- H) OTHER \_\_\_\_\_

\*\*\*\*\*  
 SPILL AFFECTED:

- A) GROUNDWATERS X
- B) DOMESTIC WELLS \_\_\_\_\_
- C) SURFACE WATERS \_\_\_\_\_
- D) A BUILDING \_\_\_\_\_
- E) STORM DRAIN \_\_\_\_\_
- F) SANITARY LINE \_\_\_\_\_
- G) UTILITY WORK OR LINES \_\_\_\_\_
- H) REACHED ADJOIN. PROPERTY \_\_\_\_\_
- I) NONE/OTHER (SPECIFY) \_\_\_\_\_
- J) SOILS \_\_\_\_\_

\*\*\*\*\*  
 OWNER OF SYSTEM:

- A) MAJOR OIL COMPANY \_\_\_\_\_
- B) LOCAL OIL COMPANY \_\_\_\_\_
- C) PRIVATELY OWNER \_\_\_\_\_
- D) GOVERNMENT FACILITY \_\_\_\_\_
- E) MARINA \_\_\_\_\_
- F) PRIVATE RESIDENT \_\_\_\_\_
- G) APARTMENT \_\_\_\_\_
- H) SCHOOL \_\_\_\_\_
- I) COMMERCIAL BUSINESS \_\_\_\_\_
- J) OTHER (SPECIFY) X

\*\*\*\*\*  
 IF UNDER TYPE OF CASE ITEM B, C, OR E IS CHECKED, DO NOT FILL IN CHART BELOW. OBSERVATION WELLS INSTALLED? YES NO # OF WELLS 1

	CAPACITY OF TANK	TANK TYPE	LINE TYPE	AGE	PRODUCT	STATUS OF TANK	LEAK FOUND
1	1000	A	A	<del>B</del>	B	C	?
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

REVIEWED BY ROK

CODES ON REVERSE SIDE

## CODES FOR USE ON REVERSE SIDE

### TYPE:

- |                                 |               |
|---------------------------------|---------------|
| A) Steel                        | D) Other      |
| B) Fiberglass                   | E) Clad Steel |
| C) Cathodically-Protected Steel | F) Copper     |

### AGE:

- |                |                  |
|----------------|------------------|
| A) 1-5 years   | D) 16-20 years   |
| B) 6-10 years  | E) Over 20 years |
| C) 11-15 years |                  |

### PRODUCT:

- |             |              |
|-------------|--------------|
| A) Gasoline | G) Jet Fuel  |
| B) #2 Oil   | H) Waste Oil |
| C) Kerosene | I) Asphalt   |
| D) #4 Oil   | J) Other     |
| E) #5 Oil   | K) Diesel    |
| F) #6 Oil   |              |

### LEAK FOUND IN:

- |                |                   |
|----------------|-------------------|
| A) Tank        | F) Fill Pipe      |
| B) Supply Line | G) Air Pocket     |
| C) Return Line | H) None           |
| D) Vent Line   | I) Other          |
| E) Fittings    | J) Flex Connector |

### STATUS:

- |                       |
|-----------------------|
| A) In Service         |
| B) Removed            |
| C) Abandoned-In-Place |



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway • Baltimore, Maryland 21224  
(410) 631-3000

William Donald Schaefer  
Governor  
June 1, 1994

David A.C. Carroll  
Secretary

NOTICE OF COMPLIANCE

Mr. Mark Carroll  
Park Rug & Dry Cleaners Corporation  
107 North Cross Street  
Chestertown MD 21620

**RE: Park Rug & Dry Cleaners  
Cross Street  
Chestertown, Maryland  
Case #91-2420 KE**

Dear Mr. Carroll:

On May 4, 1994, a representative of the Waste Management Administration's Oil Control Program reviewed the Administration's case and the report submitted by ECS, Inc. dated April 26, 1994 on the above-referenced property.

Based on this review and information, it has been determined that one (1) underground storage tank has been removed and one (1) monitoring well has been installed and sampled. The Administration does not require any corrective action at this site based on the low level of dissolved petroleum in groundwater and site characteristics. Thus, the above-referenced property is now in compliance with Code of Maryland Regulations 26.10.10.01-03.

The Administration hereby closes its case in reference to this site. This Notice should not be construed as a waiver of the Administration's right to take any other enforcement action it deems appropriate with respect to this site. This notice is not intended to address tetrachloroethane contamination which may have originate from this site.

If you have any questions concerning this matter, please telephone this office at (410) 631-3442.

Sincerely,

*Ross Kelly*

Ross Kelly, Regional Supervisor  
Compliance/Remediation Division  
Oil Control Program

ST:rdm

cc: Mr. Richard Collins  
Mr. Harold Dye  
Mr. John Grace  
Mr. Herbert Meade  
Mr. Horacio Tablada

**MEMORANDUM**

Copies { 91-2420KE

To File From S. Tiffany Date 10/25/93  
 Subject Well Analysis / Phone Conversation

On this date this Inspector spoke w/ Mr. David Carroll, of Park Regt Dry Cleaners, in reference to the re-Sample of their MW for PCB.

Previous results in Oct. 91 were 5200 ppb.  
 Oct 5, 1993 Results are 112 ppb.

This inspector requested the MW be resampled 6 mos. from last date (March, '94) w/a copy of the results forwarded to this office.

Mr. Carroll stated he would pass the info. along to his father (President - Alan Carroll)



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 91-2420KE

Report of Observations

Type of Inspection/Observation: Meeting Proposed Well Installation Date 8 / 13 / 91  
 Facility Name: Park Rug & Dry Cleaners Corp. 107 North Cross St. Chestertown  
 Remarks: Inspector, Mr. Thomas Walter (regional supervisor) and Mr. Lanny Helms (Earth Data) visited above site to meet with Mr. Alan Carroll (President, Park Rug and Dry Cleaners Corp.) to mark proposed monitoring well location due to abandonment in place of (1) 2000 gallon #2 heating oil tank. Upon arrival proposed location for well has been marked. Inspector advised Mr. Carroll and Mr. Helms that well is to be sampled and analyzed for BTEX, Napthalene, and PCE. Mr. Carroll stated no exact date has been scheduled at present time, but expects to tentatively have AST installed next week. Mr. Carroll stated that inspector's office will be notified when abandonment of UST has been scheduled. 48 hour notification prior to abandonment is preferred. Upon receiving sample results and observing tank abandonment, case status will be updated.

Left copy of report with Mr. Carroll & Mr. Helms

TIME IN: 1100

TIME OUT: 1130

Observer: Brown Rae B. Bae

Person Interviewed: Mr. Alan Carroll (President, Park Rug & Dry Cleaners Corp.)

Mr. Thomas Walter (Thomas Walt)

Mr. Lanny Helms (Earth Data)



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 91-2420 KE

Report of Observations

Type of Inspection/Observation: Follow-up Routine Inspection Date 8/2/91  
 Facility Name: Park Rug and Dry Cleaners Corp. 107 W. Cross St. Chestertown  
 Remarks: Inspector visited above site to follow-up on visit made on 6/13/91. Upon arrival inspector spoke with Mr. Alan Carroll (president, Park Rug & Dry Cleaners Corp.) who stated that an above ground storage tank has been obtained and Coastal Pump and Tank Inc. (Harrington DE) has been contracted to abandon existing heating oil tank in place. Tentative scheduling for tank abandonment is approximately (2) weeks. Inspector also advised Mr. Carroll that an environmental assessment must be performed, via installation of (1) 4" PVC groundwater monitoring well, in order to determine if any release of product has occurred and impacted the groundwater. Well is to be installed in a location acceptable to the Administration. Well is to be sampled and analyzed for B.T.E.X. and Naphthalene. Inspector hand delivered to Mr. Carroll a list of oil spill contractors and advised Mr. Carroll to contact inspector's office 48 hours prior to abandoning tank. Inspector will also refer findings to Mr. Herbert Meade (enforcement chief) and Mr. Thomas Walter (regional supervisor):

left copy of report with Mr. Carroll

TIME IN: 1400

TIME OUT: 1500

Observer: Brown Roe B. Roe Person Interviewed: Mr. Alan Carroll (president, Park Rug and Dry Cleaners Co.)

Alan Carroll

Rug and Dry Cleaners Co.



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 91-2420 KE

Report of Observations

Type of Inspection/Observation: Routine Inspection Date 6 / 13 / 91

Facility Name: Park Rug and Dry Cleaners Corp. 107 N. Cross St. Chestertown

Remarks: Inspector visited above site in reference to on-going investigation concerning contamination of Chestertown Municipal water supply. Upon arrival, inspector spoke with Mr. Alan Carroll (President, Park Rug and Dry Cleaners Corp.) who stated that there is (1) uST on site used for heating purposes. Mr. Carroll also stated that the uST was installed in 1963 and is 1000 gallon capacity. Tank is registered but has not been precision tested. There was also no color code chart or identification present. There is also (1) 80 gallon A#T which is located inside the dry cleaning facility which is used for storage of perchloroethylene. Mr. Carroll stated that bulk deliveries are made directly into the storage tank from delivery truck. Cannisters/filters are changed monthly and are disposed of through Safety-Kleen Corp. Hazardous Waste Manifests are on site. Inspector hand delivered to Mr. Carroll a copy of Md. state regulations and list of precision testers. Inspector advises Mr. Carroll of the following requirements:

- 1) On or by 1636 hrs. 7/13/91 precision test heating oil storage tank system. Contact inspector concerning results of precision test upon completion.
- 2) Perform color coding of storage tank fill and post chart which is to include type of product stored and capacity of tank. This is also to be performed on or by 1636 hrs. 7/13/91.

Return visit will be made to verify above requirements are completed. Inspector will also refer findings to Mr. Herbert Meade (enforcement chief) and Mr. Thomas Walter (regional supervisor.)

left copy of report with Mr. Carroll

TIME IN: 1130

TIME OUT: 1330

Observer: Brown Roe B. Roe

Person Interviewed: Mr. Alan Carroll (President, Park Rug and Dry Cleaners Corp.)

Alan Carroll

HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION  
UNDERGROUND STORAGE TANK DIVISION  
INITIAL REPORT OF INCIDENT

CASE NO: 91-2420 KE

CALLER

1. Name of HSWMA personnel taking report: Roe
2. Date of report: 6/13/91
3. Time of report: \_\_\_\_\_
4. Name of caller: \_\_\_\_\_
5. Telephone #: \_\_\_\_\_
6. What agency or company is caller with: \_\_\_\_\_

DETAILS OF SPILL

7. Date of incident: \_\_\_\_\_
8. Time of incident: \_\_\_\_\_
9. Has product been released? YES \_\_\_\_\_ NO \_\_\_\_\_
10. Amount released: \_\_\_\_\_
11. Tank test failure? YES \_\_\_\_\_ NO \_\_\_\_\_
12. Tank failure rate: \_\_\_\_\_
13. Precise location of the release or incident: Park Ridge Dry Cleaners Corp. 107 North  
Cross St. Chestertown County: KE
14. Nearest crossroad or other identifying mark: \_\_\_\_\_
15. Type of product involved: \_\_\_\_\_
16. Quantity on board: \_\_\_\_\_
17. Age of tank system: \_\_\_\_\_
18. Details of release: Positive inspection color coding, Precision testing  
(well head protection program)
19. Has product entered water? YES \_\_\_\_\_ NO \_\_\_\_\_
20. Name of waterway: \_\_\_\_\_

RESPONSIBLE PARTY

21. Responsible party's name: \_\_\_\_\_
22. Responsible party's address: \_\_\_\_\_
23. Responsible party's telephone number: \_\_\_\_\_
24. Has responsible party taken any action to control the problem? YES \_\_\_\_\_ NO \_\_\_\_\_
25. If yes, what: \_\_\_\_\_

ACTION TAKEN

- \_\_\_ UST INSPECTOR ASSIGNED CASE: \_\_\_\_\_
- \_\_\_ TRANSFERRED CALL TO: \_\_\_\_\_ TIME: \_\_\_\_\_
- \_\_\_ DISPATCHED: \_\_\_\_\_ DATE: \_\_\_\_\_
- \_\_\_ NO RESPONSE; Explain why: \_\_\_\_\_
- \_\_\_ OTHER: \_\_\_\_\_ INITIALS: \_\_\_\_\_



The sample collected was shipped to an independent laboratory for analysis for the presence and concentration of tetrachloroethene (PCE). The sample was accompanied by a properly maintained chain of custody form throughout the sample collection, transportation and analytic process. Copies of the laboratory report and chain of custody form are included in the appendix for your review and records. The results of the laboratory testing are presented in Table 2, Ground Water Analytical Test Results.

Table 2: Ground Water Analytical Test Results	
Monitoring Well MW-1	
Date	10/05/93
PCE	112 ug/L
ug/L - micrograms per liter or parts per billion (ppb).	

Limitations

The scope of work completed is limited to the activities and results contained in this report. Industry standard hydrogeologic investigative procedures and protocol were employed in the completion of the scope of work. No other warranty expressed or implied is made. The chemical analysis services contained in this report were performed by Phase Separation Science, Inc. of Baltimore, Maryland.

The information presented in this report should be provided to:

Maryland Department of the Environment  
Hazardous & Solid Waste Management Administration  
Oil Control Program  
2500 Broening Highway  
Baltimore, Maryland 21224

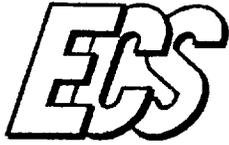
Attn: Ms. Susan Tiffany

ECS thanks you for the opportunity to be of service. If you have any questions, please contact our offices at (410) 543-0068.

Sincerely,

Jonathan Kniskern  
Staff Geologist

Bob Orgain  
President

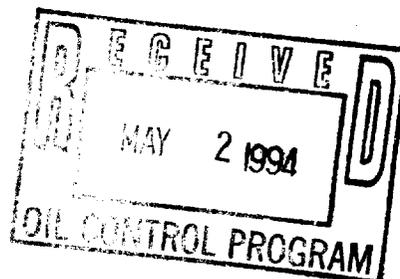


REPORT OF GROUND WATER SAMPLING  
AND LABORATORY TESTING  
PARK RUG AND DRY CLEANERS CORPORATION

Chestertown, Maryland  
April 26, 1994

prepared for

Park Rug and Dry Cleaners Corp.  
107 North Cross Street  
Chestertown, Maryland 21620



**ENVIRONMENTAL CONSULTING SERVICES, INC.**

P.O. BOX 1615, SALISBURY, MARYLAND 21802-1615

(410) 543-0068

FAX (410) 742-5089



April 26, 1994

Park Rug and Dry Cleaners Corp.  
107 North Cross Street  
Chestertown, Maryland 21620

Attn: Mr. A. Carroll

Subject: Report of Ground Water Monitoring Well  
Sampling and Testing  
Park Cleaners  
Chestertown, Maryland  
ECS Project No. 160400193  
MDE Case #91-2420 KE

Dear Mr. Carroll:

Environmental Consulting Services, Inc. (ECS) has completed the scope of work to collect and chemically analyze one (1) ground water sample from the monitoring well located at Park Cleaners in Chestertown, Maryland (see Project Location Map, drawing no. 160400193A, in the appendix). The scope of work conducted was completed in accordance with the specifications presented in our proposal dated April 7, 1994.

On Monday, April 18, 1994 one (1) monitoring well at the project site was gauged, purged, and sampled in accordance with Maryland Department of the Environment (MDE) guidelines. The monitoring well location is indicated on drawing number 160400193B, Project Site Diagram, in the appendix. The data collected from the well gauging activity is presented in Table 1, Monitoring Well Gauging Data.

Well ID Kent Co. Well Tag No.	Depth to Ground Water	Total Depth	Water Layer Thickness	Well Vol. (Gal.)	Purge Vol. (Gal.)
MW-1 KE-88-0273	15.09'	23.70'	8.61'	5.68	17.04



The ground water sample collected was shipped to an independent laboratory for analysis for the presence and concentration of tetrachloroethene (PCE). The sample was accompanied by a properly maintained chain of custody form throughout the sample collection, transportation and analytic process. Copies of the laboratory report and chain of custody form are included in the appendix for your review and records. The results of the laboratory testing are presented in Table 2: Ground Water Analytical Test Results along with the previous sampling data.

Table 2: Ground Water Analytical Test Results		
Monitoring Well MW-1		
Date	10/05/93	04/18/94
PCE	112 ug/L	3 ug/l
ug/L - micrograms per liter or parts per billion (ppb).		

The PCE concentration reported from the laboratory analysis of the ground water sample collected on April 18, 1994 was three (3) micrograms per liter (ug/L) or parts per billion. The limit of quantitation for United States Environmental Protection Agency (USEPA) analytic method 8260 is five (5) parts per billion (ug/l). Concentrations which are detected at concentrations below the USEPA method limit of quantitation are reported as estimates.

#### Limitations

The scope of work completed is limited to the activities and results contained in this report. Industry standard hydrogeologic investigative procedures and protocol were employed in the completion of the scope of work. No other warranty expressed or implied is made. The chemical analysis services contained in this report were performed by Phase Separation Science, Inc. of Baltimore, Maryland.



Park Cleaners Report  
April 26, 1994  
page 3

The information presented in this report should be provided to:

Maryland Department of the Environment  
Waste Management Administration  
Oil Control Program  
2500 Broening Highway  
Baltimore, Maryland 21224

Attn: Ms. Susan Tiffany

ECS thanks you for the opportunity to be of service. If you have any questions, please contact our offices at (410) 543-0068.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Darren Ryan'.

Darren Ryan  
Staff Engineer

A handwritten signature in cursive script, appearing to read 'Bob Orgain'.

Bob Orgain  
President



Appendix

	drawing no.
Project Location Map.....	160400193A
Project Site Diagram.....	160400193B
Laboratory Reports and Chain of Custody Forms	





**ENVIRONMENTAL  
CONSULTING  
SERVICES, INC.**  
PO BOX 1615  
SALISBURY, MD.  
21802-1615

TITLE: PROJECT SITE DIAGRAM

PROJECT: PARK CLEANERS, CHESTERTOWN, MARYLAND

CLIENT: PARK CLEANERS

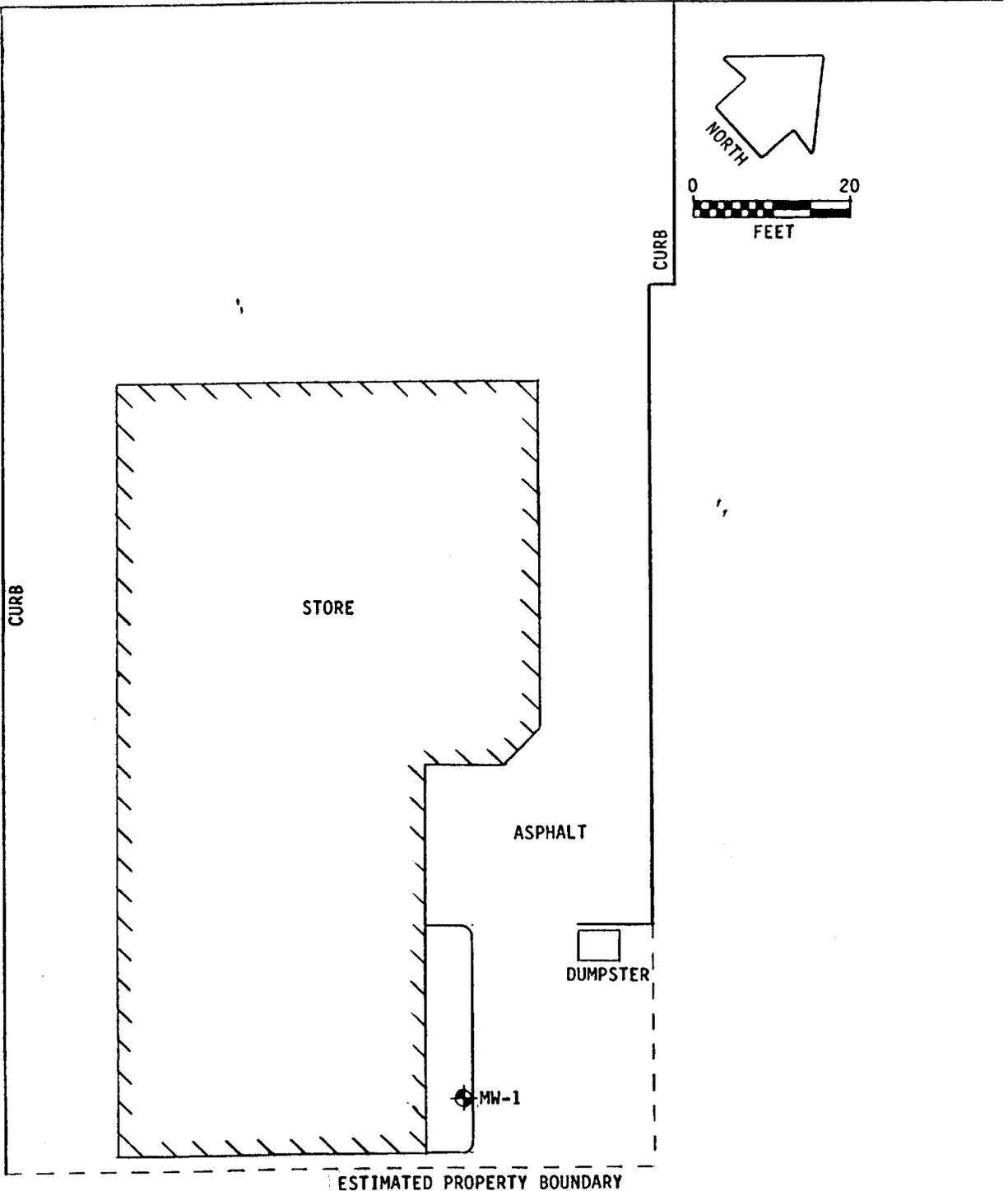
PROJECT NO.  
160400193

SCALE  
1" = 20'

DATE  
04/26/94

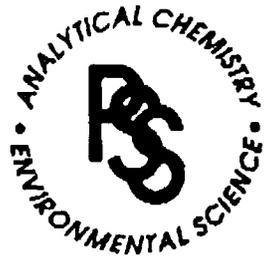
DRAWING NO.  
160400193B

CROSS STREET



OFFICES:  
6630 BALTIMORE NATL PIKE  
ROUTE 40 WEST  
BALTIMORE, MD 21228  
410-747-8770  
800-932-9047  
FAX 410-788-8723

# PHASE SEPARATION SCIENCE, INC.



## CERTIFICATE OF ANALYSIS

No. 940419-01 001

Environmental Consulting Services, Inc.

April 26, 1994

Analysis of: Water Sample MW-1

Project: Park Cleaners

Site Location: Chestertown, Maryland

Project Number: 160400193

Analysis of Tetrachloroethene

Date Sampled: 4-18-94 Date Received: 4-19-94 Date Analyzed: 4-21-94

Tetrachloroethene

e 3 ug/L

e-estimated value

The above analysis was performed according to procedures described in the following EPA methods:

EPA 8260: Volatile Organic Compounds by GC/MS

Reviewed by: \_\_\_\_\_

*[Signature]*  
Quality Assurance Chemist

**PHASE SEPARATION SCIENCE, INC.**  
**Analytical Chemistry-Environmental Science**  
**Sample Chain of Custody Form**  
*6630 Baltimore National Pike*  
*Baltimore, Maryland 21228*  
*Phone: 410-747-8770/800-932-9047 Fax: 410-788-8723*

Client Name	Environmental Consulting Services, Inc.	Project Manager	Mr. Bob Orgain
Project Name	PARK CLEANERS	Project Number	160400193
Site Location	CHESTERTOWN, MARYLAND	Laboratory Number	940419-01

Sample ID	Matrix	Sample Date	Preservative	Analytical Parameters
MW-1	H <sub>2</sub> O	4-18-94	W/A	PCE (TETRACHLOROETHYLENE) (2x 40ml)

Relinquished by Sampler <small>I attest that prep or sample procedures were used</small>	<i>Sam S. [Signature]</i>	Date	4/18/94	Time	6:30 AM
Received by		Date		Time	
Relinquished by		Date		Time	
Received by Laboratory	<i>Walter [Signature]</i>	Date	4-19-94	Time	1035

Turnaround Time <small>Expedite analyses if expedited turnaround may be feasible due to lengthy extraction procedures. Please contact the lab for applicability.</small>	Routine	48 hr	24 hr	Number of Business days

**MEMORANDUM**

Copies { 91-2420KE

To File From S. Tiffany Date 10/25/93  
 Subject Well Analysis / Phone Conversation

On this date this Inspector spoke w/ Mr. David Carroll, of Park Regt Dry Cleaners, in reference to the re-Sample of their MW for PCBs.

Previous results in Oct. 91 were 5200 ppb.  
 Oct 5, 1993 Results are 112 ppb.

This inspector requested the MW be Resampled 6 mos. from last date (March, '94) w/a copy of the Results forwarded to this office.

Mr. Carroll stated he would pass the info. along to his father (President - Alan Carroll)



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 91-2420KE

Report of Observations

FACILITY I.D. # \_\_\_\_\_

Type of Inspection/Observation: Follow-up - Date 9/14/93

Facility Name: Park Rug & Dry Cleaners, 107 N. Cross St. Chestertown

Remarks: On this date this inspector met w/ me Alan Carroll (President) to discuss Resample the one groundwater monitoring well and have it analyzed for Tetrachloroethene (PCE).

Previous Sample in Oct. 1991 showed 5,700 ppb of PCE (52x the action level.) Mr. Carroll agreed to contact someone to Resample the well for PCE w/in the next 30 days.

Additional Environ. Co.

- J.D. Hynes + Assoc - 410-546-6462 (John Hynes)
- E.C.S - 410-543-0068 (Bob ORZain)
- T.P.H Inc - 410-224-9300 (Sonny Beard)

TIME IN: 1330

TIME OUT: 1415

Observer: Susan T. Hay

Person Interviewed: Alan Carroll - Pres. Park Rug & Dry Cleaners  
Alan Carroll



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 91-2420 KE

Report of Observations

Type of Inspection/Observation: Meeting Proposed Well Installation Date 8 / 13 / 91  
 Facility Name: Park Rug & Dry Cleaners Corp. 107 North Cross St. Chestertown  
 Remarks: Inspector, Mr. Thomas Walter (regional supervisor) and Mr. Lanny Helms (Earth Data) visited above site to meet with Mr. Alan Carroll (President Park Rug and Dry Cleaners Corp.) to mark proposed monitoring well location due to abandonment in place of 10000 gallon #2 heating oil tank. Upon arrival proposed location for well has been marked. Inspector advised Mr. Carroll and Mr. Helms that well is to be sampled and analyzed for BTEX, Napthalene, and PCE. Mr. Carroll stated no exact date has been scheduled at present time, but expects to tentatively have AST installed next week. Mr. Carroll stated that inspector's office will be notified when abandonment of UST has been scheduled. 48 hour notification prior to abandonment is preferred. Upon receiving sample results and observing tank abandonment, case status will be updated.

Left copy of report with Mr. Carroll & Mr. Helms

TIME IN: 1100

TIME OUT: 1130

Observer: Brown Rae B. Lee

Person Interviewed: Mr. Alan Carroll (President, Park Rug & Dry Cleaners Corp.)

Mr. Thomas Walter (Thomas Walt)

Mr. Lanny Helms (Earth Data)







REPORT OF GROUND WATER MONITORING WELL  
SAMPLING AND TESTING  
PARK CLEANERS  
CHESTERTOWN, MARYLAND  
OCTOBER 14, 1993

OCT 20 1993

prepared for  
Park Cleaners  
107 North Cross Street  
Chestertown, Maryland 21260

prepared by  
Environmental Consulting Services, Inc.  
P.O. Box 1615  
Salisbury, Maryland 21802-1615



October 14, 1993

Park Cleaners  
107 North Cross Street  
Chestertown, Maryland 21620

Attn: Mr. A. Carroll

Subject: Report of Ground Water Monitoring Well  
Sampling and Testing  
Park Cleaners  
Chestertown, Maryland  
ECS Project No. 160400193  
MDE Case #91-2420 KE

Dear Mr. Carroll:

Environmental Consulting Services, Inc. (ECS) has completed the scope of work to collect and chemically analyze one ground water sample from the monitoring well located at Park Cleaners in Chestertown, Maryland (see Project Location Map, drawing no. 160400193A, in the appendix). The scope of work conducted was completed in accordance with the specifications presented in our proposal dated september 17, 1993.

On Tuesday, October 5, 1993 one (1) monitoring well at the project site was gauged, purged, and sampled in accordance with Maryland Department of the Environment (MDE) guidelines. The monitoring well location is indicated on drawing number 160400193B, Project Site Diagram, in the appendix. The data collected from the well gauging activity is presented in Table 1, Monitoring Well Gauging Data.

Well ID (Kent Co. Well Tag No.)	Depth to Ground Water	Total Depth	Water Layer Thickness	Well Vol. (Gal.)	Purge Vol. (Gal.)
MW-1 (KE-88-0273)	19.10'	23.70'	4.60'	3.04	9.12



The sample collected was shipped to an independent laboratory for analysis for the presence and concentration of tetrachloroethene (PCE). The sample was accompanied by a properly maintained chain of custody form throughout the sample collection, transportation and analytic process. Copies of the laboratory report and chain of custody form are included in the appendix for your review and records. The results of the laboratory testing are presented in Table 2, Ground Water Analytical Test Results.

Table 2: Ground Water Analytical Test Results	
Monitoring Well MW-1	
Date	10/05/93
PCE	112 ug/L
ug/L - micrograms per liter or parts per billion (ppb).	

Limitations

The scope of work completed is limited to the activities and results contained in this report. Industry standard hydrogeologic investigative procedures and protocol were employed in the completion of the scope of work. No other warranty expressed or implied is made. The chemical analysis services contained in this report were performed by Phase Separation Science, Inc. of Baltimore, Maryland.

The information presented in this report should be provided to:

Maryland Department of the Environment  
Hazardous & Solid Waste Management Administration  
Oil Control Program  
2500 Broening Highway  
Baltimore, Maryland 21224

Attn: Ms. Susan Tiffany

ECS thanks you for the opportunity to be of service. If you have any questions, please contact our offices at (410) 543-0068.

Sincerely,

Jonathan Kniskern  
Staff Geologist

  
Bob Orgain  
President



Appendix

	drawing no.
Project Location Map.....	160400193A
Project Site Diagram.....	160400193B
Laboratory Reports and Chain of Custody Form	





**ENVIRONMENTAL  
CONSULTING  
SERVICES, INC.**  
PO BOX 1615  
SALISBURY, MD.  
21802-1615

**TITLE: PROJECT SITE DIAGRAM**

**PROJECT: PARK CLEANERS, CHESTERTOWN, MARYLAND**

**CLIENT: PARK CLEANERS**

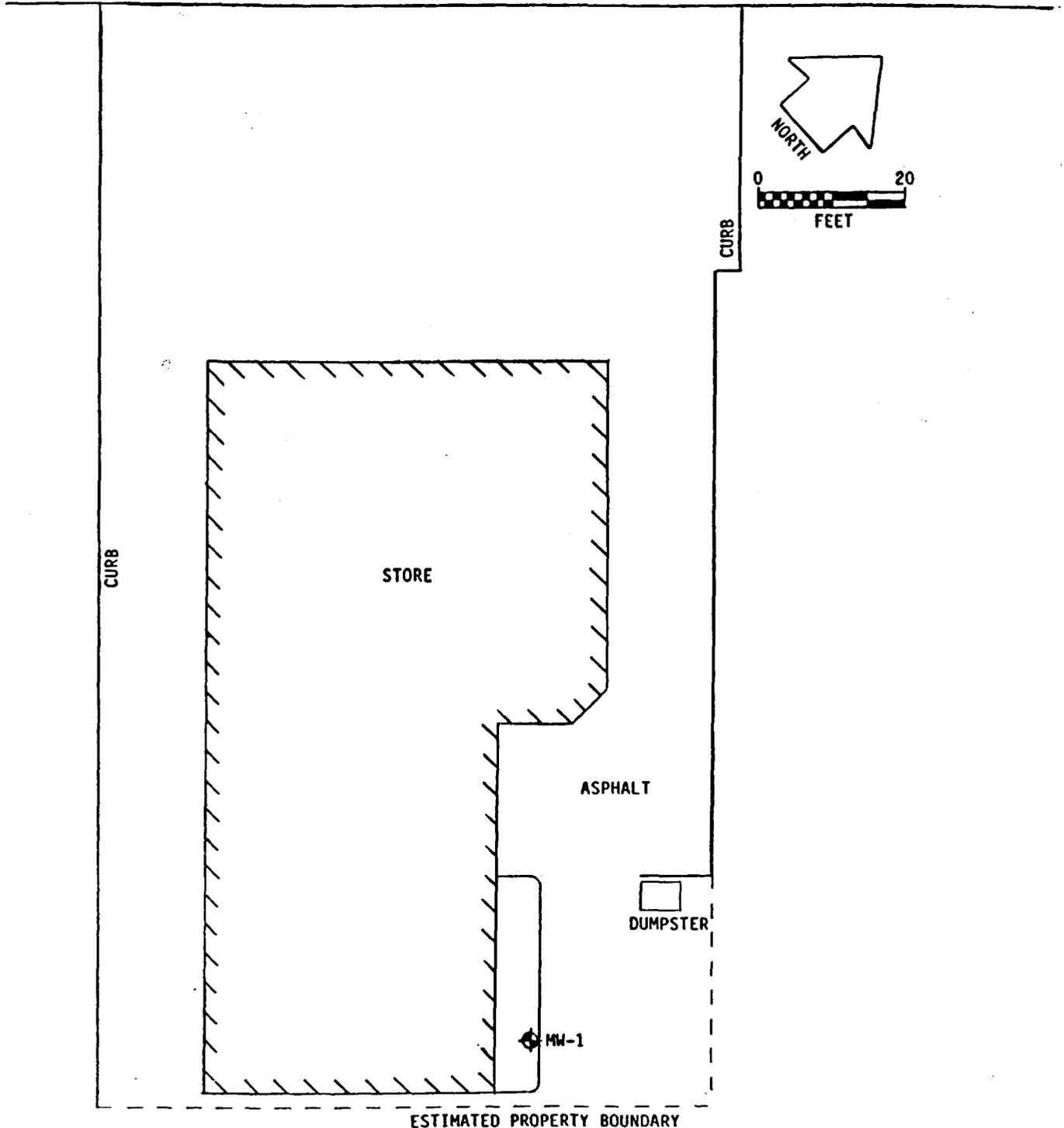
**PROJECT NO.**  
160400193

**SCALE**  
1" = 20'

**DATE**  
10/14/93

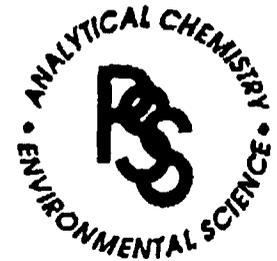
**DRAWING NO.**  
160400193B

CROSS STREET



OFFICES:  
6630 BALTIMORE NATL PIKE  
ROUTE 40 WEST  
BALTIMORE, MD 21228  
410-747-8770  
800-932-9047  
FAX 410-788-8723

# PHASE SEPARATION SCIENCE, INC.



CERTIFICATE OF ANALYSIS

No. 931006-02

Environmental Consulting Services, Inc.

October 13, 1993

Analysis of: Water Sample MW-1

Project: Park Cleaners

Site Location: Chestertown, Maryland

Project Number: 160400193

Analysis of Tetrachloroethene by GC/MS

Date Sampled: 10-5-93 Date Received: 10-6-93 Date Analyzed: 10-12-93

Tetrachloroethene

112 ug/L

The above analysis was performed according to procedures described in the following EPA method(s):

EPA 8260: Volatile Organic Compounds by GC/MS

Reviewed by: \_\_\_\_\_

*John J. Anderson*  
Quality Assurance Chemist

**PHASE SEPARATION SCIENCE, INC.**  
**Analytical Chemistry-Environmental Science**  
**Sample Chain of Custody Form**  
*6630 Baltimore National Pike*  
*Baltimore, Maryland 21228*  
*Phone: 410-747-8770/800-932-9047 Fax: 410-788-8723*

Client Name:	Environmental Consulting Services, Inc.	Project Manager	Mr. Bob Orgain
Project Name:	Park Cleaners	Project Number	160400193
Site Location:	Chester town, Maryland	Laboratory Number	931006-02

Sample ID	Matrix	Sample Date	Preservative	Analytical Parameters
MW-1	H <sub>2</sub> O	10/5/93	N/A	PCE (Tetrachloroethylene) (2 x 40ml)

Relinquished by Sampler <small>I attest that proper sampling procedures were used</small>	<i>Jonathan L. Kuebler</i>	Date	10/5/93	Time	6:30P
Received by		Date		Time	
Relinquished by		Date		Time	
Received by Laboratory	<i>M. N. J.</i>	Date	10-6-93	Time	11:40

Turnaround Time <small>For some analyses expedited turnaround may not be feasible due to lengthy extraction procedures. Please contact the lab for applicability.</small>	Routine	48 hr.	24 hr.	Number of Business days
	✓			



# ANALYSIS REPORT

## Lancaster Laboratories

INCORPORATED

STROG  
03193

Earth Data, Inc.-St. Michaels  
605 S. Talbot Street  
St. Michaels, MD 21663

LLI Sample No. WW 1722906  
Date Reported 10/10/91  
Date Submitted 10/ 3/91  
Discard Date 10/18/91  
Collected 10/ 2/91 by CW  
Time Collected 0700  
P.O. 970  
Rel.

MW-1 Water Sample  
Parks Rug & Dry Cleaners

### ANALYSIS

Tetrachloroethene  
BTEX Scan & Naphthalene

RESULT  
AS RECEIVED  
5,200. ug/l  
attached

LIMIT OF  
QUANTITATION  
30.  
LAB CODE  
042000500  
426410000

1 COPY TO Earth Data, Inc.

ATTN: Tucker Mooreshead

*Method # 502.2 (Drinking Water)*

The American Association for  
Laboratory Accreditation  
Chemical, Biological & Environmental  
Fields of Testing



Member, American Council of  
Independent Laboratories Inc



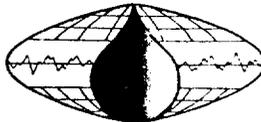
Questions? Contact Environmental  
Client Services at (717) 656-2301  
330 03193 0.00 010500

See Reverse Side For Explanation  
Of Symbols And Abbreviations And  
Our Standard Terms And Conditions

Respectfully Submitted  
Lancaster Laboratories, Inc.  
Reviewed and Approved by:

Judy A. Colello, A.S.  
Group Leader, Volatiles by GC

**Earth Data**  
INCORPORATED



GROUND WATER AND ENVIRONMENTAL CONSULTANTS  
ST. MICHAELS & ANNAPOLIS, MARYLAND AND EXTON, PENNSYLVANIA

October 21, 1991

Mr. Alan Carroll  
Park Rug and Dry Cleaners Corp.  
107 N. Cross Street  
Chestertown, MD 21620

Subject: Park Rug and Dry Cleaners Corp., 107 N. Cross Street,  
Chestertown, MD

Dear Mr. Carroll:

As requested, one monitoring well was constructed at the location shown on the attached sketch at the above mentioned facility. Driller's log, well completion report, water level data and a site sketch are attached.

Water samples were collected from the monitoring well on October 2, 1991 according to our standard protocol. Analysis for BTEX, Naphthalene and tetrachloroethene (PCE) were performed on the samples as requested. The laboratory analysis reports are attached.

If you have any questions concerning the results of this investigation or we can be of further assistance, please do not hesitate to contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read "I. L. Helms".

I. L. Helms  
Senior Engineering Geologist

ILH:bjs - 970

cc: MDE UST Division  
Attn: Mr. Tom Walters  
Earth Data - Exton Office

Enclosures

C1 3202 SEQUENCE NO. (DENV USE ONLY)  
 1 2 3 6  
 (THIS NUMBER IS TO BE PUNCHED IN COLS. 3-6 ON ALL CARDS)

STATE OF MARYLAND  
 WELL COMPLETION REPORT  
 FILL IN THIS FORM COMPLETELY  
 PLEASE PRINT OR TYPE

THIS REPORT MUST BE SUBMITTED WITHIN 45 DAYS AFTER WELL IS COMPLETED.  
 JNTY NUMBER 14

ST/CO USE ONLY  
 DATE Received [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]  
 DATE WELL COMPLETED 09/19/77

Depth of Well 24  
 (TO NEAREST FOOT)

PERMIT NO. FROM "PERMIT TO DRILL WELL"  
 WL-58-0773

OWNER Mark [ ] first name [ ] TOWN [ ]  
 STREET OR RFD [ ] last name [ ]  
 SUBDIVISION [ ] SECTION [ ] LOT [ ]

WELL LOG  
 Not required for driven wells  
 STATE THE KIND OF FORMATIONS PENETRATED, THEIR COLOR, DEPTH, THICKNESS AND IF WATER BEARING

DESCRIPTION (Use additional sheets if needed)	FEET		Check if water bearing
	FROM	TO	
Fill with [ ]	0	1	
[ ]	1	5	
[ ]	5	10	
[ ]	10	14	

GROUTING RECORD  
 WELL HAS BEEN GROUTED (Circle Appropriate Box) YES  Y NO  N  
 TYPE OF GROUTING MATERIAL  
 CEMENT  CM BENTONITE CLAY  BC  
 NO. OF BAGS 5 NO. OF POUNDS 45  
 GALLONS OF WATER [ ]  
 DEPTH OF GROUT SEAL (to nearest foot)  
 from [ ] ft. to [ ] ft.

CASING RECORD  
 casing types insert appropriate code below  
 ST CO STEEL CONCRETE  
 PL OT PLASTIC OTHER  
 MAIN CASING TYPE PL Nominal diameter (nearest inch) 4 Total depth of main casing (nearest foot) 14

OTHER CASING (if used)  
 diameter inch [ ] depth (feet) from [ ] to [ ]

SCREEN RECORD  
 screen type or open hole insert appropriate code below  
 ST BR HO STEEL BRASS OPEN HOLE  
 PL OT PLASTIC OTHER

C2

EACH SCREEN	DEPTH (nearest ft.)	
	1	2
1	PL 14	34
2	[ ]	[ ]
3	[ ]	[ ]

SLOT SIZE 2 2 3  
 DIAMETER OF SCREEN 4 (NEAREST INCH)

C3  
 PUMPING TEST  
 HOURS PUMPED (nearest hour) 1  
 PUMPING RATE (gal. per min. to nearest gal.) 1  
 METHOD USED TO MEASURE PUMPING RATE [ ]  
 WATER LEVEL (distance from land surface)  
 BEFORE PUMPING 17  
 WHEN PUMPING 22  
 TYPE OF PUMP USED (for test)  
 A air P piston T turbine  
 C centrifugal R rotary O other (describe below)  
 J jet S submersible

PUMP INSTALLED  
 DRILLER WILL INSTALL PUMP YES  NO   
 IF DRILLER INSTALLS PUMP, THIS SECTION MUST BE COMPLETED FOR ALL WELLS EXCEPT HOME USE  
 TYPE OF PUMP INSTALLED PLACE (A,C,J,P,R,S,T,O) IN BOX - SEE ABOVE: [ ]  
 CAPACITY: GALLONS PER MINUTE (to nearest gallon) [ ]  
 PUMP HORSE POWER [ ]  
 PUMP COLUMN LENGTH (nearest ft.) [ ]  
 CASING HEIGHT (circle appropriate box and enter casing height)  
 + above } LAND SURFACE (nearest foot)  
 - below }

CIRCLE APPROPRIATE LETTER  
 A WELL WAS ABANDONED AND SEALED WHEN THIS WELL WAS COMPLETED  
 E ELECTRIC LOG OBTAINED  
 P TEST WELL CONVERTED TO PRODUCTION WELL

I HEREBY CERTIFY THAT THIS WELL HAS BEEN CONSTRUCTED IN ACCORDANCE WITH COMAR 26.04.04 "WELL CONSTRUCTION" AND IN CONFORMANCE WITH ALL CONDITIONS STATED IN THE ABOVE CAPTIONED PERMIT, AND THAT THE INFORMATION PRESENTED HEREIN IS ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

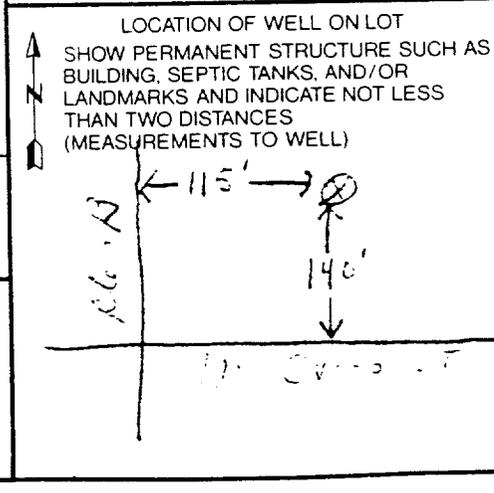
DRILLERS IDENT. NO. 476

DRILLERS SIGNATURE (MUST MATCH SIGNATURE ON APPLICATION)

SITE SUPERVISOR (sign. of driller or journeyman responsible for sitework if different from permittee)

GRAVEL PACK 11 to 34  
 IF WELL DRILLED WAS FLOWING WELL INSERT F IN BOX 68

OEP USE ONLY (NOT TO BE FILLED IN BY DRILLER)  
 T (E.R.O.S.) W O  
 70 [ ] 72 [ ] 74 [ ] 75 [ ] 76 [ ]  
 TELESCOPE CASING LOG INDICATOR OTHER DATA



DRILLER

KE-88-0273

Project: **PARK CLEANERS**

W. O.: **970** Date: **9/19/91**

DETAILED DESCRIPTION  
OF CUTTINGS

Well MW-1 Page 1 of 1  
Earth Data Sample Number \_\_\_\_\_  
Described by TED TRUMBULL

DEPTH INTERVAL		COLOR	SIZE	TYPE MATERIAL	SPECIAL FEATURES
FROM	TO				
0	1.0	BLACK		LOAMY SAND + GRAVEL	
1.0	3.0	TAN-ORANGE		FILL	BRICKS + CONCRETE
3.0	5.0	TAN-ORANGE		CLAYEY SILT	
5.0	7.5	TAN-GRAY		CLAY	
7.5	10.0	ORANGE		CLAY	
10.0	12.0	TAN	MEDIUM	SAND	
12.0	17.0	ORANGE	MEDIUM	SAND	
17.0	24.0	ORANGE-RUST	MEDIUM	SAND	18.5 METERS.

#970

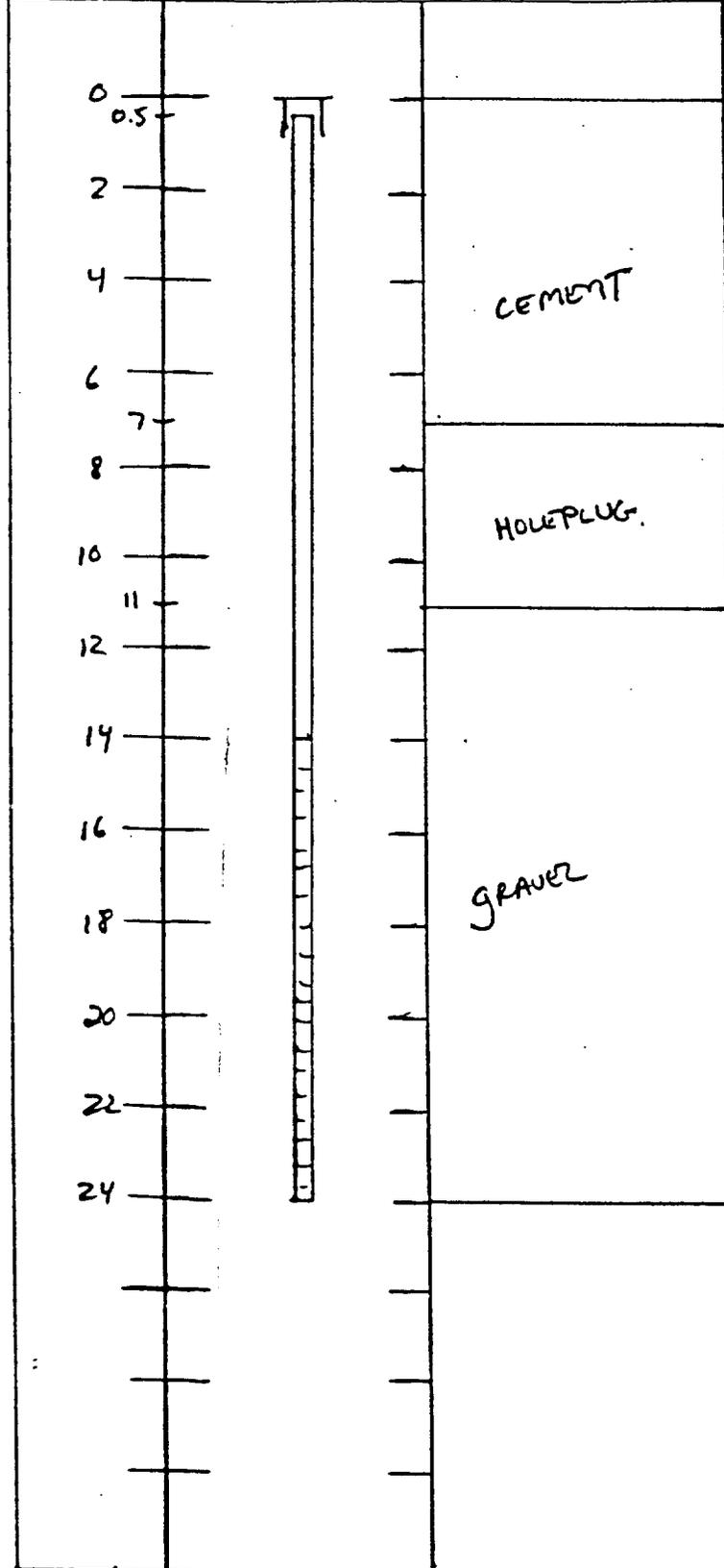
MONITOR WELL CONSTRUCTION SUMMARY

PROJECT PARK CLEANERS

WELL NO. MW-1

KE-88-0273

CONSTRUCTION PROFILE ANNULAR SPACE FILLED WITH:



DESCRIPTION OF MEASURING PTS: G.S.

M.P. ELEVATION:

Method of Drilling: AUGER

DATE(S) DRILLED: 9/19/91

DEPTH DRILLED: -24.0

DEPTH OF WELL: -24.0

DRILLER: TED. TRUMBULL

STICKUP: -0.5

CASING

MATERIAL	<u>PVC</u>		
DIAMETER	<u>4"</u>		
TOP	<u>-0.5</u>		
BOTTOM	<u>-14.0</u>		

WELL SCREEN

MATERIAL	<u>PVC</u>		
DIAMETER	<u>4"</u>		
SLOT SIZE	<u>.020</u>		
TOP	<u>-14.0</u>		
BOTTOM	<u>-24.0</u>		

SAND OR GRAVEL SIZE: #2

GROUTING DETAILS: 24-11 GRAVEL

11-7 HOLEPLUG 7-0 CEMENT

PROTECTIVE CASING: flush cover

LOCKING CAP? (YES) NO

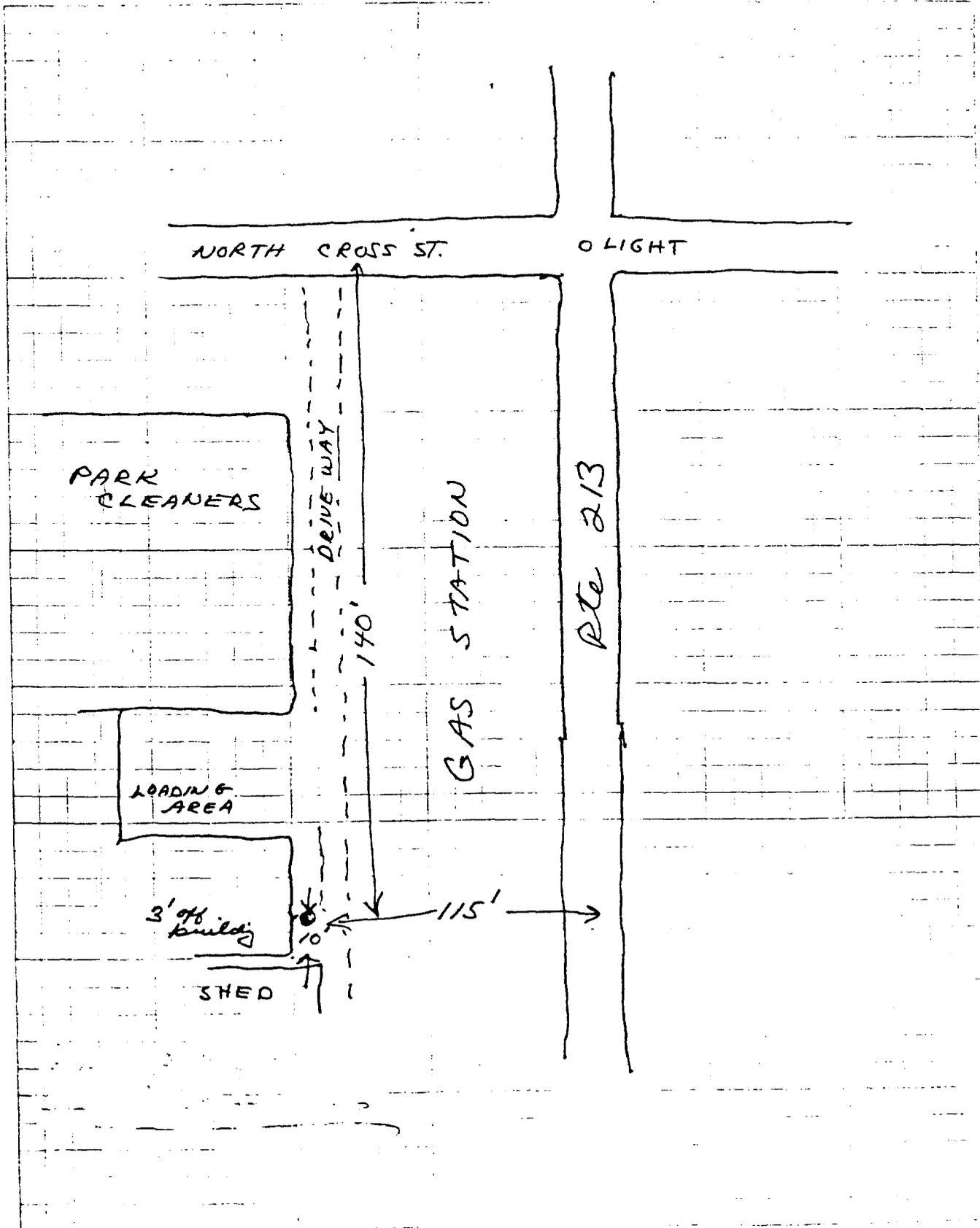
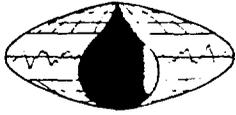
INITIAL YIELD: 3gpm

DEVELOPMENT DETAILS: pumped for 1/2 hr.

PUMPING TEST DETAILS: STILL CLOUDY AFTER 1/2 hr. pumping

STATIC WATER LEVEL: 18.5 DATE: 9/19







# ANALYSIS REPORT

## Lancaster Laboratories

INCORPORATED

NR000  
03193 0

Earth Data, Inc.-St. Michaels  
605 S. Talbot Street  
St. Michaels, MD 21663

LLI Sample No. WW 1722906  
Date Reported 10/10/91  
Date Submitted 10/ 3/91  
Discard Date 10/18/91  
Collected 10/ 2/91 by CW  
Time Collected 0700  
P.O. 970  
Rel.

MW-1 Water Sample  
Parks Rug & Dry Cleaners

### ANALYSIS

Tetrachloroethene  
BTEX Scan & Naphthalene

RESULT  
AS RECEIVED  
5,200. ug/l  
attached

LIMIT OF  
QUANTITATION  
30.  
LAB CODE  
042000500  
426410000

1 COPY TO Earth Data, Inc.

ATTN: Tucker Mooreshead

*Method # 502.2 (Drinking Water)*

The American Association for  
Laboratory Accreditation  
Chemical, Biological & Environmental  
fields of testing.



Member American Council of  
Independent Laboratories Inc



Questions? Contact Environmental  
Client Services at (717) 656-2301  
330 03193 0.00 010500

See Reverse Side For Explanation  
Of Symbols And Abbreviations And  
Our Standard Terms And Conditions

Respectfully Submitted  
Lancaster Laboratories, Inc.  
Reviewed and Approved by:

Judy A. Colello, A.S.  
Group Leader, Volatiles by GC



# ANALYSIS REPORT

## Lancaster Laboratories

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Time Collected 0700  
P.O. 970  
Rel.

MW-1 Water Sample  
Parks Rug & Dry Cleaners

	RESULT		LIMIT OF	LAB CODE
	AS RECEIVED		QUANTITATION	
BTEX Scan & Naphthalene				
Benzene	1.	ug/l	1.	313300000N
Toluene	< 10.	ug/l	10.	313400000N
o-Xylene	< 1.	ug/l	1.	080800000N
m-Xylene	< 1.	ug/l	1.	080900000N
p-Xylene	< 1.	ug/l	1.	081000000N
Ethylbenzene	< 1.	ug/l	1.	313500000N
Naphthalene	< 5.	ug/l	5.	426500000N

Due to the presence of an interferent near its retention time, normal reporting limit was not attained for Toluene.

1 COPY TO Earth Data, Inc.

ATTN: Tucker Mooreshead

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Group Leader, Volatiles by GC

**UNDERGROUND LEAK SUMMARY AND TANK CLOSURE**

HSWA CASE # 93-0478 KE      DATE OPENED 9/4/92      DATE CLOSED 9/4/92

FILE NAME Park Ridge Dry Cleaners      INSPECTOR'S INITIALS BR

**TYPE OF CASE:**

- A) PULL \_\_\_\_\_
- B) INSTALLATION \_\_\_\_\_
- C) SURFACE ✓ \_\_\_\_\_
- D) LEAK INVESTIGATION \_\_\_\_\_
- E) COMPLIANCE CHECK \_\_\_\_\_
- F) TANK TEST FAILURE \_\_\_\_\_
- G) ABANDONMENT IN PLACE \_\_\_\_\_
- H) OTHER \_\_\_\_\_

**\*\*\*\*\*  
SPILL AFFECTED:**

- A) GROUNDWATERS \_\_\_\_\_
- B) DOMESTIC WELLS \_\_\_\_\_
- C) SURFACE WATERS \_\_\_\_\_
- D) A BUILDING \_\_\_\_\_
- E) STORM DRAIN \_\_\_\_\_
- F) SANITARY LINE \_\_\_\_\_
- G) UTILITY WORK OR LINES \_\_\_\_\_
- H) REACHED ADJOINING PROPERTY \_\_\_\_\_
- I) NONE/OTHER (SPECIFY) Sidewalk driveway
- J) SOILS Food \_\_\_\_\_

**\*\*\*\*\*  
OWNER OF SYSTEM:**

- A) MAJOR OIL COMPANY \_\_\_\_\_
- B) LOCAL OIL COMPANY \_\_\_\_\_
- C) PRIVATELY OWNED \_\_\_\_\_
- SERVICE STATION \_\_\_\_\_
- D) GOVERNMENT FACILITY \_\_\_\_\_
- E) MARINA \_\_\_\_\_
- F) PRIVATE RESIDENT \_\_\_\_\_
- G) APARTMENT \_\_\_\_\_
- H) SCHOOL \_\_\_\_\_
- I) COMMERCIAL BUSINESS ✓ \_\_\_\_\_
- J) OTHER (SPECIFY) \_\_\_\_\_

**\*\*\*\*\*  
IF UNDER TYPE OF CASE ITEM B, C OR E IS CHECKED, DO NOT FILL IN CHART BELOW  
WERE OBSERVATION WELLS INSTALLED?      YES      NO      NUMBER OF WELLS \_\_\_\_\_**

	CAPACITY OF TANK	TANK TYPE	LINE TYPE	AGE	PRODUCT	STATUS OF TANK	LEAK FOUND
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

REVIEWED BY RLR

CODES ON REVERSE SIDE

## CODES FOR USE ON REVERSE SIDE

### TYPE:

- |                                 |               |
|---------------------------------|---------------|
| A) Steel                        | D) Other      |
| B) Fiberglass                   | E) Clad Steel |
| C) Cathodically-Protected Steel | F) Copper     |

### AGE:

- |                |                  |
|----------------|------------------|
| A) 1-5 years   | D) 16-20 years   |
| B) 6-10 years  | E) Over 20 years |
| C) 11-15 years |                  |

### PRODUCT:

- |             |              |
|-------------|--------------|
| A) Gasoline | G) Jet Fuel  |
| B) #2 Oil   | H) Waste Oil |
| C) Kerosene | I) Asphalt   |
| D) #4 Oil   | J) Other     |
| E) #5 Oil   | K) Diesel    |
| F) #6 Oil   |              |

### LEAK FOUND IN:

- |                |                   |
|----------------|-------------------|
| A) Tank        | F) Fill Pipe      |
| B) Supply Line | G) Air Pocket     |
| C) Return Line | H) None           |
| D) Vent Line   | I) Other          |
| E) Fittings    | J) Flex Connector |

### STATUS:

- |                       |
|-----------------------|
| A) In Service         |
| B) Removed            |
| C) Abandoned-In-Place |



State of Maryland  
 Department of the Environment  
 Hazardous and Solid Waste Management Administration  
 2500 Broening Highway, Baltimore, Maryland 21224

CASE # 93-0478 KE

Report of Observations

Type of Inspection/Observation: Surface Spill Date 9/4/92

Facility Name: Park Rug & Dry Cleaners 107 N. Cross St. Chestertown

Remarks: Inspector responded to above site upon receiving page from office regarding unknown spill reported by Mr. William Ingersoll. Upon arrival inspector <sup>observed</sup> a dark, thick substance located in drive between back entrance of dry cleaning building and curbed grass median of City Station. Inspector used sorbent pad to determine if substance would be absorbed. Upon observing "saturation" of (1) pad, Inspector contacted Mr. Larry Schultz (NPDES) to respond. Inspector was met by Mr. David Carroll (manager, Park Rug & Dry Cleaners) who advised that substance was residual soap removed from "still" associated with dry cleaning system. Mr. Carroll stated that at approximately 1630 hrs. ~~9/3~~, he observed that a 25 gallon drum that contained approximately 15 gallons of soap had been knocked over and soap had leaked from drum openings, which were capped. Drum had been put out side for pick-up by Safety-Kleen. Due to heavy rains, Mr. Carroll advised that he was not aware that soap had affected that was observed by inspector. Mr. Carroll provided inspector with copy of material safety data sheet for soap product known as "Soft Klean". Mr. Schultz advised Mr. Carroll that soap must be cleaned up immediately. Mr. Carroll agreed to do so. Mr. Schultz advised that he would perform follow-up visit to verify spill has been properly cleaned up.

Copy of report provided to Mr. Schultz

TIME IN: 1200

TIME OUT: 1500

Observer: Brown Roe B. Lee

Person Interviewed: Mr. David Carroll (manager, Park Rug & Dry Cleaners)

WASTE MANAGEMENT ADMINISTRATION  
OIL CONTROL DIVISION  
INITIAL REPORT OF OIL SPILL

CASE NO. 93-0478 KE

C 1. Name of WMA personnel taking report: Roe  
A  
L 2. Date of Report: 9/14/92 3. Time of Report: 1200 24 HOUR  
L  
E 4. Name of Caller: Bill Ingersoll 5. Telephone #: 778-0500  
P

6. What Agency or Company is Caller with: Town of Chestertown

7. Date of Spill: 9/14/92 8. Time of Spill: \_\_\_\_\_ 24 HOUR  
D 9. Precise Location of the Spill or Incident: Park Rvg + Dry Cleaners <sup>107 N</sup> Cross St.  
E Chestertown County: KE  
T  
A  
I  
L

S 11. Nearest Crossroad or other identifying mark: \_\_\_\_\_

D 12. Type of Product Involved: \_\_\_\_\_  
F

S 13. Quantity on Board: \_\_\_\_\_ 14. Amount Spilled: \_\_\_\_\_  
P

L 15. Details of the Spill: unknown oily substance on sidewalk  
L and on road + parking lot.

16. Has Product Entered Water: Yes No 17. Name of Waterway: \_\_\_\_\_

S 18. Spiller's Name: \_\_\_\_\_  
P

I 19. Spiller's Address: \_\_\_\_\_  
L

L 20. Spiller's telephone Number: \_\_\_\_\_  
E

P 21. Has Spiller taken any action to control the problem: Yes No

22. If yes, What: \_\_\_\_\_

ACTION TAKEN

TRANSFERRED CALL TO: \_\_\_\_\_ Time: \_\_\_\_\_ 24 HOUR

DISPATCHED: \_\_\_\_\_ Date: 9/14/92

NO RESPONSE: Explain Why \_\_\_\_\_

OTHER: \_\_\_\_\_ INITIALS: \_\_\_\_\_

SOLID WASTE MANAGEMENT ADMINISTRATION  
UNDERGROUND STORAGE TANK DIVISION  
INITIAL REPORT OF INCIDENT

CASE NO: \_\_\_\_\_

CALLER

page 13:05

1. Name of HSWMA personnel taking report: Carroll  
2. Date of report: 9-4-92 3. Time of report: 12:05  
4. Name of caller: Bill Ingersoll 5. Telephone #: 301-778-0500  
6. What agency or company is caller with: Town Manager

DETAILS OF SPILL

7. Date of incident 9-4-92 8. Time of incident: 12:00  
9. Has product been released? YES  NO   
10. Amount released: 2 gal.  
11. Tank test failure? YES  NO   
12. Tank failure rate: \_\_\_\_\_  
13. Precise location of the release or incident: Corner of Cross & Maple Ave. between City County: Park Clemons  
14. Nearest crossroad or other identifying mark: \_\_\_\_\_  
15. Type of product involved: used oil  
16. Quantity on board: \_\_\_\_\_ 17. Age of tank system: \_\_\_\_\_  
18. Details of release: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
19. Has product entered water? YES  NO  20. Name of waterway: \_\_\_\_\_

RESPONSIBLE PARTY

21. Responsible party's name: \_\_\_\_\_  
22. Responsible party's address: \_\_\_\_\_  
23. Responsible party's telephone number: \_\_\_\_\_  
24. Has responsible party taken any action to control the problem? YES  NO   
25. If yes, what: \_\_\_\_\_

ACTION TAKEN

- \_\_\_\_ UST INSPECTOR ASSIGNED CASE: \_\_\_\_\_  
\_\_\_\_ TRANSFERRED CALL TO: \_\_\_\_\_ TIME: \_\_\_\_\_  
\_\_\_\_ DISPATCHED: \_\_\_\_\_ DATE: \_\_\_\_\_  
\_\_\_\_ NO RESPONSE; Explain why: \_\_\_\_\_  
\_\_\_\_ OTHER: \_\_\_\_\_ INITIALS: \_\_\_\_\_

**Document Number:** 1999-1021aWH

**Type of Inspection** Assessment **Inspection Date** Thursday, October 21, 1999  
**Flag/NOV** **Type of Non-compliance**  
**Compliance Action** **Compliance Date**

**General Facility Information**

**Facility Name** Park Rug & Dry Cleaners, Corp.  
**Type of Business** Dry Cleaners **SIC Code** 7212  
**Contact Person** Alan Carroll **Title** Owner  
**Street Address** 107 N. Cross St.  
**City** Chestertown **Zip Code** 21620 **Phone #** 410-778-3181  
**County** Kent **Latitude** 39° 12.591' N **Longitude** 76° 04.048' W  
**Current Permits** none **EPSC Number**

**Facility Operations and Domestic Discharge Information**

**Types of Chemicals Used** PCE **Types of Wastes Generated** old PCE, filters  
**Manifests/Records**  **Parts Washer**  **Housekeeping Score** Average  
**Water Supply** Public/Community Supply **Septic or Sewered?** Public Sanitary Sewer

**Industrial Discharge Information**

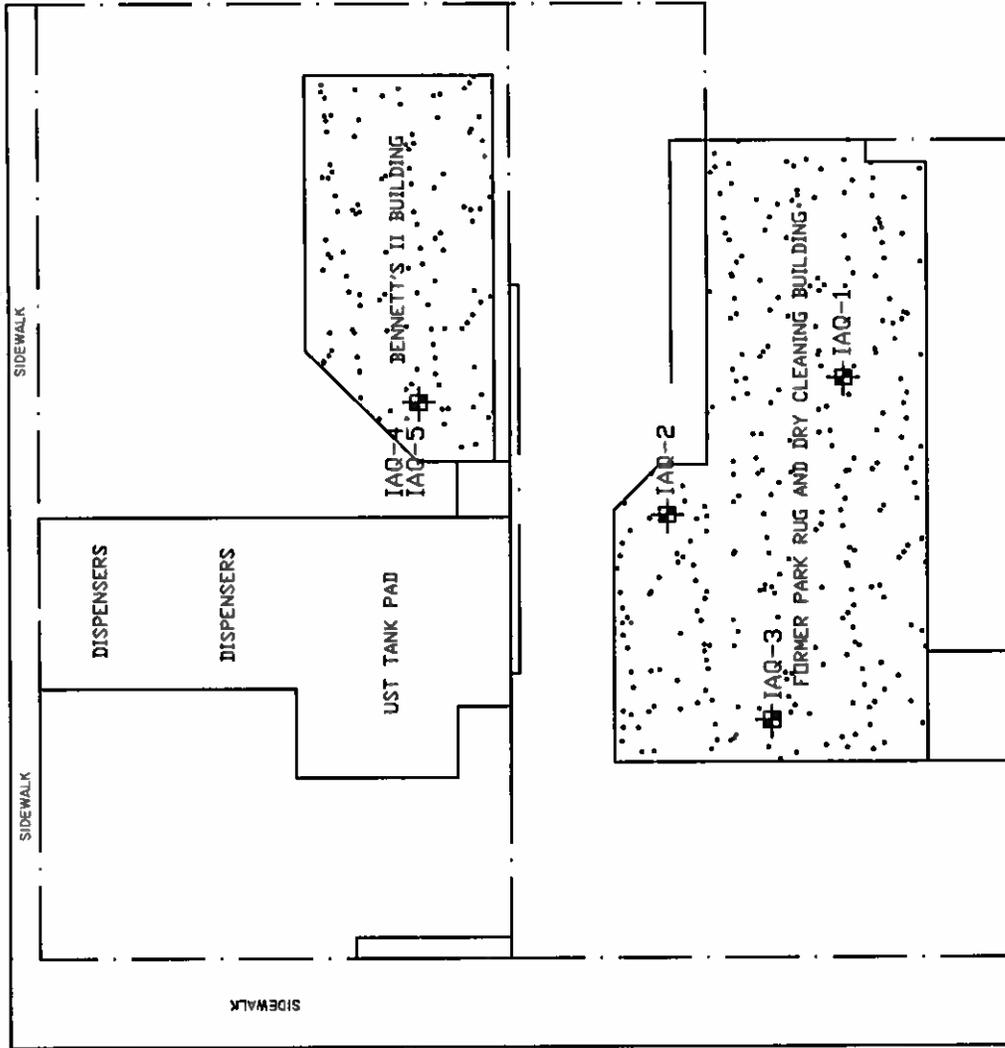
**Surface Discharge**  **Floor Drains**  **UIC Well Type** n/a  
**Methods of Waste Removal, Treatment, and On-site Disposal** hauled away by waste contractor **Industrial Wastes Going Into Drains** water, wash water

**Inspection Information**

**Recommendations** None.  
**Inspection Narrative** their floor drains and trench system are connected tot he POTW.  
**Inspector's Name** John Handy **Photos/Documents?**  **Follow-Up Needed?**



MAPLE AVENUE



NORTH CROSS STREET

LEGEND

 IAQ-4 INDOOR AIR QUALITY SAMPLE LOCATIONS

PROJECT: FORMER PARK RUG AND DRY CLEANING  
 107 NORTH CROSS STREET  
 CHESTERTOWN, MARYLAND  
 DATE: 03/06/08 DRAWN BY: KDC CAD FILE: PARK IAQ SAMP SCALE: N.T.S.

**FIGURE 2**  
**INDOOR AIR QUALITY SAMPLE**  
**LOCATIONS**

**BLUERIDGE ENVIRONMENTAL, INC.**  
 P.O. Box 166 18135 LINCOLN ROAD  
 LINCOLN, VIRGINIA 20160  
 TELEPHONE 540 338 8547 FAX 540 338 8548

Table 1

Indoor Air Sample Results  
Park Rug and Dry Cleaning  
Chestertown, Maryland  
February 2008

Sample Number	Sample Date	Location	Analytical Results (ug/M <sup>3</sup> ) <sup>1</sup>
IAQ-1	2/13/08	Rear press room – dry cleaners space	PERC – 3.45 TCE – ND <sup>2</sup> cis-1,2-Dichloroethene – ND Trans 1,2-Dichloroethene – ND 1,1-Dichloroethene – ND Vinyl chloride – ND
IAQ-2	2/13/08	Adjacent to dry cleaning plant – dry cleaners space	PERC – 36.5 TCE – 2.08 cis-1,2-Dichloroethene – 2.78 Trans 1,2-Dichloroethene – ND 1,1-Dichloroethene – ND Vinyl chloride – ND
IAQ-3	2/13/08	Front counter – dry cleaners space	PERC – 17.9 TCE – 1.15 cis-1,2-Dichloroethene – 1.73 Trans 1,2-Dichloroethene – ND 1,1-Dichloroethene – ND Vinyl chloride – ND
IAQ-4	2/13/08	Bennett's II Office	PERC – 0.827J <sup>3</sup> TCE – ND cis-1,2-Dichloroethene – ND Trans 1,2-Dichloroethene – ND 1,1-Dichloroethene – ND Vinyl chloride – ND
IAQ-5	2/13/08	Blind duplicate of IAQ-4	PERC – ND TCE – ND cis-1,2-Dichloroethene – ND Trans 1,2-Dichloroethene – ND 1,1-Dichloroethene – ND Vinyl chloride – ND

Notes:

<sup>1</sup> – ug/M<sup>3</sup> = micrograms per cubic meter

<sup>2</sup> – ND = not detected above the method quantitation limit

<sup>3</sup> – J = estimated concentration with analyte detected below the method quantitation limit

**Table 2**

Analytical Data vs. Applicable Standards  
 Park Rug and Dry Cleaning  
 Chestertown, Maryland  
 February 2008

Analyte	Maximum Concentration (ug/M3) <sup>1</sup>	Concentration (ppm) <sup>2</sup>	ACGIH TLV <sub>3</sub> (ppm)	OSHA PEL <sup>3</sup> (ppm)	NIOSH REL <sup>4</sup> (ppm)
Tetrachloroethene	36.5	0.0005294	25	100	NS
Trichloroethene	2.08	0.0003808	10	100	25
Cis-1,2-Dichloroethene	2.78	0.0006898	200	100	200

**Notes:**

- <sup>1</sup> – ug/M3 = micrograms per cubic meter
- <sup>2</sup> – ppm = parts per million
- <sup>3</sup> – ACGIH TLV = American Council of Government Industrial Hygienists Threshold Limit Value
- <sup>4</sup> – OSHA PEL = Occupational Safety and Health Administration Permissible Exposure Limit
- <sup>5</sup> – NIOSH REL = National Institute for Occupational Safety and Health Recommended Exposure Limit



**Maryland Department of the Environment  
Land Management Administration, Hazardous Waste Program  
1800 Washington Blvd, Suite 605  
Baltimore, MD 21230-1719  
410-537-3000, 1-800-633-6101**

---

**Field Inspection Report by:** Richard Vandegrift

**Media Type (s):** Hazardous Waste

**Inspection Date:** 5-21-2014

**Site Name:** Admiral Inc. #63

**Facility Address:** 107 N Cross St Chestertown MD, 21620

**County:** Kent

**Hazardous Waste Program**

**EPA / Identification Number / Waste Designation:** MDD022564074 / CESQG

**Site Status:** Active under new process non- hazardous

**Site Condition:** Remove from RCRA list no longer generate haz waste

**Contact (s):** Dave Clokey – Vice President / Mrs. Kim Smith store clerk

**Recommended Action:** Remove from EPA waste list – non generator now

**Inspection Reason:** Random

**Evidence Collected:** Pictures / Documentation / Interview

**Site History**

Admiral Cleaners has been in business as a retail dry cleaners dating back to the late 80's. RCRA records show that a Mr. Scott Kerridge applied for the original EPA ID number back in December of 2001 at this location. Mr. Kerridge was the company

operations manager for all 18 locations back then, as I found out via interviewing the clerk on duty. Mrs. Smith the clerk on duty was kind enough to help this inspector create a timeline for when Admiral stopped using perchloroethene in their dry cleaning operation. Mrs. Smith told this inspector that Mr. Dave Clokey was the Vice President and that she would call him to help with my questions. As for my research before inspection there is no evidence that Admiral Cleaners had ever received a hazardous waste inspection since its inception. On this date when I pulled into the location the sign on the business clearly stated Admiral Cleaners.

### **Physical Inspection**

Upon entrance at the address it was plain to see that the location is a dry cleaner. On entrance I was greeted by Mrs. Smith as mentioned above. After introduction and giving Mrs. Smith my explanation for the visit she agreed to my questioning. Mrs. Smith quickly stated that they no longer operate the actual dry cleaning facility at this location. Mrs. Smith went on to say that they take all clothes from this location and process them in their Easton MD facility. Mrs. Smith stated that they have been practicing this since early in 2013. At this point as earlier mentioned Mrs. Smith told this inspector that she would be more comfortable if I spoke with the Vice President of the company a Mr. Dave Clokey. I told Mrs. Smith that would be fine and she then started to locate Mr. Clokey on the phone. She left Mr. Clokey a voice mail stating I was at the location and needed to speak with him right away. After a period of about forty five minutes Mr. Clokey returned the phone call to Mrs. Smith and then began to speak with me..

After introductions on the phone I began to ask Mr. Clokey about the timeline of the processing plant closure at the location of today's inspection. Mr. Clokey went on to explain via the phone that all of Admiral Cleaners location went hazardous waste free over a year ago and that he had personally written a letter to the Maryland Department of the Environment stating such. Mr. Clokey told this inspector that he thought he had sent the letter back in March of 2013 if his memory was correct. He then stated he was surprised by Mrs. Mullins voice mail stating I was at the location to conduct a hazardous waste inspection after sending the letter some 15 months prior. I stated at this time to Mr. Clokey that I referenced the RCRA database recently to acquire inspection locations and that this Admiral location was still clearly active. I then told Mr. Clokey that I would make every effort to see that his letter would be addressed as for the generator status of his 18 locations. Memo to MDE staff please research and locate Mr. Clokeys letter stating that all of his Admiral Cleaner locations are now hazardous waste free and should be removed from the RCCRA database completely. At this point I told Mr. Clokey via the phone that I would enter the back portion of the building to ascertain if his claim of a non processing plant at this location was correct. I thanked Mr. Clokey for his time and told him that I would call him back if I had any other questions during my walk around.

During my walk around there was no indication what so ever that a dry cleaning processing operation currently on the premises. Picture evidence provided with this report will show a shuttered dry cleaning system empty of any cleaning solutions and shut

down. At this point after documenting the location via pictures I thanked Mrs. Smith for her time and exited the building. Picture evidence provided with this report will show what used to be an active dry cleaning processing plant is now just a drop off point for the actual cleaning done at another location.

### **Records Inspection**

Due to the change of processing in the business type of the original inspection target of Admiral Cleaners no record inspection was conducted on this date. The processing plant was for all purpose closed back in 2013.

### **Inspection Findings**

This inspector on this date and time deems this location to have no violations as it pertains to COMAR under the ownership of Admiral Inc.

### **Site Recommendation**

Admiral Inc #63, after this inspection and interview with the company employees deems that the facility is currently a non generator of hazardous waste. **It is the recommendation of this inspector on this date that Admiral Inc. the actual inspection target originally today be removed from the RCRA database under RCRA ID number MDD022564074 all together.**

**Richard Vandegrift  
ECS III Hazardous Waste  
Office Number 410-819-4065  
Cell Number 443-569-1162**



**STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
LAND MANAGEMENT ADMINISTRATION  
HAZARDOUS WASTE PROGRAM  
1800 Washington Boulevard  
BALTIMORE, MARYLAND 21230  
(410)537-3400**

*Beer at this location?* -

*Last summer* -

FI Inspector: *RAV* Date: *5-21-2014*

**GENERATOR CHECKLIST**

Facility Name: *Admiral Inc #63*

Address: *107 N Cross St Chester town Md 21620*

Facility Representative:

Telephone No.:

Description of Work Activity: *Dry Cleaners*

EPA Identification Number: *MDD 022564074* *CF506?*

**Section A - Hazardous Waste Determination**

Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?..... Yes No  
If yes, under which category is the waste?

Ignitable  Corrosive  Reactive  TC Toxic  RCRA Listed

Describe the amount of waste generated (day, week or month).

**Section B - Manifest (26.13.03.04)**

Does generator ship waste off-site?..... Yes No

(If no, do not complete section B and C)

Does generator use manifest?..... Yes No

If no, explain:

Does generator retain copies of manifest?..... Yes No N/A

If yes, does the manifest include the following information?

(26.13.03.04C)

-Manifest document number?..... Yes No N/A

-Generator's name, mailing address & telephone number?..... Yes No N/A

- Generator's EPA I.D. number?.....\_Yes\_No\_N/A
- Transporter name(s) & EPA I.D. number(s)?.....\_Yes\_No\_N/A
- Designated TSD name, address, & EPA I.D. number?.....\_Yes\_No\_N/A
- Alternate TSD name, address, & EPA I.D. number?.....\_Yes\_No\_N/A
- Instructions to return waste to generator if undeliverable?.....\_Yes\_No\_N/A
- Description of the waste required by DOT regulations?.....\_Yes\_No\_N/A
- Quantity of each hazardous waste by units of weight or volume?.....\_Yes\_No\_N/A
- Total number & types of containers given to transporter?.....\_Yes\_No\_N/A
- Is the proper certification noted on each manifest?.....\_Yes\_No\_N/A
- Has the generator signed & dated manifests (26.13.03.04E)?.....\_Yes\_No\_N/A
- Did the generator obtain initial transporter's signature and date of acceptance?.....\_Yes\_No\_N/A
- Do returned copies of manifest include facility owner/operation signature and date of acceptance?.....\_Yes\_No\_N/A
- Have manifests been retained for three years?.....\_Yes\_No\_N/A

Section C - Pre-Transport Requirements (26.13.03.05) N/A

- Does generator package wastes in accordance with DOT requirements?.....\_Yes\_No
- Are containers in good condition?.....\_Yes\_No
- If no, explain:
- Is the date that accumulation time began clearly marked and visible for inspection on each container?.....\_Yes\_No
- Is period of accumulation less than 90 days?.....\_Yes\_No
- If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....\_Yes\_No\_N/A
- If no, explain:
- i. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....\_Yes\_No\_N/A
- ii. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....\_Yes\_No\_N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

- 1. Does the generator keep the following reports for three years?
  - Manifests & signed copies from designated facilities?.....\_Yes\_No
  - Annual Reports?.....\_Yes\_No
  - Exception Reports?.....\_Yes\_No\_N/A
  - Waste Analyses?.....\_Yes\_No\_N/A

Section E - Special Conditions (26.13.03.07)

- 1. Has the generator received from or transported to a foreign country any hazardous waste(s)?.....\_Yes\_~~No~~
  - If yes, has a notice been filed with MDE and EPA?.....\_Yes\_No √/A
  - Is this waste manifested & signed by a foreign consignee?.....\_Yes\_No √/A
  - If generator transported wastes out of the county, has confirmation of delivery been received?.....\_Yes\_No √/A

**Section F - General Requirements (26.13.03.05E)**

**Personnel Training (26.13.05.02G)**

1. Does the owner/operator maintain personnel training records?..... Y Yes No  
If yes, do they include:  
-Job title & written job description of each position?..... Y Yes No  
-Description of type and amount of training?..... Y Yes No  
-Records of training given to facility personnel?..... Y Yes No

**Preparedness and Prevention (26.13.05.03)**

1. Is there evidence of fire, explosion, or contamination of the environment?..... Y Yes No  
2. Is the facility equipped with:  
a) Internal communication or alarm system?..... Y Yes No  
b) Telephone or two-way radio to call emergency response personnel?..... Y Yes No  
c) Portable fire extinguishers, fire control equipment, spill control equipment, & decontamination equipment?..... Y Yes No  
d) Water of adequate volume for hoses, sprinklers, or water spray system?..... Y Yes No  
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?..... Y Yes No  
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility?..... Y Yes No  
5. In the case that more than one police or fire department might respond, is there a designated primary authority?..... Y Yes No  
6. If State or local authorities decline to enter into these arrangements, has this been documented in the operating log?..... Y Yes No N/A

**Contingency Plan and Emergency Procedures (26.13.05.04)**

1. Is a contingency plan maintained at the facility?..... Y Yes No  
If yes, does contingency plan include:  
-Arrangements with local emergency response organizations?..... Y Yes No  
-Emergency coordinators' names, phone numbers, and addresses?..... Y Yes No  
-List of all emergency equipment at the facility and description of equipment?..... Y Yes No  
-Evacuation plan for facility personnel..... Y Yes No  
Is there an emergency coordinator on site or on call at all times?..... Y Yes No  
Has a copy of the contingency plan been submitted to local or State agencies that may be asked to provide emergency services?..... Y Yes No  
Has the plan ever been implemented?..... Y Yes No  
-If so, was the plan appropriate?..... Y Yes No I/A  
- If the plan was not appropriate, has it been amended?..... Y Yes No I/A  
-If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?..... Y Yes No I/A

**Management of Containers (26.13.05.09)**

- Are containers in good condition?..... Yes\_No
- Is container made of a material that will not react with the waste which it stores?..... Yes\_No\_N/A
- Are containers always closed when holding hazardous waste?..... Yes\_No
- Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?..... Yes\_No
- Does owner/operator inspect containers at least weekly for leaks and deterioration?..... Yes\_No
- Do container storage areas have adequate containment systems?..... Yes\_No
- Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?..... Yes\_No\_N/A
- Are incompatible wastes or materials placed in the same containers?..... Yes\_No\_N/A
- Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?..... Yes\_No\_N/A
- Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?..... Yes\_No\_N/A

**Annual Reports (26.13.03.06B)**

- Does the facility submit annual reports to MDE?..... Yes\_No
- If yes, do reports contain the following information?
  - a) Name, address and EPA I.D. number of facility?..... Yes\_No
  - b) Date and year covered by report?..... Yes\_No
  - c) Description/quantity of hazardous waste?..... Yes\_No
  - d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?..... Yes\_No
  - e) Certification signed by owner/operator?..... Yes\_No

**Section G - Other Checklists Completed: N/A**

- Tanks
- Transporter
- Land Disposal Restrictions
- TSD Facility
- Surface Impoundment
- Waste Pile
- Land Treatment
- Landfill
- Incinerator
- Thermal Treatment
- Groundwater Monitoring

**Section H - Additional Comments**

### Hazardous Waste Program (HWP) - Inspection Checklist

<b>Inspection Item</b>	<b>Status</b>	<b>Comments</b>
Waste generation description: [Info]	Information	
Weather Description: [Info]	Information	Sunny, warm, 73 Degrees
1. Facility made hazardous waste determination: [COMAR 26.13.03.02A ref 3.02]	Yes	
2. Does the generator use manifest (s)? [COMAR 26.13.03.04A (1) ref 3.04]	Yes	Copy of last bill of lading / manifest attached
3. Instructions to return waste to generator if undeliverable is available [COMAR 26.13.03.04A (5) ref 3.04]	Yes	
4. Manifest has document number [COMAR 26.13.03.04C (1)(a) 3.04]	Yes	
5. Generators name, mailing address and telephone number is on the manifest? [COMAR 26.13.03.04C(1)(B) 3.04]	Yes	
6. Generators EPA ID number is on manifest? [COMAR 26.08.04.09N, COMAR 26.13.03.04C(1)(B) 3.04]	No violations observed	
7. Transporter name(s) and EPA ID number is in manifest? [COMAR 26.13.03.04C (1)(C) 3.04]	No violations observed	
8. Designated TSD name, address and EPA ID number is on manifest [COMAR 26.13.03.04C(1)(D) 3.04]	No violations observed	
9. Alternate TSD name, address and EPA ID number is on manifest? [COMAR 26.13.03.04C(1)(D) 3.04]	Not Applicable	
10. Descriptions of the waste required by DOT regulations are on the manifest? [COMAR 26.13.03.04C(1)(E)]	No violations observed	
11. Quantity of each hazardous waste by units of weight or volume is on the manifest? [COMAR 26.13.03.04C(1)(F) 3.04]	No violations observed	
12. Total number and types of containers given to transporter is on manifest? [COMAR 26.13.03.04C(1)(F) 3.04]	No violations observed	
13. Proper certification is noted on each manifest. Generator has the returned copies of manifest to include facility owner/operator? [COMAR 26.13.03.04C(2) & [COMAR 26.13.03.04D(2)(D) 3.04]	No violations observed	
14. Signature and date of acceptance? [COMAR 26.13.03.04E(1)(A), 3.04]	No violations observed	
15. Generator signed and dated each manifest? [COMAR 26.13.03.04E(1)(A) 3.04]	No violations observed	

### Hazardous Waste Program (HWP) - Inspection Checklist

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
16. Generator obtained initial transporters signature and date of acceptance? [COMAR 26.13.03.04E(1)(B) 3.04	No violations observed	
17. Generator packaged the waste in accordance with DOT requirements under 49CFR 173,178 and 179? [COMAR 26.13.03.05A 3.05	No violations observed	
18. The containers used to accumulate waste are in good condition? [COMAR 26.13.03.05E(1)(D) 3.05	No violations observed	
19. Date that accumulation began is clearly marked and visible for each container? [COMAR 26.13.03.05E(1)(D) 3.05	Out of compliance	This was corrected as it was found. Almost immediately at time of inspection.
20. Generator is complying with permit exemption for storage of waste? [COMAR 26.13.03.05E(2) 3.05	Not Applicable	
21. Satellite accumulation is within maximum quantity limits (55 gallons of hazardous, 1 quart of acute waste)? [COMAR 26.13.03.05E(3) 3.05	No violations observed	
22. Containers used for satellite accumulation are closed? [COMAR 26.13.03.05E (3)(A) 3.05	No violations observed	
23. Containers used for satellite accumulation are clearly marked "HAZARDOUS WASTE"? [COMAR 26.13.03.05E(3)(B) 3.05	No violations observed	
24. Manifest has been retained for three years? [COMAR 26.13.03.06A(1) 3.06	No violations observed	In excess of three years
25. Copy of biennial reports is kept on file for at least three years? [COMAR 26.13.03.06A(2) 3.06	No violations observed	
26. Copy of exceptions is kept on file for at least three years? [COMAR 26.13.03.06A(2) 3.06	No violations observed	
27. Waste analysis reports are on file for at least three years? [COMAR 26.13.03.06A(3) 3.06	No violations observed	As to waste derived from paint process.
28. Name, address, EPA ID number are on biennial reports? [COMAR 26.13.03.06B(1)(D)(i) 3.06	No violations observed	
29. Date and year are on biennial reports? [COMAR 26.13.03.06B(1)(D)(ii) 3.06	No violations observed	
30. Description/quantity of hazardous waste is in biennial reports? [COMAR 26.13.03.06B(1)(D))ii)(v) 3.06	No violations observed	
31. Description of waste minimization efforts included in biennial reports? [COMAR 26.13.03.06B(1)(D)(vi) 3.06	No violations observed	
32. Biennial reports include the certification? [COMAR 26.13.03.06B(1)(d) viii 3.06	No violations observed.	

### Hazardous Waste Program (HWP) - Inspection Checklist

<b>Inspection Item</b>	<b>Status</b>	<b>Comments</b>
33. Job title and description are present in personnel training records? [COMAR 26.13.05.02G(4)(a-b) 5.02	No violations observed	
34. Training amount and type are present in personnel training records? [COMAR 26.13.05.02G(4)(c) 5.02	No violations observed	
35. Copy of training records given to personnel? [COMAR 26.13.05.02G(4)(D) 5.02	No violations observed	
36. Personnel training records kept by generator for at least three years for former employees and on file for current employees? [COMAR 26.08.03.01C] 5.02	No violations observed	
37. Facility is designed, constructed and operated to minimize the possibility of a fire, explosion, or any unplanned, sudden or non sudden release of hazardous waste or hazardous constituents to air, soil or water which could threaten human health or the environment? [COMAR 26.13.05.03B 5.03	No violations observed	
38. Generator has an internal communication or alarm system? [COMAR 26.13.05.03C(1) 5.03	No violations observed	
39. Generator has a telephone or two way radio for emergency response? [COMAR 26.13.05.03C(2) 5.03	No violations observed	
40. Generator has fire and spill control equipment? [COMAR 26.13.05.03C(3) 5.03	No violations observed	
41. Generator has adequate water supply for emergency response? [COMAR 26.13.05.03C(4) 5.03	No violations observed	
42. Generator complies with required aisle space restrictions? [COMAR 26.13.05.03F 5.03	No violations observed	
43. The owner or operator shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, specify a designated area for smoking and open flame during material handling, and shall post "NO SMOKING" signs conspicuously wherever there is a hazard from ignitable or reactive waste? [COMAR 26.13.05.03G 5.03	No violations observed	
44. Arrangements with local authorities for emergency procedures have been made? [COMAR 26.13.05.03H(1)(a-c) 5.03	No violations observed	
45. Primary local authority has been determined? [COMAR 26.13.05.03H(1)(b) 5.03	No violations observed	
46. Local authority entrance refusals documented? [COMAR 26.13.05.03H(2) 5.03	No violations observed	
47. Generator maintains a contingency plan? [COMAR 26.13.05.04A 5.04	No violations observed	

### Hazardous Waste Program (HWP) - Inspection Checklist

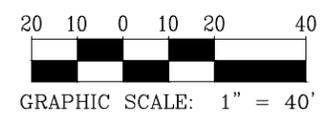
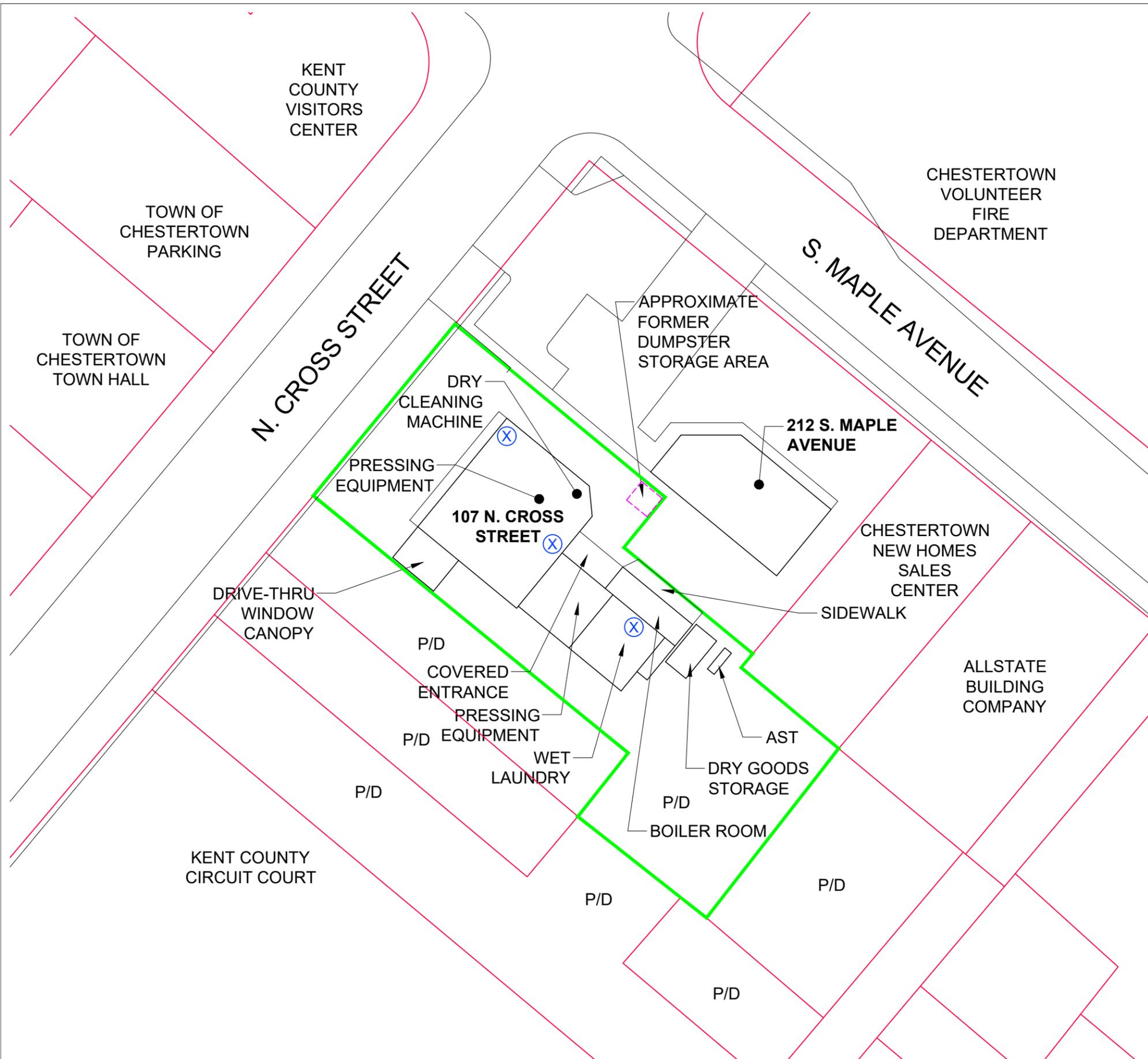
<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
48. Contingency plan contains arrangements with local authorities for emergency procedures? [COMAR 26.13.05.04C(3) 5.04	No violations observed	
49. Contingency plan contains emergency coordinator names, phone numbers and addresses? [COMAR 26.13.05.04C(4) 5.04	No violations observed	
50. Contingency plan contains listing and description of emergency equipment? [COMAR 26.13.05.04C(5) 5.04	No violations observed	
51. Contingency plan contains evacuation plan? [COMAR 26.13.05.04C(6) 5.04	No violations observed	
52. Copy of contingency plan sent to local or state agencies? [COMAR 26.13.05.04D(2) 5.04	No violations observed	
53. Implementation of the contingency plan had failed in emergency and subsequently amended? [COMAR 26.13.05.04E(2) 5.04	No violations observed	
54. Emergency coordinator is onsite or on call? [COMAR 26.13.05.04F 5.04	No violations observed	
55. Contingency plan implemented was noted in facility log and the department notified that the plan was implemented? [COMAR 26.13.05.04G(4, 10) 5.04	No violations observed	
56. The containers are in good condition? [COMAR 26.13.05.09B 5.09	No violations observed	
57. Container and waste are compatible? [COMAR 26.13.05.09C 5.09	No violations observed	
58. Containers are closed? [COMAR 26.13.05.09D 5.09	No violations observed	
59. Containers managed properly to prevent rupture and releases? [COMAR 26.13.05.09D 5.09	No violations observed	
60. Containers are inspected regularly? [COMAR 26.13.05.09E 5.09	No violations observed	
61. Containers holding ignitable and reactive waste are located at least 15m (50ft) from property line? [COMAR 26.13.05.09F 5.09	No violations observed	
62. Incompatible waste and materials are not placed in the same containers? [COMAR 26.13.05.09G(1) 5.09	No violations observed	
63. Waste is placed in clean and washed containers? [COMAR 26.13.05.09G(2) 5.09	Not Applicable	
64. Containers containing incompatible waste are separated? [COMAR 26.13.05.09G(3) 5.09	No violations observed	
65. There is an adequate containment system in place? [COMAR 26.13.05.09H 5.09	No violations observed	
66. Is the facility in compliance with conditions of the Code of Maryland Hazardous Waste Regulations? [COMAR 26.13.05.09G 5.09	Yes	

67. Are corrective actions required with follow up inspections? [COMAR 26.08.03..01 5.09	Yes	
--	-----	--

Inspector: \_\_\_\_\_

Received by: \_\_\_\_\_

Richard A. Vandegrift ECS III  
Hazardous Waste Program  
Maryland Department of the Environment



**CGS** Chesapeake  
GeoSciences, Inc.  
5405 Twin Knolls Road, Suite 1  
Columbia, Maryland 21045  
410-740-1911 www.cgs.us.com

## FIGURE 2

### SITE MAP

**Former Park Rug and Dry Cleaners**  
107 North Cross Street  
Chestertown, MD 21620

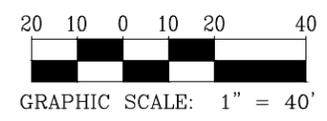
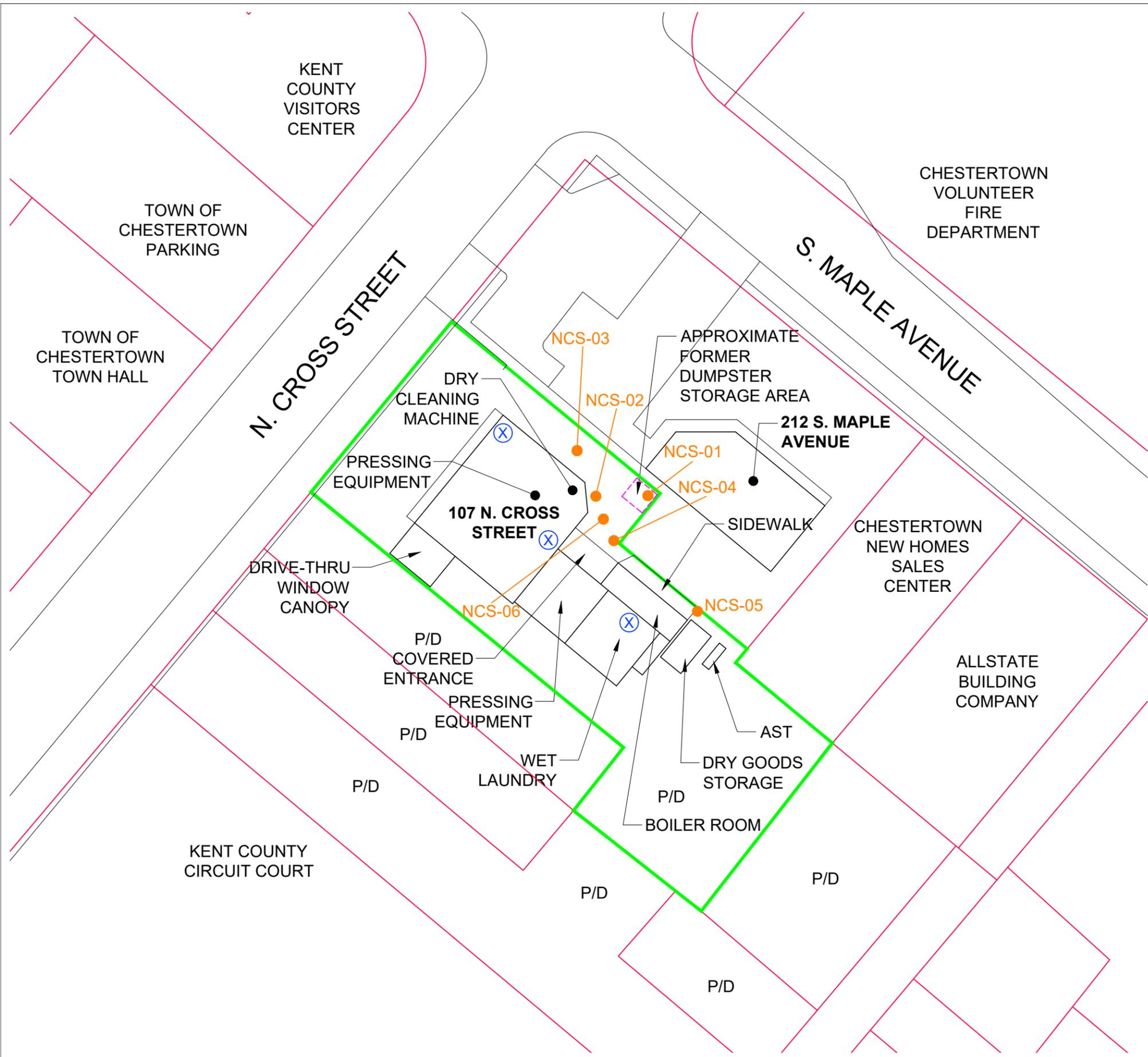
Job #: CG-15-1060.04	Date: 12/04/2017
Drawn By: M. Walsh	Scale: 1" = 40'
Project Manager: N. Love	

### LEGEND

- Subject Property Line
- Other Property Line
- Building Outline
- (X) Floor Drain
- P/D Paved Parking/Driveway

### REFERENCE SOURCES:

107 N. Cross Street Property Line - Environmental Covenant Exhibit A, 11/05/2008.  
All other property lines - MERLIN.  
107 N. Cross Street building layout - BlueRidge, 08/16/2006.



5405 Twin Knolls Road, Suite 1  
 Columbia, Maryland 21045  
 410-740-1911 www.cgs.us.com

# FIGURE 3

## Soil Boring Location Map

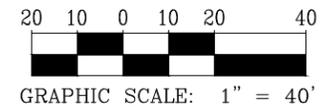
**Former Park Rug and Dry Cleaners**  
**107 North Cross Street**  
**Chestertown, MD 21620**

Job #: CG-15-1060.04	Date: 12/04/2017
Drawn By: M. Walsh	Scale: 1" = 40'
Project Manager:	N. Love

### LEGEND

- Subject Property Line
- Other Property Line
- Building Outline
- (X) Floor Drain
- P/D Paved Parking/Driveway
- Soil Boring/Grab-Groundwater Sample Location

**REFERENCE SOURCES:**  
 107 N. Cross Street Property Line - Environmental Covenant Exhibit A, 11/05/2008.  
 All other property lines - MERLIN.  
 107 N. Cross Street building layout - BlueRidge, 08/16/2006.



# FIGURE 4

## SOIL SAMPLES SUMMARY OF DRY-CLEANING RELATED CHLORINATED HYDROCARBON ANALYTICAL RESULTS

Former Park Rug and Dry Cleaners  
107 North Cross Street  
Chestertown, MD 21620

Job #: CG-15-1060.04	Date: 12/05/2017
Drawn By: M. Walsh	Scale: 1" = 40'
Project Manager: N. Love	

### LEGEND

- Subject Property Line
- Other Property Line
- Building Outline
- ⊗ Floor Drain
- Soil Boring/Grab-Groundwater Sample Location

NCS-03	7.25'	9.75'	15.00'
PCE	<b>6.86 D</b>	<b>6.33 D</b>	0.00208
TCE	0.126	0.0718	0.00351 U
cis-1,2-DCE	0.221	0.150	0.00351 U
VC	0.00373 J	0.00460 U	0.00351 U

NCS-02	4.25'	10.75'	15.00'
PCE	4.85 D	<b>32.0 D</b>	0.0267
TCE	0.403 D	0.162	0.00367 U
cis-1,2-DCE	1.70 D	0.447 D	0.00409 U
VC	0.097	0.00367 U	0.00367 U

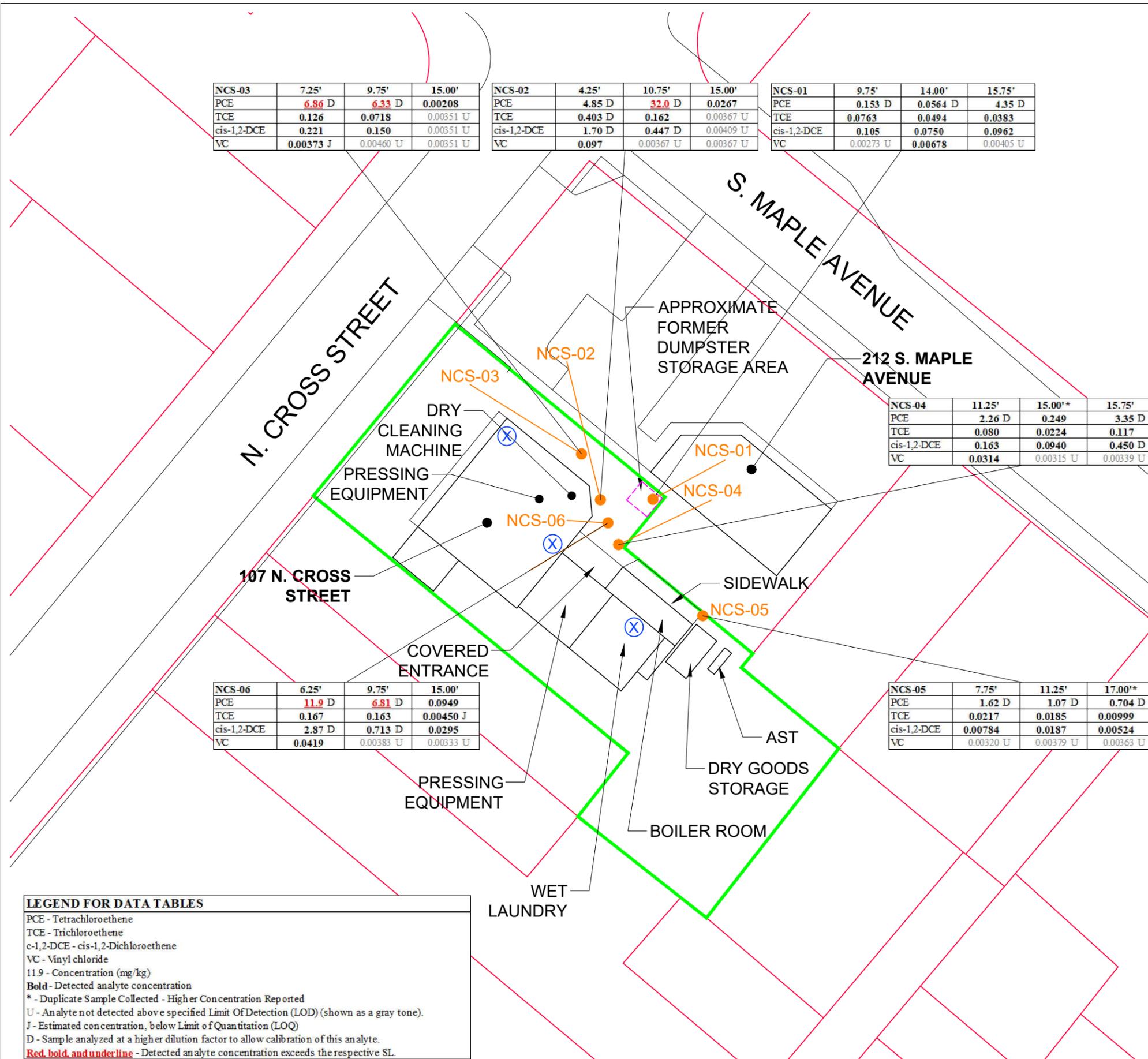
NCS-01	9.75'	14.00'	15.75'
PCE	0.153 D	0.0564 D	4.35 D
TCE	0.0763	0.0494	0.0383
cis-1,2-DCE	0.105	0.0750	0.0962
VC	0.00273 U	0.00678	0.00405 U

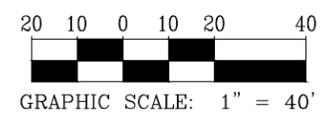
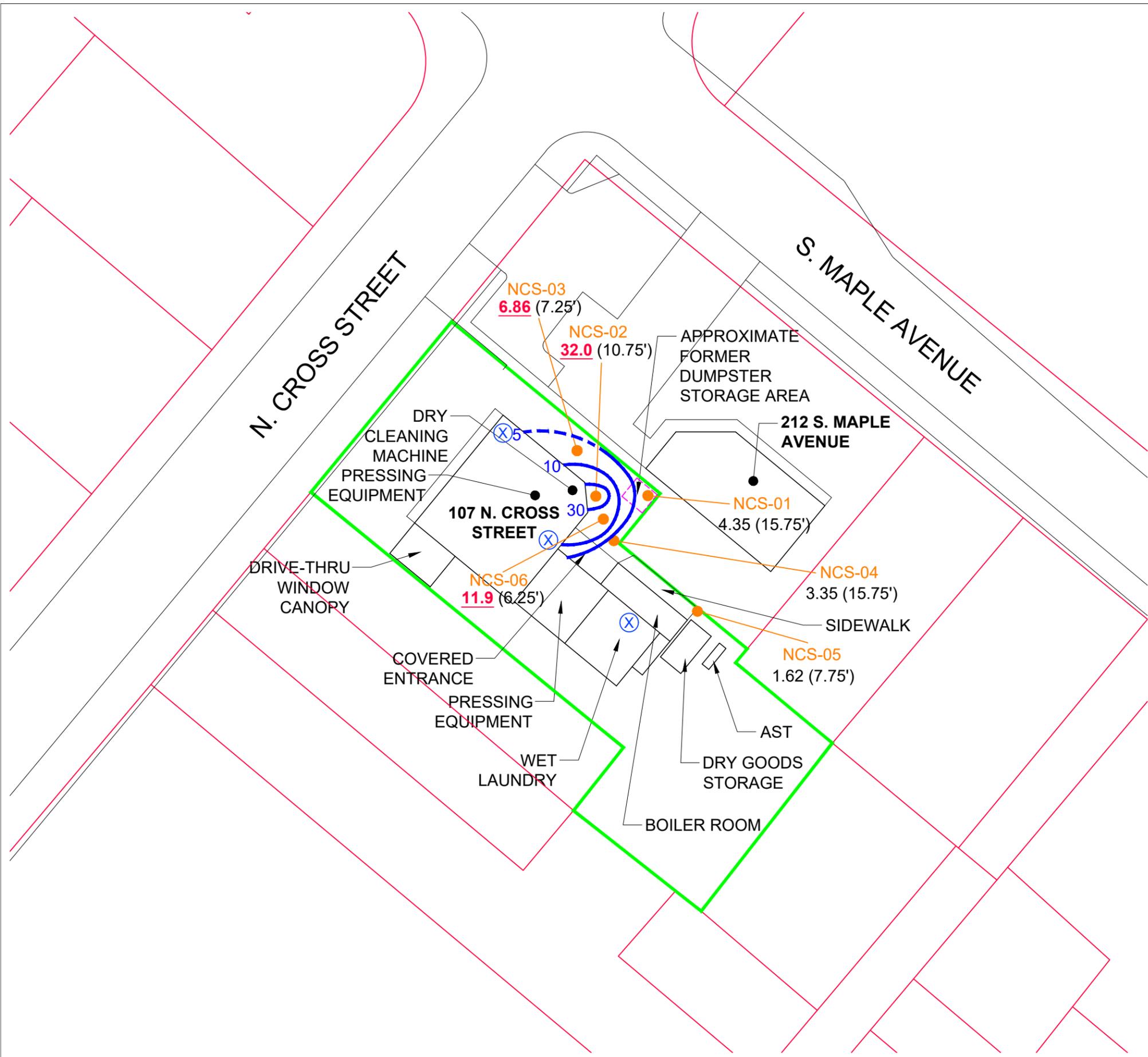
NCS-04	11.25'	15.00'*	15.75'
PCE	2.26 D	0.249	3.35 D
TCE	0.080	0.0224	0.117
cis-1,2-DCE	0.163	0.0940	0.450 D
VC	0.0314	0.00315 U	0.00339 U

NCS-06	6.25'	9.75'	15.00'
PCE	<b>11.9 D</b>	<b>6.81 D</b>	0.0949
TCE	0.167	0.163	0.00450 J
cis-1,2-DCE	2.87 D	0.713 D	0.0295
VC	0.0419	0.00383 U	0.00333 U

NCS-05	7.75'	11.25'	17.00'*
PCE	1.62 D	1.07 D	0.704 D
TCE	0.0217	0.0185	0.00999
cis-1,2-DCE	0.00784	0.0187	0.00524
VC	0.00320 U	0.00379 U	0.00363 U

**LEGEND FOR DATA TABLES**  
PCE - Tetrachloroethene  
TCE - Trichloroethene  
c-1,2-DCE - cis-1,2-Dichloroethene  
VC - Vinyl chloride  
11.9 - Concentration (mg/kg)  
**Bold** - Detected analyte concentration  
\* - Duplicate Sample Collected - Higher Concentration Reported  
U - Analyte not detected above specified Limit Of Detection (LOD) (shown as a gray tone).  
J - Estimated concentration, below Limit of Quantitation (LOQ)  
D - Sample analyzed at a higher dilution factor to allow calibration of this analyte.  
Red, bold, and underline - Detected analyte concentration exceeds the respective SL.





# FIGURE 5

## Soil PCE Isoconcentration Map

Former Park Rug and Dry Cleaners  
107 North Cross Street  
Chestertown, MD 21620

Job #: CG-15-1060.04	Date: 12/05/2017
Drawn By: M. Walsh	Scale: 1" = 40'
Project Manager: N. Love	

### LEGEND

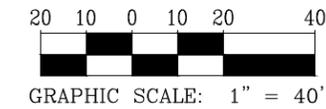
- Subject Property Line
- Other Property Line
- Building Outline
- ⊗ Floor Drain
- Soil Boring/Grab-Groundwater Sample Location
- PCE Tetrachloroethene
- 32.0 PCE Concentration (mg/kg)
- (10.75') Sample Collection Depth (feet below grade)
- 11.9 Detected analyte concentration exceeds the respective SL. ( **Red, bold, and underline** )
- PCE Isoconcentration Contour (Dashed Where Inferred)

# FIGURE 6

## GROUNDWATER SAMPLES SUMMARY OF DRY-CLEANING RELATED CHLORINATED HYDROCARBON ANALYTICAL RESULTS

Former Park Rug and Dry Cleaners  
107 North Cross Street  
Chestertown, MD 21620

Job #: CG-15-1060.04 Date: 12/05/2017  
Drawn By: M. Walsh Scale: 1" = 40'  
Project Manager: N. Love



### LEGEND

- Subject Property Line
- Other Property Line
- Building Outline
- ⊗ Floor Drain
- Soil Boring/Grab-Groundwater Sample Location

NCS-03*	
PCE	<b>225</b>
TCE	<b><u>8.10</u></b>
cis-1,2-DCE	<b>12.3</b>
VC	0.30 U

NCS-02	
PCE	<b>249</b>
TCE	<b><u>8.98</u></b>
cis-1,2-DCE	<b>19.0</b>
VC	0.30 U

NCS-01	
PCE	<b>305</b>
TCE	<b><u>37.3</u></b>
cis-1,2-DCE	<b><u>122</u></b>
VC	<b><u>8.31</u></b>

NCS-04	
PCE	<b><u>1,140</u></b>
TCE	<b><u>42.2</u></b>
cis-1,2-DCE	<b><u>98.2</u></b>
VC	<b><u>14.4</u></b>

NCS-05	
PCE	<b><u>841</u></b>
TCE	<b><u>18.5</u></b>
cis-1,2-DCE	<b><u>42.3</u></b>
VC	0.30 U

NCS-06	
PCE	<b><u>94.0</u></b>
TCE	<b>4.50</b>
cis-1,2-DCE	<b>4.59</b>
VC	0.30 U

N. CROSS STREET

S. MAPLE AVENUE

212 S. MAPLE AVENUE

107 N. CROSS STREET

APPROXIMATE FORMER DUMPSTER STORAGE AREA

DRY CLEANING MACHINE  
PRESSING EQUIPMENT

COVERED ENTRANCE

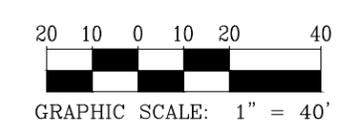
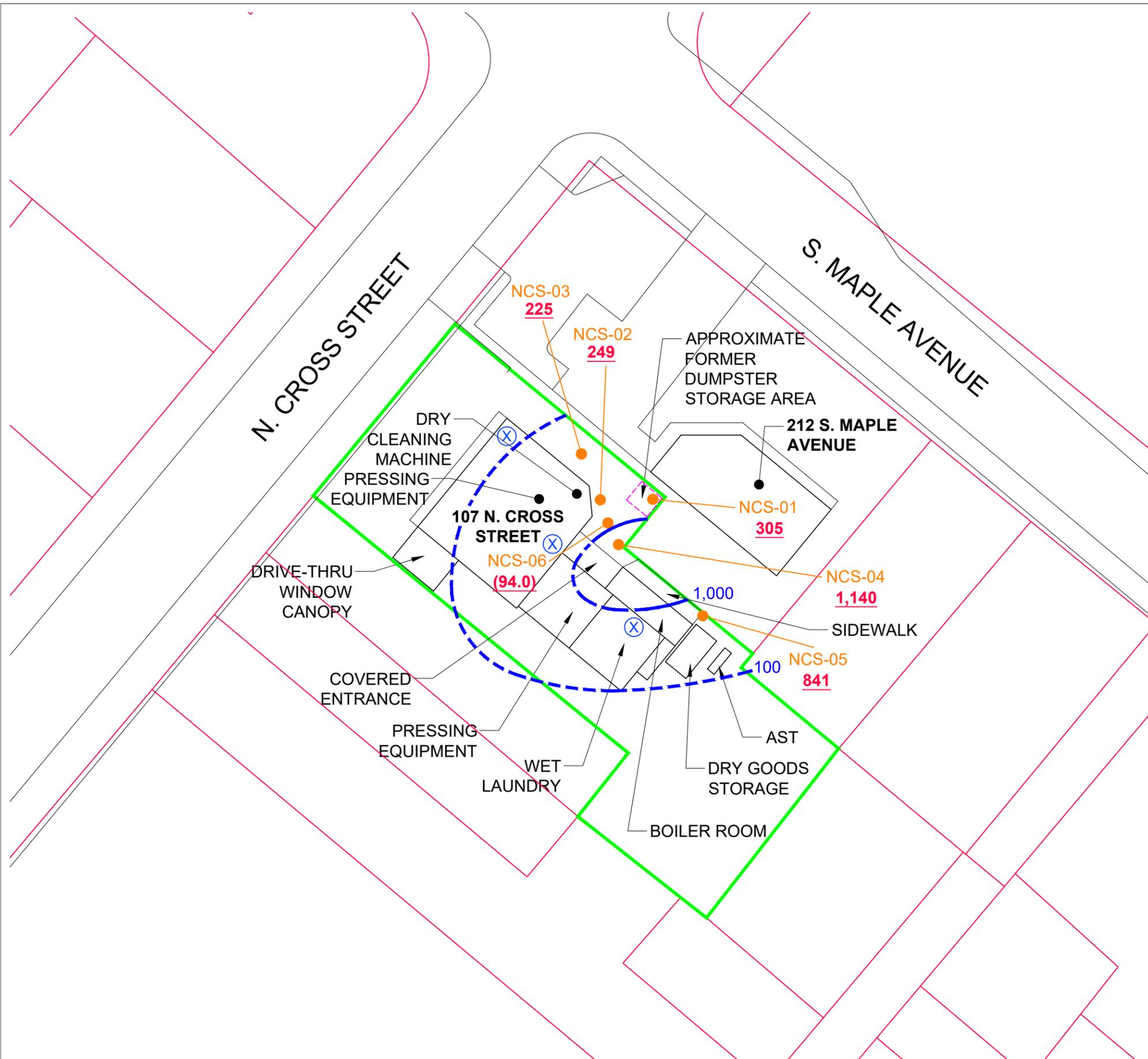
PRESSING EQUIPMENT

WET LAUNDRY

BOILER ROOM

AST  
DRY GOODS STORAGE

**LEGEND FOR DATA TABLES**  
PCE - Tetrachloroethene  
TCE - Trichloroethene  
c-1,2-DCE - cis-1,2-Dichloroethene  
VC - Vinyl chloride  
94.0 - Concentration (ug/L)  
Bold - Detected analyte concentration  
\* - Duplicate Sample Collected - Higher Concentration Reported  
U - Analyte not detected above specified Limit Of Detection (LOD) (shown as a gray tone).  
**Red, bold, and underline** - Detected analyte concentration exceeds the respective SL.



**CGS** Chesapeake  
GeoSciences, Inc.  
5405 Twin Knolls Road, Suite 1  
Columbia, Maryland 21045  
410-740-1911 www.cgs.us.com

# FIGURE 7

## Groundwater PCE Isoconcentration Map

Former Park Rug and Dry Cleaners  
107 North Cross Street  
Chestertown, MD 21620

Job #: CG-15-1060.04	Date: 12/05/2017
Drawn By: M. Walsh	Scale: 1" = 40'
Project Manager: N. Love	

### LEGEND

- Subject Property Line
- Other Property Line
- Building Outline
- ⊗ Floor Drain
- Soil Boring/Grab-Groundwater Sample Location
- PCE Tetrachloroethene
- 1,140 PCE Concentration (ug/L)
- (94.0)** PCE Concentration not contoured
- 305** Detected analyte concentration exceeds the respective SL. ( **Red, bold, and underline** )
- PCE Isoconcentration Contour (Dashed Where Inferred)

**Table 1**  
**Former Park Rug & Dry Cleaners, 107 N. Cross Street, Chestertown, Maryland**  
**Limited On-Site Subsurface Investigation**

**Photoionization Detector (PID) Readings in Macrocore Soil Sample Cores**  
**November 1, 2017**

Depth (Feet BG)	Soil Boring / Temporary Well ID					
	NCS-01	NCS-02	NCS-03	NCS-04	NCS-05	NCS-06
	PID Readings (ppm) (white) and Brief Lithological Notes (grey)					
0.00	Asphalt	Asphalt	Asphalt	Asphalt	Soil/Asphalt Mixture	Asphalt
0.25	0.5	0.0	40.6	53.6	0.0	0.3
0.75	2.0	0.0	31.0	156.2	0.0	3.5
1.00	Residual Asphalt	Gravel	Fill	Fill	Fill	Fill
1.25	10.1	0.7	6.7	28.9	0.0	26.2
1.75	7.3	3.6	12.0	4.7	0.0	2.6
2.00	Fill	Wood & Clayey Silt	Wood	Fill	Fill	Fill
2.25	0.8	10.1	2.0	2.4	0.0	7.5
2.75	0.5	47.1	15.9	1.4	0.0	5.0
3.00	Sand/Silt	Clayey Silt	Clayey Silt	Clayey Silt	Clayey Sand	Brick Fill
3.25	1.2	66.4	43.8	3.2	0.0	9.9
3.75	2.4	42.9	31.9	3.9	0.2	15.9
4.00	Silt; Perched GW 4-4.5 ft	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay	Clayey Silt
4.25	0.7	268.6	21.4	0.6	0.3	12.5
4.75	0.7	81.3	14.8	3.1	0.7	13.2
5.00	Silty Clay	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay	Silty Clay
5.25	2.8	19.3	43.5	3.5	0.4	45.7
5.75	2.7	54.7	12.9	4.0	0.9	51.4
6.00	Silty Clay	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay	Silty Clay
6.25	2.1	41.2	56.2	5.0	0.3	198.3
6.75	1.3	119.3	31.8	9.2	2.2	122.4
7.00	Silty Clay	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay	Silty Clay
7.25	4.0	81.6	157.6	5.2	3.2	87.3
7.75	13.2	229.5	37.1	8.5	5.8	16.1
8.00	Silty Clay	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay	Silty Clay
8.25	2.3	65.2	5.0	0.3	0.1	4.7
8.75	1.2	95.1	15.2	2.1	0.2	18.6
9.00	Perched GW 8-10 ft	Clayey Silt	Clayey Silt	Clayey Silt & Wood	Silty Clay	Silty Clay
9.25	0.4	93.6	46.3	2.2	0.1	13.1
9.75	0.5	60.5	65.2	0.8	2.3	104.6

**Table 1**  
**Former Park Rug & Dry Cleaners, 107 N. Cross Street, Chestertown, Maryland**  
**Limited On-Site Subsurface Investigation**

**Photoionization Detector (PID) Readings in Macrocore Soil Sample Cores**  
**November 1, 2017**

Depth (Feet BG)	Soil Boring / Temporary Well ID					
	NCS-01	NCS-02	NCS-03	NCS-04	NCS-05	NCS-06
	PID Readings (ppm) (white) and Brief Lithological Notes (grey)					
10.00	Clayey Silt	Clayey Silt	Clayey Silt	Clayey Silt & Wood	Silty Clay	Silty Clay
10.25	11.6	115.7	28.8	1.0	6.6	9.7
10.75	10.3	2,761	52.6	0.8	4.3	57.2
11.00	Sand	Sand	Sand	Sand & Wood	Silty Clay	Sand
11.25	92.7	100.1	54.1	10.2	24.0	42.8
11.75	84.5	45.7	24.2	3.8	8.8	15.7
12.00	Sand	Sand	Sand	Sand	Sand	Sand
12.25	4.4	43.1	24.9	7.6	0.7	45.1
12.75	1.5	27.3	37.6	5.2	1.0	30.3
13.00	Clayey Silt	Silt	Clayey Silt	Clayey Silt	Clayey Silt	Silty Clay
13.25	5.2	24.5	38.0	1.1	0.7	45.5
13.75	5.6	8.7	9.5	0.7	1.3	29.1
14.00	Clayey Silt	Sand	Clayey Silt	Clayey Silt	Sand	Sand
14.25	2.4	6.6	25.7	2.7	0.1	17.1
14.75	8.2	155.2	4.2	12.0	0.8	88.6
15.00	Sand	Sand	Sand	Sand	Sand	Sand
15.25	9.6	63.9	12.9	37.9	3.8	106.4
15.75	159.2	28.7	12.5	137.8	0.5	63.1
16.00	Sand	Sand	Sand	Sand	Sand	Sand
16.25	6.1	94.5	7.0	16.2	1.5	7.7
16.75	48.9	46.2	23.5	4.9	1.5	19.5
17.00	Sand	Sand	Sand	Sand	Sand	Clayey Sand
17.25	24.3	22.5	28.8	11.4	3.8	17.4
17.75	24.8	74.7	27.1	7.6	3.5	86.7
18.00	Sand	Sand	Sand	Sand	Silty Clay	Clayey Sand
18.25	3.0	34.9	27.5	12.8	1.0	16.7
18.75	2.7	26.4	11.6	16.7	0.3	1.8
19.00	Sand	Sand	Sand	Sand	Sand	Sand-Silt Mixture
19.25	1.8	5.8	4.7	34.0	5.1	1.0
19.75	0.5	1.8	0.3	11.1	9.3	1.0
20.00	Sand	Sand	Sand	Sand	Sand	Sand-Silt Mixture

**Table 1**  
**Former Park Rug & Dry Cleaners, 107 N. Cross Street, Chestertown, Maryland**  
**Limited On-Site Subsurface Investigation**

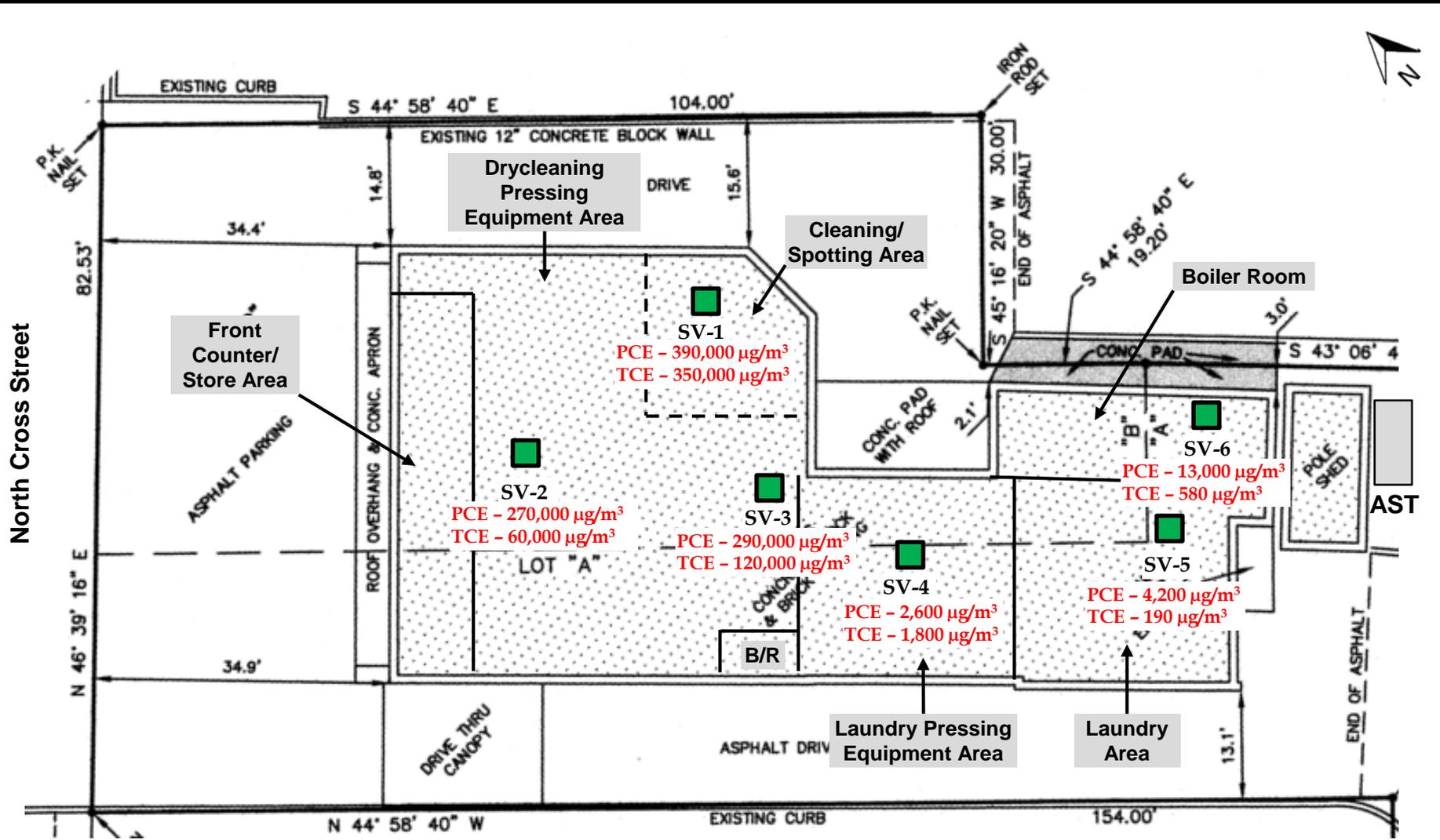
**Photoionization Detector (PID) Readings in Macrocore Soil Sample Cores**  
**November 1, 2017**

Depth (Feet BG)	Soil Boring / Temporary Well ID					
	NCS-01	NCS-02	NCS-03	NCS-04	NCS-05	NCS-06
	<b>Rationale for Selected Sample Depths</b>					
<b>Shallow</b>	9.75': Above Higher PID Readings	4.25': 2nd Highest PID Reading	7.25': Highest PID Reading	11.25': 2nd Highest PID Reading	7.75': PID Response at Mid-Depth	6.25': Highest PID Reading
<b>Middle</b>	14': Interval Above GW	10.75': Highest PID Reading	9.75': 2nd Highest PID Reading	15': Interval Above GW	11.25': Highest PID Reading	9.75': PID Response at Mid-Depth
<b>Deep</b>	15.75': Highest PID Reading	15': Interval Above GW	15': Interval Above GW	15.75': Highest PID Reading	17': Interval Above GW	15': Interval Above GW
<b>Grab-GW Sample Type</b>	1" PVC Well	Stainless Steel Screened Sampler				
<b>Soil Boring / GW Sample Summary Information</b>						
	<b>Feet Below Grade (BG)</b>					
<b>Soil Boring Depth</b>	21.0	20.0	20.0	20.0	22.0	20.0
<b>Screened Interval Depth</b>	11-21	16-20	16-20	16-20	18-22	16-20
<b>Depth GW Encountered</b>	15.5	16	16	16	18	16

Table Notes:

- Lithologic Observation
- Soil Sample Collected Based on PID Reading
- Soil Sample Collected Based on Depth that Groundwater was Encountered

- BG - Below Grade
- NCS - North Cross Street
- PID - Photoionization Detector
- ppm - Parts per Million



**Legend**

 Sub-Slab Vapor Sample Location

**Notes:**

- All locations are approximate.
- $\mu\text{g}/\text{m}^3$  - micrograms per cubic meter
- PCE - tetrachloroethene
- TCE - trichloroethene

**Table 1 - Analytes Detected in Sub-Slab Vapor Samples**  
**Supplemental Phase II ESA**  
**107 North Cross Street**  
**Chestertown, Maryland**

Analyte	May 2018 EPA RSL	SV-1	SV-2	SV-3	SV-4	SV-5	SV-6	Maximum Site Concentration (µg/m <sup>3</sup> )	MDE Commercial Target Soil Vapor Values	
									Tier 1 (2018)	Tier 2 (2018)
1,1-Dichloroethene	880	<b>8,200</b>	<2,000	<2,000	<20	<2.0	<2.0	8,200	88,000	440,000
2-Butanone (MEK)	22,000	<3,700	<3,700	<3,700	<37	<b>40</b>	<b>7.3</b>	40	2,200,000	11,000,000
Acetone	140,000	<24,000	<24,000	<24,000	<240	<b>270</b>	<24	270	14,000,000	70,000,000
Benzene	130	<800	<800	<800	<8.0	<b>5.7</b>	<b>3.3</b>	5.7	13,000	65,000
Carbon Disulfide	3,100	<31,000	<31,000	<31,000	<310	<b>43</b>	<31	43	310,000	1,550,000
Chloroform	430	<2,400	<2,400	<2,400	<24	<b>5.5</b>	<b>220</b>	5.5	43,000	215,000
Cyclohexane	26,000	<1,700	<1,700	<1,700	<17	<b>8.2</b>	<1.7	8.2	2,600,000	13,000,000
Propylene	13,000	<4,300	<4,300	<4,300	<b>56</b>	<b>140</b>	<b>23</b>	140	1,300,000	6,500,000
Tetrachloroethene	180	<b>390,000</b>	<b>270,000</b>	<b>290,000</b>	<b>2,600</b>	<b>4,200</b>	<b>13,000</b>	390,000	18,000	90,000
Toluene	22,000	<940	<b>1,400</b>	<940	<b>36</b>	<b>4.7</b>	<b>4.3</b>	1,400	2,200,000	11,000,000
Trichloroethene	8.8	<b>350,000</b>	<b>60,000</b>	<b>120,000</b>	<b>1,800</b>	<b>190</b>	<b>580</b>	350,000	880	4,400
Trichlorofluoromethane	--	<2,800	<2,800	<2,800	<28	<b>7.4</b>	<2.8	7.4	--	--
Vinyl chloride	440	<b>26,000</b>	<1,300	<1,300	<b>31</b>	<b>330</b>	<1.3	26,000	44,000	220,000
cis-1,2-Dichloroethene	--	<b>1,500,000</b>	<b>210,000</b>	<b>510,000</b>	<b>330</b>	<b>1,500</b>	<b>110</b>	1,500,000	--	--
m&p-Xylene	440	<2,200	<2,200	<2,200	<22	<2.2	<b>2.7</b>	2.7	44,000	220,000
o-Xylene	440	<1,100	<1,100	<1,100	<11	<1.1	<b>1.2</b>	1.2	44,000	220,000
trans-1,2-Dichloroethene	--	<b>64,000</b>	<b>6,800</b>	<b>13,000</b>	<20	<b>58</b>	<b>2.7</b>	64,000	--	--

Notes:

1. Only detected analytes are presented in the table.
2. Samples were collected on August 28 and 29, 2018.
3. Bolded results indicate the analyte was detected in the sample
4. All values have units of micrograms per cubic meter.
5. -- indicates no screening level is available for the analyte.
6. EPA Regional Screening Levels (RSLs) are from the May 2018 RSL table for commercial air.
7. 2018 Tier 1 and Tier 2 commercial target soil vapor values were calculated using 100x and 500x the EPA RSL (per MDE guidance), respectively.

Legend	
<b>40</b>	<b>Analyte detected</b>
<b>1,800</b>	<b>Exceeds Tier 1</b>
<b>60,000</b>	<b>Exceeds Tier 2</b>

# Facility Summary for Facility ID #11148

**Owner Name and Address:** Alan Carroll  
 107 N. Cross Street Chestertown, MD 21620  
 David Carroll (410) 778-3181

**Owner Type:** Commercial

Facility ID	County	Location Name	Location Street Address	Location City	Zip
11148	Kent	Park Rug & Dry Cleaners Corp.	107 N. Cross Street	Chestertown	21620

Tank ID	Date Installed	Product	Tank Mat'l of Construction	Piping Material	Primary - Tank Release Detection	CP	RD	FR
Status	Age (yr)	Total Capacity	Secondary Option	Secondary Option	Primary - Piping Release Detection	Over	Spill	
Closure Status	Closure Date	Compartment		Piping Type	Sec - Interstitial Monitoring Tank/Piping	Mnfd	EG	B/HO
1	1/1/1964	Heating Oil	Asphalt Coated or Bare Steel	Bare or Galvanized Steel	R	No	No	Yes
Permanently Out of Use	57	1,000	None	None	R	No	No	
Tank closed in place	6/13/1991			Not Listed	No/No	No	No	No

**Total Tanks: 1**

## Tank/Piping Release Detection Codes

<b>A</b>	Manual Tank Gauging	<b>B</b>	Tank Tightness Testing	<b>C</b>	Inventory Control	<b>D</b>	ATG/Auto Line LD	<b>E</b>	ATG 0.2 GPH Test	<b>F</b>	Safe Suction
<b>G</b>	Gravity Feed	<b>H</b>	Elect ALLD Testing 0.2 GPH	<b>I</b>	Line Tightness Annual	<b>J</b>	Line Tightness Every 2 Yrs.	<b>K</b>	Vapor monitoring	<b>L</b>	Groundwater monitoring
<b>M</b>	Inventory SIR	<b>N</b>	Interstit. Dbl-wall Monitor	<b>O</b>	Interstit. Sec. Con. Monitor	<b>P</b>	Other method	<b>Q</b>	Deferred	<b>R</b>	Not listed
<b>N/A</b>	Heating Oil/Emergency Generator										

## Tank/Piping Codes

<b>CP</b>	Corrosion Protection Met	<b>Over</b>	Overfill Protected	<b>Mnfd</b>	Manifold	<b>FR</b>	Financial Responsibility Met
<b>RD</b>	Release Detection Met	<b>Spill</b>	Spill Protected	<b>EG</b>	Emergency Power Generation	<b>B/HO</b>	Bulk Heating Oil

Report Generation Date: 5/12/2021

# Appendix B

## August 2019 Supplemental Sampling Data

**TABLE 1**  
**MDE Screening Results for**  
**Sub-Slab and Soil Gas Sampling**  
**107 N. Cross Street Site**  
**Chestertown, Maryland**

Sample ID	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 1	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 2	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9
Sampling Date			8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019
Sample Depth/Height			Sub Slab								
Units	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>
Matrix	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas
Analyte											
Benzene	1,600	8,000	216	-	-	75	-	-	-	-	-
1,1-Dichloroethene	44,000	220,000	-	2,171	4,040	-	-	-	-	-	-
cis-1,2-Dichloroethene	nca	nca	-	545,226	598,187	479	4,113	837	554	81,836	1,085
trans-1,2-Dichloroethene	27,000	135,000	-	29,421	28,433	-	135	61	537	1,961	-
4-Isopropyltoluene	nca	nca	-	-	-	-	-	-	-	-	-
Tetrachloroethene	18,000	90,000	252	<b>556,598</b>	<b>1,010,864</b>	4,987	-	4,409	6,423	51,039	10,012
Toluene	2,200,000	11,000,000	447	-	-	-	-	-	-	-	-
Trichloroethene	880	4,400	-	<b>343,204</b>	<b>330,707</b>	787	<b>4,531</b>	928	1,024	<b>34,845</b>	1,355
No other compounds reported by MDE.											
PID Reading			-	-	-	-	-	-	-	-	-

Notes:

bgs - below ground surface.

Bold - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor Values Tier 2.

Shaded - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor Values Tier 1.

nca - No criteria available.

MDE - Maryland Department of the Environment.

-- - Data not reported by MDE.

MDE - Maryland Department of the Environment.

PID - Photoionization Detector.

This table was generated using EPA Method TO-17 screening data provided by MDE.

**TABLE 1**  
**MDE Screening Results for**  
**Sub-Slab and Soil Gas Sampling**  
**107 N. Cross Street Site**  
**Chestertown, Maryland**

Sample ID	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 1	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 2	CS-SG01-G001	CS-SG02-G001	CS-SG03-G001	CS-SG04-G001	CS-SG05-G001	CS-SG06-G001	CS-SG07-G001	CS-SG08-G001	CS-SG09-G001
Sampling Date	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019
Sample Depth/Height	3 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs	6 ft bgs
Units	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>
Matrix	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas
Analyte											
Benzene	1,600	8,000	-	-	-	-	-	-	-	-	-
1,1-Dichloroethene	44,000	220,000	-	-	-	-	-	-	-	-	-
cis-1,2-Dichloroethene	nca	nca	-	-	-	-	-	-	8,942	-	-
trans-1,2-Dichloroethene	27,000	135,000	-	-	-	-	-	-	537	-	-
4-Isopropyltoluene	nca	nca	-	-	-	-	-	-	-	1,690	-
Tetrachloroethene	18,000	90,000	300	902	1,741	2,114	23,521	<b>109,906</b>	<b>127,112</b>	28,158	176
Toluene	2,200,000	11,000,000	-	-	-	-	-	-	-	-	-
Trichloroethene	880	4,400	-	257	269	193	1,241	1,461	<b>20,813</b>	297	-
No other compounds reported by MDE.											
PID Reading			78.5	26.2	103	71.8	32.5	92.7	108.7	201.3	11.3

Notes:  
bgs - below ground surface.  
Bold - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor  
Shaded - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor  
nca - No criteria available.  
MDE - Maryland Department of the Environment.  
-- - Data not reported by MDE.  
MDE - Maryland Department of the Environment.  
PID - Photoionization Detector.  
This table was generated using EPA Method TO-17 screening data provided by MDE.

**TABLE 2**  
**Eurofins Analytical Results for Soil Gas**  
**107 N. Cross Street Site**  
**Chestertown, Maryland**

Sample ID	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 1	Maryland Department of Environment Commercial Target Soil Vapor Values Tier 2	CS-SG05-G001	CS-SG06-G001	CS-SG07-G001	CS-SG08-G001	CS-SG08-G101
Sampling Date			8/22/2019	8/22/2019	8/22/2019	8/22/2019	8/22/2019
Sample Depth			6 ft bgs				
Dilution Factor			200	500	500	200	200
Units	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>
Matrix	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas
Analyte							
Cumene	180,000	900,000	770 J	1,200 J	770 J	5,200	4,600
cis-1,2-Dichloroethene	nca	nca	6,600	N.D.	6,600	N.D.	N.D.
trans-1,2-Dichloroethene	27,000	135,000	330 J	N.D.	330 J	N.D.	N.D.
Hexachloroethane	nca	nca	N.D.	N.D.	N.D.	N.D.	1,200 J
Isooctane	nca	nca	N.D.	N.D.	N.D.	N.D.	360 J
Octane	nca	nca	N.D.	N.D.	N.D.	N.D.	390 J
Tetrachloroethene	18,000	90,000	<b>94,000</b>	<b>100,000</b>	<b>94,000</b>	17,000	16,000
Trichloroethene	880	4,400	<b>16,000</b>	1,200 J	<b>16,000</b>	N.D.	N.D.
No other TO-15 analytes were detected above the laboratory method detection limit.							

Notes:

Shaded - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor Values Tier 1.

Bold - Concentration exceeds the Maryland Department of Environment Commercial Target Soil Vapor Values Tier 2.

bgs - below ground surface.

nca - No criteria available.

J - Result is less than the RL but greater than or equal to the MDL and concentration is an approximate value.

N.D. - Analyte was not detected above method detection limit

# Appendix C

## SSDS Inspection Sheet

**107 N Cross Street  
Chestertown, MD  
System Check Sheet**

Name: \_\_\_\_\_

Company: \_\_\_\_\_

Date/Time: \_\_\_\_\_

SSDS SYSTEM			
Status		Arrival	Departure
SSDS System (circle one)		ON / OFF	ON / OFF
Alarms			
Tag ID	% Open	Flow	Vacuum
SSDS-1			
SSDS-2			
SSDS-3			
SSDS-4			
SSDS-5			
SSDS-6			
SSDS-7			
Tag ID	Additional Data		Reading
	Run Time (hours)		
MV	Manual Valve Percentage Open		
	Knock Out Tank Water Level Check		
Sample Data			
<i>Samples are collected in order below from least contaminated to most contaminated.</i>			
EFF2	2nd Carbon Effluent PID:	ppm	Time:
EFF2	2nd Carbon Effluent Lab Sample (if collected)		Time:
EFF1	1st Carbon Effluent PID:	ppm	Time:
EFF1	1st Carbon Effluent Lab Sample (if collected)		Time:
INF	1st Carbon Influent PID:	ppm	Time:
INF	1st Carbon Influent Lab Sample (if collected)		Time:

**Additional Comments/Work Performed:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# Appendix D

## Cap Inspection Sheet

DATE \_\_\_/\_\_\_/\_\_\_ Time: \_\_\_\_\_ Weather: \_\_\_\_\_

**A. Paved Areas**

- 1. Asphalt Condition ..... Good \_\_\_ Fair \_\_\_ Poor \_\_\_
  - 2. Cracks in asphalt greater than 0.25 inch wide? ..... Yes \_\_\_ No \_\_\_
  - 3. Potholes? ..... Yes \_\_\_ No \_\_\_
  - 4. Deterioration, cracking, lifting, settlement,  
or any abnormal conditions? ..... Yes \_\_\_ No \_\_\_
  - 5. Describe maintenance needed \_\_\_\_\_
- Comments \_\_\_\_\_

**B. Hardscaping (Brick/Walkways)**

- 1. Hardscape Condition ..... Good \_\_\_ Fair \_\_\_ Poor \_\_\_
  - 2. Cracks in brick or concrete? ..... Yes \_\_\_ No \_\_\_
  - 3. Loose or missing bricks? ..... Yes \_\_\_ No \_\_\_
  - 4. Deterioration, cracking, lifting, settlement,  
or any abnormal conditions? ..... Yes \_\_\_ No \_\_\_
  - 5. Describe maintenance needed \_\_\_\_\_
- Comments \_\_\_\_\_

**C. Describe Any Other Significant Findings/Observations:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Inspection Performed By:**

Print: \_\_\_\_\_ Signature: \_\_\_\_\_

**D. Describe Maintenance Completed:**

Date: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Maintenance Completed By:**

Print: \_\_\_\_\_ Signature: \_\_\_\_\_

# Appendix E

## Compliance Certifications

STATEMENT OF RESPONSE ACTION PLAN COMPLIANCE

If the Response Action Plan is approved by the Maryland Department of the Environment, 107 N. Cross Street, LLC agrees, subject to the withdrawal provisions of Section 7-512 of the Environment Article, to comply with the provisions of the Response Action Plan. 107 N. Cross Street, LLC understands that if it fails to implement and complete the requirements of the approved plan and schedule, the Maryland Department of the Environment may reach an agreement with 107 N. Cross Street, LLC to revise the schedule of completion in the approved Response Action Plan or, if an agreement cannot be reached, the Department may withdraw approval of the plan.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Agent for 107 N. Cross Street, LLC

STATEMENT OF ZONING COMPLIANCE

107 N. Cross Street, LLC hereby certifies that the property meets all applicable county and municipal zoning requirements. 107 N. Cross Street, LLC acknowledges that there are significant penalties for falsifying any information required by MDE under Title 7, Subtitle 5 of the Environment Article, Annotated Code of Maryland, and that this certification is required to be included in a response action plan for the Voluntary Cleanup Program pursuant to Title 7, Subtitle 5 of the Environment Article, Annotated Code of Maryland.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Agent for 107 N. Cross Street, LLC