



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

October 21, 2020

Mr. Christopher E. Williams
Environmental Issues Program Manager
Anne Arundel County Public Schools
9034 Fort Smallwood Road
Pasadena, MD 21122

RE: SITE STATUS LETTER
Case No. 2018-0559-AA
Wiley H. Bates Middle School
701 Chase Street, Annapolis
Anne Arundel County, Maryland
Facility I.D. No. 3200

Dear Mr. Williams:

The Maryland Department of the Environment's (MDE's) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *LPH System Operation & Recovery Report* and *Quarterly Sampling Report 3rd Quarter 2020*, dated September 14, 2020. This case was opened on May 2, 2018 following the report of liquid phase hydrocarbons (LPH) impacting Spa Creek. The current monitoring well network in the vicinity of the school's boiler room consists of 13 monitoring wells, one of which was installed as a replacement tank field monitoring pipe.

Enhanced fluid recovery (EFR) events were conducted on a biweekly basis from August 8, 2019 thru October 10, 2019. Effective October 14, 2019, OCP approved the reduction of EFR to once weekly. The EFR events concluded April 29, 2020. Per the *Final EFR Evaluation Report*, 34,769.43 gallons of total liquids was recovered, 908.07 gallons of which was LPH. The LPH skimmer system was deployed April 30, 2020 in accordance with MDE's *Corrective Action Plan (CAP) Approval* letter, dated March 10, 2019 (copy enclosed). Two monitoring wells are targets of the active skimmer remediation system. As of the August 18, 2020 site visit, 68 gallons of LPH and 0.5-gallon of groundwater have been recovered.

The *LPH System Operation & Recovery Report* requests the site visit frequency be reduced to monthly. The *Report* requests site visit and gauging information be completed monthly and reported quarterly on the same schedule as quarterly monitoring well sampling, as provided in the approved *CAP*. Based on the available information reviewed for the case, MDE offers the following considerations:

- It is the responsibility of the school and its environmental consultants to determine a schedule to monitor all aspects of the active skimmer remediation system and to ensure the system is functional. This responsibility includes necessary adjustments based on various site factors, including seasonal water table fluctuation, recent precipitation events, and LPH recovery.

- It is the responsibility of the school and its environmental consultants to agree upon and prepare a plan for troubleshooting and communicating remediation system issues (i.e., telemetry system, on-site staff) to ensure system issues can be corrected in a timely manner and will not adversely impact the environment.
- The OCP concurs with monthly site visits and quarterly reporting provided the above considerations are met.

Based on the current commercial land use and the available information reviewed for the case, MDE requires the following:

- 1) In accordance with requirements in the *CAP Approval* letter dated March 12, 2020, continue groundwater monitoring and sampling and monitoring of Spa Creek (once weekly or after a significant precipitation event).
- 2) Continue quarterly report submission in accordance with the *CAP Approval* letter requirements.
- 3) When applicable, include liquid disposal receipts in *Quarterly Monitoring Reports* for liquids in the on-site storage system.
- 4) If for any reason the remedial system fails to operate for more than 24 hours, it must be reported to MDE. Once operation of the system is restored, a summary of the cause of system failure, repairs made, and total system down time must be provided to OCP within five (5) days of system reactivation.
- 5) All other requirements of the *CAP Approval* letter remain in effect until otherwise stated by MDE in writing.

When submitting documentation, provide three hard copies and one electronic copy on a labeled compact disc (CD) or via email. If you have any questions, please contact Ms. Lindley Campbell at 410-537-3387 (lindley.campbell1@maryland.gov) or me at 410-537-3499 (susan.bull@maryland.gov).

Sincerely,



Susan R. Bull, Eastern Region Supervisor
Remediation Division, Oil Control Program

Enclosure: *Corrective Action Plan Approval*, dated March 10, 2020

cc: Mr. Scott Alexander, Project Manager, Petroleum Management, Inc.
Mr. Don Curtian, Director, Division of Environmental Health, Anne Arundel County Health Dept.
Mr. Matthew Waters, Bureau of Engineering and Construction, Anne Arundel County DPW
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program