



November 25, 2024

Mr. John Lee
ExxonMobil Environmental and Property Solutions
c/o Infineum
1900 East Linden Avenue, Building 28a
Linden, NJ 07036

RE: OCP COMMENTS: CRAIG WELL REPLACEMENT WORK PLAN
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland

Dear Mr. Lee:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the alternate private supply well installation work plan documents submitted for the Craig residence located at 3627A Southside Avenue, Phoenix Maryland. The work plan documents (collectively referred to as the "work plan") were provided by Kleinfelder through email communication on September 18, 2024, on behalf of ExxonMobil. OCP understands that the property owners have requested the installation of an alternative private supply well, due to the continued presence of methyl tert-butyl ether (MTBE) concentrations in the current water supply. Because of the MTBE in the current water supply, a granular activated carbon (GAC) system is used to filter out the MTBE, which ExxonMobil is required to operate, monitor, and maintain.

The work plan outlines details for a new private supply well with proposed construction specifications, depths, well logging, and a groundwater sampling plan. A 6-inch diameter casing is proposed to be installed in a 10-inch diameter borehole at approximately 45 feet below grade surface (bgs). The borehole will advance to an initial depth of approximately 200 feet bgs. Drilling will be paused at depths of approximately 75 feet, 100 feet, 160 feet, and 200 feet for yield testing and to collect groundwater samples for MTBE analysis. If the well yield is sufficient and MTBE concentrations are below groundwater standards, the boring will be converted to a private supply well. If water yield is not sufficient at 200 feet bgs or concentrations of MTBE exceed standards, the boring will be extended to a depth of 400 feet bgs, and the well yield and water quality will be retested. Once sufficient yield is obtained and MTBE is less than groundwater standards, the well will be converted to a private supply well. If yield or MTBE concentrations below groundwater standards are not met, the well will be used for monitoring or potentially deepened. The current private supply well will be retained for monitoring purposes or used to continue to supply water to the residence.

The OCP hereby offers the following comments on the proposed work plan contingent, and in supplement to any requirements from the permitting authority:

1. Regarding the approval of private supply wells in Baltimore County, the Baltimore County Department of Environmental Protection and Sustainability is the permitting authority, and all permits and approval must be obtained prior to implementing the work plan.
2. All water testing samples collected during the well installation process **must** be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 524.2
3. All water generated during the installation and testing process must to be treated prior to discharge or containerized and treated off-site.
4. OCP will require the retention of the current private supply well for continued monitoring under the open case. Once completed, the existing private supply well and the newly drilled well must be sampled monthly.
5. **Within 45 days after installation of the new well**, submit a well installation report to OCP. The report must include a well completion report, all sampling data, and a copy of the *COP* (if applicable).

Notify the case manager, Mr. Matt Mueller, at least five (5) working days prior to conducting field activities. If you have any questions, please contact the case manager, Mr. Matthew Mueller, at 410-537-3574 or matthew.mueller@maryland.gov, or the regional supervisor, Ms. Ellen Jackson, at 410-537-3482 or ellen.jackson@maryland.gov.

Sincerely,



Susan Bull, Division Chief
Remediation Division
Oil Control Program

cc: Mr. and Mrs. Frederick Craig, Property Owners
Alicyn Craig, Esquire, ExxonMobil Corporation
Mr. Mark Schaaf, Kleinfelder East, Inc.
Mr. Kevin Koepenick, Manager, Groundwater Management Section, Balt. County DEPS
Mr. John Boris, Geologist, Water Management Admin, MDE
Mr. Matthew Mueller, Case Manager, Remediation Division, Oil Control Program
Ms. Ellen Jackson, Regional Supervisor, Remediation Division, Oil Control Program
Julie Kuspa, Esquire, Office of Attorney General
Mr. Christopher H. Ralston, Program Manager, Oil Control Program