February 20, 2025

Ms. Regan O'Brien
Project Manager
ExxonMobil Environmental & Property Solutions Company
100 Walnut Avenue, Suite 210
Clark, NJ 07066

RE: REQUEST FOR INFORMATION
Case No. 1986-1205-CE
Former Bayview Mobil Service Station (Former ExxonMobil #14489)
285 Old Bayview Road, North East
Cecil County, Maryland
Facility I.D. No. 2615

Dear Ms. O'Brien:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *Case Closure Request,* dated June 7, 2024, the *Semi-Annual Groundwater Monitoring Report - 2024,* dated August 15, 2024, and the *Half Mile Radius Water Use Survey*, dated September 27, 2024, all prepared by Arcadis, Inc. Since May 31, 2017, groundwater monitoring at this site has been conducted through a network of seven on-site monitoring wells. Private supply well samples have been collected at numerous off-site properties at select intervals throughout the duration of this case.

The monitoring wells were most recently sampled on July 10, 2024, and the samples collected were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons – diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015. The sampling results were either non-detect or below MDE's groundwater standards with the following exceptions.

- Benzene was detected in MW-1A and MW-2A at concentrations ranging from 11 to 12 parts per billion (ppb), which exceed the 5 ppb groundwater standard.
- Ethylbenzene was detected in MW-2A at 1,800 ppb, which exceeds the 700 ppb groundwater standard.
- Naphthalene was detected in MW-1A, MW-2A, MW-5A, and MW-11 at concentrations ranging from 13 to 600 ppb, which exceed the 0.17 ppb groundwater standard.

Before the OCP can finalize the review for the requested case closure, the following are required:

1. Conduct a Mann-Kendall analysis of the groundwater data provided (2014 to present) for monitoring wells MW-1A, MW-2A, MW-5A, MW-11, and MW-12, to include the following

petroleum constituents: benzene, toluene, ethylbenzene, xylenes, methyl tertiary butyl ether (MTBE), and naphthalene.

2. **By no later than April 21, 2025**, conduct an updated off-site drinking water sampling event to ensure that recent changes shift to public water did not present a risk to the remaining off-site receptors.

   a. The addresses to be sampled are: 215, 223, 233, 237, 243, 246, 265, 269, 280, 282, and 284 Old Bayview Road.
   b. All drinking water samples are to be collected by a Maryland-certified drinking water sampler, prior to any treatment systems present, and analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2.

3. **Within 45 days of completing the sampling event**, submit a report to include the sampling data and Mann-Kendall analysis. While this supplemental data is being collected and evaluated, OCP hereby authorizes a hold on collecting additional groundwater samples from the on-site monitoring wells.

Upon receipt of the above supplemental data, the OCP will review the status of this case. When submitting documentation to OCP, provide two hard copies and one electronic copy (pdf). If you have any questions, please contact the case manager, Ms. Lindley Campbell at 410-537-3387 (lindley.campbell1@maryland.gov) or me at 410-537-3482 (ellen.jackson@maryland.gov).

Sincerely,

Ellen Jackson, Eastern Region Supervisor
Remediation Division
Oil Control Program

cc: Mr. Ruben Lopez, Project Manager, Arcadis U.S., Inc.
Mr. Ed Arellano, Director of Environmental Health Services, Cecil County Health Dept.
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program
Mrs. Susan R. Bull, Division Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program