



October 24, 2024

Mr. Chandrakant K. Patel (Current Owner/Operator)
Mr. Pragnesh Patel
Calvert Country Store
2815 North East Road
North East, MD 21901

Mr. Kenneth D. Thomas (Point of Contact)
Country Stores Inc. (Former Owner/Operator)
225 City Ave, Suite 105
Bala Cynwyd, PA 19004

Mr. Chris Haab
Country Stores - Representing Alger Oil
225 E City Ave, Suite 105
Bala Cynwyd, PA 19004

RE: RESPONSE TO SYSTEM EVALUATION AND REPORTING REQUIREMENTS
Case No. 1992-2616-CE
Notice of Violation NV-2004-038-Addendum
Calvert Citgo (Former Alger Country Store)
2815 North East Road, North East
Cecil County, Maryland
Facility I.D. No. 5678

Dear Sirs:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) recently completed a review of the case file for the above-referenced commercial property, including the *Combined Quarterly Remediation and Groundwater Monitoring Report, First Quarter 2024*, dated May 29, 2024, and the *Combined Quarterly Remediation and Groundwater Monitoring Report, Second Quarter 2024*, dated July 30, 2024, both prepared by EnviroSure, Inc. In the quarterly reports submitted, EnviroSure provided recommendations based on the data collected and presented in the quarterly status reports.

Dissolved phase petroleum compounds, including benzene, ethylbenzene, toluene, methyl tert-butyl ether (MTBE), and 1,2-dichloroethane (1,2-DCA) continued to be detected above MDE's groundwater standards in the monitoring well network (on and offsite) and in two neighboring potable water supply wells. The onsite potable water supply well was non-detect or below MDE's groundwater standards for petroleum compounds. EnviroSure proposed to evaluate the current dual

phase extraction (DPE) system. It is surmised by your consultant, that the remedial efforts are potentially limited by subsurface conditions (soil matrix, geology, absorbed contaminants, etc.), inadequate site characterizations, and/or poor system design and utilization. Alternative remediation technologies such as permeable reactive barriers (PRB) and/or aeration applications, and chemical injections may be more effective remedial approaches to consider to reduce contaminate mass and achieve project end goals. EnviroSure proposed the following three recommendations:

- Abandon the deepest monitoring well, MW-008D, based upon the non-detect groundwater sampling results and the total depth of the well. EnviroSure offers that MW-008D does not benefit the site's remedial approach and acts as a potential conduit for existing contaminants or future releases.
- Add aeration to the off-site monitoring well pairs, MW-009/MW-009D and MW-010/MW-010D. The *Report* proposes equipping the wells with a localized aeration system which produce aeration via reverse pumping within the well casing.
- Evaluate the effectiveness and efficiency of the existing DPE system, by excavating the extraction well locations, investigating the piping and plumbing, evaluating the vacuum components, and assessing the system to determine its usefulness.

OCP agrees that the system should be evaluated to assess if modifications of the system can be implemented to aggressively remediate the site and reduce off-site impacts, or if an alternative remedial approach is warranted. OCP approves of the recommendations with the following comments and modifications:

1. **By no later than December 23, 2024**, conduct an investigation of the DPE system as proposed. **Within 60 days of completion of the investigation**, submit a comprehensive report to the OCP with results of the investigation, plans for improving system effectiveness, modifications, etc., or a Corrective Action Plan Addendum (CAPA) proposing alternative remedial technologies, pilot testing, rational, schedule and project end goals.
2. Schedule a technical meeting to include all parties, **to take place in January 2025**. This will allow time for OCP to receive and review the above documents to discuss the findings and recommendations.
3. Continue to operate the existing DPE system as previously approved. If the system is not operating currently, it must be reactivated **immediately**. Quarterly status reports must include details regarding system operation, system downtime, including specific dates, and results of the remediation for the respective monitoring quarter.
4. The remediation system must operate continually until written approval from the OCP to modify or discontinue system operation is received.

5. If the DPE system is expected to be turned off for investigative purposes, notify the OCP in writing via email a minimum of five days prior to shutdown, with a detailed schedule of activities and timelines for system re-start.
6. If proposing a long-term shut down of the DPE system for any reason, a work plan must be submitted that outlines the proposed system shutdown rationale, supporting documentation, and post-remedial monitoring plan, including proposed monitoring well gauging and sampling frequencies, and trigger values or conditions that will require system start-up or alternative actions.
7. OCP does not approve the abandonment of MW-8 at this time. All wells must be equipped with a sealed cap and must be properly constructed to prohibit any infiltration of surface water or debris. Notify OCP immediately if the integrity of any monitoring wells is observed to have been compromised. It is the owner's responsibility to ensure the each well is properly maintained and each well head is properly protected.
8. OCP will provide comment to the remaining recommendation regarding the implementation of in-situ remediation in off-site monitoring wells MW-009/MW-009D, and MW-010/MW-010D following receipt of the additional information and discussions during in the technical meeting.
9. Complete case files can be requested through the Public Information Act (PIA). The OCP strongly recommends submitting a PIA request to review previous site assessments and remedial work that have been performed under OCP Case No. 1992-2616-CE. To better serve our customers, MDE has established an electronic PIA portal at the following link:
<http://mdepia.mde.state.md.us/>
10. OCP understands the onsite supply well has not been sampled since December 2023. Collect a sample from the onsite supply well on a quarterly basis as previously required.

Quarterly Reporting

Based on the information reviewed, the OCP has the following requirements related to the *Combined Quarterly Remediation and Groundwater Monitoring Reports* submitted for this case.

1. In the hard copy reports submitted, the time series monitoring well data (Table 2) is cut off, and some columns are not provided. In addition, the potable well data (Table 3) is too small and not presented in a readable font size. All tables provided in all reports must be expanded to fill the entire page for readability.
2. The report must include a dissolved phase concentration map for the most recent sampling event. In addition, the on-site and off-site potable wells must be plotted on all map(s).
3. Please clarify if pre-, mid- and post-filtration samples were collected from both properties during the second quarter sampling event (Section 4, page 7). According to the First Quarter Report, access to collect mid- and post- samples were not available at 2802 North East Road. According

to the data presented in Second Quarter Report, it appears that the mid- and post- samples were collected, however the text states otherwise.

4. Please notify the case manager, Ms. Lindley Campbell and copy me via email, 14 days prior to any field activities so that we may be present.

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). When submitting documents, please provide 3 hard copies and one electronic copy (pdf) that can be submitted via email.

Sincerely,



Ellen Jackson, Eastern Region Supervisor
Remediation Division
Oil Control Program

- cc: Mr. John and Mrs. Sharan O'Brien (Property owners, 2794 North East Road)
Mr. Roudie Harrison (Property owner, 2802 North East Road)
Mr. Claude (Jeff) Vandever, EnviroSure, Inc.
Thomas V. McCarron, Esquire, Semmes, Bowen & Semmes
Robert Valliant Jones, Esquire, Law Offices of Robert Valliant Jones
Mr. Ed Arellano, Director of Environmental Health, Cecil County Health Dept.
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program
Mrs. Susan Bull, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Administrator, Oil Control Program