

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

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

July 30, 2019

Mr. Aijaz Shaikh Fahmida, LLC 1897 Conowingo Road Rising Sun, Maryland 21911

RE: REQUEST FOR ENHANCED MONITORING AND HALF-MILE WELL SURVEY
Case No. 2019-0724-CE
Pantry One Food Mart
1897 Conowingo Road, Rising Sun
Cecil County, Maryland

Facility I.D. No. 11347

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the registration file for the underground storage tanks (USTs) at the above-referenced high-risk groundwater use area property. The following UST systems are registered at this active facility: a 12,000-gallon gasohol UST and a 12,000-gallon compartmentalized UST storing gasohol, diesel, and kerosene. The MDE understands the subject property recently decommissioned the Stage II vapor recovery system and that tank top upgrades were completed during the summers of 2018 and 2019. In 2005, 3 groundwater monitoring wells were installed in accordance with Code of Maryland Regulations (COMAR) 26.10.02.03-4.

On June 5, 2019, the OCP was provided the results of samples collected from the monitoring well network on Oct. 18, 2018. The presence of benzene was identified in all 3 monitoring well samples at concentrations ranging from 6.6 to 220 parts per billion (ppb). According to the OCP's records, the on-site drinking water supply well was last sampled in June 2016 and the sampling results were all below MDE's groundwater standards. On June 6, 2019, the OCP required the collection of confirmatory samples from monitoring wells MW-1, MW-2, MW-3, and the on-site drinking water supply well.

The samples collected from the drinking water supply well on June 10, 2019 did not report the presence of any petroleum constituents. The following analytical results for confirmatory samples collected from the monitoring well network on June 10, 2019 exhibited concentrations of petroleum constituents above MDE's groundwater standards:

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- Benzene in all 3 monitoring wells at concentrations ranging from 9.21 to 2,3200 ppb, which exceed the 5 ppb standard;
- Toluene in MW-3 at a concentration of 16,100 ppb, which exceeds the 1,000 ppb standard;
- Ethylbenzene in MW-3 at a concentration of 2,440 ppb, which exceeds the 700 ppb standard:
- Xylene in MW-3 at a concentration of 12,020 ppb, which exceeds the 10,000 ppb standard;
- MTBE in MW-3 at a concentration of 34.9 ppb, which exceeds the 20 ppb state action level; and
- Ethanol in MW-3 at a concentration of 5,360 ppb. The presence of ethanol is indicative of a more recent release.

Since this property is located in a high-risk groundwater use area served by a drinking water supply well, MDE requires completion of the following:

- 1) No later than October 30, 2019, perform and submit for review a sensitive receptor survey to identify all drinking water supply wells (i.e., domestic, non-community/community water supply, agricultural) within a half-mile radius of the subject property and plot the locations on a U.S. Geological Survey map or scaled street map.
 - a) Annotate the 660-ft. (1/8-mile), 1,320-ft. (1/4-mile), and 2,640-ft. (1/2-mile) radii.
 - b) Provide a summary table of well data including, at a minimum, property address, owner name and address, well tag ID, total depth of well, casing depth, screen depth, and current status of well usage.
 - c) Perform field reconnaissance to document the presence or absence of potable water supply wells within the specified area of concern.
 - d) Provide documentation of field reconnaissance findings and the sources used to perform the survey.
 - e) Review well completion reports and evaluate whether on-site conditions could potentially impact any off-site drinking water supply wells in the area.
- 2) No later than Sept. 30, 2019, begin quarterly (every 3 months) gauging and sampling of the monitoring well network and the tank field monitoring pipes. All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates, ethanol, and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015. All groundwater and private drinking water data collected must be submitted in quarterly reports detailing the results of the gauging and sampling events no later than 45 days following sample collection.
- Begin quarterly sampling of the on-site drinking water supply well. All samples collected must be analyzed for full-suite VOCs, including fuel oxygenates, <u>ethanol</u>, and naphthalene, using EPA Method 524.2. If a granular activated carbon (GAC) filtration system is present, samples must be collected pre-, mid-, and post-filtration.

- Begin quarterly sampling of the following adjacent private drinking water supply wells: 1874 Conowingo Road (Schmoker property); 1884 Conowingo Road (Zane property); 1898 Conowingo Road (Renzo property); 1912 Conowingo Road (Mullis property); 27 Dalmation Court (Rodriquez property); and 33 Dalmation Court (Chapman property). All samples must be collected after running the water for approximately 10 minutes to purge the piping and from a sample location prior to any treatment system(s) that may be present, preferably at the pressure tank. The samples must be analyzed for full-suite VOCs, including fuel oxygenates, ethanol, and naphthalene, using EPA Method 524.2. Provide the drinking water sampling results to the property owner and OCP case manager. The OCP will notify the selected property owner of this required sampling event.
- 5) Begin quarterly sampling of the granular activated carbon (GAC filtration system located at 1894 Conowingo Road. All samples must be collected after running the water for approximately 10 minutes to purge the piping and pre-, mid-, and post-filtration. The samples must be analyzed for full-suite VOCs, including fuel oxygenates, **ethanol**, and naphthalene, using EPA Method 524.2. Provide the drinking water sampling results to the property owner and the OCP case manager. The OCP will notify the selected property owners of this required sampling event.

Continue to work with the OCP's Compliance Division to ensure continued operational compliance at this facility. If you have compliance questions, please contact Mr. Michael Jester at 410-537-3024 (<u>michael.jester@maryland.gov</u>). If you have any questions regarding remediation, please contact Ms. Lindley Campbell at 410-537-3387 (<u>lindley.campbell1@maryland.gov</u>) or me at 410-537-3499 (susan.bull@maryland.gov).

Sincerely,

Susan R. Bull, Eastern Region Supervisor Remediation and State-Lead Division

Oil Control Program

cc: Mr. Greg Pelc, Senior Project Manager, Advanced Environmental Concepts, Inc.

Mr. Fred VonStaden, Director, Environmental Health Services, Cecil County Health Department

Ms. Lindley Campbell, Case Manager, Remediation and State-Lead Division, Oil Control Program

Mr. Michael Jester, Eastern Region Supervisor, Compliance Division, Oil Control Program

Mr. Andrew B. Miller, Chief, Remediation and State-Lead Division, Oil Control Program

Mr. Christopher H. Ralston, Program Manager, Oil Control Program

Ms. Kaley Laleker, Director, Land and Materials Administration