



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

April 28, 2021

Ms. Amanda Kistler
Sunoco LP/ Evergreen Resources Group, LLC
2 Righter Parkway, Suite 120
Wilmington, DE 19803

RE: APPROVAL OF MONITORING WELL INSTALLATION

Case No. 2021-0202-CE
Sunoco No. 0651-9128
355 Telegraph Road, Rising Sun
Cecil County, Maryland
Facility I.D. No. 2823

Dear Ms. Kistler:

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 *Half-Mile Well Survey*, dated March 4, 2021, and the *First Quarter 2021 High Risk Groundwater Use Area (HRGUA) Groundwater Monitoring Report*, dated March 12, 2021. This case was opened following receipt of the August 26, 2020 monitoring well data for the three on-site groundwater monitoring wells, which were installed pursuant to Code of Maryland Regulations (COMAR) 26.10.02.03-2. Currently, there are three monitoring wells and one transient non-community drinking water supply well on site.

The most recent sampling event was conducted in February 2021. The analytical results for the monitoring well samples collected continued to exhibit concentrations of the following petroleum constituents above MDE's groundwater standards:

- Benzene in monitoring wells MW-1 and MW-3 ranged from 11.6 to 90.5 parts per billion (ppb), which exceed the 5 ppb standard;
- Naphthalene in monitoring wells MW-2 and MW-3 ranged from 8.63 to 262 ppb, which exceed the 1.4 ppb standard;
- Methyl tertiary-butyl ether (MTBE) in monitoring well MW-3 at 26.2 ppb, which exceeds the 20 ppb standard; and
- Tertiary-butyl alcohol (TBA) in all three monitoring wells ranged from 84.3 to 1,010 ppb. Although there is no regulatory standard for TBA, it is a petroleum constituent reported at an elevated level.

The *Half-Mile Well Survey* proposes the installation of one sentry well to facilitate monitoring of dissolved petroleum hydrocarbon concentrations in the down-gradient direction. The proposed location for the sentry well is southwest of monitoring well MW-3, close to the southern property boundary.

Based on the available information reviewed for the case, MDE hereby approves installation of the additional monitoring well, contingent upon the following modifications:

- (1) Notify OCP at least five (5) working days prior to conducting any work at this site so we have an opportunity to observe field activities.
- (2) The proposed location appears to be close to the Telegraph Road right-of-way. If the proposed location is within the right-of-way, ensure all proper permissions are obtained prior to well installation. If installation in the right-of-way is not approved, shift the well location onto the Sunoco property, as necessary. Also ensure the monitoring well is not impacted by surface flow from the drainage swale.
- (3) Prior to monitoring well installation, soils must be continually logged and field-screened with a photo-ionization detector (PID) during advancement of the soil boring.
 - a. Soil samples for laboratory analysis must be collected from the boring at the soil/ groundwater interface and the interval exhibiting the highest PID response. If no PID response is observed or the highest PID response is observed at the soil/groundwater interface, only one sample will need to be collected.
 - b. All soil samples submitted for laboratory analysis must be collected and field preserved in accordance with EPA Method 5035.
 - c. All soil samples collected must be 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.
- (4) The new well must be developed using active surging in addition to pumping/purging. All installed wells must be surveyed into the existing monitoring well network and depicted on an updated site map.
- (5) **No less than 10 days after well development and quarterly thereafter (every 3 months),** collect a groundwater sample from the newly installed well. All samples submitted for laboratory analysis must be analyzed for full-suite VOCs using EPA Method 8260 and TPH-DRO and TPH-GRO using EPA Method 8015.
- (6) **Within 45 days of completing the approved installation activities,** submit a *Well Installation Report*. At a minimum, this *Report* must include well completion reports; detailed data summary tables; scaled site maps showing monitoring well locations; a discussion of supplemental sampling events including details on sampling procedures, analytical laboratory results and chain of custody; conclusions and recommendations; and soil and liquid disposal receipts. Reports must also include amended groundwater contour maps; site cross-section maps depicting significant site features; corrected groundwater flow; and dissolved concentration maps.

Ms. Amanda Kistler
Case No. 2021-0202-CE
Page - 3 -

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,

A handwritten signature in black ink, appearing to read "Susan Bull", written in a cursive style.

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

cc: Mr. Eric Shertzer, Regional Operations Manager, EnviroTrac Ltd.
Mr. Calvin Bonenberger, Town Administrator, Rising Sun
Mr. Ed Arellano, Director, Environmental Health Services, Cecil County Health Dept.
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