



September 9, 2020

Mr. Herbert M. Meade
Environmental Director
Carroll Motor Fuels
2700 Loch Raven Road
Baltimore, MD 21218

RE: REQUEST FOR ADDITIONAL INFORMATION
Case No. 1993-0197-HA
High's Store No. 34
2906 Churchville Road, Churchville
Harford County, Maryland
Facility I.D. No. 3851

Dear Mr. Meade:

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 *Second Quarter 2020 Report of Monitoring Well, Domestic Supply Well Sampling and Request for Reduced Sampling Requirements*, dated June 11, 2020. This case was opened in 1991 following the detection of benzene and 1,2-dichloroethane (1,2-DCA) in the on-site supply well. The current underground storage tank (UST) system consists of a 20,000-gallon compartmentalized gasohol UST installed in 1999. Currently, five on-site monitoring wells and two tank field monitoring pipes are sampled on a quarterly basis. The subject property and surrounding area are served by private drinking water supply wells. Granular activated carbon (GAC) filtration systems are present on site and at the 2907 Churchville Road property. The on-site supply well is sampled on a monthly basis and 2907 Churchville Road is sampled on a quarterly basis.

The *Request for Reduced Sampling Requirements* proposes reduced sampling of the on-site monitoring well network from quarterly to semi-annually and to reduce sampling of the on-site supply well from monthly to quarterly. The 2907 Churchville Road supply well and GAC filtration system is proposed to remain on a quarterly sampling schedule. Based on our review, sampling of the on-site GAC filtration system on a monthly basis was established by the former owner/operator of the UST system to ensure the safety of food service consumers and because breakthrough of contaminants was occurring. The standard state protocol is to conduct monthly sampling of the GAC filtration system for the first three months following system installation and then at a potentially reduced frequency, as appropriate, provided the owner/operator can ensure the protection of consumers and the GAC system is adequately treating the water to ensure petroleum constituents are not present in the effluent water stream.

Based on the current commercial land use and the available information reviewed for the case, OCP requires the following:

- 1) To enhance this review, present calculated Mann Kendall analysis for monitoring wells MW-2 and MW-7 and tank field monitoring pipes TF-1 and TF-2. This analysis must be conducted for benzene, toluene, ethylbenzene, and xylenes; methyl tertiary-butyl ether (MTBE); and tertiary-butyl alcohol (TBA). Mann Kendall analysis is not required for monitoring wells MW-1, MW-6, and MW-8 based on the non-detect nature of the time series sampling results.
- 2) Upon review of the required information, OCP will evaluate the status of the request for reduction in sampling frequency of the drinking water well and the monitoring well network.

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,



Susan Bull, Eastern Region Supervisor
Remediation Division
Oil Control Program

cc: Mr. Greg Beal, Advanced Environmental Concepts, Inc.
Mr. John Resline, Acting Director, Environmental Health Services, Harford County Health Dept.
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program