October 29, 2026

JBA Team,

The Maryland Department of the Environment (MDE) Oil Control Program (OCP) has completed its review of the [redacted] *Leak Detection Testing Work Plan V2.0* (received October 22, 2026) and the [redacted] *Fuel Line Investigation Conceptual Site Model (CSM)* (received October 23, 2026).

Based on our review and as noted in prior correspondence, OCP maintains significant concern regarding the proposal to test the system with fuel. However, OCP is willing to conditionally approve the October 2026 *Work Plan* subject to the following contingencies:

1. **Mandatory OCP Oversight:**
   OCP personnel must be on site to oversee all preparation of the [redacted] piping for testing. This includes, but is not limited to: pipeline fuel packing, fuel circulation, and removal of entrapped air; all testing and repair activities; training on the reconfigured Permanent Leak Detection System; and all subsurface work. Contact OCP as soon as possible, and at least three (3) business days in advance, to coordinate on-site oversight.

2. **Blackout Dates:**
   OCP will not be available for on-site oversight on **November 3, November 11, November 26, or November 27, 2026**. Any field activities conducted on these dates will not be accepted.

3. **Schedule & Segmentation:**
   No later than November 12, 2026, complete the approved testing procedures. Testing must proceed using the segmented pressure test protocols approved in OCP's September 11, 2026 *Work Plan Approval with Contingencies and Modifications* (attached) and the requirements outlined herein. All special conditions must be strictly observed. Each piping section must be tested individually; concurrent or simultaneous testing of multiple sections is prohibited.

4. [redacted] **Isolation:**
   The [redacted] must remain fully isolated during the testing of all pipeline sections.

5. **Testing Sequence:**
   The [redacted] must be tested in the following distinct segments prior to conducting the proposed full-system test excluding [redacted]
   - Supply pipeline between Pump House [redacted] and [redacted];
   - Supply pipeline between [redacted] and [redacted], with [redacted] isolated;
   - Supply pipeline between [redacted] and [redacted], including both Hydrant Lateral [redacted];
   - Return pipeline between [redacted] and Pump House [redacted];
   - Supply pipeline between the Pump House and the Aboveground Storage Tank (AST); and
   - Return pipeline between the Pump House and the AST.

6. **Failure and Evacuation Protocol:**
   If any pipeline section fails to meet testing criteria or a visible leak is detected, the failed segment must be immediately isolated and completely evacuated of liquid within 12 hours and all testing activities must be terminated immediately.

7. **Initial Pressure Limits:**
   The initial test pressure must not exceed 25 psi.

8. **Pressure Step Monitoring:**
   When incrementally increasing pipeline pressure, monitor the line for a minimum of 15 minutes after pressure stabilization and record the results at the end of each interval. Once stabilized at the final test pressure, the pipeline must be monitored across two distinct test periods of at least 15 minutes each. A final test at a reduced pressure must subsequently be conducted in accordance with the approved test method.

9. **Zero-Tolerance Leak Standard:**
   Minor weeps, seeps, or drips from the [redacted] constitute visible leaks and will be classified as test failures. OCP recommends having a Maryland-certified underground storage tank (UST) system technician on site to supervise necessary repairs so that testing may resume without delay. Conduct an approved tightness test following all repairs.

10. **Environmental Safeguards & Spill Response:**
    The facility must deploy enhanced environmental containment and response measures during all testing and purging operations. At a minimum, an operational vacuum truck and designated emergency spill response personnel must remain on site during and immediately following all testing procedures.

11. **Written Approval for Modifications:**
    OCP must review and approve any deviations or modifications from the proposed *Work Plan* in writing prior to field execution by JBA or its contractors.

12. **Submittal of Test Records:**
    Within 15 calendar days of completing tightness testing on the [redacted], compile and submit all comprehensive test records to MDE. Documentation must include, but is not limited to:
    - Commercial trade name and specifications of testing equipment;
    - Name and credentials of the testing company;
    - Name and Maryland certification credentials of the testing technician;
    - Specific test protocol utilized for each segment;
    - Raw and calculated test data;
    - Logged dates, start/end times, and duration of each test;
    - Identification of piping sections tested, including length, diameter, and volumetric capacity;
    - Stabilized and recorded test pressures;
    - Field observations and notes; and
    - Detailed inventory of all repairs completed prior to, during, or following testing.

    Following review of these records, MDE will determine whether the [redacted] may be returned to service in any capacity.

13. **Conceptual Site Model (CSM):**
    The CSM dated October 23, 2026, is accepted as submitted. OCP's formal written comments will follow under separate cover and must be incorporated into the next iteration of the CSM.

14. **Subsurface Investigation (SSI) Remobilization:**
    No later than November 27, 2026, remobilize field teams and complete the SSI, specifically targeting the [redacted] area. OCP approves the proposed boring locations provided on October 20, 2026 and confirms that the Phase 1 and Phase 2 boring protocols and special conditions remain in effect. OCP suggests confirming if any supplemental borings remain in the approved budget in the event boring economization is required.

15. **Contingent Investigation Plan:**
    If the [redacted] SSI does not identify petroleum contamination, JBA must submit an alternative investigation plan no later than November 27, 2026. The plan must establish a methodology for identifying the source of petroleum contamination observed in Piscataway Creek and locating the point of failure within the [redacted]. Include an enforceable schedule with specific milestones and completion targets, evaluation of options to repair or formally abandon [redacted], and investigative pathways for other potential sources.

Regulatory Notice:
This conditional approval to perform compliance testing on the [redacted] does **not** grant JBA authorization to operate, dispense, or circulate fuel within the system. MDE has advised against utilizing fuel to test a previously compromised pipeline section due to the risk of environmental degradation. JBA remains subject to potential enforcement action, including administrative penalties, for any additional discharge of a regulated substance into the environment.

The September 11, 2026 *Work Plan Approval with Contingencies and Modifications* letter is attached for reference.

Please direct questions or coordination requests to the Oil Control Program at (410) 537-3442.