



Maryland
Department of
the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary

July 18, 2023

Mr. Sean Phillips
Remediation Manager
Motiva Enterprises, LLC.
P.O. Box 4540
Houston TX 77210

RE: APPROVAL OF MONITORING/RECOVERY WELL CONVERSION
Case No. 2003-0695-MO
Former Shell Station No. 137675
15541 New Hampshire Avenue, Silver Spring
Montgomery County, Maryland
Facility I.D. No. 11245

Dear Mr. Phillips:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) has completed a review of the case file for the above-referenced property, including the *Discrete Zone Sampling and Pump Test Summary and Recommendations Report*, dated December 28, 2022, prepared by Sovereign Consulting, Inc. Beginning in February 2021, the off-site groundwater remediation system treated groundwater extracted from recovery wells RW-20, RW-22, and RW-27. In September 2021, the pump in RW-22 was temporarily turned off after a pumping test determined the average recharge rate was less than the designed treatment system pumping rate. The pump in RW-19 was reactivated and a Work Plan was submitted/approved for the purpose of redeveloping RW-22 and evaluating MW-12 as an alternate pumping well.

In May 2022, it was determined that redevelopment of recovery well RW-22 could not be completed due to damage to the well casing. The damage likely allowed soils/sediment to clog the well screen and account for the less-than-ideal pumping/recharge rates. In accordance with the *Work Plan Revision Approval* letter, monitoring well MW-12 was selected for possible modification into a recovery well. A groundwater recharge pumping test was conducted on MW-12 to determine the viability of conversion to a recovery well. The average drawdown rate of MW-12 when pumping at a rate of 0.2 gallons per minute (gpm) was reported as approximately 0.0057 gpm and the average recharge rate after pumping was shut down was reported as approximately 0.0649 gpm. To determine if a hydraulic connection between RW-22 and MW-12 existed, pumping of RW-22 was restarted and rapid drawdown in MW-12 was reported to be observed during RW-22 pumping.

Based on the evaluation of the groundwater data, your environmental consultant is proposing to modify the operation of the off-site groundwater treatment system by converting MW-12 into a recovery well (MW-12 would be renamed RW-12) and removing RW-22 from the groundwater treatment system.

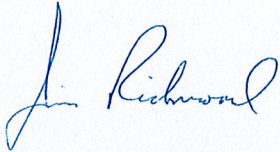
Based on our review of the case file and the information provided, OCP approves modification/operation of the off-site groundwater treatment system contingent upon the following:

- 1) Obtain all necessary permits to allow for the conversion of MW-12, to a groundwater recovery well with the new designation of RW-12. All work must be completed by a Maryland-licensed well driller. Any well development activities must include active surging in addition to pumping.
- 2) Properly abandon RW-22 under the direct supervision of a Maryland-licensed well driller in accordance with all applicable requirements of COMAR 26.04.04.34. Provide a copy of the well abandonment report to the Oil Control Program (Attn: Ms. Kathleen Thompson) and the Montgomery County Department of Permitting Services, Division of Zoning, Well & Septic, and Code Compliance (Attn: Ms. Heidi Benham) **no later than August 31, 2023.**
- 3) Continue monthly sampling of the offsite recovery wells RW-12, RW-19A, RW-20, RW-21, RW-23, and RW-27 as part of the remediation system maintenance. All samples will continue to be analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), MTBE, and fuel oxygenates. All treatment system samples will be analyzed for BTEX, naphthalene, MTBE/fuel oxygenates, and total petroleum hydrocarbons - diesel and gasoline range organics in accordance with NPDES discharge permit MDG919048.
- 4) Continue quarterly (every three months) sampling of monitoring wells 730BND, 730BNS, 750BND, MW-06D, MW-08D, MW-17S. Continue semi-annual sampling of wells: RW-03, MW-04, MW-05S, MW-06R, MW-08S, MW-11S, MW-13S, MW-14D; MW-15D; MW-16S; MW-16D; MW-17D; MW-17W, MW-18; MW-24S, MW-25D, MW-26S; MW-26D; 710 BNR; 711 BNR; 720 BNR; 721 BND; 721 BNR; 721 BNS, 730 BNR; 740 BNR; 750 BNS; and 750 BNR.
- 5) Continue semi-annual (every six months) sampling of the off-site potable supply wells for those residents that permit access. All samples collected from the off-site drinking water supply wells must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2.
- 6) **No later than 45 days following the completion of approved well conversion activities,** a report/summary letter will be submitted to the OCP detailing the conversion of MW-12 to recovery well RW-12. Include an update regarding those wells from which groundwater extraction is occurring, pumping rate, and corresponding sampling frequency. Continue submitting the Quarterly Status Reports documenting the groundwater sampling analytical results to the Oil Control Program, 1800 Washington Boulevard, Suite 620, Baltimore, Maryland 21230-1719 (Attn: Ms. Kathleen Thompson). When submitting sampling results, include data summary tables and scaled site maps showing actual sampling locations (i.e., monitoring well locations). Reports must also include all relevant supporting documentation presented in a professional format that allows OCP to clearly and efficiently review the report findings. Provide two hard copies of the Quarterly Status report and one digital copy on a labeled compact disc (CD) or via email.

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The MDE reserves the right to require additional site characterization, monitoring well installation, and/or remedial action as warranted by site conditions. Notify the case manager at least five (5) working days prior to conducting the approved site work. If you have any questions, please contact Ms. Kathleen Thompson at 410-537-3487 (kathleen.thompson1@maryland.gov), or me at 410-537-3337 (jim.richmond@maryland.gov.)

Sincerely,

A handwritten signature in blue ink that reads "Jim Richmond". The signature is written in a cursive style with a large initial "J" and "R".

Jim Richmond, Southern Region Supervisor
Remediation Division
Oil Control Program

cc: Mr. James Draper, Resident Agent
Ms. Natalie Percello, Project manager, Sovereign Consulting, Inc.
Mr. Steven Martin, Montgomery County Department of Environmental Protection
Ms. Kathleen Thompson, Case Manager, Remediation Division, Oil Control Program
Ms. Susan R. Bull, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program