

December 29, 2025

Maryland Department of the Environment
Oil Control Program
Attn: Brad Barzin, P.E.
1800 Washington Blvd. Suite 620
Baltimore, MD 21230-1719
Email: brad.barzin@maryland.gov

Subject: **Permanent Closure Site Assessment Work Plan
Piney Point Terminal
17877 Piney Point Road, Piney Point, Maryland 20674
MDE Oil Operations Permit No. 2019-OPT-3484**

Dear Mr. Barzin,

EnviroAnalytics Group, LLC (EAG) is pleased to submit this work plan to complete a Permanent Closure Site Assessment (**SA**) for the Piney Point Terminal (**Site**) located at the above referenced address on behalf of the owner, Piney Point LLC (**PP LLC**). The Site Location Map is provided as **Figure 1**, attached. This work plan describes the assessment work to be performed in order to determine whether evidence of potential spills, releases, and/or discharges is most likely to be present in the area of the former terminal's above ground storage tanks (**ASTs**) and associated fuel transfer piping. The Site is permanently closing all ASTs and removing the majority of the ASTs and all fuel transfer oil piping and delivery equipment associated with the referenced Oil Operations Permit issued by the Maryland Department of Environment's (**MDE's**) Oil Control Program.

The scope of the SA has been designed to satisfy the site assessment requirements for the requested Oil Operations Permit Permanent Closure Notification submitted to MDE on March 19, 2025. The investigation has been designed in accordance with COMAR 26.10.17.13D.1b and 26.10.18.12C.1b and includes the collection of soil samples within the footprint of the former ASTs, around the perimeter of the former ASTs, within the ASTs' secondary containment areas, immediately outside the ASTs' secondary containment areas, and at locations immediately adjacent to the underground (**UG**) fuel transfer pipelines (**pipelines**) that are to be removed.

Sampling Approach and Strategy

There are twenty-eight (28) historic ASTs associated with the Site. All ASTs and pipelines have been emptied and cleaned (or planned to be emptied and cleaned) prior to their demolition and removal. Twenty-three of the ASTs and all fuel transfer pipelines and delivery equipment are planned to be removed as part of the redevelopment of the Site. This demolition and removal work will be completed prior to implementation of the SA.

Figure 2, attached, depicts the tank farm investigation areas:

Area 1, located to the northwest, includes four historic tanks:

- Tank 50051,
- Tank 50052, tank to remain
- Tank 50053, tank to remain
- Tank 50054,

Area 2, located to the northeast, includes two historic tanks:

- Tank 27821,
- Tank 27822, tank to remain

Area 3, located to the southwest, includes fifteen historic tanks:

- Tank 5423,
- Tank 9607,
- Tank 9608,
- Tank 9609,
- Tank 9610,
- Tank 9611,
- Tank 9612,
- Tank 9614,
- Tank 9615,
- Tank 9616,
- Tank 9617,
- Tank 15001,
- Tank 15002,
- Tank 15013,
- Tank 15026,

Area 4, located to the southeast, includes seven historic tanks:

- Tank 9620,
- Tank 15003,
- Tank 15004,
- Tank 15005,
- Tank 15006,
- Tank 26818,
- Tank 26819,

In addition to investigating the historic tank locations, secondary containment, and nearby areas, there are also approximately 5,125 feet of UG pipeline onsite that are scheduled to be removed, and the pipeline corridor will be investigated, as well.

In the areas where the larger tanks were individually located within their own secondary containment area, there are a minimum of four borings per tank/containment area. In some of

the containment areas that contained multiple tanks, there's a minimum of one AST foundation boring and one boring in between each tank. There are currently seventy-six (76) AST and secondary containment borings planned, and their locations are presented as red dots on **Figure 3**, attached. Each boring is planned to be installed to an approximate depth of two (2) feet below ground surface (**ft bgs**) or 2 ft below any existing concrete pad at each location. For the UG pipeline, there are currently twenty-three (23) soil borings planned approximately every 250 linear feet of UG pipeline to be removed. Pipeline soil samples will be collected 2 ft below the bottom of the piping trench in natural undisturbed soils. Should field PID readings, visual inspections, and/or olfactory observations indicate the presence of petroleum impact at the samples from 2 ft bgs, additional/deeper soil samples may be collected.

Detailed findings from the work plan implementation will identify soils that may exceed analyte-specific exposure limits indicating whether special management, handling, and/or remedial efforts will be required in accordance with MDE regulations.

Sampling Procedures

The soil borings will be installed by a Maryland licensed driller. Soil samples will be collected in either an individual clean, disposable macrocore sleeve direct-push sleeves or via hand-auger.

The Unified Soil Classification System (**USCS**) will be used to visually classify soils, and photo documentation will be conducted for all sample cores. All samples will be visually classified and boring logs will be prepared for each location. All soil samples will be discretely measured for Volatile Organic Carbon (**VOC**) vapors with a photo ionization detector (**PID**) meter using a 10.6 eV lamp at the midpoint of the sample range (i.e., macrocore/sleeve) unless visual evidence indicates the potential presence of impact, in which case additional discrete PID readings will be collected. The PID meter will be calibrated daily, prior to each day's use. Calibration information will be documented in the field notes.

Each soil boring location will be backfilled with the soil removed from it following soil characterization and sample collection.

Boring locations will be surveyed using a handheld GPS unit. Should utilities be encountered or refusal met prior to achieving the desired sampling depths, the boring will be offset approximately five (5) feet from the original attempted location and will be guided by referencing historic utility and subgrade infrastructure maps. All attempted locations will be included on an as-built plan.

Laboratory Testing

Soil samples will be collected at each designated boring location in laboratory supplied bottles. Each sample container will be labeled, packaged, preserved on ice, and shipped/transported under industry standard chain-of-custody procedures to a Maryland licensed analytical laboratory.

Soils samples will be analyzed for the following chemical and physical constituents:

- VOCs via EPA Method 8260, inclusive of
 - Oxygenates and

-
- Naphthalene;
 - Total Petroleum Hydrocarbons – Diesel Range Organics (**TPH-DRO**) via Method 8015; and
 - TPH – Gasoline Range Organics (**TPH-GRO**) via Method 8015.

Reportable levels will be employed sufficient to meet MDE reportable concentration requirements. Trip blanks (one per cooler), equipment blanks (one per day), and duplicate samples (one duplicate for every 10 boring locations) will also be collected to aid in the assessment of data quality. The sample ID names will not indicate to the lab which samples are duplicates for which boring location in order to insure a lack of bias from the analytical laboratory.

Data Evaluation

Soil data obtained from this investigation will be utilized to determine whether any petroleum impacts exist in the subsurface near the historic ASTs and along the UG pipeline. If impacts are indicated, and per the MDE AST Permanent Closure Fact Sheet from June 2023, the Site will be further evaluated and the data used to develop appropriate remedial response actions necessary to remediate or mitigate any exceedance(s), if applicable, per MDE requirements.

An Oil Operations Permit Permanent Closure Report (**Closure Report**) will be prepared that includes the following documentation:

- A narrative of the work completed,
- A scaled site diagram identifying all boring locations with sample depths, including any failed attempt location with notes pertaining to the failed attempt;
- Analytical results and laboratory reports;
- Documentation verifying proper soil disposal of any generated waste materials
- A summary of findings and conclusions with recommendations;
- Any photographic documentation; and
- Any other pertinent documentation deemed appropriate to support the Closure Report.

This SA will be implemented upon completion of all demolition activities at the Site and upon approval by MDE. A schedule for the field work and Closure Report will be also prepared and submitted to MDE upon approval of the SA work plan.

Should the MDE have any questions or comments related to this work plan please do not hesitate to contact the undersigned.

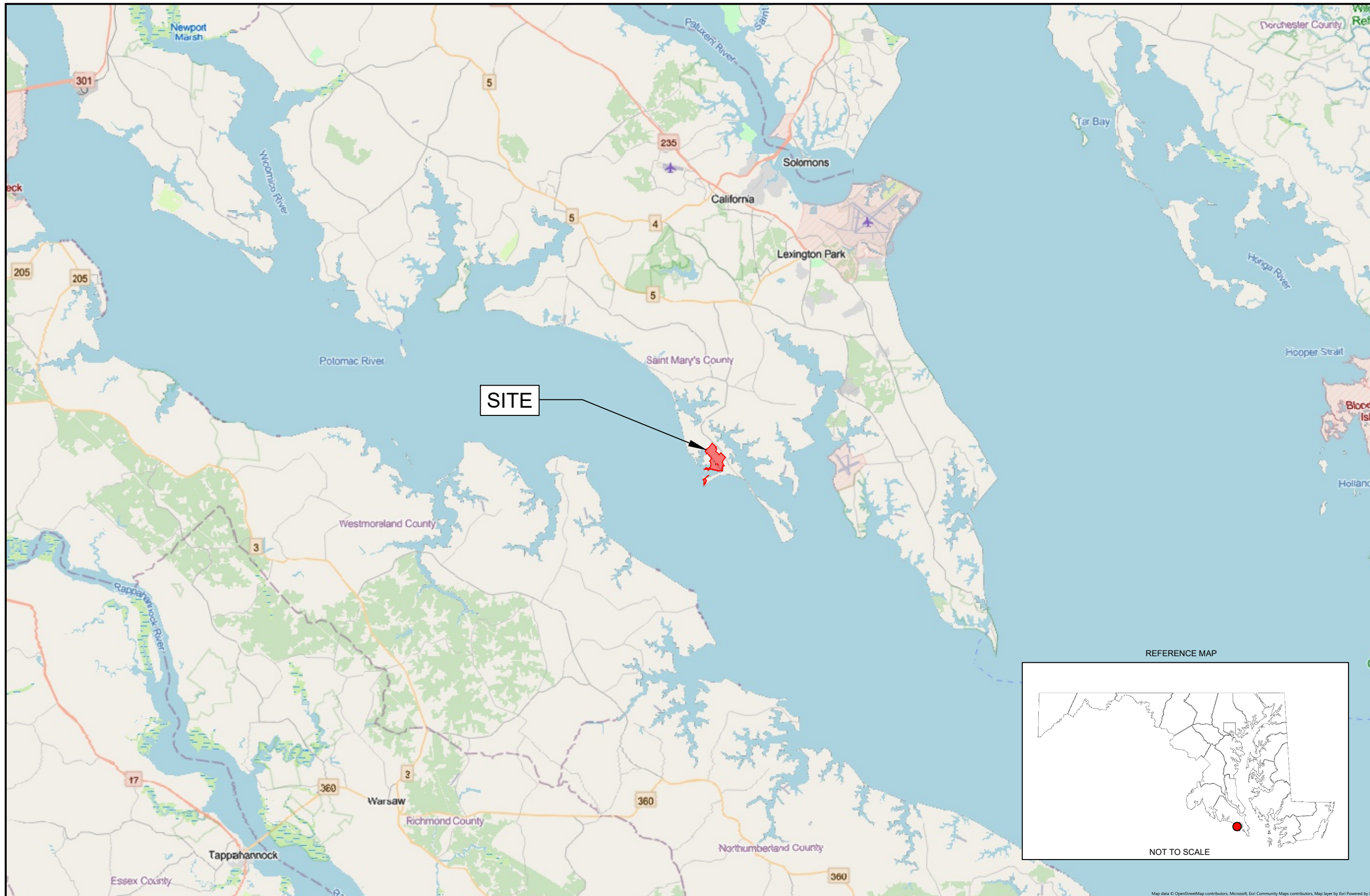
Sincerely,

James Calenda

James Calenda
EnviroAnalytics Group, LLC
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jcalenda@enviroanalyticsgroup.com

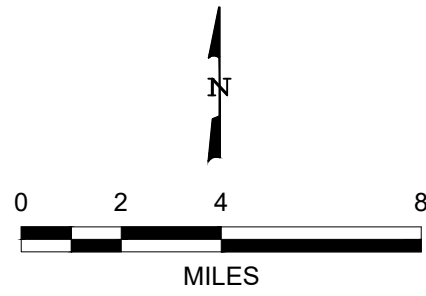
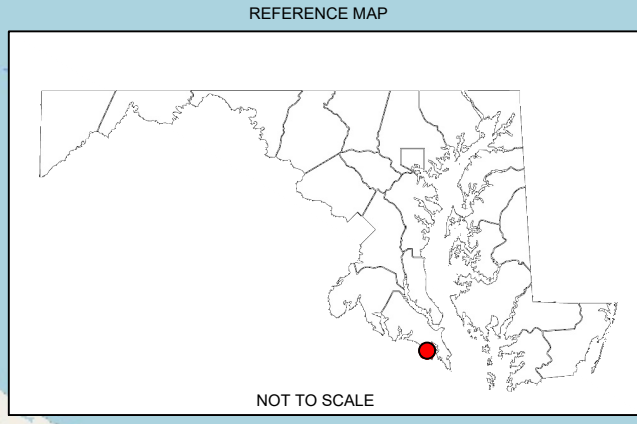
Enclosures: Figure 1 – Site Location Map
Figure 2 – Investigation Areas
Figure 3 – Proposed Boring Locations

FIGURES



LEGEND

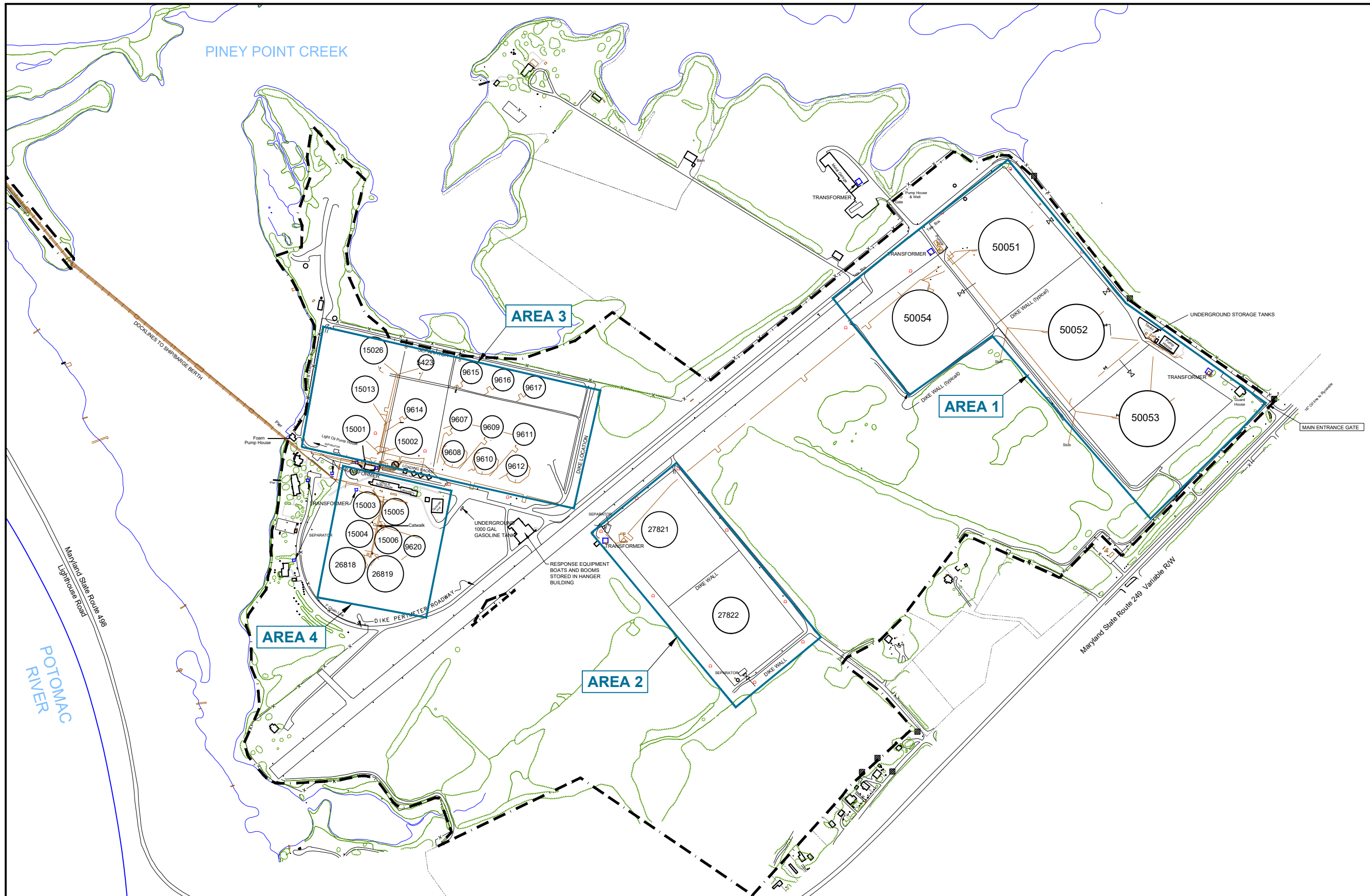
PROPERTY BOUNDARY



DRAWN BY: MN	REVISION NUMBER:	DATE OF REVISION:	BY:	DESCRIPTION:
APPROVED BY: JC	#1	NA	NA	NA
DATE: 12/23/2025	#2	NA	NA	NA
SCALE: AS SHOWN	#3	NA	NA	NA

SITE LOCATION MAP
PINEY POINT LLC
PINEY POINT, MARYLAND

PROJECT NUMBER: NA	SHEET NUMBER: 1 OF 1
DRAWING DATE: 12/23/2025	FIGURE NUMBER: 1



LEGEND

- TANK
- HYDRANT
- TRANSFORMER
- INVESTIGATION AREAS
- SHORELINE
- TREE
- | FENCE
- ABOVE GROUND PIPING
- PROPERTY BOUNDARY





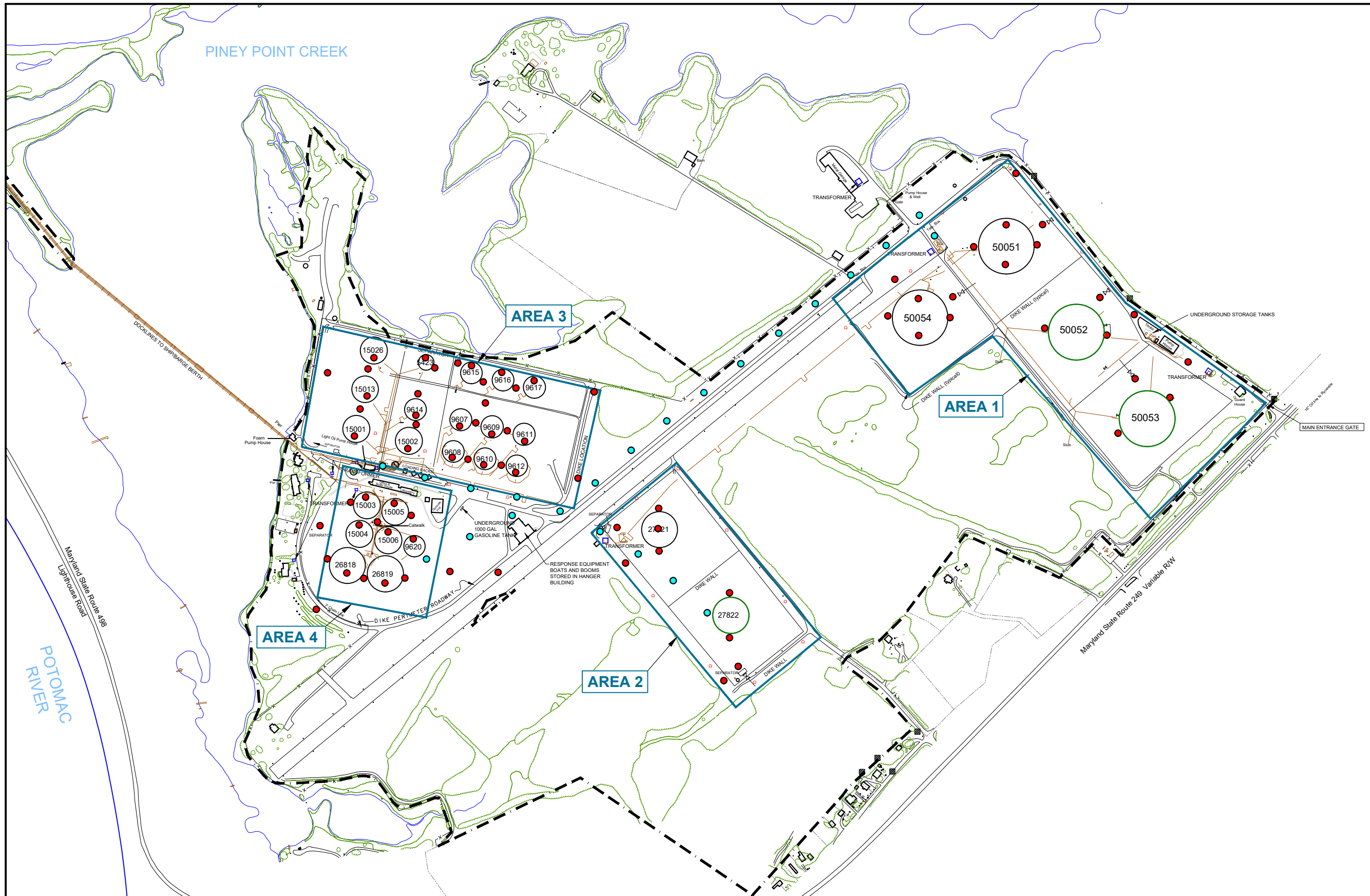
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DRAWN BY: MN	REVISION NUMBER:	DATE OF REVISION:	BY:	DESCRIPTION:
APPROVED BY: JC	#1	NA	NA	NA
DATE: 12/23/2025	#2	NA	NA	NA
SCALE: AS SHOWN	#3	NA	NA	NA

INVESTIGATION AREAS
PINEY POINT LLC
PINEY POINT, MARYLAND

PROJECT NUMBER: NA	SHEET NUMBER: 1 OF 1
DRAWING DATE: 12/23/2025	FIGURE NUMBER: 2



LEGEND

- PROPOSED SAMPLE LOCATION - UNDERGROUND PIPELINE
- PROPOSED SAMPLE LOCATION - AST AND SECONDARY CONTAINMENT
- AST TO REMAIN
- TANK
- HYDRANT
- TRANSFORMER
- INVESTIGATION AREAS
- SHORELINE
- TREE
- x— FENCE
- ABOVE GROUND PIPING
- - - PROPERTY BOUNDARY







DRAWN BY: MN	REVISION NUMBER:	DATE OF REVISION:	BY:	DESCRIPTION:
APPROVED BY: JC	#1	NA	NA	NA
DATE: 12/23/2025	#2	NA	NA	NA
SCALE: AS SHOWN	#3	NA	NA	NA

PROPOSED BORING LOCATIONS
PINEY POINT LLC
PINEY POINT, MARYLAND

PROJECT NUMBER: NA	SHEET NUMBER: 1 OF 1
DRAWING DATE: 12/23/2025	FIGURE NUMBER: 3