July 29, 2026

Mr. Russell Becker
EnviroAnalytics Group, LLC
1515 Des Peres Road, Suite 300
St. Louis, MO 63131

Mr. Robert Hicks
Offshore Aviation, LLC
45353 St. Georges Avenue
Piney Point, MD 20674

RE: WORK PLAN APPROVAL WITH MODIFICATIONS
Case No. 2026-0311-SM
Piney Point, LLC
17877 Piney Point Road, Piney Point
St. Mary's County, Maryland
Facility ID 7673
Oil Operations Permit No. 2019-OPT-3484

Dear Mr. Becker and Mr. Hicks:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above reference site including the *Permanent Closure Site Assessment Work Plan Rev1*, submitted by EnviroAnalytics Group, LLC on behalf of the former aboveground storage tank (AST) owner, operator and permittee, Piney Point, LLC. The revised *Work Plan* outlines the proposal to complete a soil sampling site assessment in conjunction with the closure of 28 field-erected and 10 shop-fabricated aboveground storage tank (AST) systems, all associated piping, and ancillary equipment.

Demolition of the field-erected AST systems is scheduled to begin on August 3, 2026, and is estimated to be completed within six months. Six shop-fabricated AST systems will continue to be used for petroleum storage by the current property owner, Offshore Aviation, LLC, and will not be permanently closed or assessed as part of this *Work Plan*.

Based on our review of the *Permanent Closure Site Assessment Work Plan Rev1*, dated July 1, 2026, OCP approves the revised *Work Plan* with the following comments and modifications:

1) All ASTs and associated piping and ancillary systems scheduled for demolition and removal must be properly emptied **and** cleaned prior to beginning demolition and removal. Receipts documenting the proper disposal of all petroleum and petroleum-impacted materials are required to be submitted in the closure assessment report.

2) **No later than August 31, 2026 after the removal of the AST systems,** implement the approved *Permanent Closure Site Assessment Work Plan Rev1* with modifications. All sitework must be completed in accordance with Code of Maryland Regulations (COMAR) 26.10.17.13 and 26.10.10.02D. All work involving underground components (i.e., piping, etc.) must be completed in the continuous on-site presence of a Maryland-certified underground storage tank remover or technician.

3) Notify the OCP case manager a minimum of ten (10) working days prior to beginning the AST closure assessments so OCP can be on site to observe field activities. Soil sampling locations may be field modified as necessary to avoid damaging underground utilities. Ensure all required permits are obtained prior to initiating work plan activities.

4) As warranted by site conditions, the OCP reserves the right to require additional investigation to further assess the potential for petroleum impacts. The property owner and EnviroAnalytics Group, LLC must be prepared to collect additional soil samples as directed by OCP.

5) All borings must be completed to a target depth of at least two feet below the ground surface (bgs) near the ASTs and two feet below the product conveyance piping in natural, undisturbed soils in the locations proposed on the enclosed figure.

   a. Soils must be field screened with a photo-ionization detector (PID) with depth. If elevated PID responses are observed at the target depth, the boring must continue until PID responses decrease. Field screening of soil must be performed utilizing a consistent methodology that will not be adversely affected by site conditions. The use of glass jars or sealable plastic bags to store a portion of the sample material for screening purposes is recommended.
   b. Soil samples for laboratory analysis must be collected from each location at the interval exhibiting the highest PID response **and** at the terminal depth. If no PID response is documented, only one soil sample is required at the terminal depth. All soil samples submitted for laboratory analysis must be collected and field-preserved in accordance with EPA Method 5035.
   c. All soil samples must be analyzed in accordance with enclosed Tables 1 through 4.

6) A sample must be collected from the on-site potable well, prior to any treatment, and analyzed for full suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 524.2.

7) **By no later than August 10, 2026 or at least 60 days prior to placing the AST systems into service**, Offshore Aviation, LLC must submit an individual oil operations permit application, which includes General Form and Forms A, E, F, and G, along with all supporting documents. This submission must include a complete inventory of the product stored in each AST system to remain on site. The application forms can be found at the link below:

https://mde.maryland.gov/programs/land/Pages/landpermits.aspx#OCP

8) The ASTs approved to be abandoned or to remain on-site are identified on the enclosed tables 1 through 4. If the current or future property owner elects to decommission any additional AST systems at this site, OCP will require further assessment of the subsurface conditions in and around the ASTs and system components in accordance with the attached Fact Sheet and COMAR 26.10.17.13D and 26.10.18.12C.

9) All registered underground storage tank (UST) systems for facility 7673 have been permanently closed. Any unregistered UST systems encountered during site work must be properly closed in accordance with COMAR 26.10.10.

10) If measurable LPH are detected during assessment activities, its presence must be reported within 2 hours of discovery by calling OCP Baltimore Headquarters at 410-537-3442 during standard business hours or the Emergency Response Division hotline at 1-866-633-4686. Reports should not be made by voice mail to OCP case managers.

11) **Within 45 days of completing the AST closure assessment**, OCP requires a comprehensive report documenting the closure activities. The report must include, at a minimum: a narrative of the AST closures and site assessment activities; a scaled site map depicting the ASTs and dispenser locations; soil sample locations/depths; PID responses; laboratory analytical results; and any photographic documentation. Include receipts to document the disposal of the residual liquids and other waste materials that may have been generated as part of the AST closure activities.

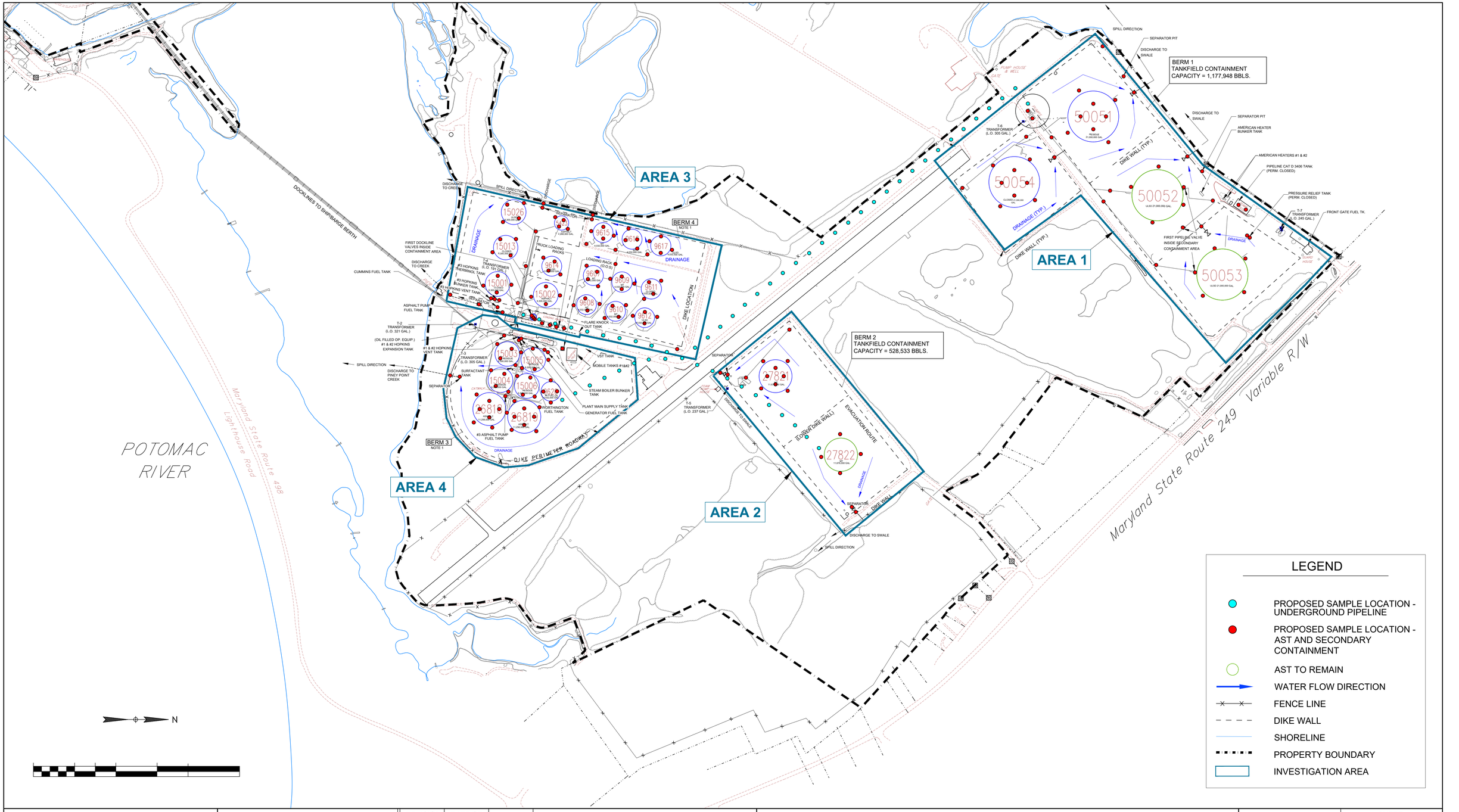
If you have any questions, please contact OCP Case Manager, Mr. Christopher King, at 410-537-4152 (christopherj.king@maryland.gov) or me at 410-537-3337 or (jim.richmond@maryland.gov.)

Sincerely,

Jim Richmond, Western Region Supervisor
Remediation Division
Oil Control Program

Enclosures: Figure 3 - Proposed Boring Locations
Tables 1, 2, 3, 4 - AST Systems listed under Individual Oil Operations Permit 2019-OPT-3484
Fact Sheet - Permanent Closure of Aboveground Storage Tank Systems

cc: Mr. James Calenda, EnviroAnalytics Group, LLC
Mr. Joe Fischinger, CFO and General Counsel, Offshore Aviation Group
Ms. Heather Moritz, Director, Bureau of Environmental Health, St. Mary's County Health Dept.
Melanie Barney, Esquire, Assistant Attorney, Office of the Attorney General
Mr. Juraj Masiar, Engineer, AST and Permits Division, Oil Control Program
Mr. Christopher King, Case Manager, Remediation Division, Oil Control Program
Ms. Susan R. Bull, Chief, Remediation Division, Oil Control Program
Mr. Arno Laud, Program Manager, Oil Control Program



EnviroAnalytics Group

	REVISION NUMBER:	DATE OF REVISION:	BY:	DESCRIPTION:
	#1	NA	NA	NA
	#2	NA	NA	NA
	#3	NA	NA	NA

PROPOSED BORING LOCATIONS

PINEY POINT LLC
PINEY POINT, MARYLAND

PROJECT NUMBER:	SHEET NUMBER:
NA	1 OF 1
DRAWING DATE:	FIGURE NUMBER:
05/27/2026	3

Piney Point, LLC

Table 1 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Field-Erected AST Systems						
Permit ID #	**Size (gallons)**	**AST Location**	**Product**	**Analytical Method** (see Codes below)	**# Footprint Samples**	**# Perimeter Samples**
5423	2,268,000	Area 3	Asphalt	1,2,3,4,5	2	2
9607	4,032,000	Area 3	Diesel	1,2,3	2	2
9608	4,032,000	Area 3	Jet Fuel	1,2,3	2	2
9609	4,032,000	Area 3	Diesel	1,2,3	2	2
9610	4,032,000	Area 3	Jet Fuel	1,2,3	2	2
9611	4,032,000	Area 3	Diesel	1,2,3	2	2
9612	4,032,000	Area 3	Diesel	1,2,3	2	2
9614	4,032,000	Area 3	Jet Fuel	1,2,3	2	2
9615	4,032,000	Area 3	Diesel	1,2,3	2	2
9616	4,032,000	Area 3	Diesel	1,2,3	2	2
9617	4,032,000	Area 3	Jet Fuel	1,2,3	2	2
9620	4,032,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	2
15001	6,300,000	Area 3	Asphalt	1,2,3,4,5	2	2
15002	6,300,000	Area 3	No. 6 Fuel	1,2,3,4,5	2	2
15003	6,300,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	2
15004	6,300,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	2
15005	6,300,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	2
15006	6,300,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	2
15013	6,300,000	Area 3	Asphalt	1,2,3,4,5	2	2
15026	6,300,000	Area 3	Diesel	1,2,3	2	2
26818	11,256,000	Area 4	Asphalt	1,2,3,4,5	4	4
26819	11,256,000	Area 4	Asphalt	1,2,3,4,5	4	4
27821	11,676,000	Area 2	Diesel	1,2,3	4	4
27822	11,256,000	Area 2	Jet Fuel	1,2,3		4
50051	21,000,000	Area 1	No. 6 Fuel	1,2,3,4,5	4	4
50052	21,000,000	Area 1	Diesel	1,2,3		4
50053	21,000,000	Area 1	Diesel	1,2,3		4
50054	21,000,000	Area 1	Jet Fuel	1,2,3	4	4

Highlighted to remain, but out of service

Piney Point, LLC

Table 2 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Shop-Fabricated AST Systems						
Permit ID #	**Size (gallons)**	**AST Location**	**Product**	**Analytical Method** (see Codes below)	**# Footprint Samples**	**# Perimeter Samples**
#3 Hopkins Vent	1,000	Area 3	Therminol [mineral oil]	1,2,3	1	
#3 Hopkins Bunker	20,000	Area 3	No. 6 Fuel	1,2,3,4,5	2	
#3 Hopkins Therminol	4,000	Area 3	Therminol [mineral oil]	1,2,3	1	
Asphalt Pump Fuel	1,000	Area 3	No. 2 Heating Oil	1,2,3	1	
#1&#2 Hopkins Vent	2,000	Area 4	Therminol [mineral oil]	1,2,3	1	
Worthington Fuel	275	Area 4	No. 2 Heating Oil	1,2,3	1	
Generator Fuel	275	Area 4	No. 2 Heating Oil	1,2,3	1	
Plant main supply fuel	2,000	Area 4	Diesel			
American Heater Bunker	20,000	Area 1	Diesel			
Front Gate Fuel	275	Area 1	No. 2 Heating Oil			
#3 Asphalt Pump	550	Area 4	Diesel	1,2,3	1	
VST	1,500	Area 4	Gasoline			
Steam Boiler Bunker	20,000	Area 4	No. 6 Fuel	1,2,3,4,5	2	
Cummins Fuel	550	South of Area 3	Diesel			
Pipeline Cat D346	2,000	Area 1	Diesel			
Pipeline Pressure Relief	12,000	Area 1	No. 4 Oil	1,2,3,4,5	2	

Highlighted to remain and stay in service

Piney Point, LLC

Table 3 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Petroleum Containing Infrastructure				
Type	**Location**	**Analytical Method** (see Codes below)	**# Samples**	**Comments**
Containment Berm Outfall	Area 1	1,2,3	4	One sample at each outfall location
Oil/Water Separator	Area 1	1,2,3	2	One sample at each location
Pipeline - Above Ground	Area 1	1,2,3	7	One sample every 500 LF
Pipeline Valve	Area 1	1,2,3	3	One sample at each location
Pump House	Area 1	1,2,3	4	Two samples within footprint at each location

Piney Point, LLC

Table 3 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Petroleum Containing Infrastructure				
Type	**Location**	**Analytical Method** (see Codes below)	**# Samples**	**Comments**
Containment Berm Outfall	Area 2	1,2,3	2	One sample at each outfall location
Oil/Water Separator	Area 2	1,2,3	2	One sample at each location
Pipeline - Above Ground	Area 2	1,2,3	2	One sample every 500 LF
Pipeline - Underground	Area 2	1,2,3	8	One sample every 100 LF

Piney Point, LLC

Table 3 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Petroleum Containing Infrastructure				
Type	**Location**	**Analytical Method** (see Codes below)	**# Samples**	**Comments**
Containment Berm Outfall	Area 3	1,2,3	3	Three samples at each outfall location
Loading Rack	Area 3	1,2,3	4	One sample at each location
Oil/Water Separator	Area 3	1,2,3	3	One sample at each location
Pipeline - Above Ground	Area 3	1,2,3	7	One sample every 500 LF
Pipeline - Underground	Area 3	1,2,3	4	One sample every 100 LF
Pipeline Valve	Area 3	1,2,3	4	One sample at each location

Piney Point, LLC

Table 3 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Petroleum Containing Infrastructure				
Type	**Location**	**Analytical Method** (see Codes below)	**# Samples**	**Comments**
Containment Berm Outfall	Area 4	1,2,3	1	One sample at each outfall location
Loading Rack	Area 4	1,2,3	1	One sample at each location
Oil/Water Separator	Area 4	1,2,3	1	One sample at each location
Pipeline - Above Ground	Area 4	1,2,3	2	One sample every 500 LF
Pipeline - Underground	Area 4	1,2,3	2	One sample every 100 LF

Piney Point, LLC

Table 3 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Petroleum Containing Infrastructure				
Type	**Location**	**Analytical Method** (see Codes below)	**# Samples**	**Comments**
Pipeline - Underground	Outside Area 1-4	1,2,3	41	One sample every 100 LF

Piney Point, LLC

Table 4 - AST Systems under Individual Oil Operations Permit 2019-OPT-3484

Codes for Sampling Analytical Methods

1. EPA Method 8260 (Analyze for full suite volatile organic compounds, including fuel oxygenates and naphthalene)

2. EPA Method 8015B for Total Petroleum Hydrocarbons - Diesel Range Organics (TPH-DRO)

3. EPA Method 8015B for Total Petroleum Hydrocarbons - Gasoline Range Organics (TPH-GRO)

4. EPA Method 8015B for Total Petroleum Hydrocarbons - Oil Range Organics (TPH-ORO)

5. EPA Method 8270 for Semi-Volatile Organic Compounds (SVOCs)

Maryland Department of the Environment

Permanent Closure of Aboveground Storage Tank Systems

What You Need to Know

The purpose of this fact sheet is to provide guidance to oil storage facility owners, operators, and/or environmental professionals regarding the requirements for the proper closure of shop-fabricated aboveground storage tank (AST) systems in accordance with the Code of Maryland Regulations (COMAR) 26.10.17.13 and Petroleum Equipment Institute (PEI) RP 1700 "*Recommended Practices for the Closure of Underground Storage Tank and Shop-Fabricated Aboveground Storage Tank Systems*", and for the proper closure of field-erected AST systems in accordance with the COMAR 26.10.18.12.

Applicability

Who must comply with the AST closure regulations and guidance?

- An owner, an operator, and a person in charge of an AST system with a shop-fabricated AST that is required under COMAR 26.10.01.10 to be registered (including those covered by an Individual Oil Operations Permit).
- An owner, an operator, and a person in charge of an AST system with a field-erected AST.
- These requirements do not apply to residential heating oil AST systems at a single-family residence. Residential heating oil tank must be closed in accordance with PEI RP 1700; however, this task is addressed by another fact sheet.

AST System Permanent Closure Process

I have an AST system at my property. I do not use this AST system and want to permanently remove it from the property. What must I do to properly close or remove this AST system?

- **Evidence of a spill, release, or discharge discovered during the AST closure activities must be reported to MDE immediately, but not later than 2 hours, following discovery. Call (410) 537-3442 during work hours or 1-866-633-4686 after normal business hours.**
- **30 Days Prior to Beginning Closure Activities**
  - Notification – Notify the Oil Control Program (OCP) AST and Permits Section in writing of the pending closure.
  - Coordinate with appropriate local authorities to obtain any required permits.

- Sampling Plan – Provide the OCP Remediation Division with a proposed sampling plan to determine if there is evidence of a spill, release, or discharge where contamination is most likely to be present.
  - At a minimum, the plan must describe the assessment work to be performed and include a scaled site diagram showing the proposed subsurface soil sampling in the following required locations:
    - Within and immediately outside the secondary containment dike, if present;
    - Within the footprint of the removed AST, including underneath and around the perimeter of a concrete pad if present; and
    - Beneath underground piping (including any dispensers to be removed) associated with the AST.
  - The number of samples required will be dependent upon the dimensions of the AST footprint, length of underground piping, number of dispensers, and the presence or absence of secondary containment.
  - All soil samples must be collected a minimum of 2 feet below the ground surface and/or an existing concrete pad, and 2 feet below the bottom of the piping trench in natural undisturbed soils.
  - All soil samples must be analyzed for:
    - Full suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260,
    - Total petroleum hydrocarbons – diesel and gasoline range organics (TPH-DRO and TPH-GRO), using EPA Method 8015, and
    - Additional analyses may be required based on the type of oil the system stored.
  - Provide detailed to-scale site maps and diagrams annotating the AST system, associated piping, secondary containment, and other vital site characteristics. All proposed sampling locations should be clearly marked on the site diagram/map. If advance inspection of the site revealed any evidence of a previous petroleum release, this should be documented on the site plan.

Maryland Department of the Environment

Permanent Closure of Aboveground Storage Tank Systems

What You Need to Know

- **AST System Closure Activities**
  - OCP recommends hiring a contractor that has experience working with flammable and combustible liquids and dismantling ASTs (when necessary).
  - **Any work involving underground piping must be completed in the continuous on-site presence of a certified UST system technician or remover and in accordance with the UST Closure procedures in COMAR 26.10.10.02D**. A list of companies that employ MDE certified UST system technicians and removers can be found on the OCP Fact Sheets, Publications, and Reports webpage.
  - Taking the AST System Out-of-Service – If the AST system to be closed is a shop-fabricated AST, then the closure must be completed in accordance with PEI RP 1700.
    - Remove all oil from the AST system;
    - Isolate all piping connected to the AST;
    - Remove all waste materials from the AST system, including storage tank-bottom sludge, and dispose of these materials in compliance with applicable federal, State, and local laws; and
    - Purge all petroleum vapors and maintain the AST system vapor free.
    - Remove all aboveground and underground piping associated with the AST system.
      - Any portions of the AST system that are to remain in place must be properly cleaned and abandoned or put back into service in accordance with applicable COMAR regulations.
    - Remove the AST and associated piping from the site.
- **Sampling Activities**
  - OCP recognizes that removal of the AST system may be necessary prior to the implementation of the approved sampling plan, coordinate these activities with OCP personnel in advance. When removing the AST system, any petroleum-impacted soil encountered must be excavated to the extent practicable for proper off-site disposal.

- Upon receiving written approval, implement the sampling plan**. OCP personnel must be on-site during the completion of the sampling plan.** OCP reserves the right to require additional soil samples and/or waive sampling locations based on observed site conditions / analytical data.
- **Within 30 days** of completing the permanent closure, including the approved site assessment, provide the OCP AST and Permits Section with written notification amending the facility's AST registration and/or the Individual Oil Operations Permit.
- **Within 45 days** of completing the permanent AST closure, including the approved site assessment, provide the OCP Remediation Division with an AST Closure Report that includes a narrative of the work completed, a scaled site diagram showing the sampling locations / depths, analytical results and laboratory reports, documentation verifying proper disposal of generated waste materials (e.g. tank, piping, liquids, soils), a summary of findings / conclusions / recommendations, and any photographic documentation.
- OCP will review the documentation and notify the owner/ operator of additional requirements.

Underground Piping Associated with an AST System

I have an AST system, that has underground piping. I want to close or remove only this piping, what must I do? Can I permanently abandon this piping in the ground? Can I purge the lines and leave them in place?

- All underground piping associated with an AST system must be properly removed and assessed under the guidance of a Maryland-certified UST system remover or technician.
- At minimum, the OCP recommends collection of soil samples every 20 feet of underground piping installed. Additional soil samples should be collected at any location where elevated photoionization detector (PID) response indicates a release of petroleum and/or petroleum impacted soils are required to be removed. These locations may include underneath product dispensers, corrosion perforations, piping unions, or piping elbows.
- All soil samples must be analyzed for:
  - Full suite VOCs, including fuel oxygenates and naphthalene by EPA Method 8260,

  - TPH-DRO and TPH-GRO by EPA Method 8015, and
  - Additional analyses may be required based on the type of oil the system stored.

- If it is determined that the underground piping cannot be removed, and closure in place is necessary, OCP will require:
  - A letter from a professional engineer (PE) that states justifications on why the piping cannot safely be removed, or removal is not possible, and
  - A *Piping Assessment Work Plan* for the collection /and analysis of the assessment soil samples as required above and the methods proposed for properly cleaning and closing the piping in place. This work plan must be reviewed and approved by the OCP Remediation Division.
  - Once received, conduct the approved Work Plan activities in the presence of OCP personnel.
- **Within 30 days** of completing the permanent piping closure (removal or approved closure in-place), including the approved piping assessment, provide the OCP AST and Permits Section with written notification amending the facility's AST registration and/or the Individual Oil Operations Permit.
- **Within 45 days** of completing the permanent piping closure, including the approved piping assessment, provide the OCP Remediation Division with a Piping Closure Assessment Report that includes a narrative of the work completed, a scaled site diagram showing the sampling locations and depths, analytical results and laboratory reports, documentation verifying proper disposal of generated waste materials (e.g. tank, piping, liquids, soils), a summary of findings, conclusions and recommendations, and any photographic documentation.
- OCP will review the documentation and notify the owner/operator of additional requirements.

What is the approved fill material for proper piping abandonment?

- The approved fill material is a flowable concrete slurry that will function to completely fill the piping and eliminate all void space.

Maryland
Department of
the Environment

Permanent Closure of Aboveground Storage Tank Systems

What You Need to Know

Questions

If you have additional questions, regarding removal of an AST system, underground piping, or sampling questions, please contact the Oil Control Program at 410-537-3442 or (800) 633-6101 x3442.

To report a spill, release, or discharge call 1-866-633-4686. Available 24 hours a day.

Limitations

This fact sheet is provided for informational purposes. This document is not intended, nor should it be interpreted to be a regulation, as defined in Section 10-101, State Government Article. The MDE encourages you to read and understand the regulations that govern the operation of underground storage systems found in Code of Maryland Regulations 26.10 “Oil Pollution Control and Storage Tank Management.”