

Larry Hogan, Governor Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

June 4, 2019

Mr. Herbert M. Meade Environmental, Health and Safety Director Carroll Independent Fuel Company 2700 Loch Raven Road Baltimore, Maryland 21218

RE: MODIFICATIONS TO RESIDENTIAL SAMPLING PROGRAM AND POET SYSTEM DISCONTINUATION APPROVAL

Case No. 2006-0319-BA Former Citgo/ Carroll Wally's 19200 Middletown Road Baltimore County, Maryland Facility I.D. No. 4593

Dear Mr. Meade:

The Maryland Department of the Environment's (MDE) Oil Control Program completed a review of the case file for the above-referenced property, including the *Post-Remediation Evaluation Report*, dated Oct. 1, 2018, and the *First Quarter 2019 Monitoring Report*, dated Apr. 25, 2019. On Jan. 16, 2019, the Oil Control Program issued a *Site Status and Modifications to Residential Sampling Program* letter requiring additional sampling of the drinking water supply wells at 19119, 19124, 19201, and 19222 Middletown Road and 1614, 1616, 1620, 1624, and 1717 Rayville Road; and an additional quarter of sampling of the point-of-entry treatment (POET) system at 1612 Rayville Road. These requirements were in response to Carroll Independent Fuel Company's (CIFC) request to eliminate quarterly sampling at the 9 subject properties and to no longer be responsible for operation of the POET system at 1612 Rayville Road.

The reviewed documents included analytical results from the required sampling event at the 9 properties in Feb. 2019. The recent sampling event reported methyl tertiary-butyl ether (MTBE) at concentrations ranging from non-detect for all analyzed compounds or below the laboratory reporting limit of 0.5 parts per billion (ppb). The sampling results are consistent with recent data trends for all properties, which indicate sustained MTBE concentrations below the state action level of 20 ppb. Based on the current data and groundwater quality trends in all supply wells, the Oil Control Program no longer requires CIFC to maintain a groundwater sampling program at the 9 subject properties. Through separate correspondence, the Oil Control Program will communicate the modification of sampling requirements to the respective homeowners.

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The reviewed documents also included analytical results from the required additional quarterly sampling event conducted in Feb. 2019 of the POET system at 1612 Rayville Road. Results from sampling events reported and estimated pre-filtration MTBE concentrations of 0.4 ppb. The sampling results are consistent with recent data trends, which indicate sustained reductions in MTBE concentrations below the state action level of 20 ppb.

Based on the groundwater quality trends in the drinking water supply well, MDE no longer requires CIFC to maintain the POET system at 1612 Rayville Road. CIFC must provide the current homeowner the option of retaining the POET system and assuming responsibility for its operation and maintenance or having CIFC remove the POET system at no cost to the homeowner. Through separate correspondence, MDE will communicate the modification of POET system requirements to the homeowner.

CIFC will continue to sample the drinking water supply well at 1612 Rayville Road on a quarterly basis until MDE determines it is no longer required. In addition, pursuant to the Jan. 16, 2019 letter, the following sampling must continue as stipulated below:

- 1) Continue sampling the 3 on-site drinking water supply wells (PW-01, PW-02, and PW-03) at 19200 Middletown Road on a bi-annual (twice per year) basis. All samples collected must be analyzed for the approved *Target List of Compounds*, including fuel oxygenates, in accordance with EPA Method 524.2.
- 2) Continue quarterly sampling of the off-site private drinking water supply well equipped with a POET filtration system at 1606 Rayville Road. All samples collected (pre-, mid-, and post-filtration) must be analyzed for the approved *Target List of Compounds*, including fuel oxygenates, in accordance with EPA Method 524.2.
- 3) Continue to submit groundwater monitoring reports as required in the *Administrative Consent Order*.

If you have any questions, please contact Ms. Ellen Jackson at 410-537-3482 or <u>ellen.jackson@maryland.gov</u>, or me at 410-537-3443 or <u>andrew.miller@maryland.gov</u>.

Sincerely,

Andrew B. Miller, Chief

Remediation and State-Lead Division

Oil Control Program

cc: Mr. Peter Reichardt, Groundwater and Environmental Services, Inc.

Mr. Kevin Koepenick, Manager, Groundwater Management Section, Baltimore County DEPS Matthew Zimmerman, Esquire, MDE Office of the Attorney General

Ms. Ellen Jackson, Case Manager, Remediation and State-Lead Division, Oil Control Program

Mr. Christopher H. Ralston, Program Manager, Oil Control Program

Ms. Kaley Laleker, Director, Land and Materials Administration