

Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

December 6, 2017

Mr. Clarke Bozeman
Project Manager
ExxonMobil Environmental Services
1900 East Linden Avenue, Building 28A
Linden NJ 07036

RE: APPROVAL OF SOUTHWEST GROUNDWATER MONITORING REDUCTION
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland

Dear Mr. Bozeman:


The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the *Groundwater Monitoring Reduction Proposal - Southwest Monitoring Area*, dated May 20, 2017. The proposal describes a reduction of groundwater monitoring (i.e., groundwater sampling and/or gauging) in the southwest area, which is defined as the area southwest of the former ExxonMobil station at 14258 Jarrettsville Pike and not including ExxonMobil-owned property. Currently, there are 83 monitoring wells in the southwest area that are gauged and/or sampled on a routine basis.

Remediation in the southwest area terminated in August 2015. Since shut-down of the southwest area remediation system, all monitoring wells and potable water supply wells in this area exhibit dissolved phase petroleum concentrations that were non-detect or below State groundwater standards with the exception of two monitoring wells, MW-29 and MW-40. Based on the dissolved groundwater concentration levels, ExxonMobil proposes a monitoring reduction, specifically to abandon 37 monitoring wells, discontinue sampling but continue gauging 21 monitoring wells, and reduce sampling and/or gauging frequency of 4 monitoring wells.

The Oil Control Program approves the proposed schedule of monitoring well modifications and proposed abandonment of select wells with modifications and exceptions as noted in the enclosed table. Based on our review of the monitoring well network construction details, historical and current dissolved phase hydrocarbon concentrations, and locations of the monitoring wells, the Department requires that, of the 83 monitoring wells, 60 monitoring wells are to be retained for continued monitoring and 23 monitoring wells are approved for proper abandonment. Please note that all well clusters that include a "C" deep zone well must be retained for long-term monitoring. These network monitoring wells were installed to monitor dissolved phase groundwater levels throughout the Jacksonville study area during the course of the case. For monitoring wells that are retained for gauge only, the Department may require groundwater sampling as warranted or when the remediation system at the station is approved for shut-down and required post-operation monitoring is performed.

The monitoring wells approved for abandonment must be properly abandoned by a Maryland-licensed well driller in accordance with Code of Maryland Regulations (COMAR) 26.04.04.34-36. Upon completion of monitoring well abandonment activities, copies of the well abandonment reports must be submitted to both the Oil Control Program (Attn: Ms. Ellen Jackson) and the Baltimore County Department of Environmental Protection and Sustainability (Attn: Mr. Kevin Koepenick). Notify the Oil Control Program at least five (5) working days prior to performing monitoring well abandonment activities so that Department staff has an opportunity to view the work activities. If you have any questions, please contact the case manager, Ms. Ellen Jackson at 410-537-3482 or by email at ellen.jackson@maryland.gov.

Sincerely,



Andrew B. Miller, Chief
Remediation and State-Lead Division
Oil Control Program

EJ/nln

Enclosure: Table of Southwest Monitoring Well Reduction

cc: Carlos Bollar, Esquire (Archer & Greiner, P.C.)
Properties, Inc. (c/o Mid-Atlantic Properties)
Dr. Mirza Baig (14223 Robcaste Road)
Mr. Steven Griffin (14219 Robcaste Road)
Dr. Michael Lynch (Jacksonville Veterinary Hospital)
Mr. Aaron Monroe (14217 Robcaste Road)
Mr. Kurt Vacovsky (14208 Robcaste Road)
Mr. Mark Schaaf (Kleinfelder East, Inc.)
Mr. Kevin Koepenick (Baltimore County DEPS)
Stephanie Cobb Williams, Esquire
Mr. Christopher H. Ralston
Ms. Hilary Miller

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Table. Southwest Groundwater Monitoring Reduction

Well ID	Address	Current Sampling Frequency	ExxonMobil Proposed Monitoring Activity	MDE Approved Proposal OR Required Sampling (Bold Type)	Comment
MW-20	3313A Paper Mill	Bi-annual	Gauging Only	Approved	
MW-29	3313A Paper Mill	Quarterly	Unchanged	Approved	
MW-30	3313A Paper Mill	Quarterly	Unchanged	Approved	
MW-30P	3313A Paper Mill	Gauging Only	Gauging Only	Approved	
MW-31	3313A Paper Mill	Quarterly	Unchanged	Approved	
MW-33	3313A Paper Mill Road	Quarterly	Abandon Well	Approved	
MW-33P	3313A Paper Mill Road	Gauging Only	Gauging Only	Approved	
MW-34	3313A Paper Mill Road	Quarterly	Abandon Well	Approved	
MW-34P	3313A Paper Mill Road	Gauging Only	Gauging Only	Approved	
MW-35	3313A Paper Mill Road	Quarterly	Abandon Well	Approved	
MW-39	3313 Paper Mill Road	Quarterly	Abandon Well	Approved	
MW-40	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-41A	Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-41B	Robcaste Road	Bi-annual	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-41C	Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-42A	Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-42B	Robcaste Road	Bi-annual	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-42C	Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-44	14240 Jarrettsville Pike	Quarterly	Gauging Only	Approved	
MW-46	14240 Jarrettsville Pike	Quarterly	Gauging Only	Approved	
MW-49	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-50	3313 Paper Mill Road	Quarterly	Gauging Only	Approved	
MW-50B	3313 Paper Mill	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-50C	3313 Paper Mill Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-51	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-53A	Robcaste Road	Quarterly	Gauging Only	Approved	
MW-53B	Robcaste Road	Quarterly	Unchanged	Approved	
MW-53C	Robcaste Road	Quarterly	Reduce Sampling to Bi-annual	Approved	
MW-55	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-56A	Robcaste Road	Quarterly	Gauging Only	Approved	
MW-56B	Robcaste Road	Quarterly	Unchanged	Approved	
MW-56C	Robcaste Road	Quarterly	Unchanged	Approved	
MW-60	14219 Robcaste Road	Quarterly	Unchanged	Approved	

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Well ID	Address	Current Sampling Frequency	ExxonMobil Proposed Monitoring Activity	MDE Approved Proposal OR Required Sampling (Bold Type)	Comment
MW-63	14219 Robcaste Road	Monthly	Gauging Only	Approved	
MW-65	14219 Robcaste Road	Monthly	Gauging Only	Approved	
MW-66	14221 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-67	14221 Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-68	14210 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-69	14210 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-70	14217 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-71	14223 Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-72	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-96A	14219 Robcaste Road	Monthly	Gauging Only	Approved	
MW-96B	14219 Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-97	14221 Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-102	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-111	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-112	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-113	14219 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-116	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-117	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-118	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-119	14217 Robcaste Road	Quarterly	Reduce Sampling to Bi-annual	Approved	
MW-120	14217 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-122	14217 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-123	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-124	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-125	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-126	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-127	14223 Robcaste Road	Quarterly	Abandon Well	Approved	

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Well ID	Address	Current Sampling Frequency	ExxonMobil Proposed Monitoring Activity	MDE Approved Proposal OR Required Sampling (Bold Type)	Comment
MW-128C	14209 Robcaste Road	Quarterly	Unchanged	Approved	
MW-130	14225 Robcaste Road	Bi-annual	Gauging Only	Approved	
MW-140A	14219 Robcaste Road	Quarterly	Gauging Only	Approved	
MW-140B	14219 Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-145P	3313A Paper Mill Road	Gauging Only	Gauging Only	Approved	
MW-146	3320 Paper Mill	Quarterly	Unchanged	Approved	
MW-146B	3320 Paper Mill	Monthly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-146C	3320 Paper Mill	Monthly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-149	14240 Jarrettsville Pike	Bi-annual	Abandon Well	Approved	
MW-153A	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-153B	14217 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-154	3313A Paper Mill Road	Quarterly	Reduce Sampling to Bi-annual	Approved	
MW-156	14223 Robcaste Road	Quarterly	Reduce Sampling to Bi-annual	Approved	
MW-157P	14223 Robcaste Road	Gauging Only	Gauging Only	Approved	
MW-158P	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-159	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-160	14223 Robcaste Road	Quarterly	Unchanged	Approved	
MW-161	14223 Robcaste Road	Quarterly	Abandon Well	Approved	
MW-163B	14208 Robcaste	Quarterly	Abandon Well	Approved	
MW-172C	3313A Paper Mill Road	Monthly	Abandon Well	Approved	
MW-174B	North Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-174C	North Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling
MW-175C	North Robcaste Road	Quarterly	Abandon Well	Bi-Annual	Retain Well for continued sampling