December 5, 2014

Ms. Susan Bull
Maryland Department of the Environment (MDE)
Oil Control Program
1800 Washington Boulevard
Baltimore, Maryland 21230-1719

Re: **Request to Modify Sampling Requirements – Tank Pit Observation Wells**
Gasoline Fueling Station – Royal Farms Store No. 96
500 Mechanics Valley Road, North East, MD 21901
MDE OCP Case No. 2011-0729-CE
Closed Case No. 99-2595-CE
Facility ID 13226

Dear Ms. Bull:

Advantage Environmental Consultants (AEC), on behalf of Royal Farms/Two Farms Inc., is requesting a modification of the sampling requirements for the tank pit observation well network at the above referenced facility.

The current tank pit observation well network was installed as part of the current UST system. The first sampling event for the network was on December 15, 2011. Since then the network has been sampled twelve times on a quarterly basis. Each of the twelve events have resulted in all analytes in all wells reported below detection limits with the exception of total petroleum hydrocarbons diesel range organics (TPH DRO). A site map and table showing results from quarterly sampling are attached.

AEC contends that the current monitoring well network is extensive and that the configuration of the monitoring wells is such that a reduction in sampling requirements can be made while maintaining adequate monitoring of groundwater quality at the site. As such AEC requests a modification of the tank pit observation sampling schedule from quarterly to annually.

Thanks you for your consideration. If there are any questions regarding this letter, please contact the undersigned at (301) 776-0500.

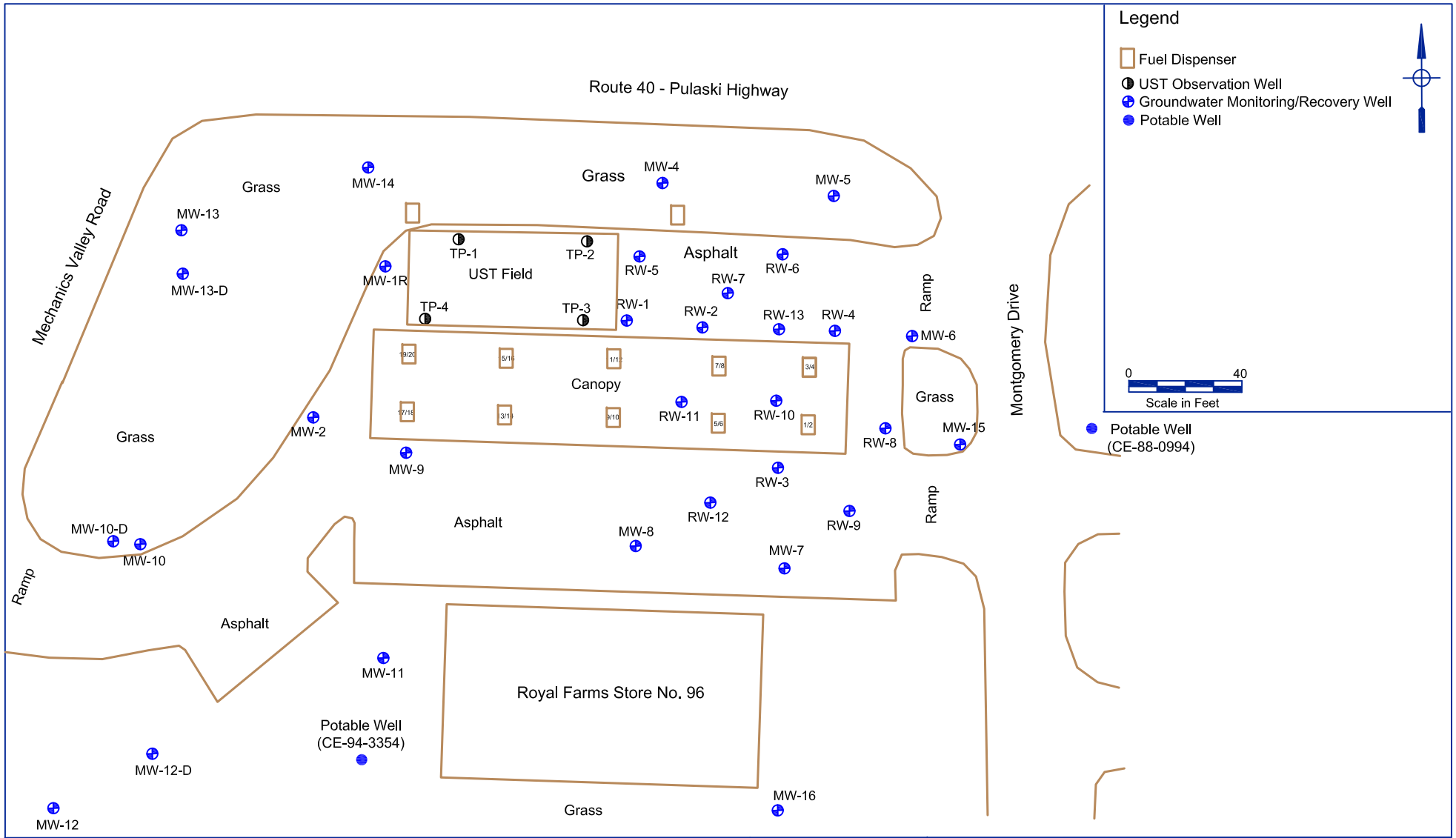
Sincerely,
Advantage Environmental Consultants, LLC

Jeffery Stein
Principal

James Wolf
Project Manager

Attachment

cc: T. Ruszin



Advantage Environmental Consultants, LLC
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Phone 301-776-0500 Fax 301-776-1123

Project No.: 05-056	Drawn by: JDW
Task No.: RF96	Date: 6-20-2013
File: Site Features	Revision No.: 2

Figure 2 - Site Features Map
Royal Farms No. 96
500 Mechanics Valley Road
North East, MD

Table 1 - Historical Monitoring/Recovery Well Groundwater Analytical Results
Gasoline Fueling Station – Royal Farms #96
500 Mechanics Valley Road, North East, MD 21901

Well No.	Date	B	T	E	X	Total BTEX	MTBE	Naph	IBP	PCE	TCE	1,2-DCE	Acetone	Carbon Disulfide	TPH GRO	TPH DRO
TP-1	6/8/2011	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	7/26/2011	**13**	27	47	610	697	BDL	**110**	9.8	BDL	BDL	BDL	BDL	BDL	**3.1**	**1.9**
TP-1*	12/15/2011	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	3/15/2012	BDL	BDL	BDL	700	700	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	6/21/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	9/6/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.5**
	11/16/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.43**
	2/22/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.38**
	5/29/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.47**
	8/13/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.54**
	11/7/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.33**
	2/11/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.31**
	5/22/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.32**
	8/15/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.67**
	11/7/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.31**
TP-2	6/8/2011	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	7/26/2011	**18**	750	**700**	3166	4634	BDL	**2800**	**95**	BDL	BDL	BDL	BDL	BDL	**19**	**5.6**
TP-2*	12/15/2011	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	3/15/2012	BDL	BDL	BDL	42	42	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	6/21/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	9/6/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.62**
	11/16/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.45**
	2/22/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.39**
	5/29/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.45**
	8/13/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.31**
	11/7/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.34**
	2/11/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.44**
	5/22/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.39**
	8/15/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.35**
	11/7/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.34**
TP-3	12/15/2011	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	3/15/2012	BDL	BDL	BDL	63	63	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	6/21/2012	**5**	5.7	BDL	11	21.7	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	9/6/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.5**
	11/19/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	2/22/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.25**
	5/29/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.31**
	8/13/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.30**
	11/7/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.24**
	2/11/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**1.71**
	5/22/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.45**
	8/15/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	11/7/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
TP-4	12/15/2011	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	3/15/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	6/21/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
	9/6/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.61**
	11/19/2012	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.30**
	2/22/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.37**
	5/29/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.41**
	8/13/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.87**
	11/7/2013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.35**
	2/11/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.33**
	5/22/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.82**
	8/15/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.45**
	11/7/2014	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**0.50**
Type I and II Aquifers		**5**	**1000**	**700**	**10000**	**NRS**	**20**	**0.65**	**66**	**5**	**5**	**5**	**550**	**100**	**0.047**	**0.047**

TPH GRO and DRO results in parts per million or mg/l

BTEX, MTBE, and Naphthalene, Acetone, MEK, 1,2-Dichloroethane, PCE, Carbon Disulfide, and Isopropylbenzene results in parts per billion or ug/l

B = Benzene; T = Toluene; E = Ethylbenzene; X = Xylene

MTBE = Methyl-tert-butyl-ether

Naph = Naphthalene

IPB = Isopropylbenzene

PCE = Tetrachloroethene

TCE = Trichloroethene

1,2-DCE = 1,2-dichloroethane

TPH GRO = Total Petroleum Hydrocarbons Gasoline Range Organics

TPH DRO = Total Petroleum Hydrocarbons Diesel Range Organics

BDL = Below Laboratory Detection Limits

NS = Not Sampled

This table presents all applicable dissolved phase constituents included in the quantifiable clean-up standards established by the Maryland Department of the Environment (MDE)

MDE Standards (Generic Numeric Cleanup Standards for Groundwater and Soil - Interim Final Guidance Update No. 2.1 - June 2008)

Bold Denotes Regulatory Exceedance

NRS = No Regulatory Standard