Maryland
Department of
the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

February 15, 2019

Ms. Kathleen McCaney
Compliance Coordinator
Sunoco, LLC
3801 West Chester Pike
Newtown Square PA 19073

RE: REQUEST FOR ENHANCED MONITORING, POTABLE WELL SAMPLING, AND HALF-MILE WELL SURVEY
Case No. 2019-0473-FR
26463 Urbana Fuel and Treat
8816 Fingerboard Road, Urbana
Frederick County, Maryland
Facility I.D. No. 6299

Dear Ms. McCaney:

The Maryland Department of the Environment's (the Department) Oil Control Program (OCP) recently completed a review of the registration file for the above-referenced high-risk groundwater use area (HRGUA) property, including the *2018 Annual Groundwater Monitoring Report*, dated January 17, 2019. Currently, three underground storage tanks (USTs) are registered as active at this facility: two 15,000-gallon gasohol USTs and one compartmentalized 20,000-gallon gasohol/diesel UST. The Department understands the subject property utilizes Stage I and II vapor recovery. Four groundwater monitoring wells were installed for HRGUA monitoring in accordance with Code of Maryland Regulations (COMAR) 26.10.02.03-4. Samples collected from the monitoring well network on October 31, 2018 detected benzene at a concentration of 370 parts per billion (ppb) in monitoring well MW-2 and 160 ppb in monitoring well MW-9, which exceeds the regulatory standard of 5 ppb. Methyl tertiary-butyl ether (MTBE) was detected at a concentration of 120 ppb in MW-2 and at 31 ppb in MW-9, which exceeds the regulatory standard of 20 ppb. The tank field monitoring pipes were also screened with a photo-ionization detector (PID), which measured petroleum vapors ranging from 100 to 200 units. The monitoring pipes were dry (no water or product was detected). The on-site drinking water supply well was sampled on October 31, 2018. The analytical results were non-detect for volatile organic compounds (VOCs).

Since this property is located in a HRGUA served by a private potable drinking water supply well, the Department requires completion of the following:

1) **No later than March 15, 2019**, submit a half-mile sensitive receptor survey to include the following:

   a. A summary table including, at a minimum, property address, owner name and address, well tag ID, depth of well, casing depth, screen depth, and current status of well usage;
   b. Review well completion reports and evaluate whether on-site conditions could potentially impact and off-site drinking water supply wells in the area;
   c. Perform field reconnaissance and provide documentation regarding verification of the presence or absence of the identified wells within 1,000 feet of the site; and
   d. Provide a map that includes the location of all identified wells within 1,000 feet of the site.

2) **No later than February 28, 2019**, sample the following private drinking water supply wells: **8826, 8994, 8995A, and 8995B Urbana Church Road** and **3514, 3526, and 3528 Urbana Pike**. If a potable well does not exist on any of these properties, provide well abandonment documentation to the OCP. All samples must be collected prior to any water treatment and be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. Sampling results must be submitted to the OCP **no later than 20 days after sample collection**.

3) **Beginning March 2019**, conduct quarterly (every three months) sampling of the monitoring well network and tank field monitoring pipes for a minimum of one year and until written approval from the Department is received to suspend or reduce the sampling frequency. All samples collected must be analyzed for full-suite VOCs using EPA Method 8260 and TPH-DRO and TPH-GRO using EPA Method 8015. Monitoring wells and tank field monitoring pipes must be screened using a calibrated PID and the results presented in a table that includes historical PID readings.

4) **Beginning March 2019**, conduct quarterly sampling of the on-site drinking water supply well. All samples collected must be analyzed for full-suite VOCs using EPA Method 524.2. If a granular activated carbon (GAC) filtration system is present, samples must be collected pre-, mid-, and post-filtration.

5) Submit quarterly reports to the OCP detailing the results of each quarterly sampling event. Reports must be received no later than 45 days following the end of each quarter (due May 15 for Q1, August 15 for Q2, November 15 for Q3, and Feb 15 for Q4)..

6) Your environmental consultant should sample the drinking water supply well and all monitoring wells and field screen the tank field monitoring pipes at the same time so all data is included in each quarterly report submitted.

7) When submitting reports, include data summary tables and scaled site maps showing actual sampling locations (i.e., monitoring well and tank field well locations). In the discussion of supplemental sampling events, include details on sampling procedures and describe analytical results in terms of media sampled. Reports must include groundwater flow maps, dissolved concentration maps, and qualitative and quantitative discussions regarding the sampling results and trends.

When submitting documentation to the Oil Control Program, provide three hard copies and a digital copy on a labeled compact disc (CD). If you have any questions, please contact the case manager, Mr. Nick Psenicnik, at 301-665-2857 (email: *nicholas.psenicnik@maryland.gov*) or Ms. Ellen Jackson, Northern Region Supervisor, at 410-537-3482 (email: *ellen.jackson@maryland.gov*).

Sincerely,

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

NJP/nln

cc: Mr. Barry Glotfelty (Director, Environmental Health Services, Frederick County Health Department)
Mr. Christopher H. Ralston (Program Manager, Oil Control Program)
Ms. Kaley Laleker (Director, Land and Materials Administration)