Maryland
Department of
the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

March 7, 2018

Mr. David Went
Global Partners, LP
Alliance Energy Gasoline Division
800 South Street, Suite 500
P.O. Box 549290
Waltham MA 02454

Ms. Florence Rosen
Rosen Associates Management Corporation
33 South Jericho Road
Jericho NY 11753

RE: SITE STATUS AND MODIFICATION TO SAMPLING
Case No. 2011-0112-HA
Bel Air Xtramart No. 7805
2476 East Churchville Road, Bel Air
Harford County, Maryland
Facility I.D. No. 12391

Dear Mr. Went and Ms. Rosen:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the case file for the above-referenced property, including the *Site Status Report: Third Quarter 2017*, dated October 30, 2017, and the *Site Status Report: Fourth Quarter 2017*, dated January 31, 2018. A *Settlement Agreement and Consent Order*, Nos. 2011-0112-HA and 2013-0007-HA, was executed for this site on October 11, 2016. Between November and December 2016, all fueling operations at this facility ceased with the removal of five underground storage tanks (USTs), all associated dispensers and piping, and 614.89 tons of petroleum-impacted soil. A total of 34 post-excavation soil samples were collected. All soil sampling results were below the *MDE Protection of Groundwater Soil Standards* with the exception of one sample that exhibited methyl tertiary-butyl ether (MTBE) at 106 parts per billion (ppb). An additional 723.73 tons of petroleum-impacted soil was excavated from a targeted area around the elevated soil sample in January 2017. Following all excavation activities, 1,102 pounds of ORC Advanced® pellets were spread in the excavation areas prior to backfilling with clean fill material.

In accordance with Paragraph B(9) of the *Settlement Agreement and Consent Order*, the network of 14 monitoring and recovery wells is currently gauged and sampled on a quarterly basis. The monitoring well network was most recently sampled in November 2017. The groundwater samples were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons - diesel and gasoline range organics (TPH-DRO and GRO) using EPA Method 8015. The November 2017 analytical results for the groundwater samples collected from the 14 monitoring wells were non-detect for petroleum constituents, except that, elevated concentrations of petroleum constituents were detected in four monitoring wells (MW-7R, MW-14, MW-16S, and MW-16I) above the Department's groundwater standards:

- Benzene ranging from 13.2 to 93.2 parts per billion (ppb), which is above the 5 ppb standard
- MTBE ranging from 188 to 3,980 ppb, which is above the 20 ppb standard
- TPH-GRO ranging from 1,200 to 32,500 ppb, which is above the 47 ppb standard; and
- TPH-DRO ranging from 94.4 to 11,600 ppb, which is above the 47 ppb standard.

Based on the elective addition of ORC Advanced pellets to the excavation, all monitoring wells were sampled for metals before and after the UST excavation to monitor the potential for releasing naturally occurring metals from the formation. The detection of metals in both sampling events leads the Department to conclude that they are naturally occurring compounds and thus not related to the activities of this case.

As required in the executed *Settlement Agreement and Consent Order*, 11 adjacent residential drinking water supply wells are monitored on a quarterly basis and a point-of-entry treatment (POET) system is maintained on the property at 1 Meadow Springs Drive. Samples have been collected on a quarterly basis from these wells since removal of the UST system. Samples collected from all drinking water supply wells over the period of August 2011 thru November 2017 have been non-detect for petroleum constituents or exhibited levels of petroleum constituents at a fractional detection below 1 ppb, with one exception. Samples collected from the drinking water supply well serving 1 Meadow Springs Drive continue to detect benzene at a concentration of 13.8 ppb and MTBE at 440 ppb. Based on the elective addition of ORC Advanced pellets to the excavation, all private drinking water supply wells were sampled for metals before and after the UST excavation to monitor the potential for releasing naturally occurring metals from the formation. Although some metals were present in the samples collected, all metals detected were represented in both the before and after samples.

The *Site Status Report: Fourth Quarter 2017* requests several modifications to the monitoring requirements set forth in the *Settlement Agreement and Consent Order*: the discontinuation of monitoring for metals in the monitoring wells and private drinking water supply wells; the discontinuation of sampling of specified off-site private drinking water supply wells; and a reduction in the sampling frequency of specific on-site monitoring wells. Based on the current data provided, the Oil Control Program (OCP) approves amendments to the groundwater sampling program as outlined below. The Department reserves the right to require additional sampling based on new information, changing site conditions, or as a final sampling event prior to issuing case closure.

1. The OCP no longer requires monitoring for metals.

2. Based on the time series data presented, the OCP no longer requires monitoring of the private drinking water supply wells located at 2303, 2317, 2319, 2401, and 2401A Churchville Road and 3, 5, 7, 9, and 10 Meadow Springs Drive. The OCP will notify all property owners of this change in monitoring status.

3. Continue quarterly monitoring and routine maintenance of the POET system at 1 Meadow Springs Drive. Samples must be collected pre-, mid-, and post-filtration. All samples must be analyzed for full-suite VOCs using EPA Method 524.2. Copies of the sampling results must be provided to the property owner, the OCP case manager, and the Harford County Health Department.

4. Continue quarterly monitoring of MW-7R, MW-14, MW-16S, and MW-16I. All samples collected must be analyzed for full-suite VOCs using EPA Method 8260 and TPH-DRO and GRO using EPA Method 8015.

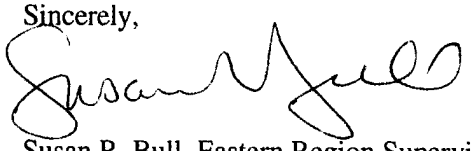
5. The OCP understands that it is your intention to retain the remaining 10 monitoring wells. The OCP approves annual sampling of the 10 retained wells in the fourth quarter of each year. All samples collected from monitoring wells MW-9, MW-15S, MW-15D, MW-16D, MW-17S, MW-17I, MW-17D , RW-18, and RW-19 must be analyzed for full-suite VOCs using EPA Method 8260 and TPH-DRO and GRO using EPA Method 8015.

6. Continue to submit groundwater monitoring reports as required by the *Settlement Agreement and Consent Order*. Continue to evaluate and discuss the data obtained as part of the *Post-removal Monitoring Plan*.

This *Site Status and Modifications to Sampling* letter should not be construed as a waiver or limitation of the Department's right to take enforcement or other action with respect to activities not addressed by this letter or unknown to the Department at this time, including newly discovered contamination or the exacerbation of existing contamination. The Department and the State of Maryland retain all authority and rights against any persons in any way responsible for causing the contamination present at or migrating from the site, including the right to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, resulting from the release of any contaminant at the site.

If you have any questions, please contact me at 410-537-3499 or by email at: *susan.bull@maryland.gov*.

Sincerely,



Susan R. Bull, Eastern Region Supervisor
Remediation and State-Lead Division
Oil Control Program

SRB/nln

cc: Ms. Andrea Taylorson-Collins (Groundwater & Environmental Services, Inc.)
Stephanie Cobb- Williams, Esquire
Mr. Richard Gordon (Harford County Health Dept.)
Mr. Andrew Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller