Maryland
Department of
the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

May 4, 2022

Mr. Samuel Kramer
Manager of Environmental Services
7-Eleven, Inc.
P.O. Box 711 (Loc. 0148)
Dallas, TX 75220-0711

RE: SITE STATUS AND CASE CLOSURE
Case No. 2005-0120-HA
Pleasantville 7-Eleven No. 22281
2400 Pleasantville Road, Fallston
Harford County, Maryland
Facility I.D. No. 6375

Dear Mr. Kramer:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced fuel service station, including the *Monitoring Well Abandonment Report*, dated April 5, 2022. Well abandonment was requested in MDE's correspondence dated January 26, 2022 (copy enclosed), which included a summary of relevant historical site events and rationale for case closure determination.

Based on the current commercial land use and the available information reviewed, OCP is closing its case in reference to this site. Future excavation in the area of investigation may create exposure pathways to the existing petroleum-related contamination that may impact human health or the environment. If impacted soil or groundwater is encountered during future excavation, it must be handled in a manner that complies with applicable federal, state, and local law and regulations. Please contact MDE if there is any proposed change to the land use or installation of any wells on the property. If a change in land use occurs or is proposed, a risk assessment may need to be performed.

The active UST system is located in a high-risk groundwater use area. Owners of an active underground storage tank system in a high-risk groundwater use area with over 2,000-gallon gasoline storage must perform additional testing beyond the standard compliance testing requirements. Based on our review and for continued compliance with COMAR 26.10.02.03-4, MDE requires the following:

Future Groundwater Monitoring:

1. Beginning June 2022, begin annual (every 12 months) sampling of the monitoring well network (MW-1A, MW-5, MW-7 and MW-10). All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260. The monitoring wells were last sampled on September 27, 2021.

2. Beginning June 2022, continue annual sampling of the on-site drinking water supply well. All samples collected must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. The on-site drinking water supply well was last sampled on August 16, 2021.

3. During future groundwater monitoring events, OCP recommends completing an evaluation of the tank field monitoring pipes including: (a) checking for the presence of LPH; (b) screening, using a PID, for the presence of petroleum hydrocarbon vapors; and (c) gauging depth-to-water, if present. The information regarding the tank field monitoring pipes must be included with future Groundwater Monitoring Reports.

4. Submit all future Groundwater Monitoring Reports to the attention of Mrs. Susan Bull and reference Facility I.D. No. 6375. Send the reports to the Oil Control Program, Suite 620, Baltimore, Maryland 21230-1719.

UST System Compliance:

In accordance with COMAR 26.10.02.03-4A, MDE requires the following to ensure UST system compliance:

- Annual testing of all spill catchment basins must be conducted in accordance with the Maryland Containment System Testing Protocol or test method approved by MDE.
- Every five (5) years test all containment sumps.

This *Site Status and Case Closure* letter is not a waiver or limitation of MDE's right to take enforcement or other action in the future based upon contamination at and around the site. The MDE and the State of Maryland retain all authority and rights to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, for contamination at and around the site.

If you have any questions, please contact the Oil Control program at 410-537-3442.

Sincerely,

Susan R. Bull, Eastern Region Supervisor
Remediation Division
Oil Control Program

Enclosure: *Request for Monitoring Well Abandonment*, dated January 26, 2022

cc: Ms. Marie Treiber, Regional Senior Project Manager, AECOM Environmental
Mr. John Resline, Acting Director, Environmental Health, Harford County Health Department
Ms. Lindley Campbell, Case Manager, Remediation, Oil Control Program
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program

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January 26, 2022

Ms. Shellena Hussein
Environmental Services
7-Eleven, Inc.
3200 Hackberry Road, #148
Irving, TX 75063

RE: REQUEST FOR MONITORING WELL ABANDONMENT
Case No. 2005-0120-HA
Pleasantville 7-Eleven No. 22281
2400 Pleasantville Road, Fallston
Harford County, Maryland
Facility I.D. No. 6375

Dear Ms. Hussein:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced commercial property, including the *Third Quarter 2021 Monitoring and Sampling Report*, dated October 29, 2021, prepared by AECOM. This case was opened in August 2004 when OCP requested an evaluation of the site in conjunction with an area-wide drinking water investigation. The current monitoring well network consists of 12 on-site and three off-site groundwater monitoring wells. Groundwater samples collected from this monitoring well network between July 2006 and September 2021 identified methyl tertiary-butyl ether (MTBE) as the primary constituent of concern. The station is located in a mixed commercial/residential community, which is served by private drinking water supply wells.

Site conditions were investigated through successive subsurface investigations. A soil-vapor extraction (SVE) system was operated from November 2006 to September 2008. In September 2008, two second-generation double-walled fiberglass UST systems were installed in a new tank field: one 10,000-gallon UST and one 15,000-gallon UST. In October 2008, the three first-generation 12,000-gallon cathodically protected steel UST systems were removed. During site upgrades, approximately 623 tons of petroleum-impacted soil was excavated for off-site disposal. Successive bio-augmentation pilot tests were performed between 2008 and 2013.

The most recent quarterly sampling event was conducted in September 2021. Per the *Third Quarter 2021 Monitoring and Sampling Report*, MW-4B was inaccessible due to a well casing shift during recent sidewalk upgrades and was not sampled this quarter. The groundwater monitoring well samples were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons - gasoline range organics (TPH-GRO) using EPA Method 8015.

The September 2021 analytical results for the groundwater samples exhibited concentrations of MTBE ranging from below the method detection limits (or ND) to 5.21 parts per billion (ppb), which are below the 20 ppb groundwater standard. All other groundwater sampling results were ND. The site is served by a private drinking water supply well. The drinking water was sampled most recently on August 16, 2021 and analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. All drinking water analytical results were non-detect.

The MDE's *Request for Additional Information* dated November 4, 2020 identified 15 off-site private drinking water wells at commercial and residential properties that had been sampled historically because of this case. Thirteen properties were sampled between March and August 2021. Two commercial properties were not sampled despite repeated access attempts by 7-Eleven's consultant. The drinking water samples were analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. The results exhibited concentrations of MTBE ranging from ND to 2 ppb, which are below the 20 ppb groundwater standard. All other drinking water sampling results were ND.

Mann-Kendall analyses were provided to OCP in the *Third Quarter 2021 Monitoring and Sampling Report*. The Mann-Kendall statistical analysis was performed for MTBE in monitoring wells HW-3, MW-4A, MW-6, MW-8A, MW-9, MW-10, MW-11, MW-12 and MW-13 and TPH-GRO in monitoring wells HW-3, MW-4A, MW-6, MW-9, MW-10, MW-11, MW-12 and MW-13. Statistical trends in all wells were decreasing with a confidence level of greater than 99 percent for both MTBE and TPH-GRO concentrations.

The *Third Quarter 2021 Monitoring and Sampling Report* proposes to retain MW-1A, MW-5, and MW-7 for the purpose of annual high-risk groundwater use area (HRGUA) monitoring requirements, due to their vicinity to the active tank field. Based upon the documented groundwater flow at this location, OCP hereby approves retention of the three proposed monitoring wells and additionally requires retention of MW-10 to satisfy HRGUA annual sampling requirements. Continue to collect groundwater samples from these four wells on an annual basis.

Based on the current commercial land use and the available information reviewed, OCP does not anticipate additional investigation or remedial activities at the site. Prior to approving case closure, all on-site and off-site monitoring wells must be properly abandoned by a Maryland-licensed well driller in accordance with applicable requirements of COMAR 26.04.04.34, **with the exception of monitoring wells MW-1A, MW-5, MW-7, and MW-10**. Provide copies of the well abandonment reports to OCP (Attn: Ms. Lindley Campbell) and the Harford County Health Department (Attn: Ms. Cari Biscoe, hchd.inbox@maryland.gov) **no later than March 9, 2022**. Following proper abandonment of the monitoring wells and receipt of all required documentation, OCP will issue case closure correspondence for the site.

This *Request for Monitoring Well Abandonment* letter is not a waiver or limitation of MDE's right to take enforcement or other action in the future based upon contamination at and around the site. The MDE and the State of Maryland retain all authority and rights to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, for contamination at and around the site.

Notify OCP at least five (5) working days prior to conducting any work at this site so we have an opportunity to observe field activities. If you have any questions, please contact Ms. Lindley Campbell at 410-537-3387 (lindley.campbell1@maryland.gov) or me at 410-537-3499 (susan.bull@maryland.gov).

Sincerely,

Susan R. Bull, Eastern Region Supervisor
Remediation Division
Oil Control Program

cc: Ms. Marie Treiber, Regional Senior Project Manager, AECOM Environmental
Mr. John Resline, Acting Director, Environmental Health, Harford County Health Department
Ms. Lindley Campbell, Case Manager, Remediation, Oil Control Program
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