

Maryland
Department of
the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Crumbles
Secretary

April 18, 2017

Mr. Jose Rios
Manager, Environmental Services
7-Eleven, Inc.
One Arts Plaza
1722 Routh Street, Suite 1000
Dallas TX 75201

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

Dear Mr. Rios:

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 *Fourth Quarter 2016 Monitoring and Sampling Report and Request to Reduce Sampling Parameters*, dated January 3, 2017. Currently, there are twelve on-site and three off-site monitoring wells. On August 4, 2016, representatives from the Department, 7-Eleven, Inc., and its environmental consultant met to discuss the current and future status of the case.

The *Report* requests the removal of monitored natural attenuation parameters from the sampling regime based on the levels of petroleum constituents in select monitoring wells (MW-4B, MW-8B, and MW-8C). A cross section of the monitoring well network and down-gradient off-site supply wells, included in the *Report*, suggests that wells MW-4B, MW-8B, and MW-8C are representative groundwater monitoring points for sampling and monitoring of the bedrock fractures in the off-site supply wells. Based on our review, the Department has the following comments and requirements:

Monitored Natural Attenuation and Remedial Goals:

- 1) The lithologic cross-section provided utilizes MW-4B, MW-8B, and MW-8C as representative wells for comparison to off-site bedrock supply wells. Based on a review of the boring logs, with the exception of MW-8C, the logs do not indicate that these wells are installed in competent bedrock or that the screen intervals appropriately represent fractures in the off-site supply wells. Therefore, the Department cannot consider MW-4B and MW-8B as sentinel monitoring wells for assessing potential off-site migration.

- 2) As discussed during the August 2016 meeting, determining the risk of impact to the off-site drinking water supply wells must be conducted. Based on our review of this report, the data provided are not adequate to assess that risk. **No later than May 30, 2017**, submit additional information to demonstrate whether or not there is a risk of migration or impact to down-gradient, off-site drinking water supply wells.
- 3) In the *Request for Supplemental Clarification*, dated February 7, 2014, remedial goals were previously outlined: removal of the Department's seven risk factors posed by the groundwater impact; the prevention of impact of migration; demonstration of an asymptotic trend of dissolved-phase hydrocarbon petroleum concentrations in on-site monitoring wells; and concentration target goals for MTBE (150 ppb or less for on-site monitoring wells and 20 ppb or less in off-site monitoring wells). If these remedial goals have changed, submit updated remedial goals and a metric for evaluation and attainment of remedial goals **no later than May 30, 2017**.
- 4) An assessment of geochemical sampling time series data at the site indicate there is no significant difference between monitoring wells located in the contaminant plume and the background wells with regards to monitored natural attenuation parameters. Based on this assessment, the Department will no longer require the collection of monitored natural attenuation data

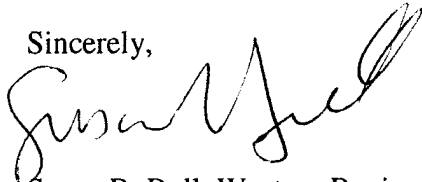
Groundwater Monitoring:

- 5) Continue gauging and sampling of the following wells on an annual basis: MW-1A, MW-5, and MW-7. Continue quarterly (every three months) gauging and sampling of the remaining monitoring wells and tank field monitoring pipes.
- 6) All samples collected must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and for TPH-GRO using EPA Method 8015.
- 7) Continue sampling of the on-site drinking water supply well on an annual basis. All samples collected must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2.
- 8) **No later than 45 days following a sampling event**, the Department expects to receive a report detailing the results of the event (e.g., on a quarterly basis). Submit quarterly reports to the Oil Control Program in a timely manner detailing the results of the sampling events. When submitting sampling results, include detailed data summary tables and scaled site maps showing actual sampling 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 surface contours and dissolved phase concentration maps indicating benzene, total BTEX, MTBE, and TPH-GRO concentrations. If liquid phase hydrocarbons (LPH) are encountered, the reports must include LPH thickness map(s) and a summary of LPH recovery volumes. Monitored natural attenuation sampling data must also be included in the tabulated summaries.

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Notify the Oil Control Program at least five (5) working days prior to beginning any work on site or off site. If you have any questions, please contact the case manager, Ms. Jeannette DeBartolomeo, at 410-537-3427 (jeannette.debartolomeo@maryland.gov) or me at 410-537-3499 (susan.bull@maryland.gov).

Sincerely,



Susan R. Bull, Western Region Section Head
Remediation and State-Lead Division
Oil Control Program

JD/nln

cc: Ms. Marie Treiber (AECOM)
Ms. Cari Biscoe (Harford County Health Dept.)
Mr. Christopher H. Ralston
Mr. Andrew Miller
Ms. Hilary Miller