January 27, 2021

Mr. Herbert M. Meade
Environmental Director
High's of Baltimore, LLC
2700 Loch Raven Road
Baltimore, MD 21218

RE: REQUEST FOR ENHANCED MONITORING AND HALF-MILE WELL SURVEY
Case No. 2021-0221-HA
High's Dairy Store No. 86
3711 Federal Hill Road, Jarrettsville
Harford County, Maryland
Facility I.D. No. 798

Dear Mr. Meade:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the registration file for the underground storage tanks (USTs) at the above-referenced high-risk groundwater use area property. In May 1995, two 12,000-gallon compartmentalized gasohol and diesel USTs with varied compartment sizes were installed. Currently, three groundwater monitoring wells, installed in accordance with Code of Maryland Regulations (COMAR) 26.10.02.03-4, and a transient non-community drinking water supply well are also on site.

On November 9, 2020, OCP received the *2020 High Risk Groundwater Use Area (HRGUA) Monitoring Well and Drinking Water Sampling Report*, dated November 2, 2020. The monitoring well network and the on-site drinking water supply well were sampled on October 9, 2020. The sampling results for monitoring well MW-4 indicated the presence of benzene at a concentration of 139 parts per billion (ppb), which exceeds the 5 ppb standard, and methyl tertiary-butyl ether (MTBE) at a concentration of 452 ppb, which exceeds the 20 ppb standard. All sampling results for the drinking water supply well were non-detect for petroleum constituents.

Based on the petroleum constituents detected, MDE required the collection of a confirmatory groundwater sample from monitoring well MW-4. The confirmatory samples were collected on November 19 and 20, 2020. The analytical results for the original and confirmatory samples collected from MW-4 are summarized in the table below.

MW-4 Sampling Results:

Sample Date	Benzene	MTBE
10/09/2020[1]	139	452
11/19/2020[2]	ND	ND
11/20/2020[1]	ND	34.5
11/20/2020[2]	ND	6.95

Notes:
1. Sample collected immediately after purging the well of groundwater.
2. Sample collected after purging but allowing groundwater to recharge to pre-sampling level.
All results are reported in parts per billion.
ND – Result not detected above method detection limit.

The OCP's Compliance Division conducted an initial review of the UST systems and did not find evidence of an active or ongoing release. Compliance testing was performed on November 19, 2020 to include line tightness testing, helium testing, and pressure decay testing. Copies of the testing results were provided to OCP on December 8, 2020. On November 30, 2020, samples were collected from the drinking water supply wells on three off-site properties: 3707, 3713, and 3717 Federal Hill Road. The analytical results for the drinking water samples collected were non-detect for petroleum constituents with the following exception. MTBE was detected at an estimated value of 0.216 ppb in the drinking water sample collected from the 3707 Federal Hill Road property, which is below the 20 ppb standard.

Based on the property's location in a high-risk groundwater use area served by a drinking water supply well and the available information reviewed for this case, MDE requires the following:

1) Perform an updated sensitive receptor survey to identify all drinking water supply wells (i.e., domestic, non-community/community water supply, agricultural) within a half-mile radius of the subject property and plot on a U.S. Geological Survey map or scaled street map. Since the site is in an area served by drinking water supply wells, MDE suggests directing your inquiries to the Harford County Health Department. Submit the required information to OCP **no later than March 9, 2021.**

    a) Annotate the 660-ft. (1/8-mile), 1,320-ft. (1/4-mile), and 2,640-ft. (1/2-mile) radii;
    b) Provide a summary table of well data including, at a minimum: property address, owner name and address, well tag ID, total depth of well, casing depth, screen depth, and current status of well usage;
    c) Review well completion reports and evaluate whether on-site conditions could potentially impact any off-site drinking water supply wells in the area;
    d) Submit documentation of which supply wells are historic and have been abandoned;
    e) For properties served by public water, provide confirmation of this connection in the summary table (this can include confirmation from the Harford County Water and Sewer authority of properties that receive a water bill);
    f) Submit copies of notes documenting field reconnaissance performed to verify presence/ absence of wells; and
    g) Provide written documentation of your findings and the list of persons contacted.

2) **No later than March 9, 2021,** begin quarterly (every 3 months) gauging and sampling of the monitoring well network and the tank field monitoring pipes. All samples collected must be 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 TPH-GRO) using EPA Method 8015.

3) **No later than March 9, 2021,** begin quarterly 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.

4) All groundwater and private drinking water data collected must be submitted in **quarterly reports** detailing the results of the gauging and sampling events no later than 45 days following sample collection.

This 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 State of Maryland retain all authority and rights to see 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 for the Compliance Division, please contact Ms. Marsha Mason at 410-537-3479 (marsha.mason@maryland.gov). If you have any questions for the Remediation Division, 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: Mr. Greg Beal, Advanced Environmental Concepts, Inc.
Mr. John Resline, Acting Environmental Health Director, Harford County Health Dept.
Mr. Andrew B. Miller, Chief, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program