

Town of Chestertown

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Monday, August 3, 2020

Mr. Christopher Ralston
Program Manager, Oil Control Program
Land and Materials Administration
Maryland Department of the Environment
1800 Washington Boulevard, Ste. 620
Baltimore, Maryland 21230

Subj: Request that MDE eliminate the Silica Gel Cleanup method from Shore Regional testing

Dear Chris,

Thank you for your recent email and your transparency in sharing MDE's findings. The Town of Chestertown truly values MDE's oversight for the ongoing remediation of the Shore Regional Health (Shore Regional) site and supports MDE's determination to continue operation of the Pump and Treat system through at least October 2020.

As Mayor, I applaud your straightforwardness when you state that MDE needs to: "review data collected between now and then to ensure that the right procedures are in place for a carefully watched shut down." Given the recent unreported shut down of the pump and treat system, has MDE reviewed the well logs to determine if this has happened before?

MDE's acknowledgement of right procedures is crucial, especially now given Shore Regional contractor's continued attempts to replace or substitute the use of EPA Method 8015 for TPH-DRO sampling analysis (the Industry Standard) with a Silica Gel Cleanup ("SGC") method. Currently every Quarterly Monitoring Report includes a discussion of SGC data with a claim that it provides "the most accurate results for quantification of TPH-DRO." The Town of Chestertown strongly disagrees that unproven assessment and is concerned with any attempt to deviate from EPA Method 8015.

The testing for TPH-DRO as a clean-up standard has existed for 30 years, not TPH-DRO after SGC (Silica gel cleanup). There is no reasonable justification for changing the test other than to accelerate closeout by using these SGC numbers and ignoring the contaminants that are removed with SGC. Using SGC removes a large percentage of the total TPH-DRO from the sample being tested, but, the things removed are still contaminants that still actually exist and should continue to be considered as contaminants and as part of the total TPH-DRO numbers.

The Town concurs with OCP's usage of, and commitment to, the EPA Method 8015 (as was apparent in the 2016 MDE and Shore Regional Health Settlement Agreement and Consent Order, and the more current April 24, 2020 MDE letter to Shore Regional Health). These MDE/Shore Regional agreements clearly mandated the use of EPA Method 8015 for TPH-DRO sampling and analysis.

Implementing the correct groundwater sampling method is an important criterion that safeguards and protects the Town's water supply and the Chester River from potential migration of contaminants associated with the oil spill at the Hospital, a goal that we mutually share. This aquifer meets all the EPA requirements as a Class I aquifer.

Our Utilities Director, Mr. Bob Sipes has told our Council that he does not feel that present approach is taking into consideration the importance of the aquifer to the drinking water needs of the people of Chestertown. The cost of an alternative would likely exceed 20 million dollars and would be far more than the cost of the protections that are in place which have been working for the last 30 years.

Shore Regional's attempts to promote an alternative TPH/DRO testing method in the Quarterly Data Reports only distracts and creates confusion in achieving the ultimate goal of protecting the aquifer. The Town believes that Shore Regional's Reports and analyses, which now include a comparison of groundwater data from EPA Method 8015 with the SGC method, only muddles the comparison long- and short-term data results. If we as a municipality tested for TPH-DRO and got a result of 2.0 mg/l and then ran a test using SGC and got a result of 0.046 mg/l, the amount of TPH-DRO would not actually change. Our citizens would still be drinking 2.0 mg/l of TPH-DRO.

The Town solicits MDE's support with a request that Shore Regional's future reports and analyses focus solely on data generated from EPA Method 8015 as a means to avoid any confusion or falsely optimistic results.

In closing, we greatly appreciate the Oil Control Program's oversight and the transparency of your sharing of the findings with the Town of Chestertown. Thank you for correcting the recent problems at the Shore Regional site, and we look forward to hearing from you.

We have other questions that we would like to ask and extend to you and/or any other interested MDE representative(s) an open invitation to attend a Mayor and Council meeting (held via Zoom) in the near future. The Town Council meets at 7:30 p.m. on the first and third Monday of each month. These meetings provide an excellent opportunity for discussion of ongoing oversight and data with the Town Council and therefore the community.

Sincerely,



Chris Cerino
Mayor