



Maryland
Department of
the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary

August 29, 2023

Mr. Jeff McCullough
Global Partners LP
Environmental, Construction and Compliance
800 South Street, Suite 500
Waltham, MA 02454

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

Mr. Richard Gray
Gray & Associates LLC
1997 Annapolis Exchange Parkway, Suite 300
Annapolis, MD 21401

RE: REQUEST FOR ADDITIONAL INFORMATION

Case No. 2011-0112-HA

REF-OCP-2016-012

Bel Air Xtra-Mart No. 7805

2476 East Churchville Road, Bel Air

Harford County, Maryland

Facility I.D. No. 12391

Dear Mr. McCullough, Ms. Rosen, and Mr. Gray:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *Site Status Report: First Quarter 2023*, dated May 5, 2023, and prepared by Groundwater & Environmental Services, Inc. (GES). A *Settlement Agreement and Consent Order*, under OCP Case Nos. 2011-0112-HA and 2013-0007-HA, was executed on October 11, 2016 (Consent Order). 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 1,338.62 tons of petroleum-impacted soil.

The monitoring well network consists of 17 monitoring wells (6 on-site, 1 well pair off-site, and 3 well clusters off-site), of which 7 monitoring wells are sampled on a quarterly basis, 3 on a semi-annual basis, and 7 on an annual basis. The most recent groundwater samples were collected in February 2023 and 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. The following petroleum constituents were detected above the State action levels:

- Benzene ranging from 7.7 to 35.7 parts per billion (ppb) in MW-16S, MW-16I, and MW-21S;
- Ethylbenzene at 1,400 ppb in MW-7R;
- Methyl tertiary-butyl ether (MTBE) ranging from 382 to 3,380 ppb in MW-16S, MW-16I, MW-21S, MW-21I, and MW-21D;
- TPH-DRO at 4,270 ppb in MW-7R; and
- TPH-GRO ranging from 519 to 14,400 ppb in MW-7R, MW-16S, MW-16I, MW-21S, MW-21I, and MW-21D.

Although the facility is served by municipal water, adjacent properties utilize private drinking water supply wells. Off-site monitoring of select private drinking water wells continues as directed by OCP. In the *Site Status Report: First Quarter 2022*, dated May 6, 2022, GES on behalf of Drake Petroleum requested a reduction in sampling frequency of monitoring well MW-14 from a quarterly to annual basis, the MW-17 series from a semi-annual to annual basis, and to stop sampling the 2303 Churchville Road property supply well. The OCP understands that GES, on behalf of Drake, is currently working on a plan to further assess the water quality for the property located at 1 Meadow Spring Drive.

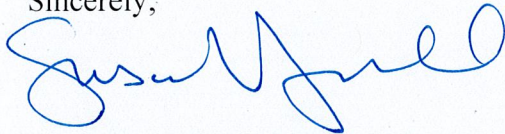
Based on the current land use and the available information reviewed for this case, the OCP has the following requirements:

1. The OCP approves the reduction in sampling for monitoring well MW-14 from a quarterly basis to a **semi-annual basis**.
2. Continue sampling monitoring well MW-17 series and the 2303 Churchville Road property supply well on a **semi-annual basis**, until otherwise approved in writing.
3. A selection of commercial and residential properties in the vicinity were previously sampled under this open case. The current conditions of the following wells must be confirmed.
 - a. **No later than October 30, 2023**, collect supplemental drinking water samples from the following property supply wells: 2317 Churchville Road, 2319 Churchville Road, 2401 Churchville Road, 2401A Churchville Road, 3 Meadow Spring Drive, 5 Meadow Spring Drive, 7 Meadow Spring Drive, 9 Meadow Spring Drive, and 10 Meadow Spring Drive.
 - b. The samples must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 524.2. **No later than November 30, 2023**, submit copies of all sampling results to the property owner, tenant (if applicable), the Harford County Health Department, and the OCP case manager, Ms. Lindley Campbell.
 - c. The OCP will contact the property owners for the selected supply wells identified for sampling to inform them of the sampling requirement.

4. Continue to submit groundwater monitoring reports as required by the Consent Order and previous MDE directives.
5. **No later than October 16, 2023**, submit a *Work Plan* for additional investigation points to assess the vertical delineation of petroleum contamination on-site, and horizontal and vertical delineation of petroleum contamination between the MW-21 series and the intersection of Campus Hills Drive and Churchville Road. At minimum, the *Work Plan* must include the installation of an intermediate depth monitoring well on-site and the installation of shallow and intermediate multi-level monitoring wells in the identified off-site location. If contamination is found, evaluate the need to install deep bedrock monitoring wells.

When submitting documentation to OCP, provide three hard copies and one electronic copy. 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, Division Chief
Remediation Division
Oil Control Program

cc: Ms. Andrea Taylorson-Collins, Groundwater & Environmental Services, Inc
Mr. M. Trent Zivkovich, Whiteford, Taylor & Preston LLP
Mr. John Resline, Acting Director of Environmental Health, Harford County Health Dept.
Julie Kuspa, Esquire, Office of the Attorney General
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program