



Maryland

Department of the Environment

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

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

May 28, 2019

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

RE: REQUEST FOR CONTINUED MONITORING

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 (MDE) Oil Control Program (OCP) completed a review of the case file for the above-referenced property, including the *First Quarter 2019 Monitoring and Sampling Report - No Further Action Request*, dated Apr. 9, 2019. This case was opened in Aug. 2004 when the OCP requested an evaluation of the site in conjunction with an area-wide drinking water investigation. There are currently 12 on-site and 3 off-site monitoring wells. Groundwater samples collected from this network between July 2006 and Mar. 2019 identified methyl tertiary-butyl ether (MTBE) as the primary constituent of concern.

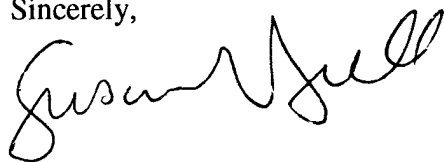
The monitoring well network was most recently sampled in Mar. 2019. The groundwater samples were analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 8260 and total petroleum hydrocarbons - diesel and gasoline range organics (TPH-DRO and TPH-GRO) using EPA Method 8015. The Mar. 2019 analytical results for the groundwater samples collected from the 15 monitoring wells exhibited concentrations of MTBE above the state action level of 20 parts per billion (ppb) in only monitoring well MW-4A. A review of the corrected groundwater elevations revealed that the groundwater table increased, on average, 5 feet during the 2018 monitoring season due to higher than average precipitation. Based on this increase in the water table levels, the Dec. 2017 data was reviewed and those results exhibited concentrations of MTBE above the state action level of 20 ppb in 6 monitoring wells (MW-4A, MW-6, MW-9, MW-10, MW-13, and HW-3) ranging from 22.8 to 201 ppb.

Based on the location of this station in a high-risk groundwater use area, private drinking water supply wells directly down-gradient of the currently monitored plume, and the elevated water table, MDE requires the following:

1. Continue gauging and sampling MW-1A, MW-5, and MW-7 on an annual basis and gauging and sampling of the remaining monitoring wells and tank field monitoring pipes quarterly.
2. All samples collected must be analyzed for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 8260 and TPH-GRO using EPA Method 8015.
3. Continue sampling of the on-site drinking water supply well on an annual basis. All samples collected must be analyzed for full-suite VOCs using EPA Method 524.2.
4. **No later than 45 days following a sampling event**, submit a *Report* detailing the results of the quarterly event. When submitting sampling reports, include detailed data summary tables and scaled site maps showing actual sampling locations. Reports must include groundwater surface contours and dissolved phase concentration maps with the concentrations of benzene, ethylbenzene, toluene, total xylenes, and MTBE. The OCP requires the following modifications:
 - a. Modify Table 1 to present the following: sample date, depth to water, corrected groundwater elevations, benzene, toluene, ethylbenzene, total xylenes, MTBE, TBA, TAME, and TPH-GRO.
 - b. Modify Table 2 to present the following: monitored natural attenuation data (methane, iron, sulfur, kjeldahl nitrogen, total nitrate/ nitrogen, and dissolved oxygen) collected between Mar. 2014 and Mar. 2017.
 - c. All tables must be sized and presented on 8-½ x 11 inch paper.
 - d. Present MTBE trends with concentrations graphed on the same logarithmic scale and presented in conjunction with corrected groundwater elevations.
5. Following a review of the 2019 calendar year of data, the OCP will reevaluate the status of this case. To enhance this review, present calculated Mann Kendall analysis for each well and select the wells that 7-Eleven proposes to retain for required high-risk monitoring at the site.

If you have any questions, please contact me at 410-537-3499 or susan.bull@maryland.gov.

Sincerely,



Susan R. Bull, Eastern Region Supervisor
Remediation and State-Lead Division
Oil Control Program

cc: Ms. Marie Treiber, Project Manager, AECOM
Mrs. Julie Mackert, Director, Environmental Health Services, Harford County Health Dept.
Mr. Andrew Miller, Chief, Remediation and State Lead Division, Oil Control Program
Mr. Christopher H. Ralston, Program Manager, Oil Control Program
Ms. Kaley Laleker, Director, Land and Materials Administration