



April 4, 2023

The Honorable J. David Foster  
Mayor  
Town of Chestertown  
118 N. Cross Street  
Chestertown, MD 21620

**RE: RESPONSE LETTER**  
**Case No. 1987-2534-KE**  
**Chester River Hospital Center**  
**100 Brown Street, Chestertown**  
**Kent County, Maryland**  
**Facility I.D. No. 3168**

Dear Mayor Foster:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) has received your letter dated February 8, 2023, and appreciates your continued input for the above referenced site. Based upon the points outlined in your letter, the OCP has completed a supplemental review of the *2023 Groundwater Sampling and Analysis Plan (SAP)*, dated November 30, 2022, prepared by Gannett Fleming on behalf of the University of Maryland Shore Regional Health (SRH) and OCP's *2023 Groundwater Sampling and Analysis Plan Approval* letter, dated February 2, 2023.

The *SAP* proposed a monitoring schedule for the 2023 calendar year that permits continued monitoring of the well network and provides flexibility for monitoring to be adjusted for future calendar years in accordance with the executed Settlement Agreement and Consent Order (SACO) between the SRH and MDE and the separate agreement between Chestertown and SRH. The *SAP* outlined six scenarios, any of which, can trigger either targeted supplemental investigation or reactivation of the groundwater pumping system.

Scenario #6 states, "*Groundwater concentrations exceeding 1 mg/L TPH-DRO or 0.017 mg/L naphthalene in all the following wells for three consecutive quarterly sampling events: MW-24, MW-16, MW-50, MW-49, MW-15, and MW-17.*" Scenario #6 was originally proposed in the *Work Plan – Pilot Pumping System Shutdown*, dated February 4, 2022, as a first warning system and approved in the OCP's *Pilot Pumping System Shutdown Approval* letter, dated April 1, 2022. Scenario #6 was incorporated again as a line of first warning wells in the *2023 SAP*, dated November 30, 2022.

The groundwater trigger concentrations outlined in Scenario #6 for the subset of six monitoring wells in the parking lot south of Brown Street, differ from the groundwater trigger concentrations

that were proposed for the subset of seven sentinel wells: S-1, S-2, S-3, MW-18, MW-23, MW-28, and MW-29, which are the same seven monitoring wells identified as the “Sentinel Monitoring Wells” in the agreement between Chestertown and SRH. The trigger conditions for the Sentinel Monitoring Wells are captured in Scenario #2, which states, “*Groundwater concentrations exceeding 0.47 mg/L TPH-DRO or 0.0017 mg/L naphthalene in any of the seven sentinel wells: S-1, S-2, S-3, MW-18, MW-23, MW-28, and MW-29.*” These more stringent concentrations, which are applicable to the Sentinel Monitoring Wells, are identical to conditions established by the agreement between Chestertown and SRH.

In addition, OCP approved the *2023 Groundwater Sampling & Analysis Plan* with modifications to ensure that all above referenced target wells are sampled on a quarterly basis and all wells in the network are gauged on a monthly basis. Based upon the clarifications, OCP does not believe a revision to the *2023 Groundwater Sampling and Analysis Plan Approval* letter dated February 2, 2023 is necessary.

If you have any questions, please contact Ms. Lindley Campbell at 410-537-3387 ([lindley.campbell1@maryland.gov](mailto:lindley.campbell1@maryland.gov)) or Ms. Susan Bull at 410-537-3499 ([susan.bull@maryland.gov](mailto:susan.bull@maryland.gov)).

Sincerely,



Christopher H. Ralston, Program Manager  
Oil Control Program

cc: Mr. Bill Ingersoll, Manager, Town of Chestertown  
Mr. Kenneth D. Kozel, President and CEO, Shore Regional Health  
Michael Powell, Esq., Gordon Feinblatt, LLC  
Mr. Ken Guttman, Principal Engineer, Gannett Fleming  
Mr. Steve Slatnick, Senior Project Manager, Gannett Fleming  
Ms. Erika Hercher, Acting Director, Env. Health Programs, Kent County Health Dept.  
Ms. Julie Kuspa, Esq., Office of the Attorney General  
Mr. Robert Peoples, Source Protection and Appropriation Division, Water Supply Program  
Ms. Lindley Campbell, Case Manager, Remediation Division, Oil Control Program  
Mrs. Susan Bull, Chief, Remediation Division, Oil Control Program