

ENVIRONMENTAL
ALLIANCE

June 20, 2008

Mr. Jim Richmond
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard, Suite 620
Baltimore, MD 21230-1719

• *Engineering*
• *Remediation*
• *Consulting*

**Re: Response to Directive
Green Valley Citgo
11791 Fingerboard Road
Monrovia, Maryland
MDE Case # 2005-0834-FR**

Dear Mr. Richmond:

Environmental Alliance, Inc. (Alliance), on behalf of Carroll Independent Fuel Company (CIFC) is responding to the March 27 and May 28, 2008 Maryland Department of the Environment (MDE) directives.

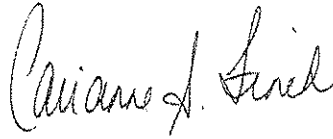
Discussions between CIFC and MDE-Water Management Administration (WMA) to permit a granular activated carbon (GAC) system for the Green Valley Shopping Center are ongoing. In April 2008, Alliance submitted a revised permit application. Alliance received comments from MDE-WMA on May 27, 2008 and is currently preparing a response to the comments. Alliance anticipates that the permit will be received within the next two months.

A *Notice of Violation NV-2007-069* dated April 5, 2007, required the addition of five monitoring wells between monitoring well MW-3 and onsite supply wells PW-1 and PW-2. Site investigative activities conducted between April 2007 and April 2008 indicated that four monitoring wells would provide sufficient information to update the Site Conceptual Model (SCM). MDE approved the Subsurface Investigation Work Plan Addendum May 28, 2008, which proposed the addition of four monitoring wells. The four new monitoring wells, monitoring wells MW-5 through MW-8, were installed on May 12, 2008. A supervising geologist, provided by Alliance, ensured that the drillers were in compliance with the directive and applicable regulations. A Maryland licensed driller conducted the drilling and installation of the monitoring wells. During drilling activities, soil was logged from cuttings samples at the discretion of the supervising Alliance geologist to characterize site lithology. Soil logs include grain size, texture, color, odor, and hydrocarbon staining. The soil boring logs and well construction records are included in Attachment I.

Currently, UST system removal and is anticipated to start in mid-July of this year.

If you have any questions or if further information is required please contact the undersigned at (410) 729-9000. Thank you for your time.

Sincerely,
ENVIRONMENTAL ALLIANCE, INC.



Carianne A. Finch
Maryland Operation Manager/Engineer

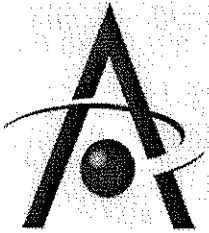


William Smith, P.G.
Principal Hydrogeologist

Attachment I: Soil Boring Logs and Well Construction Records

- C: Mr. Randy Childs, Carroll Independent Fuel Company (e-mail)
Ms. Yolande Norman, MDE – Oil Control (2 copies and CD)
Ms. Susan Bull, MDE – Oil Control
Mr. George Keller, Frederick County Health Department
Mr. Barry Glotfelty, MDE – Wastewater Permits Program
Mr. Arshad M. Ranjha, Green Valley Citgo
Mr. Samir Andrawas, Tibercrest Limited Partnership
Mr. Robert S. Bassman, Bassman, Mitchell & Alfano, Chtd.

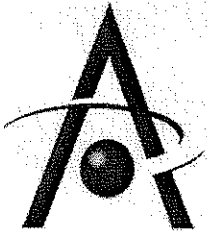
ATTACHMENT I



Log of Boring: MW-5
 Date Started: 05/12/08
 Date Completed: 05/12/08
 Total Depth (ft): 70.00
 Boring Diameter (in): 12"/8"
 Bedrock Depth (ft): N/A
 Elevation (ft-msl): N/A
 Remark:

Project Code: 1953
Project Name: Green Valley Citgo
Drilled By: Eichelbergers
Logged By: Chris Thoeny
Drill Rig: Schram T450
Drill Method: Air Hammer Rotary
Sampling Method: Cuttings

Depth	Sample Number	Sample Interval	Recovery (inches)	Blow Counts	PID/FID Units	Lithological Description	Interpreted Lithology	Well Construction	Comments
0						SAPROLITE: Asphalt, gravel then orange-tan silt and clay with pieces of flat, angular, silver-gray phyllite / sapolite.			0-5' soft dig with air knife
-5					0.3	SAPROLITE: Sapolite crushed to pinkish brown micaceous silt.			5'-14' drill with 12" dua roller bit
-10					0.3	SAPROLITE: Light tan colored micaceous sapolite as above.			
-15					0.2	SAPROLITE: Sapolite crushed to varicolored orange-brown, slightly micaceous silt.			Set 8" diameter temporary steel casing to 14' bgs; grout to surface with portland, bentonite grout
-20					0.2	SAPROLITE: Sapolite as above, all soft drilling with increase in crushed rock fragments at 29'.			Drill out hole with 8"diameter air hammer
-25					0.2	SAPROLITE: Sapolite as above, possible soft zone at 33 and 34'.			
-30					0.2	BEDROCK: Bedrock at 36' shows increase in dust and cuttings change to gray silt (from crushed phyllite/schist). Slightly moist and discolored tan-light tan at 39', then more competent drilling by 40'.			
-35					1.4	BEDROCK: Phyllite/schist as above, Possible water zone at 44.5' slightly discolored brown along with increase in rock fragments. Cuttings change back to gray at 49.5' with harder drilling.			
-40					0.7	BEDROCK: Rock as above. Possible fractures/soft zones at 51.5' 53' and 57-58' indicated by softer drilling and discoloration.			
-45					0.4	BEDROCK: Phyllite/Schist, Cuttings greenish-gray micaceous silt. Soft zone at 62'. Darder drilling 63'-69' Soft zone with some discoloration 69-70'			
-50									
-55									
-60									
-65									
-70									End boring at 70'

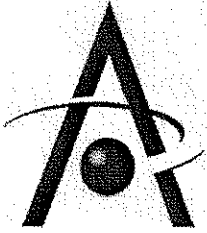


Log of Boring: MW-6

Date Started: 05/12/08
 Date Completed: 05/12/08
 Total Depth (ft): 66.00
 Boring Diameter (in): 12"/8"
 Bedrock Depth (ft): N/A
 Elevation (ft-msl): N/A
 Remark:

Project Code: 1953
 Project Name: Green Valley Citgo
 Drilled By: Eichelbergers
 Logged By: Chris Thoeny
 Drill Rig: Schram T450
 Drill Method: Air Hammer Rotary
 Sampling Method: Cuttings

Depth	Sample Number	Sample Interval	Recovery (inches)	Blow Counts	PID/FID Units	Lithological Description	Interpreted Lithology	Well Construction	Comments
0						SAPROLITE: Asphalt, gravel then orange-tan silt and clay with pieces of flat, angular, silver-gray phyllite / saprolite			0-5' soft dig with air knife
-5					1.7	SAPROLITE: Saprolite, crushed to brown slightly micaceous silt. Cuttings change from orange-brown to brown at ~ 10'.			5'-14' drill with 12" diameter roller bit
-10					2.0				Set, 8" diameter temporary steel casing to 14' bgs; grout to surface with portland bentonite grout
-15					0.4	SAPROLITE: Cuttings, brown micaceous silt with fine grain schist/phyllite and quartz fragments.			Drill out hole with 8" diameter air hammer
-20					4.8	SAPROLITE: As above, soft drilling at 26.5'			
-25									
-30					0.0	SAPROLITE: Cuttings as above, soft, moist zone at 35' with reddish brown discoloration.			
-35									
-40									
-45					0.0	SAPROLITE: Saprolite: Cuttings: Brown, micaceous silt.			
-50									
-55									
-60					22.4	BEDROCK: Harder drilling at 58', cuttings change to silver and greenish gray phyllite/schist, slightly micaceous with quartz veins. Begin show water at 62'. Possible fracture at 64. Showing good water by 66'.			End boring at 66'
-65									

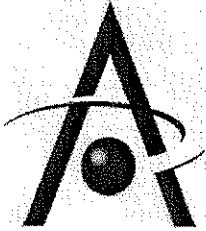


Log of Boring: MW-7

Date Started: 05/12/08
 Date Completed: 05/12/08
 Total Depth (ft): 63.00
 Boring Diameter (in): 12"/8"
 Bedrock Depth (ft): N/A
 Elevation (ft-msl): N/A
 Remark:

Project Code: 1953
 Project Name: Green Valley Citgo
 Drilled By: Eichelbergers
 Logged By: Chris Thoeny
 Drill Rig: Schram T450
 Drill Method: Air Hammer Rotary
 Sampling Method: Cuttings

Depth	Sample Number	Sample Interval	Recovery (inches)	Blow Counts	PID/FID Units	Lithological Description	Interpreted Lithology	Well Construction	Comments
0						SAPROLITE: Asphalt, gravel then orange-tan silt and clay with pieces of flat, angular, silver-gray phyllite / saprolite			0-5' soft dig with air knife
-5					0.0	SAPROLITE: Pinkish, micaceous saprolite ground to sand and clay with pieces of fine grain rock fragments.			5'-19' drill with 12" diameter roller bit
-10					0.2	SAPROLITE: As above, soft from 15-16', harder drilling 18-19'			Drill out hole with 8" diameter air hammer
-15									
-20					0.3	SAPROLITE: Orange-brown micaceous silt. Soft zone at 27'.			Set, 8" diameter temporary steel casing to 19.5' bgs; grout to surface with portland, bentonite grout
-25									
-30					0.8	SAPROLITE: Cuttings as above, become slightly darker at 30' harder drilling at 32'.			
-35									
-40					0.8	SAPROLITE: Cuttings as above, soft zone at 41' and 46.5'. Color change to orange at 48'.			
-45									
-50					9.8	BEDROCK: Cuttings change to silver-blue-gray, very dusty. Soft zone at 60', cuttings change to green-brown phyllite/schist. End boring at 63'.			Begin adding water at 50' to keep dust down
-55									
-60									



Log of Boring: MW-8
Date Started: 05/12/08
Date Completed: 05/12/08
Total Depth (ft): 70.00
Boring Diameter (in): 12"/8"
Bedrock Depth (ft): N/A
Elevation (ft-msl): N/A
Remark:

Project Code: 1953
Project Name: Green Valley Citgo
Drilled By: Eichelbergers
Logged By: Chris Thoeny
Drill Rig: Schram T450
Drill Method: Air Hammer Rotary
Sampling Method: Cuttings

Depth	Sample Number	Sample Interval	Recovery (inches)	Blow Counts	PID/FID Units	Lithological Description	Interpreted Lithology	Well Construction	Comments
0					0.4	SAPROLITE: Asphalt, gravel then orange-tan silt and clay with pieces of flat, angular, silver-gray phyllite / saprolite			0-5' soft dig with air knife; Rain; Breathing Zone PID 2.1-5.1
-5						SAPROLITE: Pinkish-tan, micaceous phyllite, soft at 10'. Color change to deeper orange. Slightly firmer drilling by 15'			5'-15' drill with 12" diameter roller bit
-10									Set, 8" diameter temporary steel casing to 15' bgs; grout to surface with portland bentonite grout
-15					0.2	SAPROLITE: Crushed Saprolite: light tan-brown micaceous fine grain silt.			Drill out hole with 8" diameter air hammer
-20					0.2				
-25									
-30									
-35									
-40					0.4	BEDROCK: Greenish gray schist, crushed to silt with fine grain pieces of slightly micaceous rock.			Slightly harder drilling
-45					1.8				
-50					1.8	BEDROCK: Possible water bearing zone, softer drilling and decrease in dust.			
-55					2.4	BEDROCK: Major increase in dust at 55'. Rock fragments: dark green, slightly micaceous schist with quartz veins.			Drill out boring at 60', clear hole and let sit for recharge evaluation. Only one-foot of water accumulated in hole after allowing to sit for 24 hrs
-60					2.4				
-65					0.2	BEDROCK: Cuttings: Crushed phyllite/schist as bluish-gray silt, fairly dry. Soft zone at 64' with some brown discoloration. Cuttings show gradual decrease in dust 66-70'.			End boring at 70'
-70									