



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

Oil Control Program, Suite 620, 1800 Washington Blvd., Baltimore MD 21230-1719  
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Martin O'Malley  
Governor

Robert M. Summers, Ph.D.  
Secretary

Anthony G. Brown  
Lieutenant Governor

October 16, 2014

Ms. Pushpinder Sandhu  
13007 Twelve Hills Road  
Clarksville MD 21029

**RE: REQUEST FOR STEP-OUT DELINEATION WORK PLAN**  
**Case No. 2012-0677-AA**  
**H&J BP Subway**  
**738 MD Route 3 North, Gambrills**  
**Anne Arundel County, Maryland**  
**Facility I.D. No. 11762**

Dear Ms. Sandhu:

The Oil Control Program recently completed a review of the case file for the above-referenced property, including the *2<sup>nd</sup> Quarter 2014 Progress Report - July 31, 2014*. Liquid phase hydrocarbons (LPH) have not been detected at the site since enhanced fluid recovery was conducted from the tank field monitoring pipes in October 2012. Dissolved phase petroleum hydrocarbons have been detected in on-site monitoring wells and tank field monitoring pipes at elevated levels; however, on-site and off-site drinking water supply well sampling has been non-detect for petroleum constituents. The report included recommendations for reduction in the frequency of gauging, the frequency of site potable well sampling, groundwater sampling parameters, and the installation of two additional monitoring wells. The Department hereby provides the following comments and requirements:

- 1) The Oil Control Program approves the recommendation to reduce the frequency of monitoring well and tank field monitoring pipe gauging from monthly to quarterly (every three months). If LPH are detected, the Oil Control Program must be notified within 24 hours and monthly gauging must continue.
- 2) The Oil Control Program approves the recommendation to reduce the sampling frequency for the on-site drinking water supply well from quarterly to semi-annually (twice a year). The supply well must be sampled in the 2<sup>nd</sup> and 4<sup>th</sup> quarters. Sample collected must be analyzed for full- suite volatile organic compounds (VOCs), including fuel oxygenates and naphthalene, using EPA Method 524.2.
- 3) The Oil Control Program approves the recommendation to decrease sample analytical parameters as proposed, however, during every 4<sup>th</sup> quarter all monitoring wells must be sampled and analyzed for full- suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 8260.

- 4) Any new monitoring wells installed must be initially sampled for full-suite VOCs, including fuel oxygenates and naphthalene, using EPA Method 8260 to establish a baseline. After baseline sampling, sample analysis may switch to the decreased analytical sampling schedule.
- 5) The Oil Control Program approves the recommendation for installation of two additional monitoring wells. A *Work Plan* must be submitted for review and approval **no later than November 18, 2014**. The *Work Plan* must detail the locations of the wells (on a site map), well construction plans, and methods. Please note all future recommendations (i.e., proposals for delineation, remediation) must be submitted separately as stand-alone documents and not in quarterly reports.
- 6) The gauging and sampling results data tables are difficult to read in the current quarterly report layout. Adjust the tables so they conform to the example tables displayed in the Department's *Maryland Environmental Assessment Technology (MEAT) for Leaking Underground Storage Tanks* guidance document, Appendices H and I. At a minimum the "parameter" column headings should display benzene, toluene, ethylbenzene, xylene, naphthalene, methyl tertiary-butyl ether (MTBE), and other analyte detections. A copy of the MEAT document can be obtained here:  
[http://www.mde.state.md.us/assets/document/MEAT\\_Guidance.pdf](http://www.mde.state.md.us/assets/document/MEAT_Guidance.pdf)
- 7) When the new sample results table is constructed, include well construction information (total depth, well diameter, screen interval) beneath the well ID in the "Well No." column.

All documentation submitted to the Oil Control Program must include three hard copies and one digital copy on a labeled compact disc (CD). If you have any questions, please contact the case manager, Mr. Michael Edillon, at 410-537-4151 (email: [michael.edillon@maryland.gov](mailto:michael.edillon@maryland.gov)) or me at 410-537-3482 (email: [ellen.jackson@maryland.gov](mailto:ellen.jackson@maryland.gov)).

Sincerely,



Ellen Jackson, Central Region Section Head  
Remediation and State Lead Division  
Oil Control Program

ME/nln

cc: Mr. Baldev Singh (Station Operator)  
Mr. Gary Lasako (BP Environmental, Inc.)  
Mr. Brian Chew (Anne Arundel County Health Dept.)  
Ms. Ginger D. Klingelhoefer-Ellis (Anne Arundel County DPW)  
Mr. Andrew B. Miller  
Mr. Christopher H. Ralston  
Mr. Horacio Tablada