



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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October 8 2013

Mr Richard Dougherty
Itran Tompkins Rubber Corporation
375 Metuchen Road
South Plainfield NJ 07080 1291

**RE APPROVAL OF MONITORING WELL REPLACEMENT AND
REQUEST FOR UPDATED SITE CONCEPTUAL MODEL**

Case No 1991 0916 BA

Former Belko Corporation

11931 Jericho Road, Kingsville

Baltimore County Maryland

Dear Mr Dougherty

The Oil Control Program recently completed a review of the case file for the above referenced property including the *Second Quarter 2013 Update Report – July 19 2013*. In August 2013 the excavation of petroleum contaminated soil was completed in Area C in accordance with the approved *Corrective Action Work Plan (CAP) December 28 2010*. Prior to implementation of the CAP groundwater monitoring wells MW 2 MW 3 and MW 7 were properly abandoned due to their location in the proposed area of excavation. During the excavation MW 8 was damaged and MW 2 was removed. The *Second Quarter 2013 Update Report July 19 2013* proposes to install replacement monitoring wells in the same location as the abandoned monitoring wells.

The Department approves the proposal to install replacement monitoring wells contingent upon the following modifications:

- 1 Two monitoring wells must be installed in the vicinity of the former brick structure (i.e. mill race) one at the eastern end of the structure in the vicinity of the natural seep which entered the excavation and one in the location of the earthen dike. A site meeting must be conducted with the case manager to field mark the final location of the two additional monitoring wells.
- 2 All replacement monitoring wells must be constructed using 4 inch diameter well casing and screened per the *Maryland Environmental Assessment Technology for Leaking Underground Storage Tanks* guidance document specifications (http://www.mde.state.md.us/programs/Land/OilControl/UndergroundStorageTanks/Pages/Programs/LandPrograms/Oil_Control/usthome/index.aspx).

- 3 The wells must be installed by a Maryland licensed well driller following all applicable standards Well development methods must include active surging of the well in addition to pumping/purging
- 4 All necessary State and local permits must be obtained
- 5 Soil cores must be continuously logged and field screened with a calibrated photo ionization detector
- 6 All wastes generated during installation and development of the monitoring wells must be containerized for proper off site disposal
- 7 After the monitoring wells are installed they must be included in the previously approved gauging and sampling schedule

The Department understands that liquid phase hydrocarbon (LPH) have been observed at the seep location along the Little Gunpowder River since *CAP* implementation was completed The Department requires inspection of the seep and product recovery if applicable to be completed on a weekly basis until further notice Sorbent booms must be monitored for product and replaced as necessary Field notes regarding weekly site visits including if LPH were observed and the product recovery method must be included in *Quarterly Monitoring Reports*

The most recent *Conceptual Site Model (CSM) Report* was submitted on April 14 2010 The report included data collected to date a description of what was known of subsurface conditions and property usage and what remedial approaches were necessary to mitigate product seeps to the Little Gunpowder River Subsequent to the *CSM* a *CAP* detailing specifics of what was recommended in the *CSM* was received and approved The *CAP* was implemented in phases and reports summarizing each completed phase were submitted During excavation activities subsurface features/structures were encountered and identified as contaminate sources and/or migration pathways and in communication with MDE were addressed (i.e. brick structure/mill race the accumulator pad drainage pipes and concrete footers)

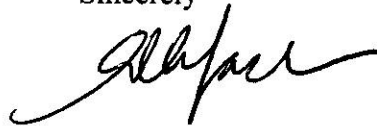
Given the amount of data collected during *CAP* implementation and information obtained since the last *CSM* submitted in 2010 the Department requires the submittal of an updated comprehensive *CSM* The purpose of the *CSM* is to provide a complete compilation report that includes a discussion of the following all data collected during *CAP* implementation an update of what is known of subsurface conditions contamination left in place fate and transport of LPH to product seeps identification of any data gaps status of site conditions and redevelopment plans The *CSM* must also include the following

- A Separate dissolved phase trend graphs for each monitoring well and seeps noting any detectable
- B VOC SVOC and TPH DRO/GRO concentrations
- C Trend graphs depicting depth to water versus LPH thickness
- D Well installation reports/drilling logs for new and replacement monitoring wells
- E Detailed geologic cross sections with a site map showing transect lines These cross sections should include the area of the millrace/brick structure and other pertinent subsurface features

- F Results from soil samples collected during *CAP* implementation from all on site areas in a table and map format
- G An evaluation of any data gaps
- H Discuss the fate and transport of contaminants of concern and LPH
- I An area site map depicting adjacent off site properties
- J An evaluation of the seven risk factors per the Department's *Maryland Environmental Assessment Technology for Leaking Underground Storage Tanks* guidance document and any further recommendations
- K The updated *CSM* must be submitted within sixty (60) days after replacement and installation of additional monitoring wells

Notify the Oil Control Program at least five (5) working days prior to conducting any field activities associated with this project. Prior to conducting any investigative or remedial work at this site, written approval must be received from the Department. When submitting documentation to the Oil Control Program, provide three hard copies and an electronic copy on a labeled compact disc (CD) to the attention of the case manager at the above letterhead address. If you have any questions, please contact the case manager Ms Jenny Herman at 410 537 3413 or via email jenny.herman@maryland.gov

Sincerely



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

JH/nln

cc Mr Tripp Fischer (Brownfield Associates Inc)
Mr Kevin Koepenick (Baltimore County DEPS)
Mr Andrew B Miller
Mr Christopher H Ralston
Mr Horacio Tablada

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