



Maryland
Department of
the Environment

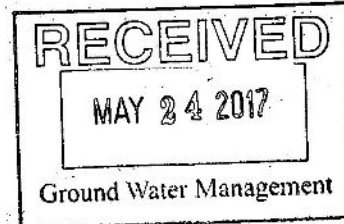
Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

May 19, 2017

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



RE: MONITORING WELL ABANDONMENT AND SEEP MONITORING APPROVAL
Case No. 1991-0916-BA
Former Belko Corporation
11931 Jericho Road, Kingsville
Baltimore County, Maryland

Dear Mr. Dougherty:

The Maryland Department of the Environment's (the Department) Oil Control Program recently completed a review of the case file for the above-referenced property, including the *4th Quarter 2016 Remedial Action Completion Report*, dated January 2017. On November 1, 2016, the Department issued a letter requiring all site monitoring wells be gauged and sampled during 4th quarter 2016 or 1st quarter 2017. The Department also required continued monthly monitoring and quarterly sampling of the Seep for total petroleum hydrocarbons-diesel range organics (TPH-DRO).

On December 6, 2016, your consultant, Brownfield Science & Technology, Inc. (BSTI), gauged and sampled the monitoring wells for full-suite volatile organic compounds using EPA Method 8260, TPH-DRO using EPA Method 8015, and polycyclic aromatic hydrocarbons using EPA Method 8270. All analytical results were below State groundwater standards with the following exceptions. TPH-DRO were detected in all wells sampled at concentrations ranging from 1,200 to 21,400 micrograms per liter ($\mu\text{g/L}$), which exceed the 47 $\mu\text{g/L}$ standard. Naphthalene was detected in one well (W-9) at a concentration of 2.02 $\mu\text{g/L}$, which exceeds the 1.4 $\mu\text{g/L}$ standard. No measurable liquid phase hydrocarbons (LPH) were observed in the wells during 4th quarter 2016. Measurable LPH have not been detected in any wells since October 2009.

BSTI requested to abandon the eleven monitoring wells and two potable wells. Based on the aforementioned findings, the Department grants approval to abandon all site monitoring wells. All wells must be properly abandoned by a Maryland-licensed well driller in accordance with Code of Maryland Regulations (COMAR) 26.04.04.34-36. Upon completion of abandonment activities, provide copies of the well abandonment reports to both the Oil Control Program (Attn: Mr. Lenn Roberts) and the Baltimore County Department of Environmental Protection and Sustainability, Groundwater Management Section, 111 West Chesapeake Avenue, Suite 319, Towson, Maryland 21204 (Attn: Mr. Kevin Koenig).

BSTI also provided rationale for not completing the proposal in the *Corrective Action Plan*, dated December 22, 2010, for decommissioning Outfall 2 by demolishing the discharge point and filling 40 feet of piping leading from the discharge point. This was proposed in an effort to eliminate any preferential flow path for petroleum impacted water from entering the Gunpowder River. In 2013, two locations of the piping were removed down-gradient of former Building 7. Due to the absence of LPH and/or sheen at Outfall 2 from the

remaining 40 feet of piping and considering that groundwater infiltrates the remaining pipe leading to the outfall, which is no different than groundwater discharging through seeps along the river bank in the area of the outfall, BTSI recommends leaving the pipe without sealing the end since there is no added benefit in completing this portion of the *Corrective Action Plan*. The Department has no objection to leaving the pipe in place in its current condition.

Monthly monitoring and quarterly sampling of the seep, as well as changing and maintaining booms and absorbent pads, will continue as proposed. The Department requires that, in addition to collecting a seep sample, a surface water sample be collected for laboratory testing. The location should correspond with samples collected in 2015 (S.W. SEEP) located approximately 10 feet down-gradient of the seep conducted for the Ecological Evaluation Results (refer to the attached Figure). Both the seep sample and surface water samples collected must be analyzed for TPH-DRO by EPA Method 8015. Quarterly monitoring reports with the results of the seep inspections, photographs of the Seep, and sampling results must continue to be submitted to the Oil Control Program. Provide three hard copies and an electronic copy on a labeled compact disc (CD).

If you have any questions, please contact the case manager, Mr. Lenn Roberts, at 410-537-3111 or via email at lenn.roberts@maryland.gov.

Sincerely,

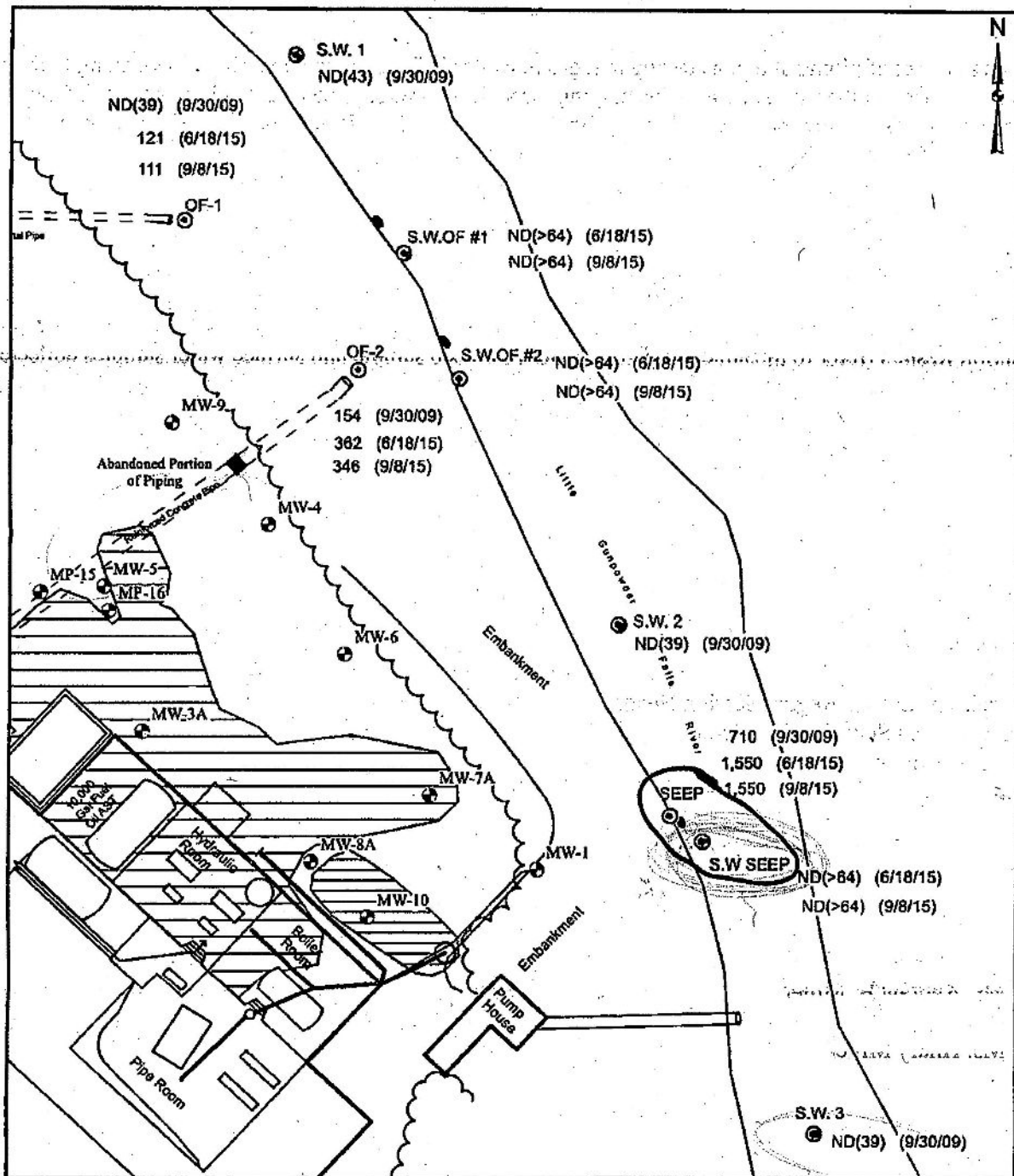


Ellen Jackson, Central Region Section Head,
Remediation and State-Lead Division
Oil Control Program

LDR/nln

Enclosure: Figure Showing Seep and Surface Water Sampling Locations

cc: Mr. Tripp Fischer (Brownfield, Science, and Technology, Inc.)
Mr. Kevin Koepenick (Baltimore County DEPS)
Mr. Andrew B. Miller
Mr. Christopher H. Ralston
Ms. Hilary Miller



3157 Limestone Rd.
Cochranville PA, 19330

Legend
 ⊕ Existing Monitoring Wells
 ■ Zone of Less than 10:1 Mixing
 710 TPH-DRO (ug/l)

ECOLOGICAL EVALUATION RESULTS

AXIL-BELKO

11931 JERICO RD KINGSVILLE, MD

Notes:
 Historic Site Features Are Illustrated. All Buildings Have Been Removed.

Date: 12/17/15	Dr. By: NP	Chk. By: WTP	BSTI Job No. 367	Figure Number: 1
Scale Bar: 0 5 10 20 30 40 Feet				Scale Reference

○ Area of seep and surface water sampling locations.