



# 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.  
Acting Secretary

Anthony G. Brown  
Lieutenant Governor

February 25, 2011

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

**RE: CORRECTIVE ACTION PLAN**  
**Case No. 1991-0916-BA4**  
**Former Belko Corporation**  
**11931 Jericho Road, Kingsville**  
**Baltimore County, Maryland**

Dear Mr. Dougherty:

The Oil Control Program (OCP) recently completed a review of the case file for the above-referenced property, including: the *Conceptual Site Model Report - April 14, 2010*; the *Data Summary Report - October 1, 2010*; and the *Phase II Environmental Site Assessment - November 1, 2010*. On October 28, 2010, a meeting was conducted with representatives of Itran-Tompkins Rubber Corporation, your legal council, Brownfield Associates your environmental consultant, and the Oil Control Program to discuss future site remediation. The Department required that a *Corrective Action Plan (CAP)* must be submitted detailing further site assessment and a remedial strategy.

A *CAP* was received on December 28, 2010, which details the site history and provides an updated site conceptual model. The remedial goal as described in the *CAP* is to remove as much source material as possible in order to eliminate the petroleum seep observed in the Little Gunpowder River. In order to achieve this goal, the *CAP* proposes to remove source material via soil excavations; conduct an outfall pipe investigation and decommissioning; and partial building demolition, for source removal within the building footprint.

Brownfield Associates proposes to excavate and remove petroleum contaminated soils from the Areas A, C, D and I. Concentrations of total petroleum hydrocarbon- diesel range organic (TPH-DRO) were detected above regulatory standards in these four areas during a Phase II investigation conducted in February 2002. The soil excavation activities described in the *CAP* include removal of subsurface source material containing concentrations of TPH-DRO greater than 2,500 ppm. Surface soils with concentrations of TPH-DRO at or above 620 ppm will be excavated for proper off-site disposal as well.

In order to segregate soils with these concentrations for removal and proper disposal, excavated soils will be evaluated using a combination of field screening tools, including; visual inspection, screening with a calibrated photo-ionization detector (PID), and field sampling using Confirmation Screening Samples (CSS)

for rapid qualitative sampling (i.e. "shaker tests" Oil-In-Soil™) for TPH-DRO. Soil exhibiting TPH-DRO concentrations greater than 2,500 ppm, via the shaker tests, will be excavated for proper off-site disposal. Soil samples exhibiting TPH-DRO concentrations between 500 ppm and 2,500 ppm will be evaluated for use as backfill or proper disposal pending visual inspection, PID readings and laboratory testing. Soils exhibiting TPH-DRO concentrations less than 500 ppm will be stockpiled as clean for reuse as backfill. Confirmatory testing of each excavated area (sidewalls and bottom of the excavations if rock is not encountered) is proposed using both the field shaker test kits (CSS) and laboratory analysis at a ratio of 10:1 (i.e. 10 CSS shaker test kits to 1 laboratory sample).

Pending approval from the Baltimore County Landmark Preservation Society, a section of the building containing the boiler room and hydraulic room is proposed for demolition in order to access contaminated source areas within the building footprint (referred to as Building 8). If the building is demolished, soils in the building footprint will be assessed and excavated. If the building is not approved for demolition, then select areas, which are accessible and where petroleum contamination is likely, will be targeted for excavation.

In order to remove some source material within the building the removal of oil contaminated water within the building is proposed. All above ground storage tanks (ASTs), product piping and associated equipment within the building will be emptied of water and removed. Either vacuum trucks or dewatering may be used to recover contaminated water.

It is anticipated that dewatering activities will be necessary to excavate soils at Area C, and perhaps other areas. In order to develop a treatment system for groundwater recovered, two 24-hour pump tests from monitoring wells W-5 and W-8 are proposed. Water recovered will be treated via 55 gallon drums of granular activated carbon, sampled and discharged in accordance with the NPDES permit.

River outfalls OF-1 and OF-2 will be also investigated and OF-2 will be decommissioned to eliminate a preferential pathway for petroleum contamination to enter the Little Gunpowder River. A second round of outfall and surface water sampling was proposed as well as sediment sampling between outfalls. Data collected will be used to evaluate mass loading to the river and plume stability.

The Department approves the *Corrective Action Work Plan*, contingent upon the following modifications;

#### **Soil Excavation**

1. The Department requires all soil with laboratory analytical detections of TPH-DRO above the regulatory limit of 620 ppm be excavated and properly disposed of off-site, regardless of the depth of the excavations. Therefore, surface and subsurface soils must be removed to the TPH-DRO cleanup level of 620 ppm, as determined by laboratory analyses.
2. The Department conceptually approves the use of Confirmation Screening Samples (CSS) to aid in delineation during the soil excavation activities. However, the Department does not approve the ratio of field samples versus laboratory confirmation samples as proposed. Post excavation soil sample must be collected for laboratory analysis every 25-feet along the perimeter of the excavation. One confirmatory soil sample must be collected for laboratory analysis per every 50-square feet from the excavation floor (where bedrock is not encountered). For example, the excavation in Area A is proposed to extend 650-square feet in floor area and 90-feet along the excavation perimeter. So thirteen (13) soil samples will be collected for laboratory analysis from the excavation floor and four (4) soil samples will be collected

from the perimeter of the excavation. The field screening samples may be used as needed to determine the extent of the excavation.

3. The Department understands that excavated soil will be assessed in the field using a combination of field screening by both a photo ionization detector, CSS field screening sampling and by visual inspection. Please note, soils with elevated field screening readings, or with visible signs of petroleum contamination may not be used as backfill material. Soils which are segregated as "clean", as determined by field screening tools, must be sampled for laboratory analysis, prior to being used as backfill. Soil exhibiting the highest PID and CSS levels must be collected from the "clean" soil stockpile and submitted for laboratory analysis for TPH-DRO by EPA Method 8015B. The Department will require periodic analytical sampling of the "clean" stockpiled soil for verification that the TPH-DRO concentrations are below regulatory levels (620 ppm).
4. Petroleum contaminated soils must be transported off-site for proper disposal in accordance with State and local regulations. If soils are to be staged on-site prior to their disposal they must be placed on top of plastic and covered securely with plastic.
5. Given the detection of liquid phase hydrocarbon (LPH) in monitoring well W-1 and in test pit TP-1 the Department expects that the excavation in Area C will be extended into this vicinity.
6. Contaminated soil encountered during the exploratory excavations in Areas A and D should be removed to the maximum extent practicable, as opposed to select depth of four feet below ground surface, as proposed.
7. If any monitoring wells are abandoned or destroyed during the soil excavation, they must be replaced. A plan to install monitoring wells to assess the success of the cleanup must be included with the *Report of Results*.
8. MDE-OCP personnel retain the right to determine the final number and location of soil samples to be collected for laboratory analysis from the "clean" soil stock pile and post excavation, based on field conditions.

#### **Piping Runs**

9. All piping runs from the building to the Little Gunpowder River and natural product seeps must be assessed. The Department understands that outfall OF-2 will be decommissioned. Confirm all piping runs from the building to the river bank have been cut, capped, and/or removed. Specifically determine if the three inch floor drain pipe leading from the southeast side of the boiler room to the bank of the river near the pump house is still in place.
10. The Department approves the collection of surface water and sediment samples from the Little Gunpowder River in the vicinity of the outfall pipes as proposed.

#### **Pumping Test**

11. During the proposed pumping test and dewatering of the site, water within the building or groundwater that contains a sheen or more of petroleum must be containerized for proper off-site disposal. In the

fourth quarter 2010 a sheen of LPH was detected in proposed pumping well W-8. Water that does not contain a sheen of petroleum may be treated on-site with carbon filtration as long as dissolved phase petroleum concentrations in effluent water are within levels permissible by the NPDES permit. A fractionation tank may be incorporated to achieve these requirements.

12. After the pumping test is completed, a *Dewatering System Design Plan* must be submitted to the Department for approval. This report should include the results of the pumping test, analytical data collected and design specifications for the dewatering system.

### **Additional Requirements**

13. The Department **does not** approve the abandonment of potable well POT-1 as proposed. Given that bedrock wells were never installed at this site, potable wells POT-1 and POT-2 must continue to be monitored. These wells must be sampled on a semi-annual basis for full suite volatile organic compounds (VOCs) by EPA Method 8260. These wells must be secured to prevent damage during demolition activities.
14. All groundwater and surface water samples must be analyzed for full-suite volatile organic compounds (VOCs), including fuel oxygenates, using EPA Method 8260; total petroleum hydrocarbons/diesel-range and gasoline-range organics (TPH/DRO and TPH/GRO) using EPA Method 8015B; and for polycyclic aromatic hydrocarbons (PAHs) using EPA Method 8310.
15. All required sampling and monitoring must continue as previously approved (i.e., monthly gauging using an oil/water interface probe and clear bailer, quarterly sampling of all monitoring wells, and semi-annual sampling of both on-site drinking water supply wells).
14. Provide documentation of when and how the gasoline (in Area E) and heating oil underground storage tanks (USTs) referenced in the Phase II report were abandoned. Improperly abandoned USTs could be a contributing source to the contamination on-site.

Please note that page 7 of the *Conceptual Site Model Report* states that "twelve soil borings including six shallow bedrock cores and two monitoring wells were installed in June 2005." Although the Department approved this work, it was never conducted. The Department may require this work to be conducted at a later date.

The Department approves the proposed schedule for field activities. As work progresses at the site, the Department requires the submittal of periodic schedule updates. In addition, monthly updates of the status of the demolition approval process and all permits submitted. The required *Dewatering System Design Plan* must be submitted within **30-days** after the pumping test is completed. A completed *Report of Results for the CAP* must be submitted within **90 days** after the completion of excavations in all areas.

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 (3) hard copies and an electronic copy on a labeled compact disc (CD) to the attention of the case manager at the above letterhead address.

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Failure to complete the advised actions may result in enforcement proceedings that could include the issuance of civil penalties and other legal sanctions. All information, data, reports or plans generated for this site must be submitted to the Oil Control Program for review by the dates specified or agreed upon with the Department. If you have any questions, please contact the case manager, Ms. Jenny Herman, at 410-537-3413 or via email [jherman@mde.state.md.us](mailto:jherman@mde.state.md.us).

Sincerely,



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

JH/dt

cc: Mr. Tripp Fischer (Brownfield Associates, Inc.)  
Mr. Kevin Koepenick (Baltimore County DEPRM)  
Pricilla Carroll, Esq.  
Mr. Christopher H. Ralston  
Mr. Horacio Tablada