



October 6, 2013

Mrs. Jenny Herman  
Maryland Department of the Environment  
Oil Control Program  
1800 Washington Boulevard  
Baltimore, Maryland 21230-1719

Re: **Request for Reduction in IAQ Sampling  
Gasoline Fueling Station – Royal Farms #64  
7950 Pulaski Highway, Baltimore, Maryland 21237  
MDE Case No. 10-0339-BA  
MDE Facility No. 3975**

Dear Mrs. Herman:

Advantage Environmental Consultants (AEC), on behalf of Royal Farms/Two Farms Inc., is requesting permission to discontinue quarterly indoor air quality (IAQ) sampling of the first and second floors of 1207 Chesaco Avenue. Sampling of the basement will continue as scheduled. As shown in the attached historical laboratory analytical results table IAQ levels in the basement and 1<sup>st</sup> floor exhibit similar concentrations. The increased concentrations on the third floor are directly correlated to tobacco use by the tenant. As such, testing on the second floor should be suspended based on cross contamination from tenant tobacco use. Furthermore, the vapor density of the chemicals of concern (i.e., benzene, toluene, ethylbenzene, xylene, and naphthalene) are greater than that of air. Therefore, petroleum vapors should not travel beyond the basement in the absence of preferential pathways. It should be noted that the residence does not operate a central heating, ventilation, and air conditioning (HVAC) system. In the event that petroleum vapor concentrations in the basement sample exceed the regulatory standards during any given sampling event, testing would resume on the other two floors. If there are any questions regarding this letter, please contact me at (301) 776-0500.

Sincerely,  
**Advantage Environmental Consultants, LLC**

A handwritten signature in blue ink that reads 'Jeffery Stein'.

Jeffery Stein  
Principal

Attachment

cc: T. Ruszin

**Table 1 - 1207 Chesaco Avenue Indoor Air Quality Analytical Results**  
**Gasoline Fueling Station – Royal Farms #64**  
**7950 Pulaski Highway, Rosedale, MD 21237**

Location	Sample ID	Date	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	Naphthalene
2nd Floor	IAQ-03	8/20/2010	2.72	9.96	0.87 U	2.60	0.72 U	1.1 U
	IAQ-03	4/26/2011	1.03	7.78	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-03	7/20/2011	3.45	10.70	1.11	4.52	0.72 U	2.60
	IAQ-03	10/6/2011	14.00	41.90	3.49	10.10	0.72 U	6.36
	IAQ-03	3/23/2012	4.86	17.80	1.56	5.82	0.72 U	1.1 U
	IAQ -03A	3/23/2012	4.19	15.30	1.39	5.08	0.72 U	1.1 U
	IAQ -03	6/14/2012	4.31	10.20	0.87 U	2.30	0.72 U	1.1 U
	IAQ -03	9/27/2012	5.24	12.90	1.39	5.30	0.72 U	1.83
	IAQ -03	12/21/2012	4.31	8.74	1.09	3.39	0.72 U	1.42
	IAQ -03	3/15/2013	2.04	3.84	0.87 U	2.57 U	0.72 U	1.1 U
IAQ -03	7/12/2013	5.18	9.99	1.22	2.74	0.72 U	1.1 U	
1st Floor	IAQ-02	8/20/2010	2.00	4.88	0.87 U	1.7 U	0.72 U	1.2
	IAQ-02	4/26/2011	1.08	2.03	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-02	7/20/2011	2.23	4.31	0.90	3.97	0.72 U	1.32
	IAQ-02	10/6/2011	1.39	2.68	0.87 U	1.7 U	0.72 U	1.75
	IAQ-02	3/23/2012	2.24	6.75	0.91	2.82	0.72 U	1.1 U
	IAQ-02	6/14/2012	0.64 U	0.75 U	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-02	9/27/2012	0.93	1.58	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-02	12/21/2012	0.70	1.73	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-02	3/15/2013	0.64 U	0.75 U	0.87 U	2.57 U	0.72 U	1.1 U
	IAQ-02	7/12/2013	0.96	1.17	0.87 U	2.57 U	0.72 U	1.73
Basement	IAQ-01	8/20/2010	2.71	4.56	0.87 U	1.7 U	0.72 U	1.4
	IAQ-01	4/26/2011	1.05	3.08	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-01	7/20/2011	5.02	5.80	0.97	3.65	0.72 U	2.98
	IAQ-01	10/6/2011	1.74	4.09	0.87 U	1.7 U	0.72 U	3.04
	IAQ-01	3/23/2012	2.40	6.82	0.87 U	2.43	0.72 U	1.1 U
	IAQ -01A	3/23/2012	2.36	6.44	0.87 U	2.39	0.72 U	1.1 U
	SV-01	3/23/2012	10.20	9.69	1.00	4.69	0.72 U	1.1 U
	SV-02	3/23/2012	1.47	2.26	1.74 U	3.4 U	1.44 U	2.2 U
	IAQ-01	6/14/2012	0.64 U	0.79	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-01	9/27/2012	1.12	2.22	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-01	12/21/2012	0.73	1.58	0.87 U	1.7 U	0.72 U	1.1 U
	IAQ-01	3/15/2013	0.64 U	0.75 U	0.87 U	2.57 U	0.72 U	1.1 U
	IAQ-01	7/12/2013	1.95	3.69	0.87 U	2.57 U	0.72 U	1.1 U
Outside	AA-01	8/20/2010	1.16	3.32	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	4/26/2011	0.64 U	1.07	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	7/20/2011	0.81	2.85	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	10/6/2011	0.64 U	2.73	0.87 U	1.7 U	0.72 U	1.38
	AA-01	3/23/2012	1.82	5.80	0.87 U	2.04	0.72 U	1.1 U
	AA-01	6/14/2012	0.64 U	0.75 U	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	9/27/2012	0.64 U	1.58	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	12/21/2012	0.64 U	1.21	0.87 U	1.7 U	0.72 U	1.1 U
	AA-01	3/15/2013	0.64 U	0.75 U	0.87 U	2.57 U	0.72 U	1.1 U
	AA-01	7/12/2013	0.64 U	0.98	0.87 U	2.57 U	0.72 U	1.1 U

All results reported in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ )

L = suspect artifact

U = less than reported quantitation limit

B = detected in laboratory blank

AA-01 located in up wind direction