



October 26, 2016

Ms. Jeannette Debartolomeo
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard, Suite 620
Baltimore, MD 21230

Re: **LNAPL Recovery Work Plan – Tank Field**
Pilot Travel Center #290
31 Heather Lane
Perryville, Maryland
MDE Case # 2016-0422-CE

Dear Ms. Debartolomeo:

Sovereign Consulting Inc. (Sovereign), on behalf of Pilot Travel Centers (Pilot) is submitting an LNAPL Recovery Work Plan to address product accumulation in the Tank Field located at Pilot Travel Center #290 in Perryville, Maryland. The proposed Recovery Work Plan is submitted subsequent to the Interim plan currently being conducted.

WORK PLAN

A continuous recovery plan is proposed to address LNAPL accumulation in the tank field, replacing the interim recovery activity currently being conducted. The equipment specification, installation, maintenance and monitoring is detailed as:

- Installation of passive skimmers in the two tank field wells, TF-1 and TF-2, to collect LPH as it enters the well. Passive skimmer system will be mounted and secured in the existing manholes.
- Skimmer specification equivalent - QED SOS4® Passive Skimmer, 3000 cc, 18" vertical travel. Skimmers are mounted to manufacturer product specific well caps within the vault.
- Recovered LPH will be accumulated and stored in DOT compliant 55-gallon steel drums to permit continuous recovery. Collected LPH will be transported offsite by a licensed transporter for recycling at a permitted Treatment, Storage, and Disposal Facility.
- Weekly monitoring and maintenance for first 2 months - gauging, skimmer chamber LNAPL transfer, and skimmer filter removal/cleaning.
- Bimonthly maintenance of the skimmers and recovery monitoring shall be conducted when LNAPL accumulation reduces to $\leq 50\%$ skimmer storage capacity during consecutive weekly events. Monitoring and maintenance shall revert back to weekly monitoring if LNAPL skimmer chamber exceeds 75% capacity in either skimmer within the two week time period.
- Monthly maintenance of the skimmers and recovery monitoring shall be conducted when LNAPL accumulation reduces to $\leq 25\%$ skimmer storage capacity during consecutive bimonthly events. Monitoring and maintenance shall revert to bimonthly if LNAPL skimmer chamber exceeds 50% capacity in either skimmer within the month.



SCHEDULE

Sovereign is prepared to initiate passive recovery within two weeks of approval.

REPORTING

Email updates shall be provided to the MDE following each event. Quarterly monitoring reports will continue summarizing groundwater analytical and LPH recovery.

We appreciate your feedback and guidance on compliance measures at the subject site. Please do not hesitate to contact me or John Butillo with any questions or concerns via email jbutillo@sovcon.com, ewilliams@sovcon.com, or office phone (610) 524-8124.

Sincerely,
Sovereign Consulting Inc.

JR Williams
Environmental Scientist/ Project Manager

Cc: Project files
Joey Cupp/Pilot
Scott Beals, John Butillo/Sovereign