

Response Action Plan
Sykesville Oil Site
Sykesville, Maryland

EPA Docket Number: CWA-03-2005-0150CW

27 May 2005

Environmental Resources Management
200 Harry S Truman Parkway, Suite 400
Annapolis, Maryland 21401

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1.0

INTRODUCTION AND SITE OVERVIEW

The Fogle's Septic Clean, Inc. (Fogle's) property (the "Facility") is located in a residential/rural area just north of the intersection of Wimmer Lane and Obrecht Road in the town of Sykesville, Carroll County, Maryland (mailing address 580 Obrecht Road) (see Figure 1). The entire property is approximately two and one-third acres in size and is improved with an office building, and several garage/maintenance shops. The property is covered with gravel around the buildings to the property boundaries. The present owner of the property is Fogle Properties LLC.

Approximately 188 acres of land to the north, east and southeast of the Facility is owned by Episcopal Ministries to the Aging, Inc. (EMA). The land to the southeast and east of the facility is used for public recreation ball fields. To the northeast, the land is used for agriculture. The land to the north of the facility is undeveloped and contains an unnamed creek feeding Piney Run.

This Response Action Plan (RAP) has been developed to comply with and in accordance with the requirements of an Administrative Order by Consent (AOC) executed between the U.S. Environmental Protection Agency (EPA) and Fogle's (effective 28 April 2005) relative to the reported discharge of oil from the Fogle's facility. This Facility and the properties to which contamination has migrated or come to be located are hereinafter referred to as the "Sykesville Oil Site" or the "Site". It has been reported that some volume of fuel-impacted soils was excavated from the Facility where the 10,000-gallon above ground diesel tank was previously located and transported to and disposed on a portion of a farm located at 1711 Dennings Road, New Windsor, Maryland (hereinafter referred to as the "Fogle's Farm"). Pursuant to the AOC's definitions, the Fogle's Farm is also considered a portion of the "Site."

1.1

BACKGROUND

Fogle's business operations at and from the Site include septic service, provision of portable toilets, excavating, well drilling, and pump services. At one time, a 10,000-gallon aboveground storage tank (AST) was located on the facility. The tank is used to store #2 diesel fuel for use by the Facility's trucks and other work equipment. The Site includes a wooded area at the bottom of a steep slope located adjacent to and behind the facility, and owned by EMA. An unnamed creek feeding Piney Run runs

through this wooded area (the "unnamed creek"). Piney Run is a tributary to the Patapsco River.

National Response Center (NRC) spill report #711788, dated 28 January 2004 was initially referred by EPA to the Maryland Department of the Environment (MDE), Emergency Response Division. This report identified an oil seep emanating from the ground at the Facility and impacting the unnamed creek running through the Site. On first response, MDE personnel observed fuel oil surfacing from an underground-fed spring and discharging in to the unnamed creek. Beginning in early March 2004, MDE personnel enlisted the services of an environmental cleanup contractor to mitigate the release by placement of sorbent pads and booms at the seep location and in the unnamed creek. On 30 March 2004, MDE requested assistance from EPA Region III's Removal Response Section.

As indicated above, MDE initially responded to this release, sampled the material to identify the seeping material as oil, and hired a cleanup contractor to mitigate the release and prevent continued impact to surface waters of the State. The EPA On-Scene Coordinator ("OSC") assigned to the Site issued a Pollution Removal Funding Authorization ("PRFA") to the United States Army Corps of Engineers ("USACE"), Baltimore District, on 8 April 2004. Under the PRFA, the USACE hired a cleanup contractor (Plexus Scientific) to perform the seep mitigation activities.

Based on an agreement with EMA, the USACE and its contractor initiated seep-mitigation activities on-site. The investigations indicate that a source of oil that discharged into the unnamed creek at the Site is contamination which occurred as a result of Fogle's operations at the Facility. On-site response actions have continued pending further investigation of the source of the contamination.

1.2 PURPOSE

The purpose of this Response Action Plan (RAP) is to propose response actions at the Site to address soil and ground water contamination sufficiently to ensure protection of human health, welfare, and the environment. This RAP will propose activities that are: consistent with statutory requirements for response actions at oil contaminated sites including the National Contingency Plan; have been developed in accordance with EPA's AOC (Docket No. CWA-03-2005-0150CW); and are commensurate with the contamination at the Site and the risks posed by that contamination.

The ultimate objective of the RAP, once approved and implemented, will be to provide an appropriate level of response at the Site to allow the EPA to issue a Notice of Completion determination for the property. The specific objectives of the RAP will be to:

1. Present measures that will be implemented to provide site security and fire protection at the Site;
2. Develop and submit for approval a written plan for conducting an Extent of Contamination Study, which will characterize the nature, concentration, extent and depth of oil contamination at the Site;
3. Outline a schedule for implementation of the EPA-approved Extent of Contamination Study;
4. Provide a work plan/remedy for removal/mitigation of contaminated soils identified during the Extent of Contamination Study; and
5. Outline a schedule for implementation of the other requirements of the AOC pursuant to the EPA-approved work plan/remedy.

2.0

SYNOPSIS OF REMEDIAL ACTIVITIES COMPLETED TO DATE

The following environmental documents relating to the referenced property were reviewed in preparation of this RAP.

- Site Plan with Investigation Location, Plexus Scientific, Inc., dated 20 April 2005;
- Extraction Sump Installation Location Map, Plexus Scientific, Inc., dated 20 April 2005;
- Groundwater Table Elevation Map for 14 December 2004, Plexus Scientific, Inc., dated 17 December 2004;
- Table of Results of Subsurface Soil Samples, Plexus Scientific, Inc., dated February 2005; and
- Summary of oil recovery data, Plexus Scientific, Inc., through 11 May 2005.

The initial investigations conducted by EPA in December 2004 confirmed the presence of free product on the water table in three monitoring wells (TMW-B1, TMW-B2 and TMW-C1) located adjacent to the oil seeps area (see Figure 2). Free product thickness in these wells ranged from 0.20 feet in TMW-C1 to 4.97 feet in TMW-B1. During a follow-up investigation, free product was identified on the water table in one well (MW-A01) located adjacent to the Facility. Petroleum hydrocarbons were also detected in soils at depths between 16 and 27 feet below grade in the area of the former 10,000-gallon diesel AST. Total petroleum hydrocarbons (TPH) in the gasoline range (GRO) were detected from 0.061 milligrams per kilogram (mg/kg) to 2,900 mg/kg. TPH in the diesel range (DRO) were found at concentrations from 36 mg/kg to 24,000 mg/kg.

2.1

INSTALLATION OF UNDERFLOW AND ADSORBENT BOOMS

To prevent the downstream transport of oil in the unnamed creek, the USACE and its contractor installed a temporary dam with an underflow drain and a series of adsorbent booms both upgradient and downgradient of the dam. Currently, periodic (i.e., weekly) inspections and maintenance of the booms are performed and oil or oily debris is removed from the Site. Beginning 11 May 2005, at the request of the EPA Project Coordinator, the Respondent hired ERM/AEG to replace the USACE contractor and undertake such inspection and maintenance.

2.2

REMOVAL OF OIL FROM THE SITE

The USACE and its contractor installed four recovery sumps (Sumps A, B, C and D) in the area just upgradient of the oil seeps (see Figure 2). The sumps were installed to capture and prevent free product from entering the unnamed creek. Currently, periodic (i.e., weekly) fluid recovery events are being performed at the sumps. During the period 24 March to 11 May 2005, approximately 2,231 gallons of oil has been recovered from the Site. Beginning 11 May 2005, at the request of the EPA Project Coordinator, the Respondent hired ERM/AEG to replace the USACE contractor and to perform the fluid recovery at the sumps as well as maintain the sumps.

3.0 *SCOPE OF PLANNED ACTIVITIES*

3.1 *INTERIM MEASURES*

Pursuant to Section II of the AOC, interim measures are required to contain and prevent any existing discharge of oil to shorelines and navigable waters until final abatement, mitigation and/or elimination of the discharge or threat of discharge of oil from the Site has been approved by the EPA. To-date, the installed trenches and sumps, coupled with periodic fluid recovery events have served this purpose at the oil seeps location. The installation and maintenance of adsorbent booms and an underflow dam within the unnamed tributary to Piney Run has also been used as a mitigation measure to prevent continued discharges to Piney Run.

Operation of the existing product recovery system and maintenance of the adsorbent booms and underflow dam will be continued until a final remedy is approved by the EPA. Operation of the system will involve weekly maintenance visits, well gauging and periodic fluid recovery events. In the event that the fluid recovery events result in a de minimus volume of product being recovered over an extended period of time, a recommendation will be made to the EPA to lengthen the time between recovery events with continued gauging of wells on a weekly basis. Only upon receiving written approval from the EPA will this transition occur. Boom inspection and maintenance will continue on a weekly basis until a final remedy is approved.

Recovered oil, oily water and oily debris will be removed from the Site and disposed or recycled by a licensed contractor. Direct discharge (via a National Pollutant Discharge Elimination System (NPDES) Permit) of ground water that is extracted from the product recovery system may also be explored with EPA as a means of enhancing the operational and economic efficiency of the system.

The contractors involved in the product recovery operations will be:

1. Environmental Resources Management, Inc. (ERM), functioning as the oversight contractor; and
2. AEG Environmental (AEG) who will be responsible for the mechanical operation of the product recovery system as well as off-

Site transport and disposal of all recovered fluids. AEG will work under the direction of ERM.

3.2 *SITE SECURITY AND FIRE PROTECTION*

Items 9.3 (a) and (b) of Section IX of the AOC requires Fogle's to provide site security to preclude access by persons not conducting or overseeing the response actions and fire protection appropriate to the conditions of the Site. Site security will be provided through a series of activities as follows:

1. First, equipment and materials stored or located on the remote portions of the EMA property will be kept to the absolute minimum (e.g., limited to fixtures such as monitoring/extraction wells and deployed booms). Support facilities and equipment will be relocated to the Fogle's facility where security can be more easily maintained. This measure will not only facilitate security, but will also minimize undue attention to the Site and thereby reduce the potential for security-related issues.
2. Warning signs which conform to 29 CFR §1910 (General Industry - Hazardous Waste Site Operations, Excavations, Personal Protective Equipment, Respiratory Protection) and 29 CFR §1926 (Construction) will be placed at all entrances and around the perimeter of the site at a minimum spacing of 100 feet.
3. The entire Site will be inspected by Fogle's representatives at a minimum frequency of daily to ensure that in-place fixtures and equipment (e.g., wells, damns, etc.) are sound, and to perform general reconnaissance of the Site making observations for additional seeps and/or any evidence of discharges to the stream.
4. All monitoring wells and oil recovery sumps at the Site will be fitted with locking covers; and
5. All oil and oily water collected during the pumping events will be removed from the site daily.

3.3 *EXTENT OF CONTAMINATION STUDY PLAN*

Item 9.3 (c) of Section IX of the AOC requires the development and submission to EPA of an Extent of Contamination Study Plan for the Site.

Based on the information provided, the objective of this plan is to characterize the nature, concentration, horizontal extent, and depth of oil contamination at the Site in accordance with the AOC. Following the submission and approval of the RAP, the Extent of Contamination Study Plan will be developed for submittal to EPA. Following its approval, the Extent of Contamination Study Plan will be implemented. An overview of the plan is provided in the sections below.

3.3.1 *Document Review*

A thorough review of all historical documentation relevant to the contamination at the Site will be included as part of the Extent of Contamination Study. The purpose of this review is to help determine the location of buried tanks, utilities, overfill locations, and/or other locations of spills which may be present. The review is anticipated to include, but not be limited to, Sanborn[®] fire insurance maps, aerial photographs and fuel volume purchase and use records.

3.3.2 *Soil Gas Survey*

The previous investigations have not yet fully determined the nature or extent of oil contamination on Fogle's property, nor the direction of migration of the oil contamination between Fogle's property and the oil seeps along the unnamed creek. A soil gas survey will be conducted to determine the horizontal extent and migration of the oil contamination and to identify areas that would warrant further investigation. The EMFLUX[™] soil gas method will be used for the survey.

The survey will consist of installing soil gas collectors at points located throughout the Fogle's property to verify a source area, between the Fogle's property and the oil seep area to determine the pathway of oil migration, and throughout the area of oil seeps to identify potential future seep locations. Each soil gas collector will be analyzed for a suite of organic compounds indicative of the #2 diesel fuel oil detected at the Site. The EMFLUX[™] soil gas method has been successfully used to differentiate various petroleum sources and *is an EPA-preferred investigative technology for these types of situations* (<http://www.epa.gov/ORD/SITE/reports/138.htm>).

The soil gas survey will provide a visual indication of the location, movement, composition and relative concentration of petroleum hydrocarbons across the Site. Based on the information from the soil gas survey, we will be able target specific areas with high hydrocarbon

concentrations (i.e., suspected areas of free product) and evaluate the need for installing additional wells.

3.3.3 *Geophysical Survey*

Prior to ownership by Fogle's, there were two historic owners both with fueling operations on the property. Also prior to ownership by Fogle's, the property was reportedly brought to its existing grade using a variety of fill material. It is not clear what potential other sources of oil may be present on the property or if underground utilities (e.g., fuel pipes, storm sewers, sanitary sewers, etc) and their backfill materials are acting as preferential pathways for the transfer of free product. A ground penetrating radar (GPR) or electromagnetic (EM) induction survey will be conducted to identify if any metal or nonmetal debris is present beneath the property. The GPR or EM surveys will also overlap with the soil gas survey to determine if any debris is present in the areas with elevated soil gas readings. This data will be used to reduce the number of soil borings and monitoring wells required to complete Site characterization.

3.3.4 *Soil Borings*

To date there have been ten soil borings (SB FGL-01 through 09 and 7B) completed at the Fogle's Facility and an additional five soil borings (SB A-01, B-01 and 02, and C-01 and 02) completed on the EMA property, which have been used to determine the extent of free product and residual hydrocarbon contamination in soils. Total petroleum hydrocarbons (TPH) detected in these samples has ranged from 69 mg/kg (milligrams per kilogram) to 26,900 mg/kg. The installation of additional soil borings on the Site will provide data to refine the estimate of the amount of residual hydrocarbons present in soil at the Site. Soil borings will also be completed at the Fogle's Farm to determine the extent of oil contamination resulting from the contaminated soils reportedly placed on the property. The data will be used to develop a scope and cost estimate for remediation of oil contaminated soils at all these locations in accordance with the requirements of the AOC.

The number of soil borings and their locations will be identified based on the results of the soil gas survey. Hydraulic, direct-push drilling equipment will be utilized for the collection of soil samples from the boreholes. Soil cores will be screened in the field with an organic vapor analyzer to determine the relative quantity of residual oil contamination present. A sufficient number of soil samples will be submitted to a qualified environmental laboratory for analysis of TPH diesel range

organics (DRO) and gasoline range organics (GRO) to determine the extent of oil contaminated soils.

3.3.5 *Well Installation and Monitoring*

There is currently one monitoring well (MW-FGL-01) at the Fogle's Facility and an additional 17 wells at other locations on the Site (MW-A01 and TMW A1 through A3, TMW-A5 through A9, TMW-B1 and B2, TMW-C1 and C2, TMW-D1, TMW-E1, and TMW-F1 and F2), which can be used to monitor ground water flow direction and free product thickness. The installation of additional wells on the Site will provide data to refine the direction of ground water flow, identify the presence or absence of free product which may be floating on the water table, accurately gauge the thickness of any free product present, and characterize free product on the ground water surface. Well construction would be such that they could also be used to remove and/or remediate the oil contamination if necessary.

Monitoring Well Installation – Shallow ground water monitoring wells will be installed in the water table aquifer. The monitoring wells will be constructed using four-inch diameter polyvinyl chloride (PVC) well casing and 10-foot long slotted well screens, placed across the water table. Four-inch diameter wells are proposed to accurately determine the thickness of free phase hydrocarbons on the water table and to provide a potential location for recovery of free phase hydrocarbons.

Given the size of the Site and existing monitoring wells and recovery wells present at the oil seep area, six additional well locations are anticipated to sufficiently characterize the on-Site extent of free product on the water table. The monitoring well locations will be identified based on the results of the soil gas survey and will be definitively located in the Extent of Contamination Study Plan. Wells are not currently anticipated to be installed at the Fogle's Farm; however, the decision to install wells on the property will be made following a review of the soil analysis results.

Based on the topographic survey of the Site area, the direction of ground water flow should be northwest towards the unnamed creek. However, based on existing wells at the Site, it appears that ground water flow is northeast and follows geologic features within the weathered bedrock/saprolite aquifer. The ground water table varies from about 30 feet below ground surface (bgs) at MW-FGL-01 to about 4 feet bgs at the oil seep area. Therefore, it is anticipated that the monitoring wells will be completed to a maximum depth of 50 feet below ground surface.

The horizontal coordinates and top-of-casing elevations of all wells will be determined by a Maryland-licensed land surveyor. Top-of-casing elevations will be determined to the nearest 0.01-foot relative to mean sea level to allow accurate measurement of water levels to calculate the ground water elevation and determine the direction of ground water flow. Horizontal coordinates will be referenced to the Maryland State Planar coordinate system.

Well Gauging and Water Level Monitoring – After the monitoring wells are developed, the wells will be allowed to equilibrate prior to monitoring. Each well will be gauged for free product and a synoptic round of water level measurements will be completed. Well gauging will be performed using an optical interface probe (OIP) to determine the presence or absence of free product and the static water level. If free product is encountered, the thickness will be measured, and adjusted water levels will be calculated. Water levels will be measured to 0.01 foot. Water level measurements will be used to calculate the ground water elevation to determine the direction of ground water flow.

Hydraulic Conductivity Testing – In-situ hydraulic conductivity tests will be performed at each of the new well locations. The conductivity tests will provide data that will be used to determine the rate of fluid flow to the wells. This data will also be used in the modification of the existing system or design of a new oil recovery system, if necessary.

3.3.6 *Management/Disposal of Investigation-Derived Wastes*

Investigation-derived wastes (i.e., soil cuttings from well borings and water from well development, equipment decontamination and purging) generated during the investigation will be placed in an appropriate sealed container and labeled as investigation-derived wastes with the date of collection and a description of the contents. The volume of investigation-derived wastes will be minimized to the extent possible. If analytical results indicate the investigation-derived wastes are not contaminated, then these materials may be disposed on-Site. If the investigation-derived wastes are contaminated, these wastes, along with any recovered oil, oily water and oily debris can be disposed off-Site in accordance with State laws by a Maryland-licensed disposal contractor.

3.4 **ABATEMENT PLAN**

Item 9.3 (e) of Section IX of the AOC requires a written plan for EPA review and approval, which will remove/mitigate oil contaminated soils

from the Site. Following completion of the Extent of Contamination Study, a written plan (i.e., Abatement Plan) will be developed to guide the removal/mitigation of oil contaminated soils with a TPH concentration greater than 5 ppm from the Site. While specific removal/mitigation measures cannot be developed until the Extent of Contamination Study has been completed, several different approaches/technologies for remediating the residual soil contamination at the Site will be evaluated. Remedial approaches to be evaluated following removal of free product from the water table (and following the results from the Extent of Contamination Study) will likely include, but not be limited to, the following:

- Excavation with off-Site disposal;
- Excavation with on-Site treatment (e.g., landfarming, bioventing or biopiles); and
- In-situ treatment via biosparging, chemical oxidation, or other treatment technology.

Approaches will be evaluated for their effectiveness at remediating the contamination, implementability, and cost. Based upon the findings of the evaluation, a remedial approach will be selected and presented in the Abatement Plan that will be submitted to the EPA for approval. The Abatement Plan will also address the transportation and disposal of investigation derived wastes (i.e., recovered oil, oily water and oily debris) generated during the remedial activities. The Abatement Plan will include a detailed description of the remedial approach as well as a schedule for implementation.

3.5 *SITE RECOVERY/RESTORATION PLAN*

As required by Item 9.3 (h) of the AOC, the excavated areas of the site will be restored to original conditions through re-grading and re-vegetation of the land surface. All restoration activities that occur on the portion of the Site owned by EMA, including the area adjacent to the unnamed creek, will be fully coordinated with EMA representatives. Preliminary discussions regarding restoration efforts and the final restoration plan for the EMA property have already been held.

3.6 HEALTH AND SAFETY PLAN

Item 9.3 (j) of Section IX of the AOC requires Site-specific health and safety measures be followed for actions to be performed at the Site. Prior to the initiation of any work on the Site, ERM will prepare and implement a Health and Safety Plan (HASP). The HASP will provide for proper decontamination of personnel and equipment, monitoring and control of off-site migration of oil during the performance of activities and protection of public health from exposure to oil during the activities pursuant to the AOC. The health and safety requirements of the HASP will meet or exceed Occupational, Safety and Health Administration and EPA requirements, including but not limited to, requirements contained in 29 C.F.R. §1910.120 and/or EPA Standard Operation Safety Guides (5 July 1988).

3.7 PROGRESS REPORTS

The AOC Section IX, 9.7, requires the submission of written progress reports to EPA beginning seven (7) calendar days subsequent to the date of receipt of written approval to proceed with the implementation of the RAP and every seven (7) calendar days thereafter. The progress reports will provide, at a minimum: 1) a description of the Work completed and the actions that have been taken toward achieving compliance with the AOC; 2) a description of all data anticipated and activities scheduled for the next report period; 3) a description of any problems encountered or anticipated; 4) any actions taken to prevent or mitigate such problems; 5) a schedule for when such actions will be completed; 6) copies of all analytical data received during the reporting period; and 7) all modifications to the work, RAP, and schedule made in accordance with Section XIII of the AOC during the reporting period. A standard format will be developed for all progress reports to ensure all items are addressed.

The weekly progress reports will not only cover all activities that fall within the scope of the RAP, but will also provide updates and forecasts relative to the ongoing pumping of oil from the extraction system on the EMA property.

Presented below is the anticipated schedule for implementing the RAP, which has been prepared in accordance with the requirements of the AOC.

- Adsorbent booms in the unnamed tributary and at the underflow dam will be inspected daily and maintained as necessary to ensure oil is contained and recovered. Inspections will also follow rain events of 0.5-inches intensity or greater.
- Recovery of oil began at the Site in March 2005. Fogle's will continue pumping of existing well(s) on the property to remove oil from the ground water in the seep area. Oil, oily debris, and oily water will be removed from the Site for proper disposal/recycling by a Maryland-licensed disposal contractor.
- The HASP for the Extent of Contamination Study will be submitted to EPA within five (5) business days from the approval date of the RAP.
- The Extent of Contamination Study Plan will be submitted to EPA within five (5) business days from the approval date of the RAP. Following EPA-approval, implementation of the Extent of Contamination Plan will be initiated. The anticipated implementation schedule is as follows:
 - Week 1 - utility clearance scheduled to be completed, preparation of subcontract agreements, scheduling of subcontractors, etc.;
 - Weeks 2 and 3 - review of relevant historical documentation and evaluation of on-Site and off-Site utilities, soil gas survey and geophysical survey;
 - Weeks 4 and 5 - mobilization of drilling equipment to the Site, completion of soil borings, installation and development of monitoring wells;
 - Weeks 6 and 7 - laboratory analyses of environmental samples, water level monitoring, surveying of well locations and elevations;
 - Weeks 8 through 10 - receipt of final laboratory results and preparation of Extent of Contamination Study Report and Abatement Plan; and
 - Week 11 - submit Abatement Plan to remove/mitigate oil contaminated soils from the Site.

This schedule assumes that subcontractors are available when needed to provide necessary services, and that no delays are encountered due to severe weather conditions.

The Project Coordinator for Fogle's is:

Barry Bruce
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Sykesville, MD 21784

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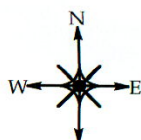
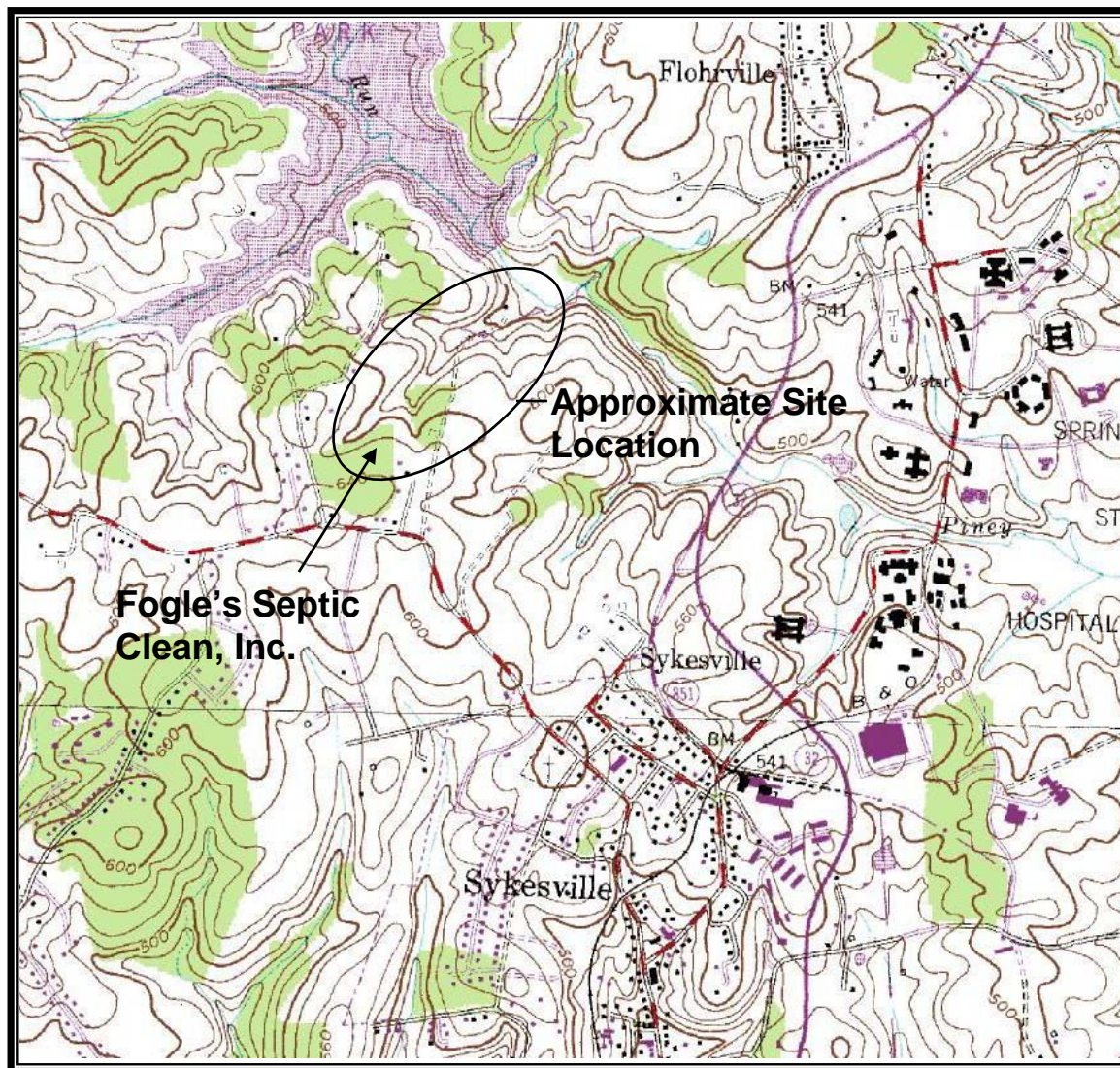
The Project Coordinator for EPA is:

Charles Fitzsimmons
On-Scene Coordinator
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Removal Response Section (3HS31)
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Fort Meade, MD 20755-5350

Office Phone: (410) 305-3027
Email: fitzsimmons.charlie@epa.com

Environmental Resources Management, Inc. (ERM) will be the technical consultant responsible for developing and implementing the RAP (and all subordinate documents) in accordance with the AOC.

Figure 1
Site Topographic Map –
580 Obrecht Road and Adjacent Properties
Sykesville Oil Site
Sykesville, Maryland



Sykesville Quadrangle
Maryland
7.5 Minute Series

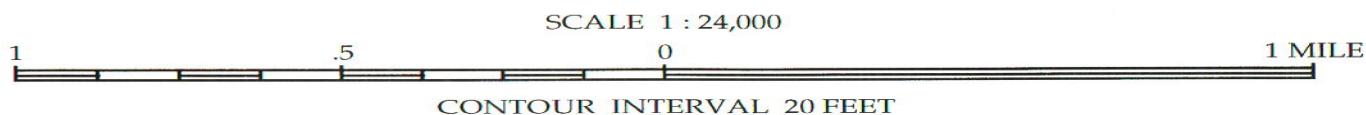
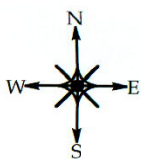
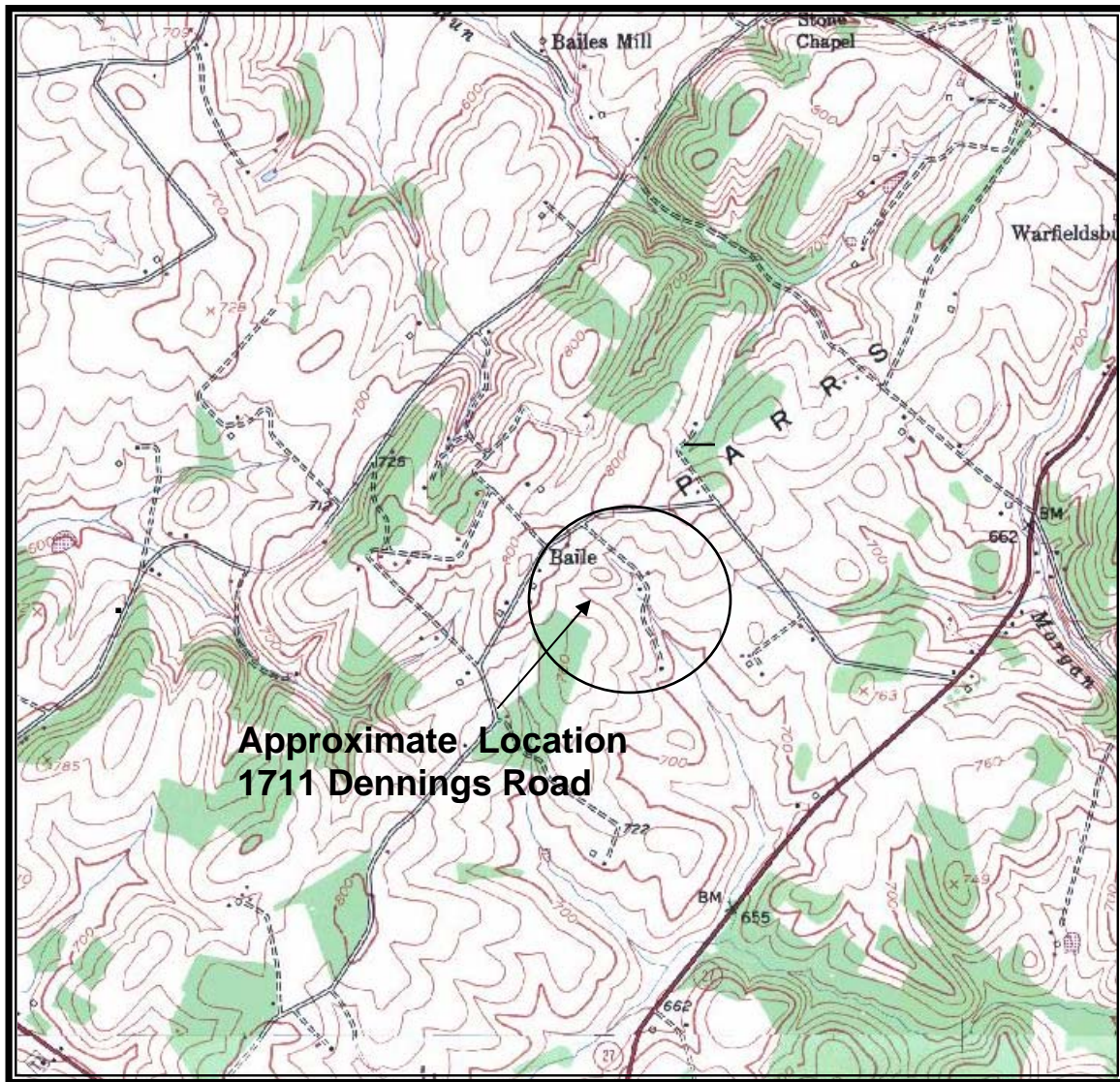
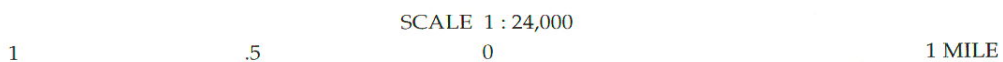


Figure 2
Site Topographic Map –
1711 Dennings Road
Sykesville Oil Site
Sykesville, Maryland



New Windsor Quadrangle
Maryland
7.5 Minute Series



CONTOUR INTERVAL 20 FEET

NOTES

SURVEY CONTROL DATUM: NAD 83/91

31.	624984.0840	1318545.8520	615.47'
32.	624986.9450	1318078.5630	606.23'
101.	625302.2740	1317948.6402	588.18'
102.	625333.7029	1318299.5046	562.46'
103.	625736.1327	1318640.6964	533.42'
104.	625518.6088	1318849.9881	570.81'
105.	625136.6357	1318716.4970	605.49'

SURVEY PERFORMED NOV. 13-16, 2004

SB B-01 SOIL BORING COMPLETED BY PLEXUS/PSA, DEC. 04

SB FGL-01 SOIL BORING COMPLETED BY PLEXUS/EARTH MATTERS, FEB. 05

TMW A-1 MICROWELL COMPLETED BY PLEXUS/PSA, DEC. 04

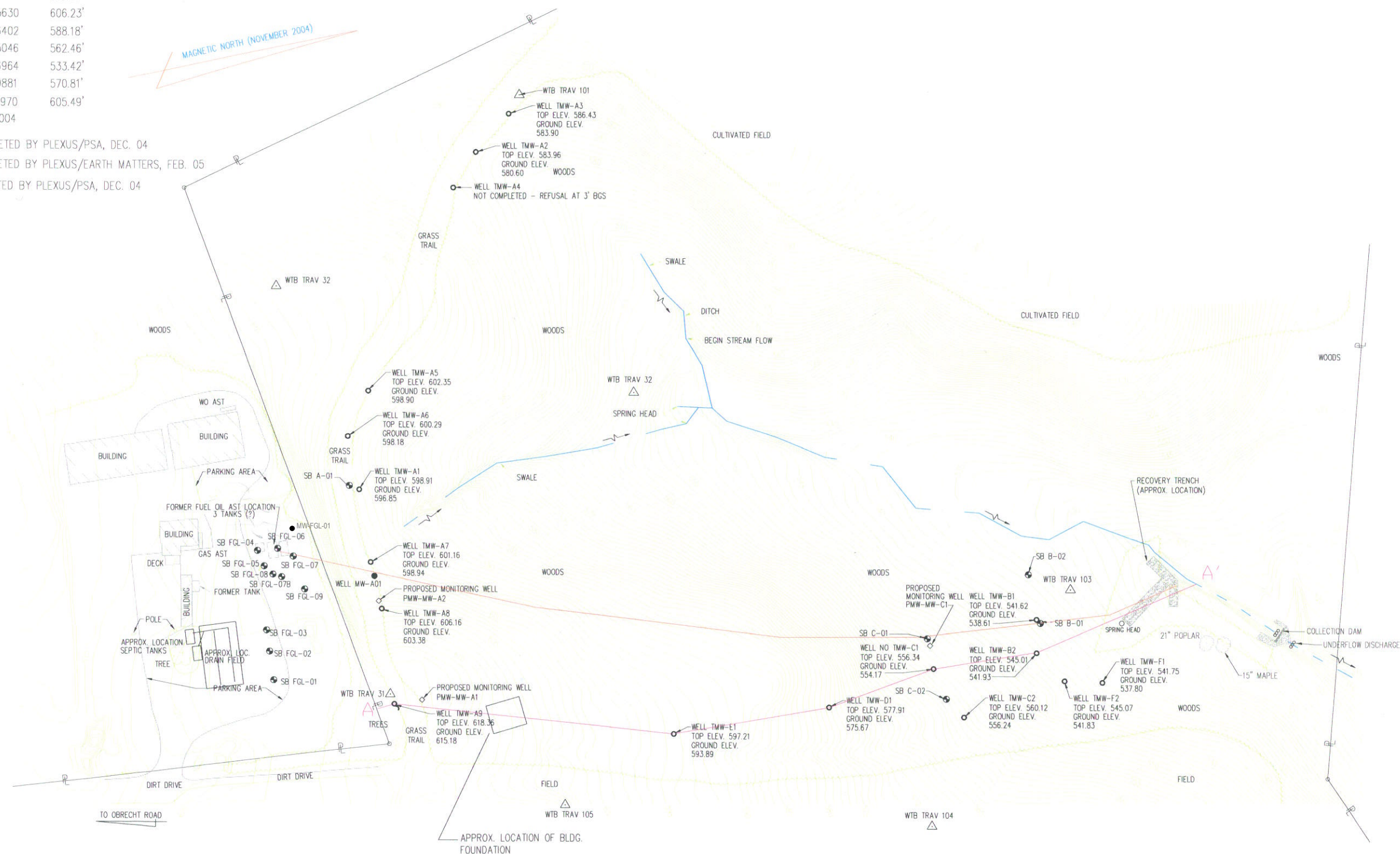


Figure 3
Site Layout and Features
Sykesville Oil Site
Sykesville, Maryland

SCALE: 1" = 50'