

-----Original Message-----

From: Hynum, Tammie

Sent: Thursday, June 12, 2014 05:01 PM Central Standard Time

To: Bunce, Jeff

Cc: karen.s.tyrone@exxonmobil.com; Mark Weesner (mark.d.weesner@exxonmobil.com);

Allen Dodson; Clem, Sarah; Shafii, Mo; Benenati, Katherine; Wilson, Penny; Rich, Jay;

VanDerhoff, Dean; brescia.nicolas@epa.gov; Shirley Louie; Benefield, Ryan; Harrelson,

Tammy; Gutting, Lorielle; Kendra Jones (kendra.jones@arkansasag.gov)

Subject: Comments re: Mitigation Action Plan

Jeff,

The Arkansas Department of Environmental Quality (ADEQ) has coordinated review of the Mitigation Plan (dated May 2014) with the Arkansas Department of Health and the Arkansas Game and Fish Commission. Please see the comments below received by ADEQ:

- Page 1-3 (Section 1.3 Mitigation Action Summary); 4th bulleted statement
Recommended change: Monitored natural attenuation at locations within the Heavily Vegetated Area that are inaccessible and were left in place during the emergency response due to the habitat value and **limited extent** of oiling.
- Page 2-2 (Section 2.1 Summary of Pre-Design Study); Open Water Area – 4th sentence
Recommended change: Sheen was observed at the remaining 37 locations (**approximately 52%**) during probing and/or sheen stir testing.
- Page 2-3 (Section 2.1 Summary of Pre-Design Study); Open Water Area – 5th bulleted statement
Note: Sheen occurrence is consistent with activities conducted during the emergency response phase to push and aggregate oil product in the central/southeastern portion of the cove to be removed by vacuum truck.
- Page 2-3 (Section 2.1 Summary of Pre-Design Study); Heavily Vegetated Area – 1st paragraph, third sentence
Recommended change: At the remaining 16 locations (**one-half of the locations**) sheen was observed during probing and/or sheen stir testing.
- Page 4-8 (Section 4. Basis of Design); Subsection 4.3.1 (Reactive Media Basis of Design); 1st bulleted statement, second sentence
Recommended Change: This assumption that residual oil is present within the entire top foot of sediments represents an **conservative** assumption of the maximum amount of sheen-bearing material that may be present in any location within the Open Water Area and **significantly** overestimates the amount of sheen-bearing material that may be present within the entire reactive cap area.

- Page 4-8 (Section 4. Basis of Design); Subsection 4.3.1 (Reactive Media Basis of Design; 2nd bulleted statement; first sentence)
Recommended Change: The median reported oil saturation of 4.2% was selected as a ~~conservative~~, high-end estimate for design.
- Page 5-4 (Section 5 Construction); Subsection 5.7 (Restoration)
Recommended Change: A restoration plan is currently under development ~~in conjunction with the Arkansas Game and Fish Commission~~ for the site to meet the USACE requirements for wetlands restoration.

Please amend the Mitigation Plan as appropriate and provide a response to each comment above as well as a revised Mitigation Plan no later than June 27, 2014. If you have any questions, please contact me.

Thanks,

Tammie J. Hynum
Chief
Hazardous Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Office: 501-682-0831
Cell: 501-920-1538
Fax: 501-682-0565