

From: Bunce, Jeff <jeff.bunce@exxonmobil.com>
Sent: Friday, November 01, 2013 4:58 PM
To: Hynum, Tammie
Cc: Tyrone, Karen S
Subject: Response to Comments
Attachments: FINAL Mayflower DADAR Text_11-1-13.pdf; Summary of Major Revisions to Text.pdf; Mayflower - Implementation Schedule 11-1-2013.pdf; Surface Water SAP_Rev 9_11-1-13.pdf

Tammie,

Please find the attachments and the response to comments below.

Comment #1:

In the report it appears ExxonMobil did not evaluate certain metals because the concentration in the crude oil released was less than the amount detected in the respective medium. ExxonMobil must evaluate all data against the ecological screening values (ESV) to determine whether the detected amount is above, equal to, or below the respective ESV. At the conclusion of the report ExxonMobil can present their views but in no means should this step be omitted in the assessment of the investigation data.

Response to Comment #1:

The detected metals concentrations were screened (bolded) against the ESVs in the data tables (Tables 6-2 and 6-3 for soil samples; Tables 7-2, 7-3, and 7-4 for sediment samples). Sections 5, 6, 7, and 8 of the report have been revised as requested to include a discussion of screening against the ESV for all metals.

Comment #2:

Table I-2: The Estimated Pore Water PAH Concentrations presented in this table could not be reproduced. Please provide detailed calculations to support the numbers reflected in the table.

Response to Comment #2:

Appendix I has been revised to include a detailed calculation to support the numbers reflected in Table I-2 (see Attachment I-1). In addition, Table I-2 was revised to aid in the reproducibility of the calculation.

Comment #3:

Table I-3: The Toxic Unit (TU) values for Surface Water could not be reproduced. Please provide detailed calculations to support these values reflected in the table.

Response to Comment #3:

Appendix I has been revised to include a detailed calculation to support the numbers reflected in Table I-3 (see Attachment I-1). In addition, Table I-3 was revised to aid in the reproducibility of the calculation.

Comment #4:

ExxonMobil provides examples for calculating the Toxic Units (TUs) for specific samples in Tables I-1, I-2, and I-3. However, for data validation purposes, ExxonMobil should also provide similar tables for all samples where a TU was calculated.

Response to Comment #4:

A new Appendix J has been added to show the calculation for each sample where a TU was calculated.

Comment #5:

Section 4.2, it is mentioned Tier III data validation is underway, but has not been completed as of the date of this report. An amended report reflecting Tier III data validation results should be submitted to ADEQ for review/approval.

Response to Comment #5:

Tier III data validation is underway and an updated report will be submitted by November 8, 2013, and will include a summary of findings in Appendix G.

Comment #6:

ExxonMobil should prepare a table summarizing all sample points greater than or equal to the detection limits for all respective constituents of concern.

Response to Comment #6:

A new Appendix K has been added to the report and includes analytical data tables which have been modified to remove non-detect constituent results. The tables in Appendix K show only sample results greater than or equal to detection limits for metals, total organic carbon, black carbon, percent moisture, PAHs, TPH, and VOCs (only a list of 16 VOCs that were detected in soil, sediment, and/or surface water samples).

Comment #7:

Section 9-4, Recommended Path Forward, ExxonMobil indicates sediments in Lake Conway do not warrant further evaluation based on the sampling results. Only one round of sediment samples were collected in the main body of Lake Conway. ADEQ requests ExxonMobil conduct an additional round of sediment sampling in the main body of Lake Conway (SED-DA-033 through 038) at all depths and full analysis as described in the approved Plan.

Response to Comment #7:

Based on assessment of data for the six locations (18 samples), there were no VOCs detected in Lake Conway sediments, the PAH TUs for the surface sediments were well below 1, and the concentrations of metals were consistent with natural background conditions in the area and/or below ESVs. However, as

requested by the ADEQ, ExxonMobil agrees to resample these six locations (SED-DA-033 through SED-DA-038) using the same depth intervals and analyses described in the Downstream Areas Remedial Sampling Plan approved on July 12, 2013. The timeline for the sediment sampling is included as an attachment.

ADEQ Comment #8:

Section 9-4, Recommended Path Forward, ExxonMobil indicates continued surface water sampling is recommended at a frequency of weekly for 2 locations (Dawson Cove WS-007 0.5 to 1 feet and Lake Conway WS-001 0.5 to 1 feet). ADEQ requests ExxonMobil also conduct surface water sampling weekly (at all depths; PAHs) at WS-001, WS-004, WS-006, WS-007, WS-008, WS-009, WS-010, WS-011, WS-012, WS-014, WS-015, WS-020, and WS-021.

Response to Comment #8:

The path forward has been revised to include the sampling locations listed by ADEQ. In addition, the Surface Water Sampling and Analysis Plan (Rev. 9) has been updated to reflect the modifications. The Surface Water Sampling and Analysis Plan is submitted as an attachment under separate cover from the Downstream Area Data Assessment Report. These changes have been implemented immediately, the daily sampling program was completed on October 31, 2013 and the first weekly sampling event will occur during the week of November 4, 2013.

Please let me know if you have any questions or need additional information. Thanks

Regards,
Jeff Bunce