

**Responses to ADEQ Comments Received December 13, 2013 on  
“Downstream Areas Data Assessment Report (Revision 3)  
Mayflower Pipeline Incident Response, Mayflower, Arkansas”  
Submitted December 2, 2013**

**ADEQ Comments - Downstream Areas Data Assessment Report, Rev 3 Received Dec 13, 2013**

*ExxonMobil Downstream Area Data Assessment Report Revision 3 Comments*

*The Arkansas Department of Environmental Quality (ADEQ) has completed their review of the Downstream Area Data Assessment Report (Revision 3) for the Mayflower Pipeline Incident. ADEQ is requesting a final revised report (Revision 4) to be submitted no later than January 17, 2014 to the attention of Tammie J. Hynum, Chief of the Hazardous Waste Division. The final revised report should include the following amendments/information.*

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**Comment #1:**

Section 9, Recommended Path Forward, second paragraph: It is ADEQ's understanding the six Lake Conway samples have already been collected per an earlier ADEQ request. This paragraph needs to be updated to include discussions based off those results.

**Response to Comment #1:**

The results for the Lake Conway sediment samples have been added to the Downstream Areas Data Assessment Report (DADAR) in Section 7.6 and 9. The associated tables and figures in Sections 2 and 7 have been updated. Appendices A, B, F, G, H, J, and K have also been updated.

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**Comment #2:**

Section 9, Recommended Path Forward: This section must include recommendations on how ExxonMobil proposes to mitigate (i.e., remediate) the areas noted in this assessment report that contain crude oil constituents in levels exceeding the established ecological screening values. A thorough investigation has been completed. The next step is to mitigate these areas. ExxonMobil should evaluate several (minimum of 3) remedial alternatives for factors including, but not limited to, overall protection of human health and the environment, compliance with applicable and relevant rules and regulations, reduction of toxicity, mobility, and volume, effectiveness (short and long term), cost, and implementability.

**Response to Comment #2:**

A new Appendix N (Remedial Alternatives Evaluation) has been added to the report to present a detailed analysis and evaluation. Section 12 of the report has also been added to provide a high-level summary of the remedial alternatives evaluation and the preferred remedial alternative in Appendix N. Section 13 of the report provides a recommended path forward for design and permitting of the preferred remedial alternative.

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**Comment #3:**

The weekly sheen reports have been showing a movement and increase of sheening in all the drainage areas. Revision 4 should include measures to mitigate the sheen appearing in all the drainage areas.

**Response to Comment #3:**

A new Appendix M (Sheen Monitoring and Sampling Summary) has been added to the report to present a detailed analysis and evaluation. Section 11 of the report has also been added to provide a high-level summary of the findings in Appendix M.

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**Comment #4:**

ESVs for benthic receptors were exceeded in the subsurface samples in “Drainage way”, “Dawson Cove” and “Lake Conway” areas. ADEQ requests a monitoring plan to address long term or potential future exposure of the benthic community to the PAH’s and VOC’s exceeding these ESVs. This monitoring plan should be included in the Revision 4 Downstream Area Data Assessment Report.

**Response to Comment #4:**

This version of the DADAR (Revision 4) includes a refined ecological risk evaluation for the locations that warranted further evaluation based on screening approach. The refined risk evaluation is presented in detail in Appendix L and summarized in Section 10. Based on the results of the refined ecological risk evaluation and in accordance with USEPA guidance (1997), adequate information has been collected to conclude that there is no unacceptable risk to ecological receptor populations from exposure to the COPECs and no further ecological assessment is warranted at the downstream areas.

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**Additional notes:**

In addition to the revisions listed above, the following additional items were revised and/or added:

- The daily and weekly surface water data between September 7 and December 31, 2013, were added to the report. Section 2 was updated to describe the weekly surface water sampling and Sections 8 and 9 were updated to reflect a summary of the more recent data. Section 13 includes proposed modifications to the surface water sampling program based on the recent sampling results.
- This version of DADAR (Revision 4) includes a pre-design study that will be conducted to confirm and design the preferred remedial alternative, support the permitting of the preferred remedial alternative, and support the development of a Mitigation Action Plan. Details of the pre-design study are provided in Appendix O of the DADAR.