

From: Hynum, Tammie

Sent: Friday, December 13, 2013 1:49 PM

To: Bunce, Jeff

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Subject: ExxonMobil Downstream Area Data Assessment Report Revision 3 Comments

Jeff,

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:

- 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.
- 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.
- 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.
- 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.

The DADAR Revision 4 is to be submitted to ADEQ no later than January 17, 2014 and should include, at a minimum, all the validated data results collected to-date for soil, sediment, and surface waters, corrections/additions based off the Section 9 comments above, the sheen matter, and the Monitoring Plan to address the potential future impacts to the benthic receptors in all the drainage pathway areas. If you have any questions, please do not hesitate to contact me.

Thanks,

Tammie J. Hynum

Chief

Hazardous Waste Division

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