From:	Hynum, Tammie
To:	Sixsmith, Michael L; Bunce, Jeff; karen.s.tyrone@exxonmobil.com
Cc:	Benefield, Ryan; Benenati, Katherine; VanDerhoff, Dean; Rich, Jay; Ritchie, Douglas; Clem, Sarah; Bolenbaugh, Jason; Shafii, Mo; Harrelson, Tammy; Gutting, Lorielle; Chastain, Ricky (Ricky.Chastain@agfc.ar.gov); Shirley Louie; Allen Dodson; "Ewing, Jamie"
Subject:	Mitigation Completion Report (March 2015) for ExxonMobil Pipeline Release in Mayflower, AR
Date:	Friday, April 03, 2015 10:06:54 AM

Mike,

The Arkansas Department of Environmental Quality (ADEQ), Arkansas Game and Fish Commission (AGFC), and Arkansas Department of Health (ADH) have reviewed the Mitigation Completion Report submitted on March 18, 2015 for the ExxonMobil Pipeline Release in Mayflower, AR. The following summarizes the State's comments based off a review of this completion report:

- In the Executive Summary (page ES-2) the text mentions the lack of forensics match to oil in the sheen samples in the vegetated downstream area, but remains silent on the confirmed oil sheens in the open water of the cove area. In Table 3-2 (Summary of Sheen Sampling Analytical Results) there is indication some of the sample results resembled crude oil in the open water area. The maps in Appendix H also document sheen in the open water area and the vegetative area downstream. Overall, there appear to be some inconsistencies in the text between the Executive Summary and Table 3-2 and the maps in Appendix H.
- In Section 5.2, it is proposed to discontinue the surface water sampling program upon ADEQ's approval of this completion report. Please note, the sheens must continue to be monitored every 2 weeks for up to a 6 month period following the completion of the mitigation actions or until ADEQ approves discontinuation of sheen monitoring. ExxonMobil shall provide monthly sheen monitoring reports to ADEQ. Based upon these conditions, it is approved for ExxonMobil to discontinue the surface water sampling program with the condition that if sheen monitoring results indicate that surface water sheens have a recurrence and are related to crude oil from the Pegasus Pipeline, the maintenance activities defined in Section 5.1 of this completion report will be followed, including but not limited to collection of surface water/sediment data.

Please amend the language of the Executive Summary, Table 3-2, Appendix H maps, and other related text of this Completion Report to be consistent in the message that sheens encountered during the mitigation actions may have reflected sheens associated with crude oil, however, observations and sheen monitoring toward the completion of the mitigation actions revealed the origin of the sheens to be less petrogenic in nature and more naturel to the environment.

Additionally, please amend Section 5.2 to reflect considering certain conditions under which ExxonMobil will commence collection of surface water and sediment samples.

Please submit a revised Mitigation Completion Report no later than April 17, 2015 to the attention of Tammie J. Hynum, Chief, Hazardous Waste Division, ADEQ. If you have any questions, please do not hesitate to 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