STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

August 16, 2018

Mr. Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

Re: Ecology Comments of Supplemental Remedial Investigation Report

- **Site Name:** Coleman Oil Biodiesel Spill
- **Site Address:** 3 E Chehalis St., Wenatchee, Chelan County
- **Facility/Site ID:** 83844381
- **ERTS ID No.:** 671575
- **Agreed Order No.:** DE 15389

Dear Mr. Cach:

Enclosed are comments from the Department of Ecology (Ecology) on the Draft Supplemental Remedial Investigation Report (SRI) prepared by HydroCon and dated August 8, 2018. Overall, Ecology is pleased with the submittal. The attached comments include requested edits and clarifications, and the request for some additional data presentations and discussions. Editorial comments are provided as a courtesy only.

Ecology would be pleased to meet and discuss the SRI Report and Ecology's comments, if needed. Our expectations are that the comments be fully incorporated into a revised SRI Report, and if not fully incorporated, a detailed response should be provided explaining why they were not incorporated.

Ecology notes that the Draft SRI Report was submitted with no Appendices other than Appendix A, Soil Boring Logs. Ecology has since then requested Appendix I – Apex Forensics - Characterization MW22-Product. Note that some of Ecology's comments provided herein may affect appendices.

- Appendix A – Soil Boring Logs
- Appendix B – Well Development Forms
- Appendix C – Groundwater Sample Collection Forms
- Appendix D – Soil Disposal Receipts
- Appendix E – Surface Sediment Field Sample Record

- Appendix F – Laboratory Analytical Reports
- Appendix G – Data Validation Reports
- Appendix H – Offsite Facility Reviews
- Appendix I – Apex Forensics - Characterization MW22-Product
- Appendix J – Offsite Wells Logs

Please note that all of the Appendices will eventually need to be submitted in hard copy and reviewed by Ecology. One hard copy is required and an electronic copy would be appreciated. If Ecology has comments on any of the Appendices, then the affected appendix will need to be reissued. If Ecology has no comments on the appendices, then they will not need to be resubmitted. These appendices can be submitted as unbound documents, so that if any portion needs replacement, then only the part that has changed would need to be resubmitted.

Please note than laboratory analytical data will need to be entered into Ecology's EIM data system.

Let me know if you wish to meet to discuss comments on the SRI Report. Please feel free to call me at (509) 454-7835 or email me at frank.winslow@ecy.wa.gov with any questions.

Sincerely yours,

Frank Winslow
Cleanup Site Manager
Toxics Cleanup Program
Central Region Office

Enclosure

cc: Craig Hultgren, HydroCon

Patrick Wicks, EEC

Ecology Site File

Ecology Comments on Coleman Oil Company Biodiesel Spill Site

Draft Supplemental Remedial Investigation (SRI) Report

Ecology has prepared the following comments on the Draft SRI Report. These comments include suggested edits and clarifications, and the request for some additional data presentations and discussions. Editorial comments are provided as a courtesy only.

A few additional data gaps are suggested for the conclusions (Section 6.5) and a request regarding unused wells (Section 5.3.3 is responded to). The comments are organized based on text, figures, and appendices.

Text

Executive Summary, page ES2

Typo: "Sandborn" maps should be "Sanborn" maps.

The text states: "This review identified two facilities (Chelan County PUD and Burlington Northern Santa Fe (BNSF) railroad), both located north of the Coleman property, that may be contributing to soil and groundwater impacts north of the property (e.g., in the area of MW22)." Ecology considers the contamination at MW22 to be consistent with a source at the Chelan County PUD facility. We currently do not have any data to suggest contamination in this area is from the BNSF Railway site (see map presented below for the BNSF Railway site).

Section 5.1.2, Page 40 – Results from MW3S/MW3

Please clarify that the PID reading from MW3 at 10 foot depth was measured in September 2010. It appears that this contamination has attenuated.

Section 5.1.2, Page 41 – Registered wells

The text indicates that there are two registered "water supply wells". Two wells are then described as a resource protection well (monitoring well) and an abandoned well. Ecology does not consider the monitoring well to be a water supply well. Please clarify this in the text what the 139 registered wells were (all resource protection wells except for one abandoned well?). Please also clarify that the 139 registered wells were within the area shown on Figure 19.

Section 5.1.3 – TEE

Please update this subsection with a completed Table 749-1, including the name of the field biologist that prepared the table. Ecology's understanding is that the completed Table 749-1, item 6 shows that the simplified TEE may be ended.

Section 5.3.3 – Unused Wells

Ecology requests at least one more sampling of monitoring well MW-1 since this well had 200 µg/L GRPH and 410 µg/L DRPH in September 2017. Monitoring well MW-1S had 188 µg/L GRPH in April 2018. It is unclear why the deeper monitoring well (screened over ten feet below the water table) had higher concentrations in September 2017.

There is one piece of data Ecology had previously requested prior to abandoning monitoring wells MW-1, MW-2, MW-3, and MW-4. This was vertical gradient data from MW-1/MW-1S and MW-3/MW-3S. Water levels were not measured in MW-1 and MW-3 in April 2018. Therefore, no information regarding vertical gradients has yet been acquired. Please measure water levels in these well clusters at least two times so that vertical gradient data can be verified. Note that there could be seasonality to vertical gradients. Hence, additional water level rounds could potentially have value if vertical gradients are evident during the first two rounds.

Ecology concurs that other than MW-1, there is no reason to sample the improperly screened monitoring wells (MW-2, MW-3, or MW-4) again.

Section 5.3.5 – Groundwater Sampling – Field Parameters

Please add a summary table to the SRI Report presenting the final field parameter results for the monitoring wells sampled in April 2018. These data are useful for understanding the geochemical conditions associated with the groundwater system.

Section 5.4 – Soil Sampling from Shoreline

Please provide descriptions of the shoreline soil samples, including lithologies, contamination observations and PID readings. Please discuss the depth of the storm water piping. Was there any evidence of contamination from this piping?

Section 5.5 – Sediment Sampling

Please provide detailed description of the sediment samples, including lithologies, organic material contents, any odors or contamination observations, etc. Any apparent stratification of contamination should be discussed. Photographs of sediment samples would also be helpful.

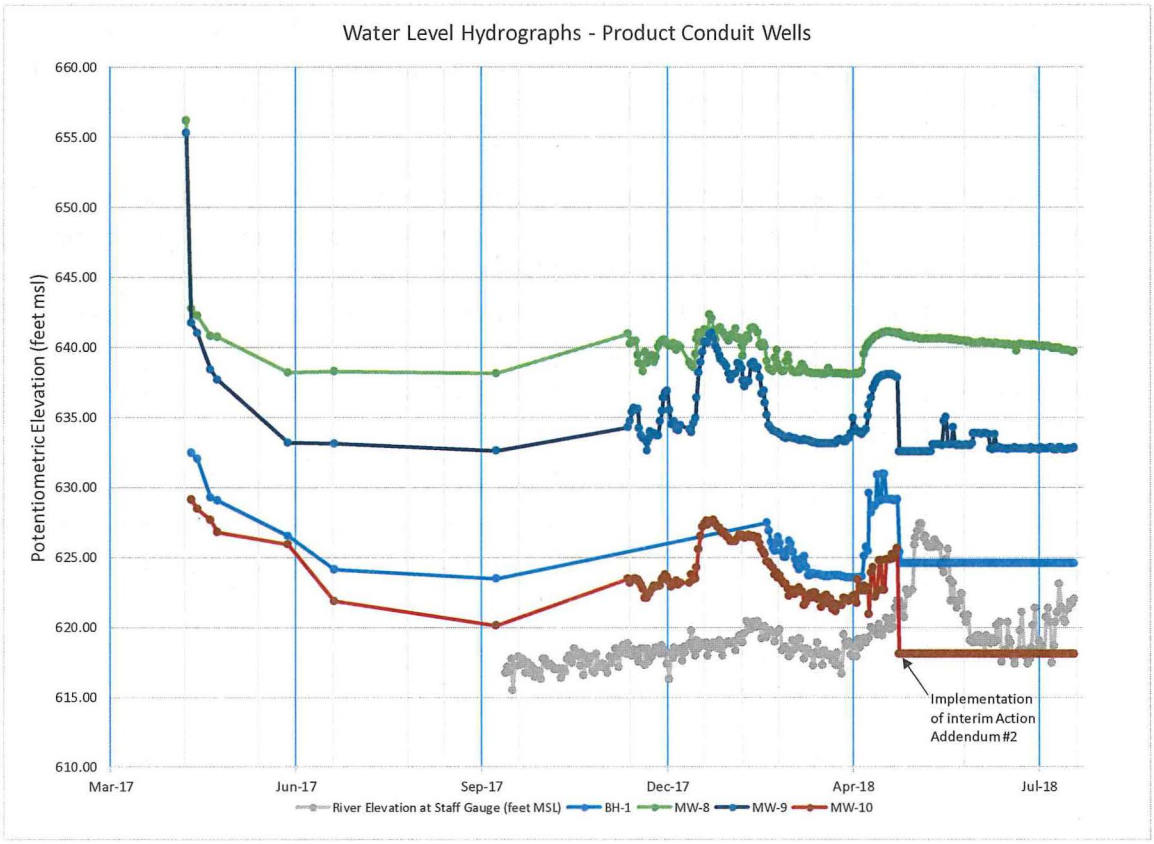
Section 5.6.4 – Figure 8 - Staff Gauge Water Levels and Product Thickness

This figure is a scatter plot of river elevation versus product thickness in monitoring wells MW8, MW9, MW10, and BH1. It is unclear whether or not a relationship is being asserted. Cross sections and water level hydrograph data would appear to eliminate a causal relationship between river levels and groundwater or product levels, expect perhaps during the one month period in May when river levels are very high. Only during a one month period in May is the river losing. Most of the year the river is gaining. During this time, a localized effect on river and groundwater levels and/or product thickness may be evident in the vicinity of MW10 may be evident. The requested revisions to the cross sections (see comments on Figures, below) should make this relationship more clear.

Of potential greater relevance would likely be the relationship between groundwater level elevation and product thickness. However, product recovery efforts make this relationship difficult to assess.

We recommend removing Section 5.6.4 and Figure 8 if there is no significant causal relationship between river stage and product thickness in monitoring wells MW-9, BH-1, and MW-10. Instead, a section is needed in the SRI Report discussing groundwater and river levels over time, period of river loss and gain, and the potential effects on contaminant transport.

For example, when a groundwater level drops below a conduit level in a monitoring well (see comment on Section 5.7.1.), then product transport in the conduit should cease. This section should include a groundwater level hydrograph similar to the following:



Section 5.7.1 – Hydraulic Testing – February 2018.

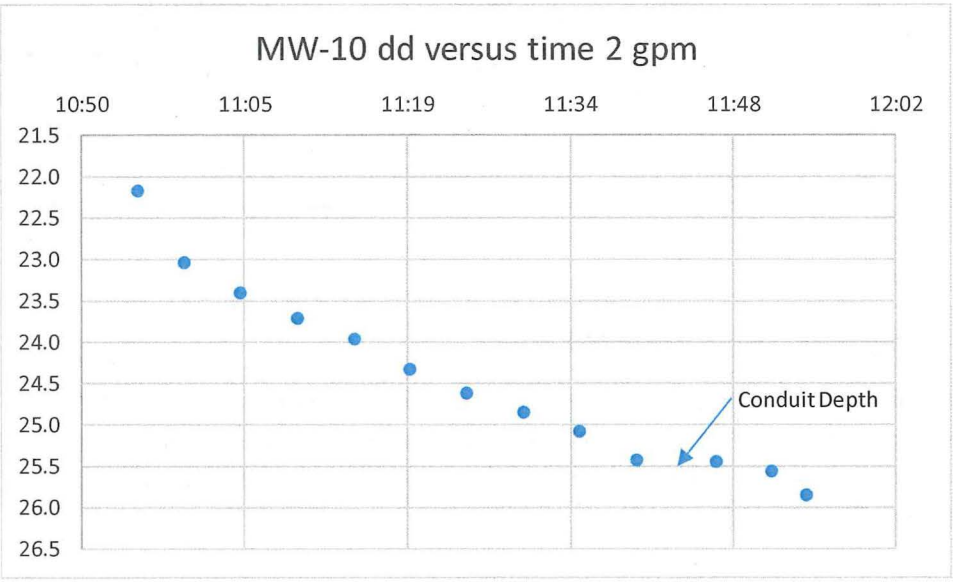
Please strike "for hydraulic parameters" from the first sentence in this section. As later clarified, the hydraulic testing conducted in February 2018 was not conducted primarily to derive hydraulic parameter values, but to collect data that could support site conceptual model development for product migration and Interim Action design.

Outcomes of this testing included assessment of interconnectivity of wells, monitoring of drawdown and recovery in monitoring wells to identify transmissive zones, and finally to collect data that could be used to determine hydraulic parameter values. Ecology did not provide formal feedback on the technical memorandum prepared from this testing (HydroCon 2018b) since this deliverable was not requested by Ecology and since the technical memorandum was not used for subsequent decision-making.

The results of the hydraulic testing were primarily the following three points:

- No response to pumping was seen in the monitoring wells used as observation wells during the testing. This could have been due to excess distance and/or insufficient pumping rates to induce drawdown in the observation wells.
- The tested wells could be differentiated into two classifications; 'high' flow and 'low' flow. Only brief slug testing was needed to assess whether or not a given well could be considered 'high', 'medium', or 'low' flow. Hence the subsequent abbreviated slug testing was recommended to classify the monitoring wells.
- Within a given well, drawdown versus time could be used to identify discrete higher transmissivity zones. If drawdown in wells is steady over time, then slows down significantly at a given depth, (while the pumping rate is relatively constant), then that interval with slower drawdown can be considered to be a higher transmissivity zone (i.e. conduit). In the case of MW10, when the drawdown slowed at a depth of roughly 25.5 ft bgs, the well started producing product. If drawdown speeds up after a conduit is drained, the bottom depth of the conduit could also be estimated.

Please include the drawdown and recovery versus time charts for MW9, MW10, and BH1 and include discussion of the observed higher transmissivity (conduit) intervals at each well. An example of a conduit at 25.5 ft bgs in MW-10 based on manual water level measurements is shown below:



Ecology disagrees with the conclusion that BH1, MW9, and MW10 have an average hydraulic conductivity of 2 ft/day. The saturated zone thickness used in HydroCon 2018 was much greater than the actual identified conduit intervals. Although contribution of some water from other intervals is likely, it appears that the majority of flow was likely from discrete intervals of higher conductivity. Because hydraulic parameters are not being used at the Site (i.e. for groundwater modeling), no presentation of hydraulic parameters is required in the SRI report.

Section 5.7.2 - Slug Testing – May 2018.

One outcome of the simplified slug testing is a relationship of monitoring wells with 'high flow' with product recovery (Figure 22 and 23). Although the sump wells (Sump #1 through Sump #6) were not tested, the product recovered in those sump wells appear to be potentially indicative of relative flow.

Presumably, sump wells with higher product recovery likely had higher flow (product transmission intervals) and sump wells with low product recovery likely had lower flow (or not being in the path of product migration). This relationship should be discussed in Section 5.7.2 and/or Section 6.1.2 (Contaminant Migration within the Subsurface).

Section 5.8.2 – Groundwater Flow Direction and Gradient

The last paragraph in this section is split (editing error).

It would be appropriate to mention in this section that groundwater flows from areas of higher potential (elevation) to areas of lower potential; however, Site data indicate that groundwater beneath the site commonly flows within conduits that may run in directions different from the potentiometric surface.

Section 5.9 – Field Screening Results

The in-text table "Field Screening Results" is incomplete. For example, odor and PID readings for MW13 were not reported. Please change the heading 'PID reading' to 'maximum PID reading', and report for all monitoring wells and borings installed. Also, please add visual observations of contamination associated with the odor and PID readings.

Section 5.10 – Analytical Results – Surface water

Ecology understands that some surface water samples have likely been collected and analyzed on behalf of Coleman. Please include discussion of surface water sampling methods, sampling results, and comparison with cleanup levels within the SRI report. Note that Ecology considers the sheen to constitute a cleanup level exceedance. Therefore, discussion of analytical data from surface water does not supersede the need for cleanup based on sheen alone.

Section 5.10.3 - Groundwater Monitoring Well Analytical Results

Wells MW15 and MW18 were not sampled due to low water levels, as discussed in the Executive Summary. If these wells have some water, but dry quickly during purging, Ecology would prefer to have some data (i.e. no purge sampling), rather than no data at all. Are these wells planned for sampling next quarter? Ecology suggests sampling these wells at least one time.

Section 5.10.3 - Groundwater Monitoring Well Analytical Results

Two or three monitoring rounds have taken place from 15 monitoring wells. Please prepare a summary table regarding contaminant (i.e. gasoline, diesel, and heavy) time trends in the monitoring wells that have been sampled at least twice. Such trends can be summarized as "increasing", "decreasing", or "relatively steady". Overall concentration trends should be briefly discussed within the SRI Report.

Section 5.10.3 - Groundwater Monitoring Well Analytical Results, Apparent source at MW13.

Based on the groundwater data presented in Table 6, it appears that a release of gasoline occurred near MW13 (GRO of 40,900 µg/L and benzene at 1,500 µg/L). This apparent release should be discussed in Section 5.10.3 and in Section 6, Conceptual Site Model.

Soil analytical and PID data suggests that MW13 is likely near but not co-located with the release point. The highest PID readings in MW13 was at 10 feet below ground surface [ft bgs] and a low PID reading was measured at 3 ft bgs.

Additional soil sampling would appear to be warranted to define this source area. If excavation and offsite disposal is proposed for this source as an interim remedial action, then the soil sampling could potentially be done as part of the remedial action.

Section 5.11 – Data Validation

Ecology prefers that this subsection be re-titled "Data Quality Review" to avoid confusion with U.S. EPA's Level IV Data Validation process, which includes a detailed review of all chromatograms.

This section discusses data qualifiers; however, the data qualifiers are not presented. Please provide a tabulation of qualified data, and the exact reason for the qualification. For example, if LCS recoveries are out of range, both the LCS value and the acceptance range should be presented in this table. Without these data, the severity of the qualified data cannot be assessed.

Please provide a tabulation and discussion of field duplicate results.

Please include a statement similar to the following: "Aside from the data quality issues discussed above, the data quality review identified no concerns with respect to the quality or usability of the data presented herein."

Section 6 – Conceptual Site Model – Contamination sources

Please add a subsection discussing contamination sources. This discussion should include the apparent release near MW13. The current status of the other releases (R-99 and previous UST releases) should also be discussed. How effective were the previous remedial efforts at addressing these releases? Is there source contamination mass remaining at these source area?

The dry well was investigated via well MW23. Please discuss the distance between MW23 and the dry well, and any conclusions that can be drawn regarding a potential contamination release at the dry well.

Section 6.1.2 – Discussion on Figure 22 – Relative Flow Rates

See comment on Section 5.7.2 above. We anticipate that the product recovery from the sumps may give an indication of the likely flow rate from the sumps. We would assume that the sumps that had greater product recovery (#1, #2, #5, and #6) likely had higher flow (greater interconnectivity) than sumps with less product recovery (#3 and #4).

Section 6.2 – Chemicals and Media of Concern and Cleanup Levels.

Surface water and sediment are impacted media at the Site and more discussion should be included on these media including a cleanup level table for sediment similar to those provided for soil and groundwater.

Please note the Ecology monitors surface water compliance using monitoring wells that are in proximity to surface water. Currently the wells located in close proximity to the river that have sufficient yield and are contaminated are being used as interim action recovery wells. Ecology considers it premature to consider monitoring of wells for surface water compliance at this time, since:

1. Non-compliance via sheen is currently being demonstrated; and
2. Surface water compliance must be demonstrated based on individual compounds, not TPH.

However, prior to completing remedial actions at the site, compliance monitoring points for surface water using monitoring wells near the river will need to be developed, and surface water compliance analytical parameters will need to be identified. Surface water cleanup levels are discussed in WAC 173-340-730 (2) (b).

Section 6.4.2 – Subsurface Soil Direct Contact Pathway

The possibility of contaminated surface soil in the vicinity of MW13 cannot be precluded at this time (the release source of the contamination in this area has not yet been defined). Therefore, the direct contact pathway from surface soil could be operable, if work is performed in this area.

Please note the typo in the sentence "Each of these locations are with the Coleman Oil property." Please add to the end of that sentence "which is secured with fencing".

Section 6.4.3 – Vapor Pathway

No structures currently remain on the Coleman property that could constitute a vapor intrusion concern. However, a structure could be installed on the property that could constitute a potential future pathway concern. Please include discussion of potential vapor intrusion in this subsection.

EPA Screening guidance adopted by Ecology includes a depth separation of 15 feet for LNAPL. LNAPL has been measured in MW9 at a depth of approximately 21.5 ft bgs. Therefore, vapor intrusion would appear to be unlikely at the structure on the Chelan PUD property north of MW9, unless the structure has a basement. The depth of this structure and whether or not it can be eliminated as a vapor intrusion concern should be discussed within the SRI Report.

Section 6.4.4 – Surface Water Pathway

Please add the word 'pathway' to the subsection title, as above.

Please note the typo in the subsection title.

Please add "/Sediment" to the subsection title and mention detections of sediment samples above the sediment cleanup objective for diesel range petroleum hydrocarbons.

Section 6.4.5 – Groundwater/Drinking Water Pathway

Please add the word 'pathway' to the subsection title, as above.

Please note the typo in the subsection title.

Under MTCA, an aquifer must be considered a potential future potable supply source unless it can be eliminated by criteria of salinity and yield, as specified in the rule. Therefore, potential future drinking water use must be considered an operable pathway.

Section 6.5 – Potential Data Gaps

Please further discuss the soil data gap near MW13. Please clarify what additional data are needed in this area.

Please discuss the potential LNAPL transport vector shown in Figure 23 west of MW17 to MW10. This flow vector may be actually from Sump #6 to MW9. If so, less impact to groundwater beneath the neighboring property to the north would be likely. Collecting data to the west of MW17 may eliminate the currently depicted LNAPL transmission pathway.

Please discuss the data gap between LNAPL beneath Worthen Street and the soil seeps along the riverbank. Additional Interim Action Addendum #2 activities are anticipated to help fill this data gap.

Please discuss planned continued groundwater monitoring at the Site. This should include proposed locations for monitoring, schedule, and analytical parameters.

Section 6.5 – Potential Data Gaps – Shoreline Seeps and Sediments

Based on the exceedances of the sediment cleanup objective of 340 mg/kg for diesel range organics, cleanup of the sediments is anticipated to be required. Cleanup of the shoreline seeps soils, which have diesel range organics at concentrations significantly above the Method A cleanup level, is also anticipated to be required. Additional data will be needed either prior to or during a remedial action such that the lateral and vertical extent of contamination in the shoreline and seeps is clearly defined. The requested modified cross section B-B' (see comment on Figure 11, below) will help with conceptual model development for seepage and sediment contamination. Unless an effective field screening or field analytical methodology is proposed, additional characterization will likely be needed prior to remedial action.

Due to the exceedances of the sediment cleanup objective, Ecology has included one of our sediment experts, Mr. Russ McMillan, within our review team. Mr. McMillan has indicated that further characterization of sediments should be done under a work plan, which he is available to review. He has also indicated that he is available for questions in work plan development to ensure consistency with Ecology's sediment rule and guidance. He can be reached at (360) 407-7536.

Figures

Site Plan Maps

Please add the river shoreline to all figures with a Site Plan map (Figure 3, Figure 7, Figure 9, Figure 13, Figure 14, Figure 15, Figure 16, Figure 17, Figure 20, Figure 21, Figure 22, and Figure 23.

Please include the R99 release area (currently shown on Figure 3 and Figure 7) on subsequent site plan maps. The label does not need to be included (can add to the legend).

Figure 2 – Site Features and Sampling Locations

Please add an additional site plan map (e.g. Figure 2a), zoomed into the Coleman facility area showing the three confirmed release locations, the former dry well location, all excavation and trench boundaries, and sumps, borings and monitoring wells. Note that this zoomed plan map would probably be more easy to use without the aerial base map.

Figures 10 through 12 – Cross Sections

Please add the period of record high and low water levels for the monitoring wells installed in 2017. This may allow extrapolation of estimated high and low water levels in the monitoring wells installed in 2018.

Please add the depth of any transmissive intervals identified during the hydraulic testing of MW9, BH1, and MW10 (see comment on Section 5.7.1).

Figure 11 – Cross Section B-B'

Note the high river elevation (5/15/18) was for a relatively small portion of the year. For Figure 11, we suggest presenting a 5/4/18 groundwater level that connects with the 5/15/18 river level, and a seasonal low groundwater level that connects with the corresponding low river water level. May 4, 2018 was immediately prior to implementation of Additional Interim Action Addendum #1 hence wells MW9, BH1, and MW10 were not yet being pumped.

Please change BH-2 to BH-1 on cross section B-B' and add shoreline seep sample location SL-04, and sediment samples SS-01 and SS-04. The addition of these features will help in understanding in conceptual model development for the seeps and impacted sediments.

Figure 13 and 13 – Potentiometric Surface Maps

We suggest making the contours in the area underneath the Chelan PUD property to the north dashed, since contours may curve more to the west in this area. This contour curvature is suggested by potentiometric surface maps from the BNSF Railyard site located to the northwest (groundwater flows to the north-northwest in that area, parallel to the river). A copy of a potentiometric surface map from the BNSF site is shown below.

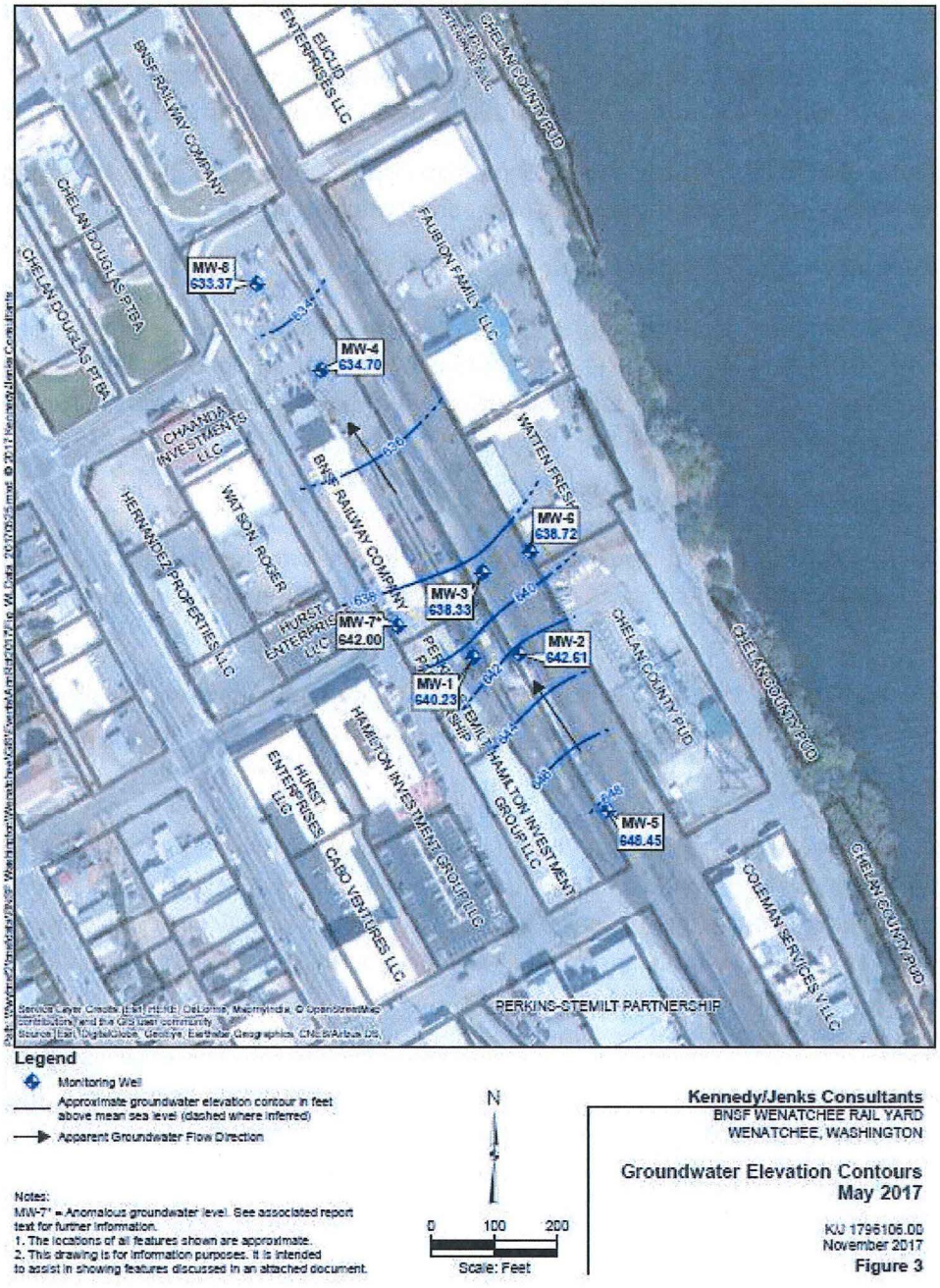


Figure 15, 16, and 17 – Soil, Sediment, and Groundwater Results Maps

The use of these maps would be facilitated by color-coding (i.e. color dots) differentiating locations with and without cleanup level exceedances (e.g. 'hot' color for locations with exceedances and 'cool' color for locations without exceedances).

Figure 18 – Offsite Facilities

Please adjust the dots showing the Site, Wenatchee Substation, and BNSF Wenatchee Rail Yard. The Site dot should be near the R99 release point. The Substation dot should be just north of Chehalis and just west of Worthen. The BNSF site dot should be near MW-2 and MW-3 in the above map.

Figure 19 – Area of Well Search

Please add the location of the Site and label the highlighted area on this figure.

Figure 20 – Site Boundary Definition

Although a Site is defined in MTCA as the area of contamination above cleanup levels, Ecology is reluctant to label a polygon as "Site Boundary". This is because contamination extent can change over time. Rather, Ecology prefers that the figure name and area label be "Current Extent of Contamination above Cleanup Levels." Please add additional question marks along the north west part of the area within the Chelan PUD property and adjacent to the area within the river north of the sediment sample locations.

Figure 22 – Comparison of Product Recovery Relative Flow Rates, and Top of Chumstick Formation

The combined data in this figure present data that indicates controls on product migration. The symbol for product recovery is a difficult to distinguish from the medium flow symbol. We suggest removing the symbol for product recovery (the product recovery number shown is sufficient). In addition, flow symbols could potentially be added to the Sumps, based on the amount of product recovered (e.g. #1, #2, #4, and #6, high; #3, medium). Sump #4 may have had low product recovery due to being hydraulically upgradient of the release. A footnote could be added to the table: "Flow rates at sumps estimated based on product recovery".

Figure 23 – Conceptual Model of Product

See comment on Figure 22 above.

The arrow from the known 'point of R99 release' to MW8 currently curves around a mapped 'top of Chumstick Formation' high area. However, Sump # 5 had the highest product recovery of any sump. In addition, HC02 has very little indications of contamination in soil samples and in the boring log (suggesting low flow at HC-02). We suggest straightening the flow arrow so it runs through Sump #5.

The flow arrow from Sump #6 curves to the west of MW17 to MW10. Although MW17 had high flow, it did not have product, suggesting that MW17 is not interconnected with FB3. Therefore, there appears to be two potential scenarios for product flow in this area; west of MW17 or east of MW17 (near MW9).

Testing west of MW17 is recommended to determine whether product is present at that location. If product is not found west of MW17, then that product transmission scenario would appear to be eliminated, and product transmission beneath the neighboring parcel would likely be much less significant.

Periodic monitoring of MW17 may be warranted to confirm that product has not migrated into that well.

Tables

Table 2 – Groundwater Elevation Data

Table 2 should include depth to product, product thickness, and potentiometric elevation data. The calculation of potentiometric surface elevation should include the basis for product density value used. Please make font significantly larger to make this table readable.

Table 3 – Product Recovery Data

I suggest moving the current table to an appendix, and replace Table 3 with a product recovery summary table including a breakdown of different categories of product recovery from the current Table 3.

Table 4 – Slug Tests

I suggest renaming this table "Simplified Slug Tests" since these were not standard slug tests that are intended to determine aquifer hydraulic parameters.

Tables 5 & 6 – Analytical Results Data

I suggest increasing the font size a little in these tables, since they are currently hard to read. The margins applied can be reduced some.

Table 5 – Soil Results

Please remove sediment from this table and make a new table or reformat Table 5 to present sediment results and sediment cleanup objectives.

Table 6 – Groundwater Results

Samples from wells MW15 and MW18 are reported as "not analyzed" in the footnote. Please elaborate in the footnotes why these wells were not sampled.

Results on page 1 from April 2017 include flags, of F, O, and N1. Please include definitions of these flags in the footnotes.

Please confirm that none of the sampled wells contained product when the samples were collected.

Use of different line types or line weights in the table can facilitate the use of this type of table (e.g. dashed lines between different sampling rounds for the same monitoring well can make it easier to review the data).

Table 6 – Gasoline Additives

The data in Table 6 includes total lead (five groundwater samples), MTBE, EDB, and EDC (three groundwater samples). Please include sampling from MTBE, EDB, and EDC in the sample from MW13 during the next sampling round so that a case can be made from the worst-case location that no gasoline additives are present in groundwater.

Table 7 - PAHs in Groundwater

Please include the calculated carcinogenic PAH (CPAH) concentrations in the table and compare with the Method A cleanup level (0.1 µg/L benzo(a)pyrene [BAP] equivalents).

Please note the font issue with Table 7, last row.