

Supporting Documentation for a Modified List of Contaminants of Concern
Spill #484495
Badger Wash Federal 1-32
Grynberg Petroleum

In Document #403422219, the list of contaminants of concern was modified to include: TPH (GRO, DRO, ORO), EC, Organic Compounds in Soils and selenium.

Since then, additional soil samples were collected. SS15, which was previously impacted at 5 feet bgs with TPH at >4,000 mg/kg, as well as benzene and several other organic compounds, was sampled at 6 feet bgs. TPH and all organic compounds in soil were non-detect for the 6-foot sample. However, selenium remained elevated above the standard. Additionally, the EC concentration in SS15@5' was below the standard, and SS15@6' was above the standard for EC. As such, the Operator respectfully requests to remove selenium and EC from the list of contaminants of concern. There does not appear to be a correlation between a spill/release and the selenium and EC concentrations found in the soil. Rather, the concentrations of EC and selenium that are found in the soil on the Site appear to be naturally occurring.

SS15 was used as an example due to it exhibiting the most dramatic change in TPH (a clear indication of impacts). The above reasoning can also be applied to SS13, SS14, and SS16. All three of these samples showed a decrease in organic compounds in soil (a clear indication of impacts), correlated with an increase in EC and/or selenium.