

From: Hunt, John T - DNR
Sent: Friday, August 13, 2021 10:26 AM
To: Justin Button-Hutchens
Cc: Saari, Christopher A - DNR
Subject: FedEx MMP

Justin,

The revised MMP include the pond/berm liner and other requested items however there are several omissions and further clarifications needed. Some of these items were noted in my June 18 email, some are noted in form 4400-315:

- In the form, Section 5:
 - Attachments are referenced by number, the attachments have no numbers.
 - A Phase II is referenced (also in section 4), there does not appear to be a Phase II included in the submittal.
 - Info regarding well abandonment- BP officially requested abandonment of 5 wells, this should be noted in Section 5. Additional info required - Is BP going to do the work? Is BP going to submit abandonment forms? Is BP going to be responsible for well replacement if it is a condition of approval?
 - The intent here is for you to tell the complete story of what you are proposing to do.
- Figures, the construction plan set is included however they do not clearly include required information:
 - Additional figure(s) are needed that clearly indicate where exactly the contaminated soil going into the berm came from and where leftover residual soil is located. The plan set is referenced but it is not specific enough. There are Antea figures but they are not specific enough either.
 - The intent is to be able to **easily** determine where contaminated soil was excavated, where it went and where it remains.
- Maintenance Plan:
 - The Antea abandonment request does not have to be included in the maintenance plan. The only things needed are the text, figures and inspection logs.
 - In the text it does not say the asphalt paved area will be annually inspected.
 - As noted above, the figures need to clearly define the exact areas of residual soil and the areas requiring annual inspection. Currently the paved area is not indicated as a cap to be inspected in any drawing.
 - The maintenance plan does not have to be submitted as a separate document.
 - The intent of the maintenance plan is it should be easy enough for anyone to pick up, follow, do an inspection and make recommendations on repairs if required.

I'll give you a follow up call on Monday to discuss any comments or questions you may have on any of these items.

--John

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