From:	Carey Guilbeau
To:	Vargas, Ricardito
Cc:	Azzam, Nidal
Subject:	RE: New LNAPL Releases
Date:	Friday, April 8, 2022 10:35:02 AM
Attachments:	ATT00001.txt HOVENSA New LNAPL Occurrences - ERT"s DRAFT Notes.xlsx

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Hi Ricky,

The ERT added some DRAFT notes to your spreadsheet. Please see columns G through L in the attached.

Also, for the site visit, please let me know if there are specific questions EPA may have regarding the division of assets, responsibilities, and liabilities between the ERT and Limetree (and now Port Hamilton). I think the site visit would be a great opportunity to discuss these items and see first-hand in the field what these divisions look like. I will prepare slides or handouts to help facilitate this part of the site visit.

Regards,
Carey Guilbeau
HOVENSA Environmental Response Trust (ERT)
Trust Representative and Technical Program Manager
Office: (340) 692-3179
Cell: (340) 626-2521

From: Carey Guilbeau
Sent: Monday, March 7, 2022 4:29 PM
To: Vargas, Ricardito <vargas.ricardito@epa.gov>
Cc: Azzam, Nidal <Azzam.Nidal@epa.gov>
Subject: RE: New LNAPL Releases

Hi Ricky,

Please see the responses in blue below. The ERT and Limetree review the quarterly gauging data as soon as it is available and make changes in remediation at the site based on the quarterly gauging data and any new laboratory analyses. Thus, the work that Limetree requests (and pays for) changes at least quarterly if not more frequently.

Please let me know if you have additional questions.

Regards,
Carey Guilbeau
HOVENSA Environmental Response Trust (ERT)

Trust Representative and Technical Program Manager
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From: Vargas, Ricardito <vargas.ricardito@epa.gov>
Sent: Monday, March 7, 2022 4:05 PM
To: Carey Guilbeau <CGuilbeau@HovensaERT.com>
Cc: Azzam, Nidal <Azzam.Nidal@epa.gov>
Subject: RE: New LNAPL Releases

Hey Carey,
Nidal and I had a chance to review the information that you provided below. I am attaching an updated excel sheet, outlining the new LANAPL occurances identified in the CAS addendum report and highlighting areas where you identified Limetree is reimbursing ERT (green highlight) and where Limetree is partially reimbursing ERT (orange highlight). Based on this information, it appears that the following areas are currently not being reimbursed by Limetree:

1. Subdomain 6 (wells 440,444,135,334)
    a. 440 & 444
        - Work is not occurring in these areas because PSH goals are being met (below 0.2 ft. thickness or less than 0.1 ft./day velocity). When work did occur, Limetree reimbursed the ERT for the work.
        - From the semiannual report (the language is very similar or maybe the same in the addendum: "On August 11, 2021, Limetree requested well 440 to be added to the well vacuuming schedule, and subsequently, after further review during an October 1, 2021 meeting between the ERT and Limetree, it was decided that well 440 should be removed from the well vacuuming list, and to continue to observe PSH thickness and groundwater elevation trends. The ERT will continue to work with Limetree to determine possible sources of the PSH in wells 440 and 444. The ERT will continue to monitor fluid levels in wells 440 and 444. Should there be a change in the PSH thickness in either well, the ERT will notify Limetree of the opportunity to collect a split sample."
    b. 135.
        - Work is not occurring at this well because the goals are being met. Limetree had requested vacumming of this well (Limetree pays for all work they request).
        - From the addendum and most recent semiannual: Per the July 28, 2021 fingerprinting report, the PSH sample collected on July 14, 2021 is "composed of a very highly degraded diesel/fuel oil component and a very weathered and degraded gasoline

component both superimposed on an exceedingly degraded crude oil. The distillate fraction has a nC17/pristane ratio of 0.10 which indicates that it has been in the subsurface up to 20 years or more." At the present time, this new occurrence is not deemed to be from a new release; the area will continue to be monitored.

   c. 334 – from the addendum & semiannual report, the fingerprinting results do no indicate the new occurrence of PSH is from a new release. The ERT will continue to monitor the well.

1. Subdomain 11-S-W (Tank 7506)
   a. The ERT's wells in this area have not been impacted and Limetree has therefore not requested any work at the wells.
   b. Other than participate in sampling the excavations, the ERT has not performed any work in this area.
   c. Limetree performed any work in their excavations and for the repair of their line. All details provided to the ERT regarding the work performed by Limetree are provided in the addendum and the most recent semiannual report.

First, is this information accurate or are there other areas where Limetree is currently not reimbursing ERT? Limetree does not reimburse the ERT for any remediation work in areas that have been deemed to be pre-existing condition (i.e. caused by a release that occurred prior to Jan 4, 2016). Second, is ERT doing anything in these areas in the interim? Where goals are exceeded and the area is deemed to be a pre-existing condition (i.e. release prior to Jan 2016), the ERT performs the remediation work without reimbursement from Limetree. In areas deemed to be a new occurrence caused by a new release (i.e. post Jan 4, 2016), Limetree makes requests on the work to be performed at the ERT's wells and Limetree reimburses the ERT for that work.

Thanks,
Ricardito Vargas,
Project Manager
Land and Redevelopment Programs Branch,
Land, Chemicals and Redevelopment Division
USEPA Region 2
290 Broadway, 25th Floor
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212-637-3703 Office

From: Carey Guilbeau <CGuilbeau@HovensaERT.com>
Sent: Thursday, March 3, 2022 5:08 PM

To: Vargas, Ricardito <vargas.ricardito@epa.gov>
Subject: RE: Potential Site Visit

Hi Ricky,

Limetree is currently reimbursing the ERT for work in the following areas:

- RAA 1A
- Tankfield 21
- 50% of Tankfield 22 costs
- Subdomain 4 wells LW-9, 487, 608 & 648
- Subdomain 6 wells 297 & 681
- Subdomain 8 well 714

There are other areas where remediation/additional monitoring was performed per Limetree's request in the past and Limetree paid for this work as well. For example, well 81 vacuuming and monitoring was funded by Limetree.

Regards,
Carey Guilbeau
HOVENSA Environmental Response Trust (ERT)
Trust Representative and Technical Program Manager
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Cell: (340) 626-2521

From: Vargas, Ricardito <vargas.ricardito@epa.gov>
Sent: Thursday, March 3, 2022 1:48 PM
To: Carey Guilbeau <CGuilbeau@HovensaERT.com>
Subject: Potential Site Visit

Hey Carey,
Hope all is well!

The SCA folks reached out to me regarding having EPA come down for a site visit. Obviously with COVID, travel is restricted in our Region and must go to our RA for approval. However, since we are requesting approval for travel to the SCA site, Nidal and I thought we can also conduct a site tour at the HOVENSA site. SCA is requesting us to go down April 28th so this visit would fall the week of April 24th. Before we put our travel request, I was wondering if this was something you would be interested in. Possible agenda items that we can discuss at this meeting are the Permit application and new LNAPL releases.

Also, for clarification, is Limetree Terminal reimbursing ERT for all new LNAPL releases or only some areas? If ERT is receiving reimbursement for some areas, we would like to know which.

Thanks!

Ricardito Vargas,
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