



March 2, 2004

Mr. C. D. Stevens
Manager, Global Remediaton
Retail Projects
ExxonMobil Corporation
16825 Northchase Drive, Room 928
Houston, TX 77060

Dear Mr. Stevens:

The Louisiana Department of Environmental Quality (LDEQ) and United States Environmental Protection Agency (EPA) Region 6 together have determined that the five Underground Storage Tank (UST) sites listed in Enclosure 1 (the "Properties"), owned or operated by ExxonMobil Corporation (ExxonMobil), are Ready for Reuse. The Ready for Reuse Determination is an acknowledgment that environmental conditions on the Properties are protective of human health and the environment based on their current and anticipated future use as commercial/industrial sites.

The Properties, located in the New Orleans and Baton Rouge areas, were formerly and/or are currently operated as gasoline retail stations engaged in dispensing fuel from USTs. The sites were evaluated under the LDEQ Risk Evaluation/Corrective Action Program (RECAP) regulations. The Properties have or will meet a closure completion or no further action at this time (NFA-ATT) standard. Based on a review of site investigation and remediation information, the LDEQ has determined that these sites are ready for reuse.

Specifically, this Ready for Reuse Determination is based on information contained in the site assessment documents previously submitted to the LDEQ and summarized in Enclosure 1. Additional information may be found in the Basis of Decision documents attached to each NFA-ATT determination letter. A copy of these documents may be obtained from LDEQ at the address provided in Enclosure 2 to this letter. Information concerning the current environmental conditions of the Properties (i.e., concentrations of contaminants present and their associated risks) and the risk management activities conducted to ensure protectiveness are summarized in Enclosure 1.

The RECAP Evaluation Reports demonstrate that, although releases of hazardous constituents have occurred as a result of operations on the sites, residual concentrations do not present an unacceptable risk to human health or the environment, based on risk-based cleanup levels established by LDEQ and given the current and reasonably expected future commercial/industrial use of the Properties. Other considerations in making this Ready for Reuse Determination include zoning and conveyance

notifications to ensure the long-term integrity of the remedy. In particular, current zoning in these areas restricts the sites to industrial use. Additionally, under RECAP, sites closed to industrial standards require that a conveyance notice be filed with the Parish Clerk of Court as an institutional control, which includes a description of the environmental conditions on the Property at the time of the NFA-ATT. If site conditions change, including environmental conditions, land use, site receptors and remedy performance, it will be necessary to reevaluate this Ready for Reuse Determination to ensure site conditions remain protective for the current and anticipated future use.

The undersigned expressly reserve all rights and authorities to require future action by owners or operators if new or additional information comes to light that materially impacts this Ready for Reuse Determination, whether such information is known as of this date, or is discovered in the future.

Congratulations on this noteworthy accomplishment!

Sincerely yours,

Mike D. McDaniel, Ph.D. Secretary Louisiana Department of Environmental Quality

Enclosures

Carl E. Edlund, P.E. Director, Multimedia Planning and Permitting Division EPA Region 6

ENCLOSURE 1 Current Environmental Conditions Table

Site Name, Agency Interest Number and Location	Area of Investigation	Residual Contaminants of Concern (COCs) in Soil	Residual Contaminants of Concern (COCs) in Groundwater)	Limiting RECAP Standard	Remediation Status	Risk Management Activities	Remedial Action Taken
,	Hydrocarbon AOI 1	In Soil: Benzene: 0.07 mg/kg Dibenz(a,h)anthracene: <1.00* mg/kg Napthalene: <3.34 mg/kg Lead: 101** mg/kg	In Groundwater: Benzene: 0.0298 mg/L TPH-GRO: 1.12 mg/L TPH-DRO: 0.965 mg/L Naphthalene: 0.0422 mg/L Arsenic: 0.101 mg/L	3.2 mg/kg 0.36 mg/kg 440 mg/kg 100 mg/kg 100 mg/L 10,000 mg/L 10,000 mg/L 31 mg/L 36.2 mg/L 36.2 mg/L	Complete; NFA (2/27/04)	commercial/ industrial. Conveyance	UST system removed; 40 cubic yards of soil removed
		<u>In Soil:</u> Arsenic: 9.56*** mg/kg	In Groundwater: TPH-DRO: 0.183 mg/L	7 mg/kg 10,000 mg/L 36.2 mg/L	Complete; NFA (2/27/04)	Zoned commercial/ industrial. Conveyance notice filed with Clerk of Court, East Baton Rouge Parish	

Site Name, Agency Interest Number and Location	Area of Investigation	Residual Contaminants of Concern (COCs) in Soil	Residual Contaminants of Concern (COCs) in Groundwater)	Limiting RECAP Standard	Remediation Status	Risk Management Activities	Remedial Action Taken
	Chlorinated Hydrocarbon AOI		Trichloroethene: 0.01080	0.55 mg/L 4.62 mg/L	Complete; NFA (2/27/04)	Zoned commercial/ industrial	
	Former Used Oil Tank Area		In Groundwater: TPH-ORO: 0.273 mg/L Lead: 0.031mg/L Benzo(a)pyrene: 0.00025 mg/L	1700 mg/kg 10,000 mg/L 169 mg/L 0.0016 mg/L	Complete; NFA (2/19/04)	with Clerk of Court, Orleans	UST system removed; site investigation and RECAP evaluation

Site Name, Agency Interest Number and Location	Area of Investigation	Residual Contaminants of Concern (COCs) in Soil	Residual Contaminants of Concern (COCs) in Groundwater)	Limiting RECAP Standard	Remediation Status	Risk Management Activities	Remedial Action Taken
	Hold Area	In Soil: Benzene: 0.173 mg/kg Lead: 103 mg/kg TPH-GRO: 101 mg/kg		3.2 mg/kg 1700 mg/kg 500 mg/kg	indicates protective standards are met. SPLP analyses indicated that the facility can default to industrial RECAP Standards	filed with Clerk of Court, Orleans Parish	was reused and put back into the tank hold. Approximately 156 cubic yards of clean fill were brought into the site
,	Hold Area	In Soil: Benzene: 1.3 mg/kg TPH-GRO: 500 mg/kg TPH-DRO: 172 mg/kg TPH-ORO: 8340 mg/kg	In Groundwater: Benzene: 3.7 mg/L Toluene: 2.5 mg/L Ethylbenzene: 1.4 mg/L MTBE: 1.4 mg/L TPH-GRO: 37.6 mg/L TPH-DRO: 2.7 mg/L TPH-ORO: 0.212 mg/L Acenaphthene: 0.74 mg/L Naphthalene: 0.165 mg/L Barium: 2.38 mg/L	3.8 mg/kg 3100 mg/kg 3100 mg/kg 10,000 mg/kg 6.2 mg/L 530 mg/L 170 mg/L 51,000 mg/L 10,000 mg/L 10,000 mg/L	NFA (12/15/03)	with Clerk of Court, East Baton Rouge Parish	UST system removed and replaced; 10 cubic yards of soil removed; site investigation and RECAP evaluation

Site Name, Agency Interest Number and Location	Area of Investigation	Residual Contaminants of Concern (COCs) in Soil	Residual Contaminants of Concern (COCs) in Groundwater)	Limiting RECAP Standard	Remediation Status	Risk Management Activities	Remedial Action Taken
	Hold Area	In Soil: Benzene: 0.85 mg/kg Toluene: 1.45 mg/kg Ethylbenzene: 11.4 mg/kg Xylenes: 7.70 mg/kg MTBE: 2.50 mg/kg TPH-GRO: 214 mg/kg		11 mg/kg 2300 mg/kg 1100 mg/kg 640 mg/kg 21,000 mg/kg 4700 mg/kg		filed with Clerk of Court,	and RECAP
			Toluene: 0.003 mg/L Ethylbenzene: 0.405 mg/L Xylenes: 0.301 mg/L MTBE: 0.032 mg/L TPH-GRO: 5.610 mg/L Total Lead: 0.042 mg/L Aromatics>C10-C12: 0.184 mg/L Aliphatics>C10-C12:	21 mg/L 530 mg/L 170 mg/L 160 mg/L 39,000 mg/L 11mg/L 169 mg/L 510 mg/L 7.8 mg/L			

Site Name, Agency Interest Number and Location	Area of Investigation	Residual Contaminants of Concern (COCs) in Soil	Residual Contaminants of Concern (COCs) in Groundwater)	Limiting RECAP Standard	Remediation Status	Risk Management Activities	Remedial Action Taken
Exxon RAS #5-0775, AI # 5721, 5701 Crowder Boulevard, New Orleans	Hold Area	In Soil: Benzene: 0.0948 mg/kg Toluene: 0.0948 mg/kg Ethylbenzene: 0.0948 mg/kg Xylenes: 0.114 mg/kg MTBE: 0.205 mg/kg TPH-GRO: 82.2 mg/kg Lead: 23.4 mg/kg TPH-ORO: 976 mg/kg		3.2 mg/kg 20 mg/kg 19 mg/kg 150 mg/kg 20 mg/kg 500 mg/kg 100 mg/kg 2000 mg/kg	Complete; UST closure completion notification (11/24/03)	Orleans Parish	UST system removed and replaced; 400 cubic yards of soil removed; site investigation and RECAP evaluation

Note: The RECAP Standards selected in the RECAP Evaluation Reports, and approved by LDEQ, provide LDEQ-derived risk-based standards for soil and groundwater based on non-industrial (residential) and industrial land use scenarios using currently recommended default exposure parameters and toxicity criteria issued by the EPA. A complete description of the risk-based standards for the sites can be found in the RECAP Evaluation Reports.

^{*}Although the dibenz(a,h)anthracene practical quantitation limit (PQL) exceeded the limiting RS for soil in one sample, it is not considered an exceedence of the limiting RS because, as identified in RECAP Section 2.5, page 28, the elevated detection limit for the constituent does not represent more that five percent of the data and the constituent was not detected in any other sample at the site, which achieved a detection limit lower than the limiting RS.

^{**}Although the lead concentration in soil exceeds the soil limiting RS, the SPLP result of 0.333 mg/L shows that the concentration of lead is still protective of groundwater, therefore the soil to groundwater pathway was eliminated from further consideration.

^{***}In an attempt to confirm the arsenic soil concentration of 9.56 mg/kg found in soil sample SB-5, additional soil sampling was conducted at soil boring SB-7 and SB-8, which resulted in arsenic concentrations of 5.54 mg/kg and 2.5 mg/kg, respectively. Both of the confirmatory analytical arsenic results are below the limiting RS for arsenic (7 mg/kg).

ENCLOSURE 2 CONTACTS

For copies of the documents referenced in the Ready for Reuse Determination, please contact:

Louisiana Department of Environmental Quality

Public Records Center Galvez Building, Room 127 602 N. Fifth St. Baton Rouge, LA 70802

Exxon Mobil Corporation

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Houston, TX 77060
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