

November 8, 2011

Mr. David Burke
Mr. Ayman Ghobrial
Environmental Cleanup
Pennsylvania Department of Environmental Protection
2 East Main Street
Norristown, Pennsylvania 19401

**RE: Response Letter/Addendum to Agency Comments
Site Characterization/Remedial Investigation Report AOI 10
Sunoco, Inc.
Philadelphia Refinery
Philadelphia, Pennsylvania**

David T. Gockel, P.E., P.P.
George P. Kelley, P.E.
George E. Derrick, P.E.
Michael A. Semeraro, Jr., P.E.
Nicholas De Rose, P.G.
Andrew J. Ciancia, P.E.
George E. Leventis, P.E.
Rudolph P. Frizzi, P.E., G.E.
Ronald A. Fuerst, C.L.A.
Colleen Costello, P.G.
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Michael D. Szura, C.L.A., A.S.L.A.
Stewart H. Abrams, P.E.
Brian M. Conlon, P.E.
Jeffrey A. Smith, P.G.

Dear Mr. Burke and Mr. Ghobrial:

The purpose of this letter is to provide responses to comments received by the Pennsylvania Department of Environmental Protection (PADEP) regarding the Site Characterization Report/Remedial Investigation Report (SCR/RIR) for AOI 10, dated June 29, 2011, prepared by Langan Engineering and Environmental Services, Inc. (Langan) on behalf of Sunoco Inc. (R&M) (Sunoco). Comments from the PADEP were received in a correspondence dated August 18, 2011. This response letter along with the attachments is meant to serve as an Addendum to the AOI 10 SCR/RIR.

Each comment provided by PADEP is noted below along with a response. Additional information for certain responses is included in the attachments to this letter.

PADEP Comments/Conditions

- 1. Following the requirements of Pennsylvania's Land Recycling Program/Technical Guidance Manual, the SWLOAD model must be utilized for all contaminants of concern to evaluate the mass loading of contaminants to surface water and ultimately to determine compliance with surface water quality criteria using PENTOXSD. Results from evaluating the migration of contaminants from groundwater to Lands Creek must be submitted as an addendum to the RIR and reviewed by the Department (DEP) prior to approving the report.***

Response

As described in the SCR/RIR, fate and transport calculations were completed for groundwater in AOI 10 to evaluate potential migration pathways/potential impacts to receptors. Eight monitoring wells (W-1, W-12, W-23, W-28, W-31, W-32, W-33, and W-34) in AOI 10 exhibited concentrations of groundwater constituents of concern (COCs) above their respective PADEP non-residential, used-aquifer (TDS<2,500) statewide health groundwater medium-specific concentrations (MSCs). The results from these monitoring wells were modeled using the PADEP's Quick Domenico (QD) model to determine whether COC concentrations could potentially reach the AOI 10 boundary. The modeling results indicate concentrations above the non-residential groundwater MSCs in monitoring wells W-1, W-12, W-23, W-28, W-31, W-32, and W-34 are not predicted to migrate beyond the AOI 10 boundary, with the exception of one well, W-33, which contains a concentration of benzene that has the potential to reach Lands Creek above the non-residential groundwater MSC. The QD-predicted benzene concentration at the Lands Creek boundary of 53 micrograms per liter (ug/L) is below the 25 Pa. Code Chapter 93 fish and aquatic life surface water quality criteria for benzene; however, to further assess the potential groundwater to surface water impact from benzene in well W-33, the PADEP's SWLOAD model was run for benzene. The input parameters for SWLOAD were the same as the input parameters used in the QD model. The edge criterion in SWLOAD is 5 ug/L which is the non-residential groundwater MSC for benzene. The distance between well W-33 and Lands Creek is 90 feet.

The SWLOAD model for W-33 predicted a benzene concentration of 51 ug/L along the centerline of the plume at the point of discharge to Lands Creek. This concentration is consistent with the QD-predicted concentration at this point. The SWLOAD model predicted the mass loading from benzene to Lands Creek to be 267 milligrams per day (mg/day). Because the predicted benzene concentration at the discharge point is above the edge criterion, the SWLOAD model suggests PENTOXSD is needed. PENTOXSD modeling was not completed because Lands Creek is an inland channel connected to the Schuylkill River and does not exhibit flow. An earthen berm is located between Lands Creek and the Schuylkill River further preventing any flow in the creek. Based on the ecological screening evaluation completed at AOI 10 and the sediment analytical results, an ecological risk assessment will be completed for Lands Creek. A copy of the revised fate and transport appendix for the SCR/RIR is included as Attachment A to this addendum.

2. Information regarding the API Model that was used to evaluate the distribution and the volume of the LNAPL was not included with the report.

Response

As part of the Current Conditions Report and Comprehensive Remedial Plan (CCR) dated June 30, 2004 prepared for the Sunoco Philadelphia Refinery, light non-aqueous phase liquid (LNAPL) modeling was performed using the American Petroleum Institute (API) Model. A copy of the revised LNAPL Appendix from the AOI 10 SCR/RIR and the LNAPL modeling procedures, input parameters, and results are included as Attachment B to this addendum. During groundwater gauging activities for the CCR, LNAPL was identified in W-8 with a thickness of 0.01 feet and in W-14 with a thickness of 0.01 feet. A LNAPL sample was collected from W-8 and submitted to Torkelson Laboratories (Torkelson) of Tulsa, Oklahoma as part of the CCR site characterization activities. Torkelson identified the LNAPL in W-8 as a weathered residual oil. Based on the API modeling performed for the CCR, it was determined that the residual oil in W-8 was stable and immobile with a specific volume of 4.88e^{-10} feet and a seepage velocity of 2.45e^{-16} centimeters per second (cm/sec).

As discussed in the AOI 10 SCR/RIR, LNAPL was identified in W-8 (0.51 feet), W-14 (0.11 feet), and W-18 (0.01 feet). LNAPL samples were collected from all three monitoring wells and submitted to Torkelson for LNAPL typing analysis as part of the site characterization activities for the AOI 10 SCR/RIR. A summary of the LNAPL typing analysis is included in Attachment B. The quantity of sample submitted for W-18 was not sufficient for Torkelson to run LNAPL analysis but it appeared to be similar to the other LNAPL samples collected at W-14 and W-18. Based on the LNAPL characterization performed by Torkelson, the LNAPL types present in monitoring wells W-8 and W-14 consisted mainly of weathered residual oil, and is assumed to be weathered residual oil in W-18. As part of this response letter, the API Model was updated to include the new LNAPL thickness value for W-8, W-14, and W-18. The input and output parameters of the updated API Model and seepage velocity calculations are presented in Attachment B as Tables B-1 through B-3, respectively of this response letter. In summary the updated LNAPL modeling outputs for W-8, W-14, and W-18 are as follows:

Well ID	API Model Calculated LNAPL Specific Volumes (feet)	Calculated LNAPL Seepage Velocity (cm/sec)
W-8	4.41e^{-4}	7.03e^{-10}
W-14	3.13e^{-6}	4.84e^{-12}
W-18	2.13e^{-9}	2.87e^{-15}

Revised figures depicting the results of the LNAPL modeling are included in Attachment B as Figure B-1 - LNAPL Specific Volume and Figure B-2 - LNAPL Mobility Value.

Based on the LNAPL type (weathered residual oil) and the updated API Model output results, the weathered residual oil found in monitoring wells W-8, W-14, and W-18 is stable and immobile. Attachment B includes all of the information used to evaluate the distribution and volume of LNAPL in AOI 10.

- 3. The 1994 CCR indicates that site characterization activities were proposed in a "Corrective Measures Study Work Plan," dated April 1999. This document is not referenced in the SCR/RIR, so it is not clear whether the proposals in the 1999 document have been followed up. It would be useful if this were clarified.**

Response

As summarized in the AOI 10 Work Plan submitted to the PADEP and EPA on February 14, 2011, a number of RCRA corrective action investigations/reports were completed for AOI 10 between 1986 and 1997. The Corrective Measures Study (CMS) Work Plan was prepared in April 1997 by ENSR Consulting and Engineering on behalf of Sunoco, not in April of 1999 which was an incorrect reference in the CCR. In preparation of the AOI 10 Work Plan, these RCRA investigations, reports, and correspondence, including the 1997 CMS Work Plan, were reviewed to develop the site characterization activities carried out in AOI 10.

The 1997 CMS Work Plan stated that, based on the RFI data, there were no further data gaps to initiate CMS activities at the CAMU. However, the 1997 CMS Work Plan laid out objectives for the CAMU to assure that there is no unacceptable exposure to waste on the ground surface and that potential exposures to subsurface materials are controlled or eliminated. The 1997 CMS Work Plan included potential alternative corrective measures such as institutional controls or covering, that could be implemented as result of the CMS.

Between 1997 and 1999, correspondence was exchanged between Sunoco and EPA regarding proposed revisions to the 1997 CMS Work Plan. In February of 1999, as a final response to the EPA's comments to the 1997 CMS Work Plan, Sunoco recommended that all soil data (surface and subsurface) be screened against PA Act 2 non-residential soil MSCs and any constituent above its respective soil MSC be considered a constituent of potential concern (COPC). Subsequent correspondence between Sunoco and EPA concluded that areas with COPC concentrations above the PA Act 2 non-residential soil MSCs would be further investigated. To

develop the scope of work in the 2011 AOI 10 Work Plan for Site Characterization, the historic RFI data from both inside and outside of the CAMU were screened against current PA Act 2 MSCs. Results of this screening process were used to develop the COC list and sampling locations for characterization activities at the CAMU. Any area that had historic soil concentrations above the current PA Act 2 non-residential soil MSCs was further investigated during the AOI 10 site characterization activities through soil borings and sampling. In addition, the extent of the waste materials in the CAMU was delineated through borings.

Based on the recent site characterization activities and results, limited shallow soil samples were identified above their respective non-residential soil MSCs. The plan for these areas will include delineation and remediation to be addressed in the combined Ecological Risk Assessment and Cleanup Plan for AOI 10 as further described in the response to Comment 4 below.

- 4. The total cumulative risk for exposure to carcinogens is 3.65E-04, greater than the acceptable risk of 1.0E-04. The RIR proposes that the cumulative risk for exposure to carcinogens will be re-evaluated after addressing the areas with lead and benzo (a) pyrene that show concentrations above the calculated site-specific values. Additional remediation may be requested should the total cumulative risk not meet the Risk Target of 1.0E-04.**

Response

Sunoco acknowledges that remediation of locations with lead and benzo(a)pyrene above the calculated site specific values may not be enough to reduce the total cumulative risk of exposure to carcinogens below the acceptable risk level of 1.0e^{-04} . Therefore, additional locations with higher detections of these compounds may also be selected for remediation with the goal to reduce the total cumulative risk to below 1.0e^{-4} . These areas will be addressed by Sunoco through implementation of a remedy that will be presented in a combined Ecological Risk Assessment and Cleanup Plan for AOI 10.

- 5. Based on the ecological screening performed, and due to the presence of contaminated sediments along Lands Creek, the RIR proposes additional ecological evaluation. Results will be documented in the Cleanup Plan.**

Response

Sunoco and Langan will complete an ecological evaluation of Lands Creek in accordance with Act 2. The results of the ecological evaluation will be presented in a combined Ecological Risk Assessment and Cleanup Plan for AOI 10.

- 6. It is noted that the Pennsylvania Natural Heritage Inventory has indicated the possible presence of threatened or endangered species. Lands Creek is a tidal waterway, and probably has associated wetlands (although the presence of wetlands is not documented in the SC/RIR). It is possible that Exceptional Value Wetlands are present. (Exceptional Value Wetlands are defined in PA Code Title 25, Chapter 105, Section 105-17.)**

Response

A natural resources figure is presented in Attachment C of this response letter. The floodway and flood hazard areas depicted on the map were derived from the Digital Flood Insurance Rate Map Database (DFIRM) for Pennsylvania, by the federal Emergency Management Agency (FEMA) 2005. The wetlands depicted, which are all located off-site of AOI 10, were obtained from the National Wetlands Inventory (NWI) for Pennsylvania by the U.S. Fish and Wildlife Service (USFWS) published in September 25, 2009. Based on the current FEMA and NWI mapping databases, as shown on the figure presented in Attachment C, there are no known mapped wetlands within AOI 10. Therefore, the presence of exceptional value wetlands is highly unlikely, however as part of the ecological risk assessment (as described in Response No. 5 above), AOI 10 will be further evaluated for the presence of such wetlands.

- 7. Because of the likelihood of future development activity nearby, natural resources such as Lands Creek take on a particular significance as potential loci for targeted restoration, or creation of wetlands. Wetland creation opportunities may be sought by developers of projects who have mitigation obligations pursuant to the regulations that protect wetlands from destruction. Although Sunoco has no obligation to offer their property to others for the purpose of mitigation, DEP wishes to make sure that Sunoco is aware of this factor, which could play a role**

in Sunoco's decision-making regarding the future disposition of the property at AOI-10.

Response

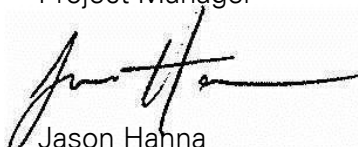
Sunoco is aware and appreciates the PADEP's mention of this opportunity.

We hope this response letter and report addendum adequately addresses the department's comments. Should you have any questions regarding these items, or have further comments, please contact Jim Oppenheim of Sunoco at 610.833.3444.

Sincerely,
Langan Engineering and Environmental Services, Inc.



Dennis Webster
Project Manager



Jason Hanna
Senior Project Manager



Colleen Costello, P.G.
Senior Principal

Attachments:

- A – Revised Appendix G from AOI 10 SCR/RIR - Fate and Transport Analysis
- B – Revised Appendix F from AOI 10 SCR/RIR - LNAPL Modeling Procedures & Results
- C – AOI 10 Existing Natural Resources Plan

cc: Steve O'Neil, PADEP
Hon Lee, US EPA
James Oppenheim, Sunoco, Inc
Tiffani Doerr, Aquaterra
Jennifer Menges, Stantec

ATTACHMENT A

Revised Appendix G from AOI 10 SCR/RIR –
Fate and Transport Analysis

ATTACHMENT A
REVISED APPENDIX G FROM THE JUNE 29, 2011 AOI 10 SCR/RIR
FATE AND TRANSPORT MODELING PROCEDURES
AOI 10: SUNOCO PHILADELPHIA REFINERY
PHILADELPHIA, PENNSYLVANIA

QUICK DOMENICO MODELING

A.1 INTRODUCTION

Fate and transport calculations were completed for groundwater in Area of Interest (AOI) 10 to evaluate potential migration pathways/potential impacts to receptors. Eight wells (W-1, W-12, W-23, W-28, W-31, W-32, W-33, and W-34) in AOI 10 exhibited concentrations of groundwater compounds of concern (COCs) above their respective MSCs. The COCs above the MSCs include benzene, chrysene, naphthalene and lead. The COCs that were above the MSCs in these wells were modeled using the analytical results from the April 2011 groundwater sampling event, and the Quick Domenico Version 2 (QD) spreadsheet model developed by Pennsylvania Department of Environmental Protection (PADEP). Site-specific data was used to complete the fate and transport calculations, when available.

A.2 MODEL OVERVIEW

The QD Model is a Microsoft Excel spreadsheet application based on the analytical contaminant transport equation developed by P.A. Domenico in *"An Analytical Model For Multidimensional Transport of a Decaying Contaminant Species,"* Journal of Hydrology, 91 (1987), pp. 49-58. The QD model calculates contaminant concentrations at any down-gradient location after a specified interval of time. The model incorporates the processes of advection, first order decay, retardation, and dispersion to describe fate and transport of compounds. In addition, the QD model displays the results as a two dimensional chart to facilitate interpretation of the results.

A.3 MODEL LIMITATIONS

Limitations of the QD model include:

- Groundwater flow is assumed to be steady state, and one-dimensional;
- Aquifer properties are assumed to be reasonably uniform;
- Applicable only to unconsolidated aquifers;
- Intended for use primarily with dissolved organic compounds;

- Does not account for the transformation of parent compounds into daughter products as the result of biodegradation;
- Compounds are considered individually, and are assumed to not react with each other; and
- The contaminant source is limited to a single and continuous source concentration.

A.4 MODEL INPUT PARAMETERS

In preparation of the June 2011 SCR/RIR, input values for the QD model were compiled from available site-specific data. When no site-specific data was available, estimated input values from the PADEP spreadsheet “Number Please! 2011” which is based on PA Code, Chapter 250, Appendix A, Table 5, or other acceptable literature sources, were utilized. The input parameters are discussed in detail in the following sections and are summarized in the input/output tables for each model (Tables A.1 through A.8). An Excel spreadsheet interface was used to construct the QD simulations. This interface allowed the simulation of all relevant compounds at each well location to be constructed and saved in a single electronic file.

A.4.1 Source Concentration

Results of the April 2011 groundwater sampling indicated that three organic compounds (benzene, chrysene and naphthalene) and one metal (lead) were detected above their respective groundwater MSCs in shallow wells (W-1, W-12, W-23, W-28, W-31, W-32, W-33, and W-34). The potential for these compounds to migrate offsite (beyond property boundary or discharge to the Schuylkill River) was evaluated through the use of the QD model.

A.4.2 Distance to Location of Concern (x)

Distance to the Location of Concern (distance) for the current simulations is the distance required for each COCs concentration to fall below its respective MSC under steady-state plume conditions. The distance is iteratively entered using the Excel “Solver” Add-on in the QD model until the location where the COC concentration falls below the MSC is identified. This step is performed using a large simulation time of 1×10^{99} days to ensure that the plume has reached steady-state.

A.4.3 Dispersivity

Dispersivity is the tendency of a dissolved plume to “spread out” as it moves down-gradient.

- Longitudinal dispersivity (A_x) occurs in the direction parallel to groundwater flow;
- Transverse dispersivity (A_y) occurs in the same plane as longitudinal dispersivity but perpendicular to the direction of groundwater flow; and
- Vertical dispersivity (A_z) occurs in the upward direction, normal to the plane in which longitudinal and transverse dispersivity occur (Vertical dispersivity is usually negligible and is typically omitted from most QD analyses).

Dispersivity estimates are difficult to quantify and are commonly estimated from the following relationships:

1. $A_x = X/10$ (where, X is the distance a contaminant has traveled by advective transport)
2. $A_y = A_x/10$
3. $A_z = A_x/20$ to $A_x/100$ (generally, it is recommended that A_z be a very small number (0.001) unless vertical monitoring can reliably justify a larger number. Additionally, a value of 0.0001 is suggested for uncalibrated or conceptual applications).

As stated above the value for A_y was estimated to be 10 percent of A_x . A value of 0.001 was used as a value for A_z . A longitudinal dispersivity of 200 feet was assumed which is also the longitudinal dispersivity used in the CCR.

A.4.4 Lambda

Lambda is the first order decay constant. It is determined by dividing 0.693 by the half-life of the compound. The value can typically be estimated for shrinking plumes by evaluating at concentrations versus time or distance. Lambda can also sometimes be estimated for stable plumes by evaluating concentration versus time using the methodology outlined in Buscheck and Alcantar (1995). Important considerations to estimating Lambda from site data include:

1. Are the measured concentrations along the centerline of the plume?
2. Are the measured concentrations the result of the single source area?
3. Are there no remedial systems and/or activities that effected the migration of the plume during the time interval of evaluation?

If the answer is yes to these questions, then the methodologies outlined in Buscheck and Alcantar may be utilized to estimate a site-specific lambda from site data.

Based on review of the available site data, the criteria necessary to calculate a site-specific lambda could not be met; therefore, a default value for lambda (when appropriate and available) was obtained from the PADEP spreadsheet "Number Please! 2011" which is based on PA Code, Chapter 250, Appendix A, Table 5. For the lead simulation, the lambda value was set to zero.

A.4.5 Source Dimensions

Source width is the maximum width of the area measured perpendicular to the direction of groundwater flow. Source thickness is the thickness of the contaminated soils below the water table that contribute contamination to groundwater. In addition to the saturated zone, fluctuation in groundwater elevation may create a smear zone in the unsaturated portion of an aquifer. As an estimate of the thickness of the smear zone, average fluctuation can be used. An assumed source width of 100 ft was used for wells in AOI 10. An assumed source thicknesses of 60 feet (ft) was used for wells in AOI 10. This thickness is the average saturated thickness of the upper unconfined aquifer based on cross sections DD-DD' and EE-EE.'

A.4.6 Hydraulic Conductivity (K)

The hydraulic conductivity of a geologic material is a measure of its ability to transmit water. A hydraulic conductivity of 4.64 ft/d was used in the AOI 10 QD simulations. This value was the average hydraulic conductivity of the fill/alluvium at the site, obtained from the CCR. The wells that were modeled are screened in the fill/alluvium.

A.4.7 Hydraulic Gradient

Hydraulic gradient is the change in hydraulic head relative to the distance between head measurement locations. The hydraulic gradient is measured parallel to the direction of ground water flow assuming horizontal flow and a uniform gradient. Using the groundwater elevations collected in April 2011, the hydraulic gradient value was estimated between W-31 and W-16 and is 0.0046. This hydraulic gradient was used as a conservatively high estimation for all eight QD simulations.

A.4.8 Porosity (n)

Porosity is measured as the ratio of the volume of void space in a geologic material to the total volume of material. A porosity of 0.35 was used in the fate and transport modeling and is based on historical geotechnical analysis of site alluvial sediments.

A.4.9 Soil Bulk Density (p_b)

Soil bulk density is the dry weight of a sample divided by the total volume of the sample in an undisturbed state. Soil bulk density can either be determined by a laboratory or by the equation

$$p_b = 2.65 * (1 - n).$$

Soil bulk density value used in the fate and transport modeling was 1.72 gm/cm³ which is based on historical geotechnical analysis.

A.4.10 Organic Carbon Partition Coefficient (KOC)

The organic carbon partition coefficient is chemical specific and was taken from the PADEP EP spreadsheet "Number Please! 2011" which is based on PA Code, Chapter 250, Appendix A, Table 5. Koc is chemical specific and can be found in the QD model input-out tables.

A.4.11 Fraction Organic Carbon (foc)

The fraction of organic carbon is the organic carbon content of a soil. A laboratory using ASTM methods can determine this value. Samples for organic carbon are taken from the same soil horizon in which the contaminant occurs, but outside of the impacted area. Since no site specific fraction of organic carbon data was available for the site, the fate and transport modeling used the model-recommended default concentration of 0.005, which is a conservative value based on the description of site soils.

A.4.12 Time (t)

'Time zero' is the point at which contamination was introduced into the aquifer. Time since 'time zero' is measured in days. The final simulation time of 1×10^{99} days was used to ensure that a steady-state plume was simulated.

A.5 QD OUTPUT DATA AND RESULTS

A spreadsheet for each well, for which a QD simulation was performed, is included in this appendix. The inputs for each model are summarized in Tables A.1 through A.8 and the model spreadsheets are provided for each well. Table A.9 is a summary of the QD modeling results. This table summarizes the QD-model predicted distance for each COC to reach its Act 2 non-residential groundwater MSC. The table also compares this predicted distance to the downgradient point of compliance distance.

The modeling results indicate concentrations above the groundwater MSCs in shallow wells W-1, W-12, W-23, W-28, W-31, W-32, and W-34 are not predicted to migrate beyond the AOI 10 boundary, with the exception of one well, W-33, which contains a concentration of benzene that has the potential to reach Lands Creek. The QD-predicted benzene concentration at the Lands Creek boundary (53 ug/L) is below the 25 Pa. Code Chapter 93 fish and aquatic life surface water quality criteria for benzene; however, to further assess the potential groundwater to surface water impact from benzene in well W-33, the PADEP's SWLOAD model was run for benzene. This model is discussed in the following section.

SWLOAD MODELING

A.6 INTRODUCTION

Based on the results of the QD modeling described above, a SWLOAD model was prepared for benzene in well W-33.

A.7 SW LOAD MODEL OVERVIEW

The SWLOAD model is Microsoft Excel spreadsheet applications based on the analytical contaminant transport equation developed by P.A. Domenico in *"An Analytical Model For Multidimensional Transport of a Decaying Contaminant Species,"* Journal of Hydrology, 91 (1987), pp. 49-58. The SWLOAD model calculates groundwater contaminant concentrations just before discharge to surface water and the volume of groundwater discharged to surface water. SWLOAD incorporates the processes of advection, first order decay, retardation, and dispersion to describe fate and transport of compounds.

A.8 MODEL LIMITATIONS

Limitations of the SWLOAD models include:

- Groundwater flow is assumed to be steady state, and one-dimensional;
- Aquifer properties are assumed to be reasonably uniform;
- Applicable only to unconsolidated aquifers;
- Intended for use primarily with dissolved organic compounds;
- Does not account for the transformation of parent compounds into daughter products as the result of biodegradation;
- Compounds are considered individually, and are assumed to not react with each other; and
- The contaminant source is limited to a single and continuous source concentration.

A.9 MODEL INPUT PARAMETERS

The input parameters of the SWLOAD model for W-33 are the same parameters used in the QD model described above.

A.9.1 Edge Criterion

The maximum predicted groundwater concentration adjacent to a surface water body is compared to the edge criterion. For benzene, the edge criterion entered into the SWLOAD model is 5 ug/L, benzene's Act 2 non-residential groundwater MSC. If the maximum predicted plume concentration exceeds the edge criterion, then the model suggests whether additional evaluation using PENTOXSD is necessary.

A.9.2 Distance to Stream

The distance between well W-33 and Lands Creek is 90 feet.

A.10 SWLOAD RESULTS

A copy of the SWLOAD model spreadsheet for well W-33 is included at the end of this appendix. The SWLOAD model for W-33 predicted a benzene concentration of 51 ug/L along the centerline of the plume at the point of discharge to Lands Creek. This concentration is consistent with the QD-predicted concentration at this point. The SWLOAD model predicted the mass loading from benzene to Lands Creek to be 267 mg/day. Because the predicted benzene concentration at the discharge point is above the edge criterion, the SWLOAD model suggests PENTOXSD is needed. PENTOXSD modeling was not completed because Lands Creek is an inland channel connected to the Schuylkill River and does not exhibit flow. An earthen berm is located between Lands Creek and the Schuylkill River further preventing any flow in the creek. Sunoco plans to conduct additional ecological assessment activities at Lands Creek.

QD SIMULATIONS

Table A.1
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

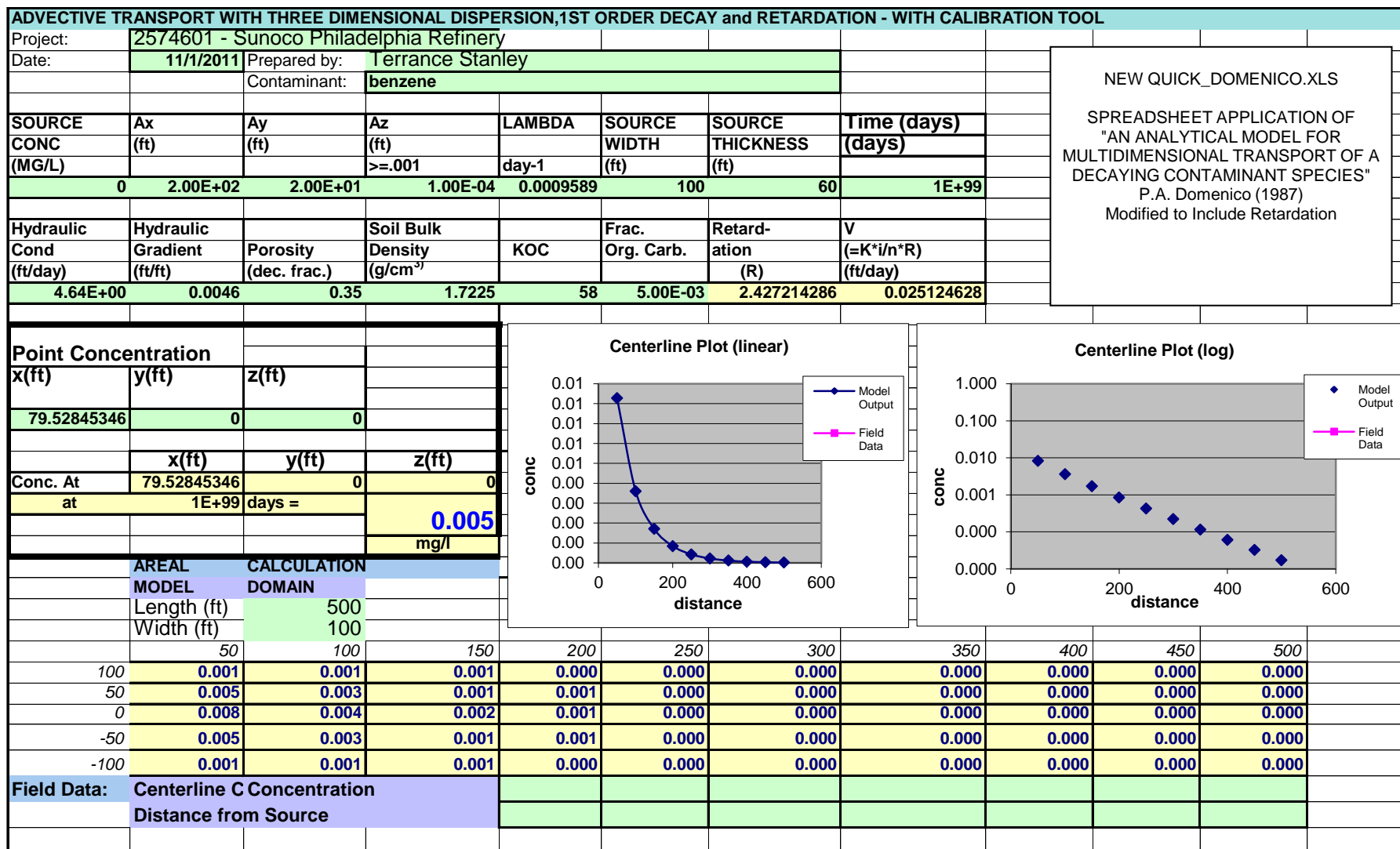
Project 2574601 - Sunoco Philadelphia Refinery
 Prepared by Terrance Stanley
 Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-01	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{OC}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0200	4/27/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0200	0.005	0.005	80

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



NEW QUICK_DOMENICO.XLS

SPREADSHEET APPLICATION OF
"AN ANALYTICAL MODEL FOR
MULTIDIMENSIONAL TRANSPORT OF A
DECAYING CONTAMINANT SPECIES"
P.A. Domenico (1987)
Modified to Include Retardation

Table A.1 W-01 QD2 Model
SIM 1

Table A.2
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

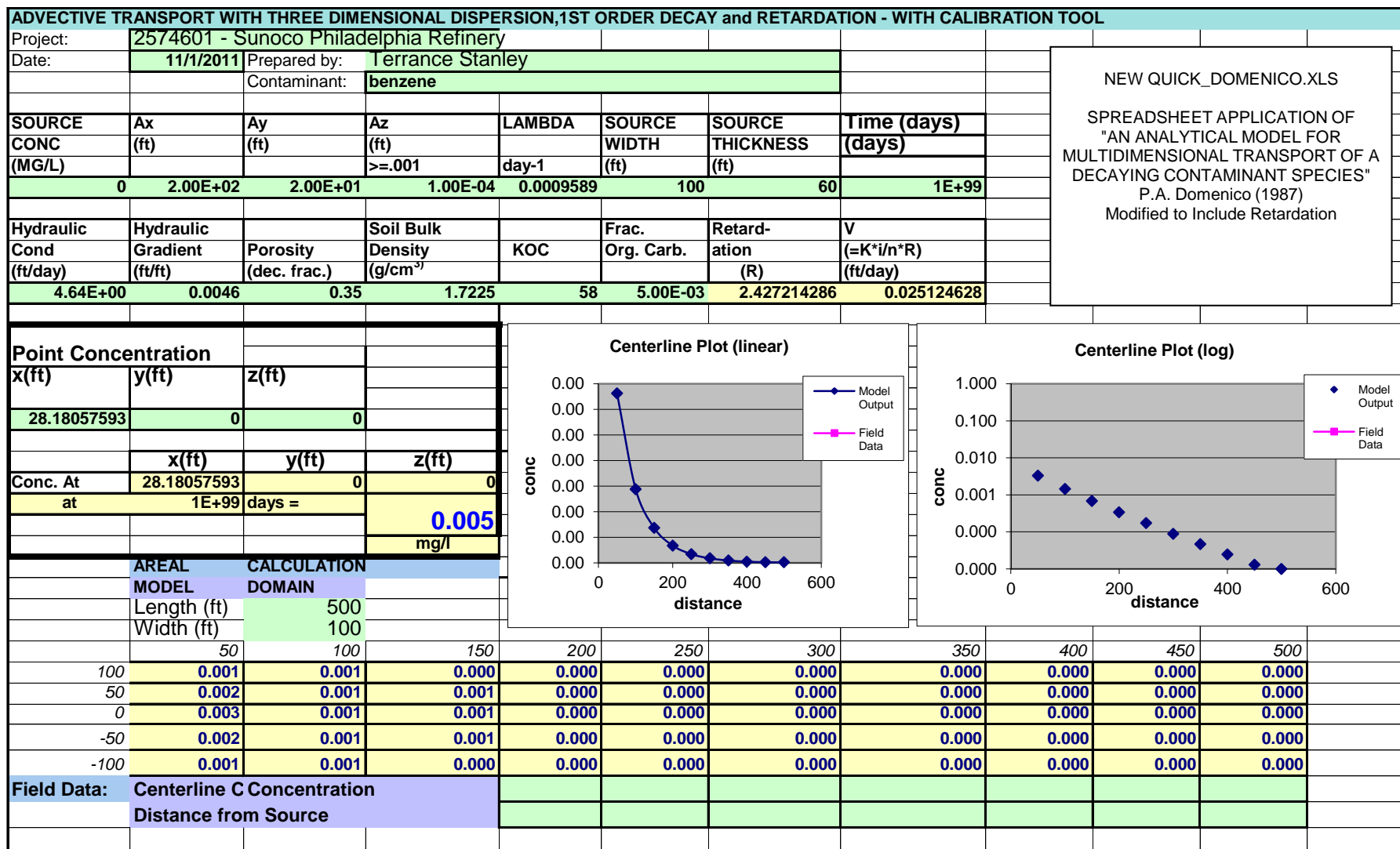
Project 2574601 - Sunoco Philadelphia Refinery
 Prepared by Terrance Stanley
 Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-12	
Sample Date			4/26/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{OC}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0080	4/26/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0080	0.005	0.005	28

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Modified to Include Retardation

Table A.2 W-12 QD2 Model
SIM 1

Table A.3
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

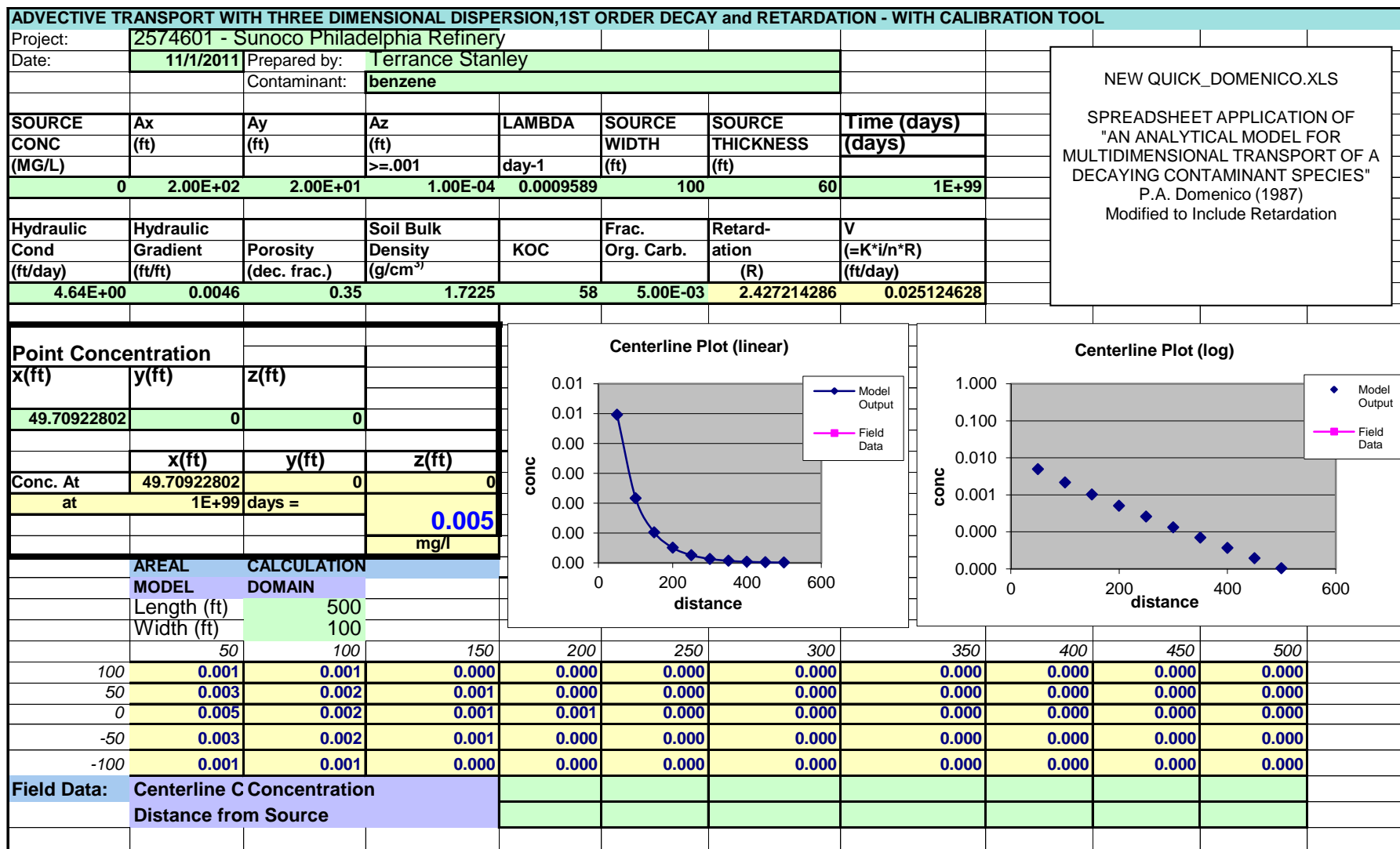
Project 2574601 - Sunoco Philadelphia Refinery
Prepared by Terrance Stanley
Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-23	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{OC}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0120	4/27/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0120	0.005	0.005	50

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Table A.3 W-23 QD2 Model
SIM 1

Table A.4
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

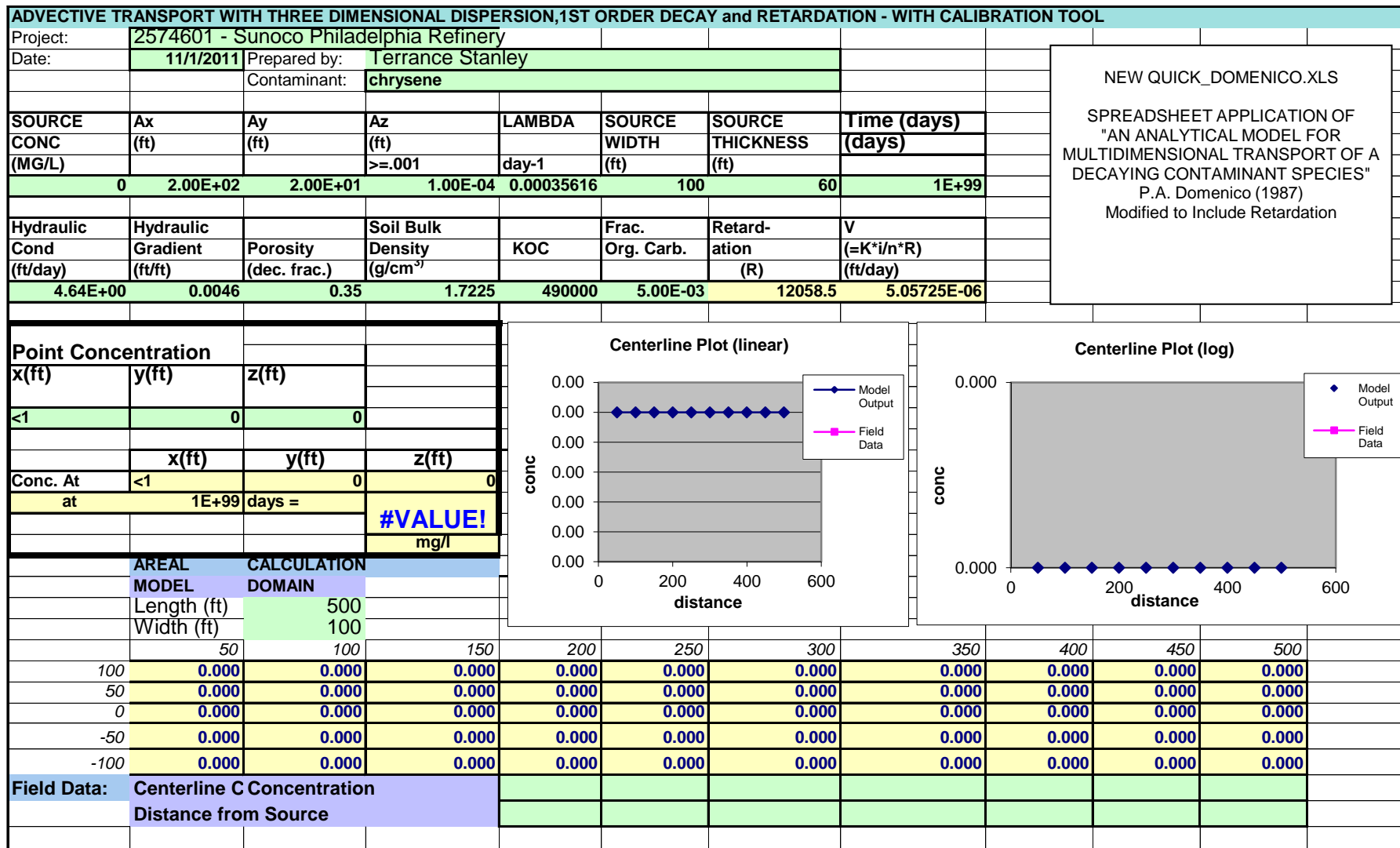
Project 2574601 - Sunoco Philadelphia Refinery
 Prepared by Terrance Stanley
 Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-28	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{OC}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			chrysene	
Source Concentration (mg/L)		mg/L	0.0020	4/27/2011
Lambda (per day)		day ⁻¹	0.000	PADEP Number Please! 2011
KOC			490000	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - chrysene	0.0020	0.002	0.002	<1

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Table A.4 W-28 QD2 Model
SIM 1

Table A.5
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

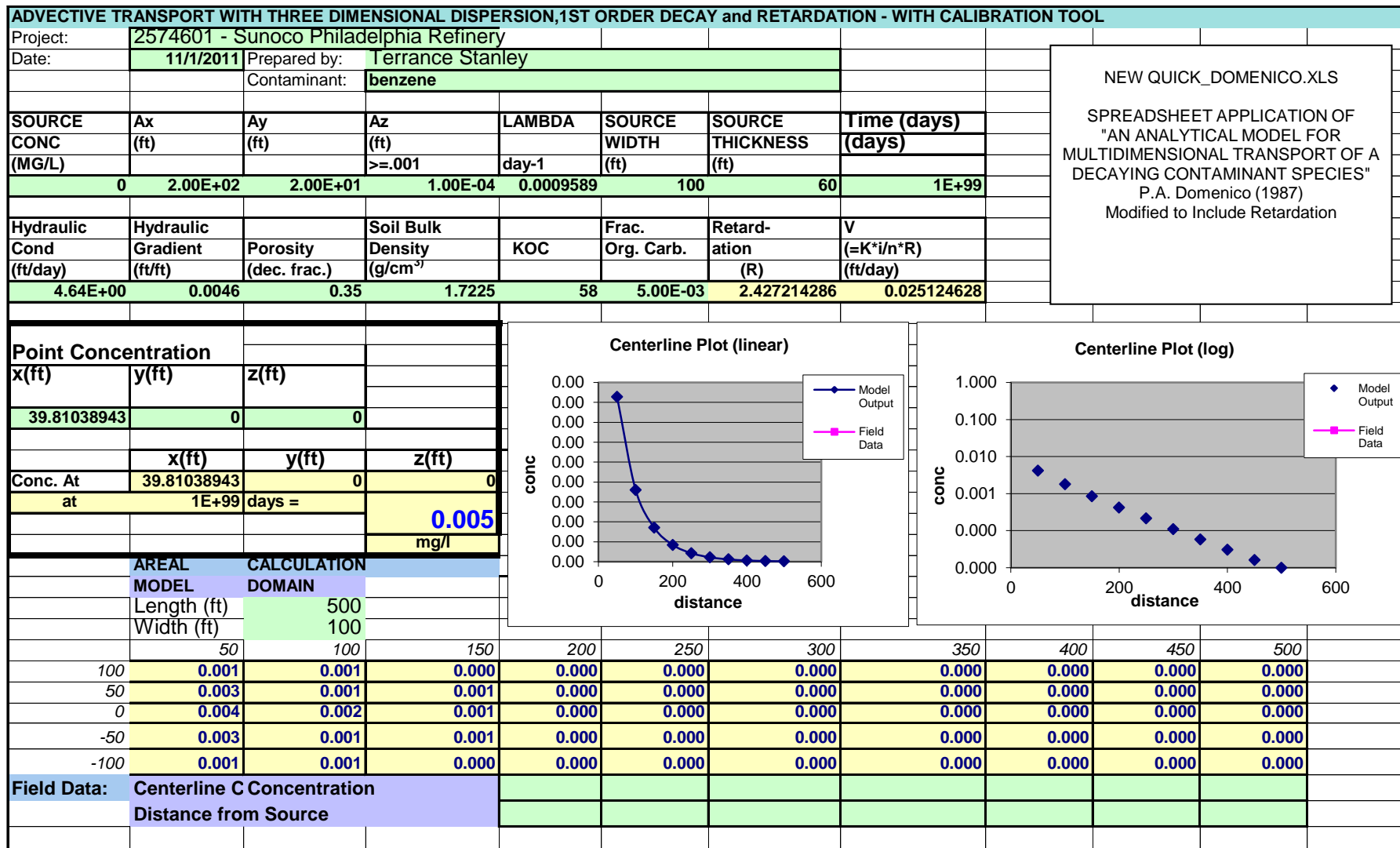
Project 2574601 - Sunoco Philadelphia Refinery
Prepared by Terrance Stanley
Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-31	
Sample Date			4/26/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium based on site-wide slug testing
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{oc}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0100	4/26/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011
Sim 2				
Contaminant			chrysene	
Source Concentration (mg/L)		mg/L	0.0040	4/26/2011
Lambda (per day)		day ⁻¹	0.000	PADEP Number Please! 2011
KOC			490000	PADEP Number Please! 2011
Sim 3				
Contaminant			lead	
Source Concentration (mg/L)		mg/L	0.0060	4/26/2011
Lambda (per day)		day ⁻¹	0.000	PADEP Number Please! 2011
KOC			0.000	PADEP Number Please! 2011

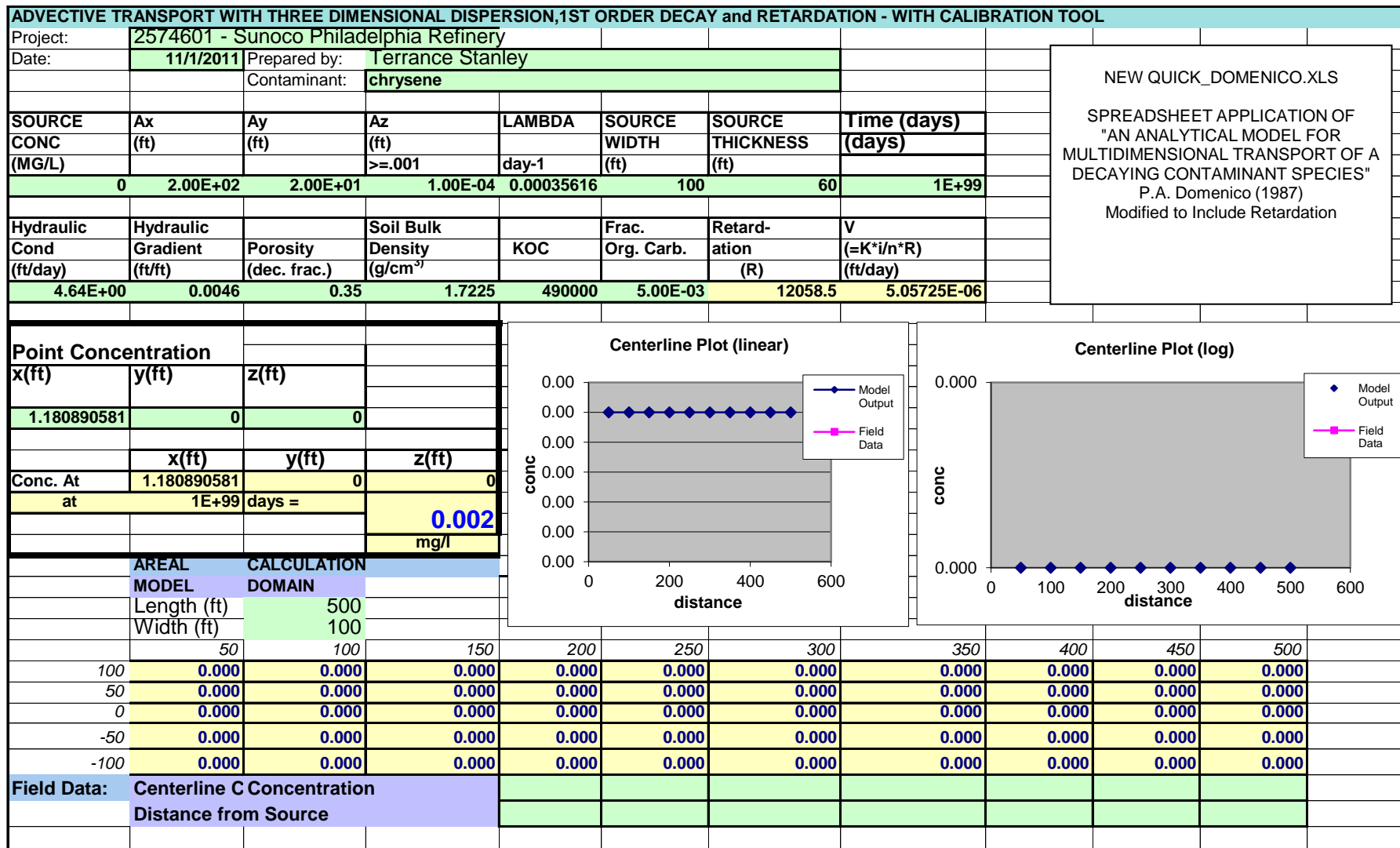
Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0100	0.005	0.005	40
Sim 2 - chrysene	0.0040	0.002	0.002	1
Sim 3 - lead	0.0060	0.005	0.005	32

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Table A.5 W-31 QD2 Model
SIM 2

ADVECTIVE TRANSPORT WITH THREE DIMENSIONAL DISPERSION,1ST ORDER DECAY and RETARDATION - WITH CALIBRATION TOOL									
Project:	2574601 - Sunoco Philadelphia Refinery								
Date:	11/1/2011	Prepared by:	Terrance Stanley						
		Contaminant:	lead						
SOURCE	Ax	Ay	Az	LAMBDA	SOURCE	SOURCE	Time (days)		
CONC	(ft)	(ft)	(ft)		WIDTH	THICKNESS	(days)		
(MG/L)			>=.001	day-1	(ft)	(ft)			
0	2.00E+02	2.00E+01	1.00E-04	0.00001	100	60	1E+99		
Hydraulic	Hydraulic		Soil Bulk		Frac.	Retard-	V		
Cond	Gradient	Porosity	Density	KOC	Org. Carb.	ation	(=K*i/n*R)		
(ft/day)	(ft/ft)	(dec. frac.)	(g/cm ³)			(R)	(ft/day)		
4.64E+00	0.0046	0.35	1.7225	0.00001	5.00E-03	1.000000246	0.060982842		
</									

Table A.6
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

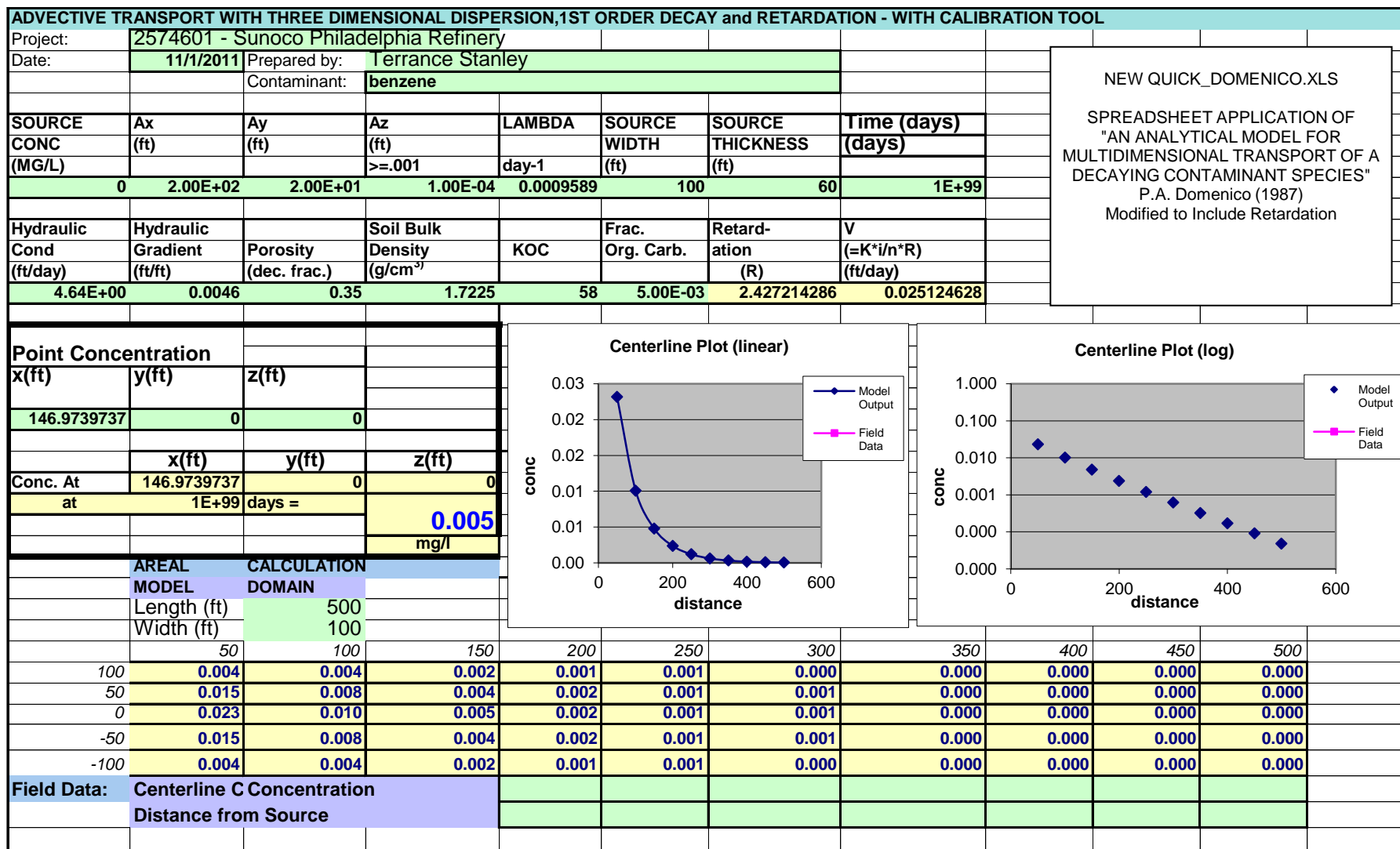
Project 2574601 - Sunoco Philadelphia Refinery
 Prepared by Terrance Stanley
 Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-32	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{oc}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0560	4/27/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011
Sim 2				
Contaminant			chrysene	
Source Concentration (mg/L)		mg/L	0.0040	4/27/2011
Lambda (per day)		day ⁻¹	0.000	PADEP Number Please! 2011
KOC			490000	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0560	0.005	0.005	147
Sim 2 - chrysene	0.0040	0.002	0.002	1

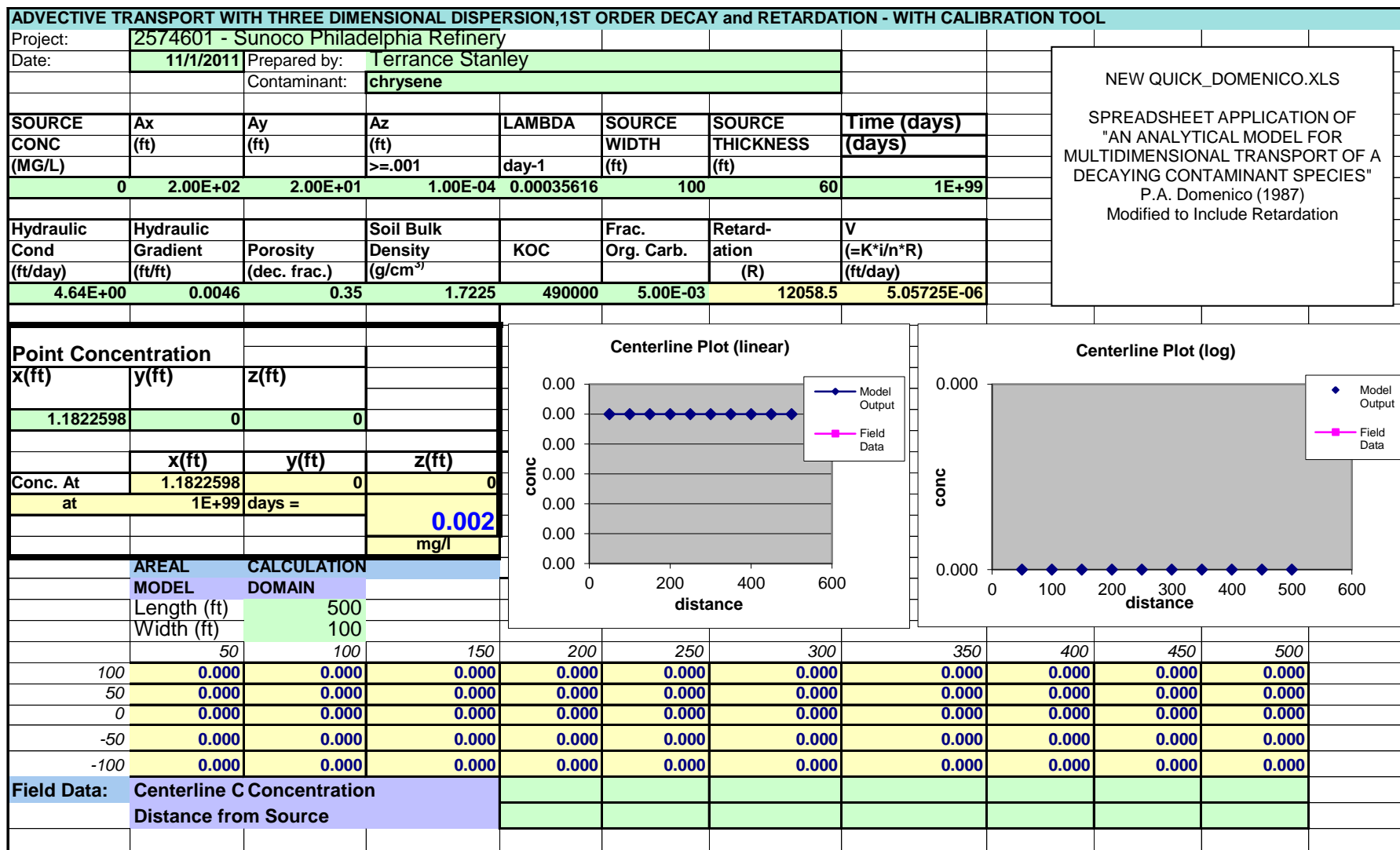
¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Table A.6 W-32 QD2 Model
SIM 1



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Table A.6 W-32 QD2 Model
SIM 2

Table A.7
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

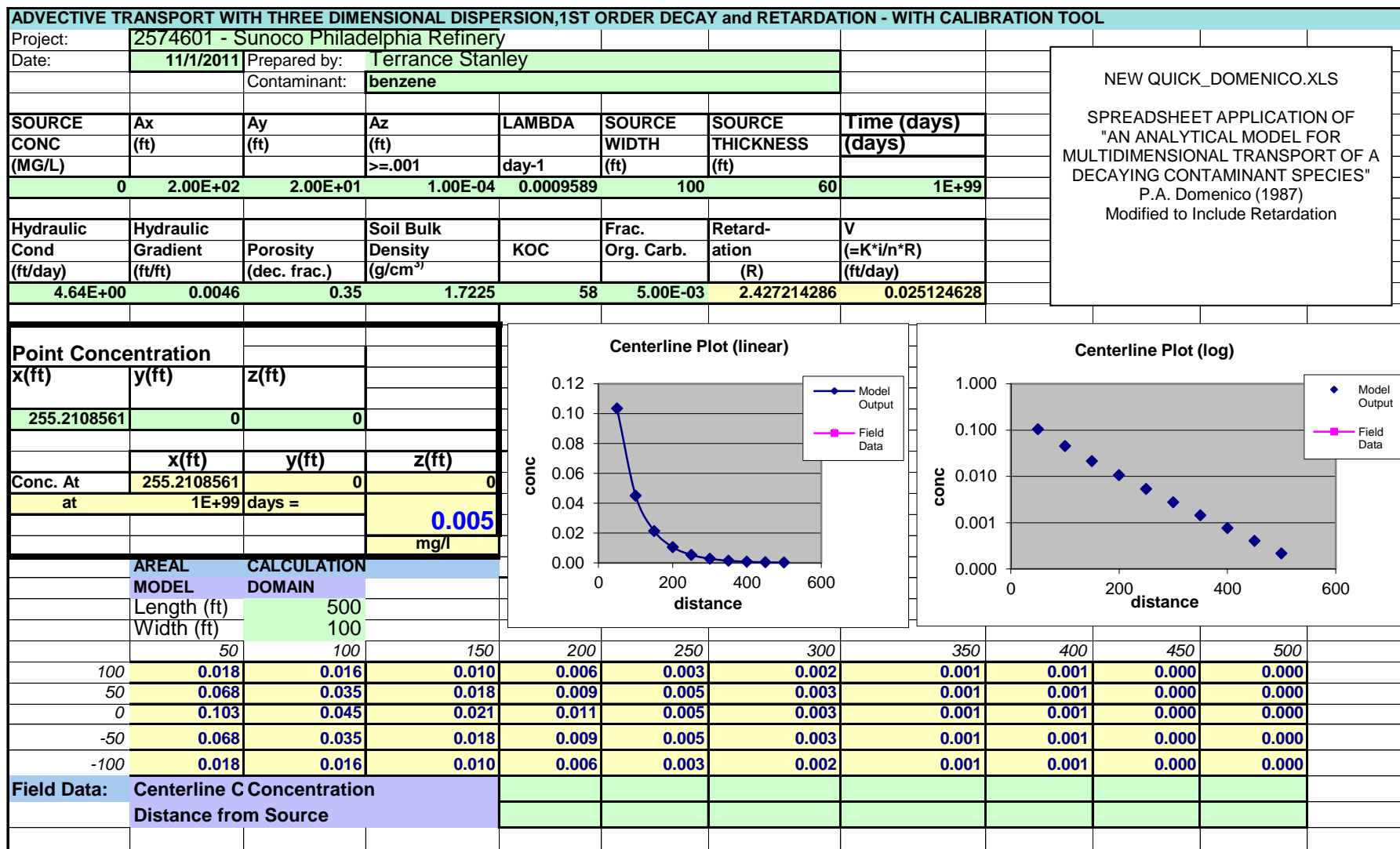
Project 2574601 - Sunoco Philadelphia Refinery
 Prepared by Terrance Stanley
 Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-33	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{oc}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.2500	4/24/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011
Sim 2				
Contaminant			chrysene	
Source Concentration (mg/L)		mg/L	0.0060	40657.0000
Lambda (per day)		day ⁻¹	0.000	PADEP Number Please! 2011
KOC			490000	PADEP Number Please! 2011
Sim 3				
Contaminant			naphthalene	
Source Concentration (mg/L)		mg/L	0.3300	40657.0000
Lambda (per day)		day ⁻¹	0.003	PADEP Number Please! 2011
KOC			950	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.2500	0.005	0.005	255
Sim 2 - chrysene	0.0060	0.002	0.002	2
Sim 3 - naphthalene	0.3300	0.100	0.100	16

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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Table A.7 W-33 QD2 Model
SIM 1

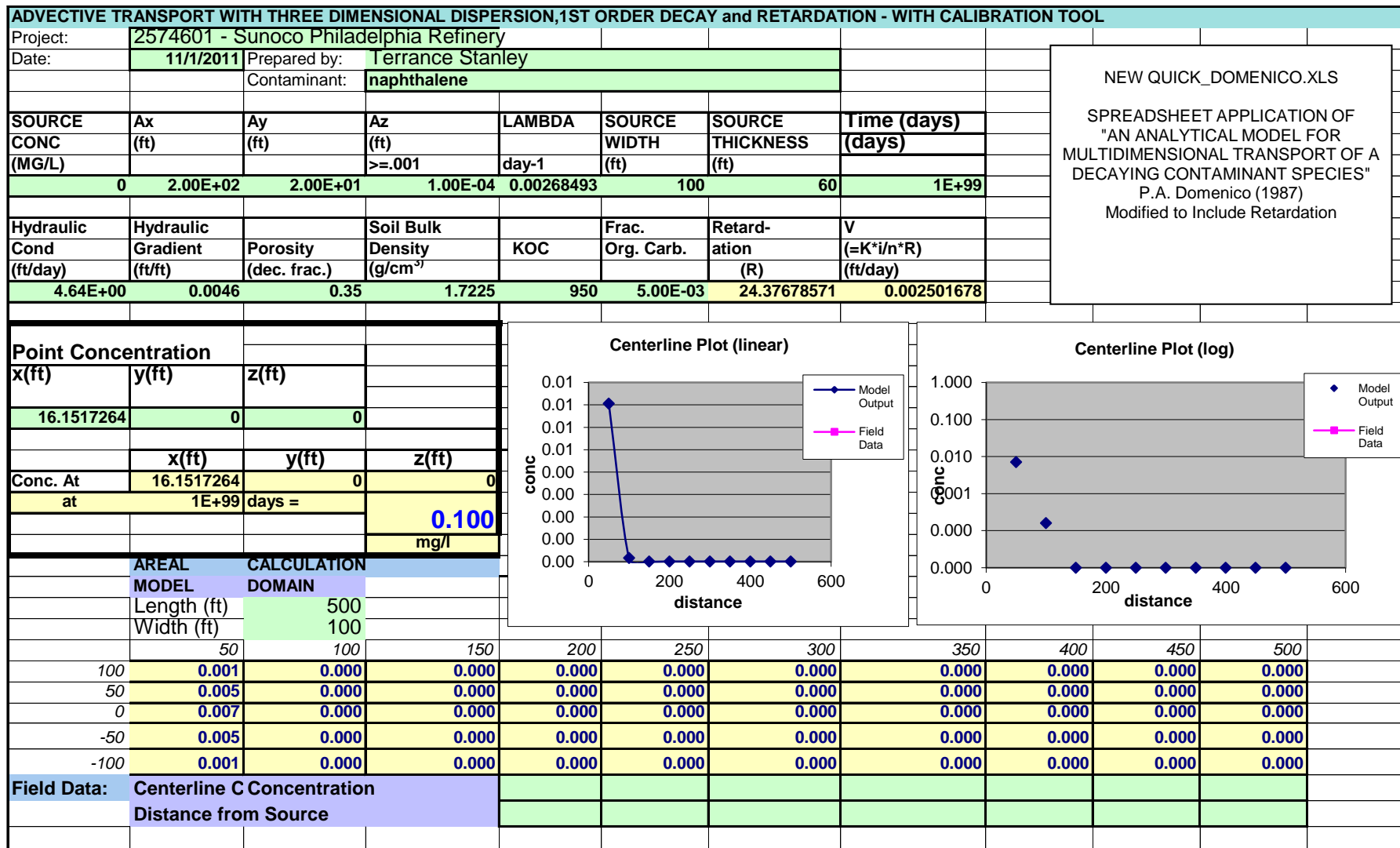


Table A.7 W-33 QD2 Model
SIM 3

Table A.8
Quick Domenico
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

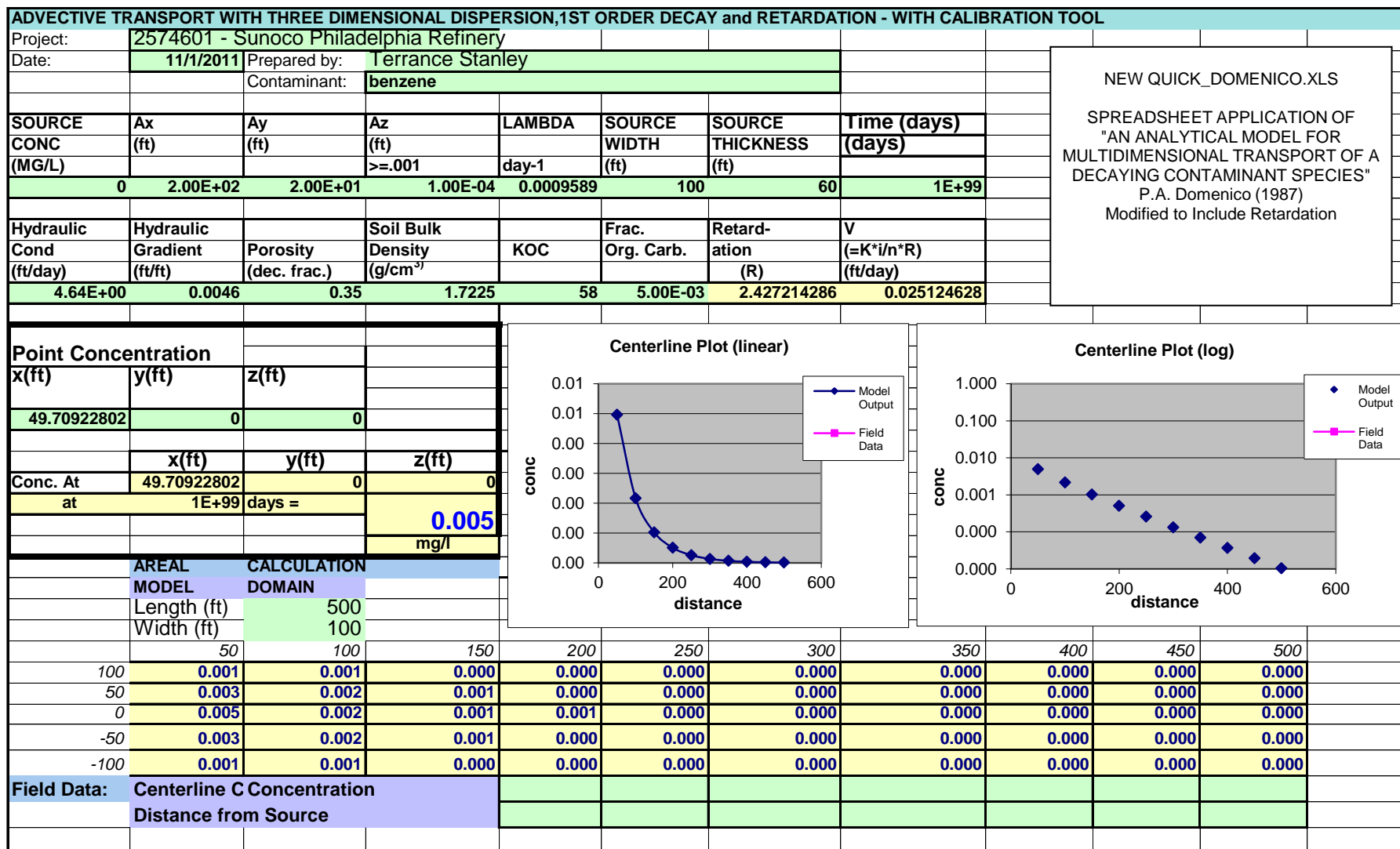
Project 2574601 - Sunoco Philadelphia Refinery
Prepared by Terrance Stanley
Date Prepared 11/1/2011

Generic Input Parameters				Data Source
Source Identification (or Well ID)			W-34	
Sample Date			4/27/2011	
Source Width		ft	100	Delineated LNAPL (100' default if no plume is present)
Source Thickness		ft	60	Estimated from cross-sections DD-DD' & EE-EE'
Longitudinal Dispersivity	A_x	ft	200	From CCR QD Simulations
Transverse Dispersivity	A_y	ft	20.0	Quick Domenico User's Manual
Vertical Dispersivity	A_z	ft	0.0001	Quick Domenico User's Manual
Hydraulic Conductivity	k	ft/day	4.64	Alluvium
Hydraulic Gradient		ft/ft	0.0046	W-31/W-16 April 2011
Porosity		decimal fraction	0.35	Site soil analyses
Soil Bulk Density	ρ_b	g/cm ³	1.7225	ACT 2 TGM Default
Fraction of Organic Carbon	f_{OC}	decimal fraction	0.005	ACT 2 TGM Default
Time		days	1.00E+99	Steady-State Conditions

Chemical Specific Input Parameters				Data Source
Sim 1				
Contaminant			benzene	
Source Concentration (mg/L)		mg/L	0.0120	4/27/2011
Lambda (per day)		day ⁻¹	0.001	PADEP Number Please! 2011
KOC			58	PADEP Number Please! 2011

Output (Distance from Source Where Concentration Equals Respective Ground Water MSC)				
Contaminant	Starting Concentration (mg/L)	GW MSC ¹ Non-Residential (mg/L)	Predicted Concentration (mg/L)	Predicted Distance to Meet Non-Residential GW MSC (Rounded Upward to the Nearest foot)
Sim 1 - benzene	0.0120	0.005	0.005	50

¹ ACT 2 TGM, Appendix A, Table 1 MSC for a Non-residential Used Aquifer with Total Dissolved Solids less than or equal to 2500.



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P.A. Domenico (1987)
Modified to Include Retardation


Table A.8 W-34 QD2 Model
SIM 1

QD SUMMARY TABLE

Table A.9
Fate and Transport Model Input and Output AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

Well ID	Compound	Starting Concentration	Final Concentration (Screening Value)	Predicted Distance to Achieve Screening Value	Estimated Distance to AOI 10 Boundary
		ug/l	ug/l	ft	ft
W-1	benzene	20	5	80	90
W-12	benzene	8	5	28	105
W-23	benzene	12	5	50	98
W-28	chrysene	2	1.9	<1	180
W-31	benzene	10	5	40	270
	chrysene	4	1.9	1	
	lead	6	5	32	
W-32	benzene	56	5	147	170
	chrysene	4	1.9	1	
W-33	benzene	250	5	255	90
	chrysene	6	1.9	2	
	napthalene	330	100	16	
W-34	benzene	12	5	50	130

Note:

 = indicates predicted distance is greater than distance to property boundary

SWLOAD SIMULATION

Table A.10 W-33 Benzene

METHOD FOR ESTIMATING FLOW, AVERAGE CONCENTRATION AND MASS LOADING TO SURFACE WATER FROM GROUNDWATER																
Project:	SWLOAD5B															
Date:	9/21/2011															
Contaminant:	Benzene				Prepared by:	DH				PA DEPARTMENT OF ENVIRONMENTAL PROTECTION SWLOAD5B.XLS A METHOD FOR ESTIMATING COMTAMINANT LOADING TO SURFACE WATER based on P.A. Domenico (1987) Modified to Include Retardation						
SOURCE																
CONC (units)	Ax (ft)	Ay (ft)	Az (ft)	LAMBDA	SOURCE WIDTH (ft)	SOURCE THICKNESS (ft)	Time (days)									
mg/l	>.0001	>.0001	>=.0001	day-1												
0.25	200	20	1.00E-04	0.001	100	60	1.00E+99									
Hydraulic Cond (ft/day)	Hydraulic Gradient (ft/ft)	Porosity (dec. frac.)	Soil Bulk Density (g/cm ³)	KOC	Frac. Org. Carb.	Retard- ation (R)	V (=K*i/n*R) (ft/day)									
4.64E+00	0.0046	0.35	1.7225	58	5.00E-03	2.427214	0.0251246									
				-144	-115.2	-86.4	-57.6	-28.8	0	28.8	57.6	86.4	115.2	144		
Edge Criterion (mg/l)		0.005	0	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
Highest modeled conc.		0.05134	-6	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
			-12	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
SURFACE WATER LOADING GRID			-18	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
Distance to Stream (ft)		90	-24	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
Plume View Width (ft)		288	-30	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
Plume View Depth (ft)		60	-36	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
			-42	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
			-48	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
PENTOX NEEDED			-54	0.005	0.0116968	0.022466	0.0356263	0.0468713	0.0513379	0.0468713	0.0356263	0.0224664	0.011697	0.005		
			-60	0.0025	0.0058484	0.011233	0.0178131	0.0234356	0.025669	0.0234356	0.0178131	0.0112332	0.005848	0.0025		
				Average Groundwater Concentration				0.02557 mg/l								
				Plume Flow				0.00426 cfs		0.00275 MGD						
				Mass Loading to Stream				267.08 mg/day								

ATTACHMENT B

Revised Appendix F from AOI 10 SCR/RIR –
LNAPL Modeling Procedures and Results

ATTACHMENT B
REVISED APPENDIX F FROM THE JUNE 29, 2011 AOI 10 SCR/RIR
LNAPL MODELING PROCEDURES
AOI 10: SUNOCO PHILADELPHIA REFINERY
PHILADELPHIA, PENNSYLVANIA

B.1 INTRODUCTION AND OVERVIEW

Models which assess volume, mobility, and recoverability of light non-aqueous phase liquid (LNAPL) contamination have progressed beyond simply extrapolating LNAPL monitoring well thicknesses into the surrounding geologic materials. Instead, these models incorporate the physical properties of groundwater, LNAPL, and soil, in conjunction with an improved understanding of how fluids interact with each other and the surrounding geologic materials, and provide better estimates of LNAPL volume, mobility, and recoverability. These scientific improvements have allowed more realistic endpoints to be set during the remediation process.

For the LNAPL modeling at the Sunoco Refinery in Philadelphia, PA (the Facility), Langan utilized the American Petroleum Institute (API) Publication Number 4682, "Free-Product Recovery of Petroleum Hydrocarbon Liquids," dated June 1999, as a guide for assessing LNAPL volume, mobility, and recoverability. The parameters discussed in subsequent sections are presented in API Publication 4682 as the significant variables and parameters needed to evaluate the nature and extent of free LNAPL. An updated version of the API model found in the API publication "API Interactive LNAPL Guide," version 2.0.4, dated July 2004, was used. These parameters, the RETC model, and the API model were utilized to estimate the specific volume and mobility of LNAPL at the Facility.

B.2 INPUT PARAMETERS

Where applicable, input parameters for the RETC and the API models were derived from the analyses of site-specific media. Representative values obtained from the API's LNAPL and Environmental Canada's Reference Database were used for the remaining input parameters. Table B-1 of this attachment summarizes the LNAPL modeling input parameters used for this phase of the project. The individual input parameters used for the LNAPL models are described in detail below.

B.3 FLUID PROPERTIES

The fluids of concern in LNAPL modeling are LNAPL, groundwater, and air. Key physical properties of these fluids are density (ρ), interfacial tension (σ) and viscosity (μ). Chromatographic and mass spectroscopic hydrocarbon LNAPL characterization analyses were conducted on collected LNAPL samples in an attempt to identify and categorize LNAPLs on site.

B.3.1 Fluid Density and Specific Gravity

Fluid density, ρ , is the mass of fluid per unit volume. Specific gravity, ρ_r , is the relative density of LNAPL with respect to the density of water. The density of LNAPL is related to its specific gravity through the following relationship:

$$\rho_r = \rho_o / \rho_w \quad (F.1)$$

where ρ_o and ρ_w are the LNAPL and water densities, respectively.

Density estimates for LNAPL samples collected from wells within the Facility were determined from LNAPL and groundwater density data. If a density value was not available for the LNAPL in a particular monitoring well, a value was assigned based on the physical characteristics of the LNAPL observed in neighboring wells.

B.3.2 LNAPL Viscosity

Viscosity is the measure of friction between molecules within a given fluid. The dynamic (or absolute) viscosity, μ , is defined as the ratio of the shear stress to the strain rate for a Newtonian fluid (Newtonian fluids have constant viscosity and flow immediately on the application of a force). The kinematic viscosity (ν) is the ratio of the dynamic viscosity to the density of a fluid.

If a kinematic viscosity value was not available for the LNAPL within a monitoring well, a value was assigned based on the physical characteristics of the LNAPL in relation to neighboring monitor wells, or a representative viscosity value was selected from the

API or Environmental Canada Database chosen based upon other LNAPL physical characteristics.

B.4 FORMATION PHYSICAL PROPERTIES

Where available, site-specific geologic and hydrogeologic data were obtained from site soil boring investigations, monitoring and recovery wells installation and sampling activities, and aquifer characteristic testing. All remaining physical property input values were obtained from reference literature.

Variations in soil type were noted from boring log descriptions. For the purpose of determining modeling parameters, generalizations of the geologic characteristics were made based on the occurrence and distribution of soil types within the LNAPL wetted screen interval of monitoring wells. Consistent with the API guidance publication, the geologic parameters of interest include: soil texture, porosity, bulk density, fluid saturation, capillary pressure relationships, and total organic carbon (TOC). These parameters are discussed in detail below.

B.4.1 Formation Texture

One of the most important parameters in determining the properties of porous media is the size range of particles in a soil, which is referred to as soil texture. Grain size is closely related to soil texture, and a grain size distribution gives the relative percentage of grain sizes within a formation.

Where available, historic site-specific grain size distribution data were used to describe the relative percentage of grain size within the various geologic units at the Facility. Regions with similar grain size distributions were grouped together, and representative values were selected. Soil within the historic maximum LNAPL wetted interval was used for this selection. Note, however, that in any given boring log, the soil type spanning the LNAPL wetted interval may actually include a range of soil types. In addition to the grain size analyses, the soil Atterberg Limits were referenced for select soil types. The Atterberg limits were used to correlate and characterize the fine-grained soil (i.e., silt and clay) in conjunction with the grain size distribution analyses.

B.4.2 Porosity

The ratio of the volume of void space in a soil to the total volume is defined as the porosity (n), which is usually written as a fraction or a percent of void space. Generally, wider variations in particle sizes result in smaller porosity values, as the void space between the larger particles are filled by smaller particles. The effective porosity (or kinematic porosity) refers to the volume of interconnected pore spaces through which fluids can flow.

B.4.3 Bulk Density

Bulk density is a measure of the weight of the soil per unit volume, usually given on an oven-dry (110° C) basis. Variation in bulk density is attributable to the relative proportion and specific gravity of solid organic and inorganic particles and to the porosity of the soil. Most mineral soils have bulk densities between 1.0 and 2.0.

B.4.4 Fluid Saturation

According to the API guidance documents, the void space of a natural porous medium affected by an LNAPL release is filled with water, air and LNAPL. The fraction of the pore space of a representative volume of material that is occupied by a particular fluid is called the fluid saturation. The fluid saturation of each phase can range from 0 to 1, and the sum of the three phases must equal 1.

B.4.5 Capillary Pressure Relationships

According to the API guidance document, molecules located near the interface between two fluids (i.e. water and LNAPL) in one void space have a greater energy than molecules of the same fluid located within the bulk volume due to cohesive forces between the molecules. The excess energy associated with a fluid interface results in interfacial tension between the fluids, and surface tension between the liquid and vapor.

These relationships are incorporated into the API model for determining formation specific volume under vertical equilibrium.

B.5 LNAPL EFFECTIVE PERMEABILITY

Water, air, and LNAPL are in competition for the interstitial spaces within the formation. Relative permeability describes the ability of one fluid to flow in the presence of other fluids, compared to the ability of the fluid to flow if it were the only fluid present. Typically, these differences in permeability between water and LNAPL are observed as LNAPL reaches the water table in sufficient quantities, pools, and spreads laterally as a floating layer.

The API modeling approach is to predict the LNAPL saturation and relative permeability distributions under vertical equilibrium conditions. The effective saturation and relative permeability values depend on the LNAPL thicknesses within the formation, for which the apparent monitoring well LNAPL thicknesses serve as a useful measure. The modeling objective is to replace the layer with varying saturation and relative permeability with an equivalent layer with vertically uniform characteristics.

For each well with reported apparent LNAPL thickness, the API model was run to determine the effective relative permeability of LNAPL within that well. As a first approximation, the residual saturation of LNAPL (the portion of LNAPL that is adhered to soil and not recoverable) was considered to be zero for the calculation of effective relative permeability. The residual saturation of LNAPL will be determined based on the soil grain size, fluid saturation and capillary curves for the recoverability analysis.

B.6 SOIL INTRINSIC PERMEABILITY

The intrinsic permeability of the soil was estimated using the following equation:

$$k_{soil} = \frac{K_w \mu_w}{\rho_w g} \quad (F.2)$$

where,

k_{soil} = permeability of soil

K_w = hydraulic conductivity of groundwater for fill horizon

μ_w = dynamic viscosity of water

ρ_w = density of water

g = gravity

The estimates of the ground water density and viscosity were used to determine the intrinsic soil permeability. The gravity constant was assumed to be 32.2 feet/s² (9.81 m/s²).

B.7 LNAPL HYDRAULIC CONDUCTIVITY AT SATURATION

To estimate the seepage velocity of the free-phase LNAPL, the hydraulic conductivity of the formation with respect to LNAPL must be known. The hydraulic conductivity of LNAPL is first calculated at 100% saturation at the LNAPL phase. Then it is corrected from the effective LNAPL relative permeability. This corrected hydraulic conductivity of LNAPL is the hydraulic conductivity of LNAPL in the formation at the estimated saturation of LNAPL. This can be estimated based on the following equation:

$$K_{oil} = k_{ro} \frac{k_{soil} \rho_{oil} g}{\mu_{oil}} \quad (F.3)$$

where,

K_{oil} = hydraulic conductivity of LNAPL in the soil at saturation

k_{ro} = effective LNAPL relative permeability

k_{soil} = permeability of soil relative to groundwater (Equation D.2)

μ_{oil} = dynamic viscosity of LNAPL

ρ_{oil} = density of LNAPL

g = gravity

B.8 LNAPL SPECIFIC DISCHARGE

The result of the corrected hydraulic conductivity for LNAPL saturation (Equation F.3) was used to calculate the specific velocity of the LNAPL based on hydraulic gradient of the groundwater using the following equation:

$$q_{oil} = K_{oil} \times i_w \quad (F.4)$$

where,

q_{oil} = LNAPL specific velocity of LNAPL discharge

K_{oil} = hydraulic conductivity of LNAPL in the soil at the corrected saturation

i_w = water table gradient

The water table gradient was assumed to be similar to the LNAPL table gradient. Based on the groundwater monitoring data collected to date, average water table gradients were selected.

The seepage velocity or mobility of the LNAPL was calculated based on the specific velocity calculated in Equation F.4, and correcting it for the effective porosity of the formation as follows:

$$v_{oil} = \frac{q_{oil}}{\phi_{eff}} \quad (F.5)$$

where,

v_{oil} = LNAPL seepage velocity

q_{oil} = LNAPL specific velocity of LNAPL discharge

ϕ_{eff} = effective porosity

The specific velocity of the LNAPL discharge from the previous calculation was divided by the effective porosity to determine the seepage velocity of LNAPL for all wells. For this calculation, total porosity values associated with each soil type were reduced for use as an effective porosity for LNAPL mobility.

Located in Tables B-2 and B-3 are the output results of the LNAPL modeling. Also included on these tables are the previous LNAPL modeling results from the CCR. Located in Table B-4 of this attachment is the LNAPL characterization data provided by Torkelson Laboratories.

Table B-2
Seepage Velocity Calculations
Sunoco Philadelphia Refinery
AOI 10
Philadelphia, Pennsylvania

AOI	Well ID	Sample Date	Porosity	API Database USCS Soil Type Equivalent	LNAPL Density	Dominant LNAPL Type at Each Well Location	API Model Calculated Relative LNAPL Permeability	Effective Porosity	Groundwater Density @ 60F (kg/m ³)	Groundwater Dynamic Viscosity (N·s/m ²)	Soil Permeability (m ²)	Kro (%)	Groundwater Gradient	Dynamic Viscosity of SPL (N·s/m2)	SPL Density (kg/m3)	NAPL K @ 100% Saturation (m/day)	Corrected NAPL K (m/day)	NAPL Specific Discharge (m/day)	NAPL Seepage Velocity (m/year)	NAPL Seepage Velocity (cm/sec)
			unless		(gm/cc)		API Model (unitless)	API Database	Literature Value	API Database	API Database	API Model (unitless)	Site Contour Maps/SWLOAD	API/Env. Canada Databases	Torkelson Geochemistry Inc.	Calculated	Calculated	Calculated	Calculated	Calculated
AOI 10	W-8	11/02/03	0.426	SW-SM	0.912	Res Oil	1.340E-10	0.39	999.19	1.124E-03	6.15E-12	0.00%	3.000E-03	2.300E-02	912.10	2.07E-01	2.77E-11	8.31E-14	7.78E-11	2.45E-16
	W-8	04/27/11	0.426	SW-SM	0.9515	Res Oil	2.390E-04	0.388	999.19	1.124E-03	6.15E-12	0.02%	4.600E-03	2.300E-02	951.50	2.16E-01	5.15E-05	2.37E-07	2.23E-04	7.03E-10
	W-14	04/27/11	0.426	SW-SM	0.9478	Res Oil	1.650E-06	0.388	999.19	1.124E-03	6.15E-12	0.00%	4.600E-03	2.300E-02	947.80	2.15E-01	3.54E-07	1.63E-09	1.53E-06	4.84E-12
	W-18	04/27/11	0.426	SW-SM	0.9478	Res Oil	9.790E-10	0.388	999.19	1.124E-03	6.15E-12	0.00%	4.600E-03	2.300E-02	947.80	2.15E-01	2.10E-10	9.67E-13	9.10E-10	2.87E-15

NOTES:
The physical characteristics of LNAPL at W-18 are assumed to be similar to LNAPL at W-14

Table B-3
LNAPL Model And Seepage Velocity Output Summary
AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

AOI	Well ID	Date Apparent Thickness Gauged	Apparent LNAPL Thickness (ft)	API Model Calculated LNAPL Specific Volume (feet)	Calculated LNAPL Seepage Velocity (cm/sec)
AOI10	W-8	11/02/03	0.010	4.880E-10	2.45E-16
		04/27/11	0.590	4.410E-04	7.03E-10
	W-14	04/27/11	0.11	3.130E-06	4.84E-12
	W-18	04/27/11	0.01	2.130E-09	2.87E-15

Table B-4
LNAPL Characterization Summary Table
AOI 10
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania

Interpretation of Product Types, Proportions, and Weathering				
<i>Characterization Results Compiled for CCR (TGI Job No. 04046 - Analyzed in February 2004)</i>				
Well ID	Density g/cc (60°F)	LNAPL Type(s)	Torkelson LNAPL Type(s)	Weathering
W-8	0.9121	Residual Oil	Residual Oil	Extreme
<i>Characterization Results Compiled for AOI 10 Site Characterization Activities (TGI Job No. 11047 - Analyzed in May 2011)</i>				
W-8	0.9515	Residual Oil	Residual Oil	Extreme
W-14	0.9478	Residual Oil	Residual Oil	Extreme
W-18	QNS	Residual Oil	Residual Oil	Extreme

Notes:

The physical characteristics of LNAPL at W-18 are assumed to be similar to LNAPL at W-14

Heavier material could either be crude oil or residual oil

g/cc - Grams per cubic centimeter

TGI - Torkelson Geochemistry, Inc.

NA - Not Applicable

? - Tentative identification

CCR - 2004 Sunoco Current Conditions Report

LNAPL - Light Non Aqueous Phase Liquid

All LNAPL results reported were analyzed by TGI

Product interpretations were provided by TGI

QNS - Quantity of sample not sufficient for analysis

W-8

van Genuchten-Mualem Model of LNAPL Distribution and Relative Permeability**Enter Data in Yellow Region****Maximum Monitoring Well
LNAPL Thickness [feet]** $b_o = 0.590$ **Soil Characteristic**

$n = 0.388$	porosity
$N = 2.040$	van Genuchten "N"
$\alpha = 1.990$	van Genuchten " α " [ft ⁻¹]
$S_{wr} = 0.253$	irreducible water saturation
$S_{orv} = 0.000$	residual LNAPL saturation (vadose)
$S_{ors} = 0.000$	residual LNAPL saturation (saturated)

Fluid Characteristics:

$\rho_o = 0.952$	LNAPL density [gm/cc]
$\sigma_{aw} = 65.000$	air/water surface tension [dyne/cm]
$\sigma_{ao} = 32.100$	air/LNAPL surface tension [dyne/cm]
$\sigma_{ow} = 30.200$	LNAPL/water surface tension [dyne/cm]

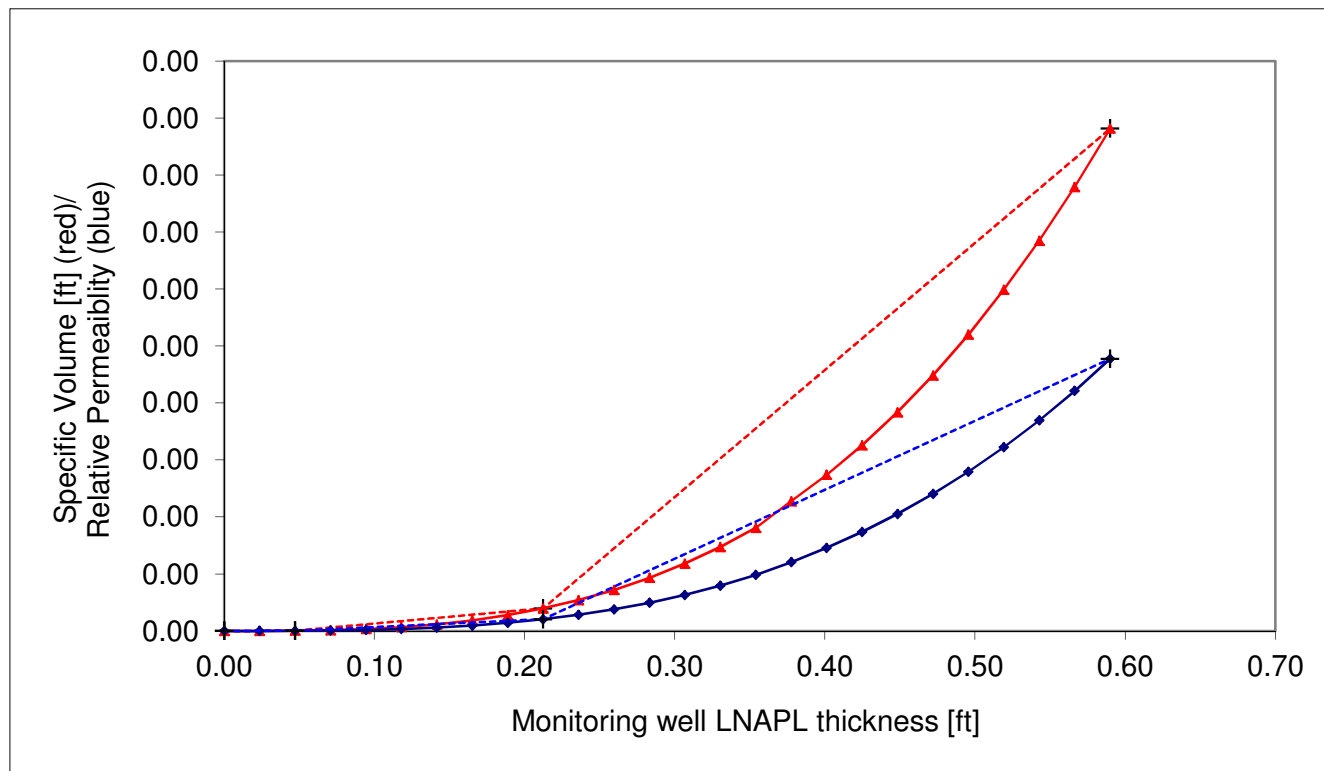
Calculated Parameters

$M = 0.510$	van Genuchten "M"
$\alpha_{ao} = 3.834$	air/LNAPL " α " [ft ⁻¹]
$\alpha_{ow} = 0.208$	LNAPL/water " α " [ft ⁻¹]
$Z_{ao} = 0.029$	elevation of air-LNAPL interface [ft]
$Z_{ow} = -0.561$	elevation of LNAPL-water interface [ft]
$Z_{max} = 0.069$	maximum free-product elevation [ft]
$\lambda = 0.773$	pore-size distribution index
$\Psi_b = 0.313$	B-C displacement pressure head [ft]

Set Tools > Option > Calculations tab to "Manual."**Press Ctrl+Shift+S to calculate sheet**

W-8

Data for curve-fitting segments				Press Ctrl+Shift+S to calculate sheet		
b_o [ft]	D_o [ft]	k_{ro}	χ [ft]	β	ξ [ft]	η
0.000	0.000	0.000				
0.047	0.000	0.000	0.0000	0.000004	0.0000	0.000002
0.212	0.000	0.000	0.0455	0.000118	0.0456	0.000061
0.590	0.000	0.000	0.1947	0.001115	0.1956	0.000605
						0.0001
						0.0001
						Eps-Do
						Eps-kro

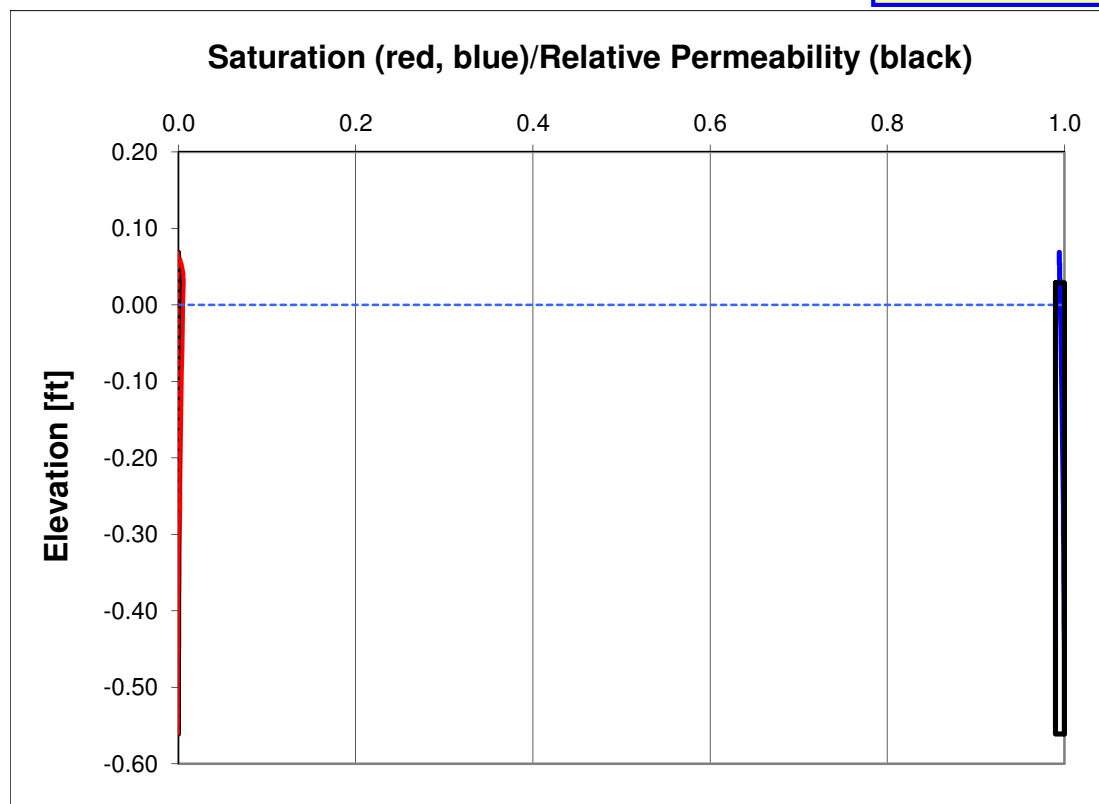


W-8

Monitoring Well LNAPL Thickness b_o [ft] =			0.590
D_o [ft] =	0.000	k_{ro} =	0.000

Enter b_o value
here to plot
corresponding
profiles

Press Ctrl+Shift+S to calculate sheet



W-14

van Genuchten-Mualem Model of LNAPL Distribution and Relative Permeability**Enter Data in Yellow Region****Maximum Monitoring Well
LNAPL Thickness [feet]** $b_o = 0.110$ **Soil Characteristic**

$n = 0.388$	porosity
$N = 2.040$	van Genuchten "N"
$\alpha = 1.990$	van Genuchten " α " [ft ⁻¹]
$S_{wr} = 0.253$	irreducible water saturation
$S_{orv} = 0.000$	residual LNAPL saturation (vadose)
$S_{ors} = 0.000$	residual LNAPL saturation (saturated)

Fluid Characteristics:

$\rho_o = 0.948$	LNAPL density [gm/cc]
$\sigma_{aw} = 65.000$	air/water surface tension [dyne/cm]
$\sigma_{ao} = 32.100$	air/LNAPL surface tension [dyne/cm]
$\sigma_{ow} = 30.200$	LNAPL/water surface tension [dyne/cm]

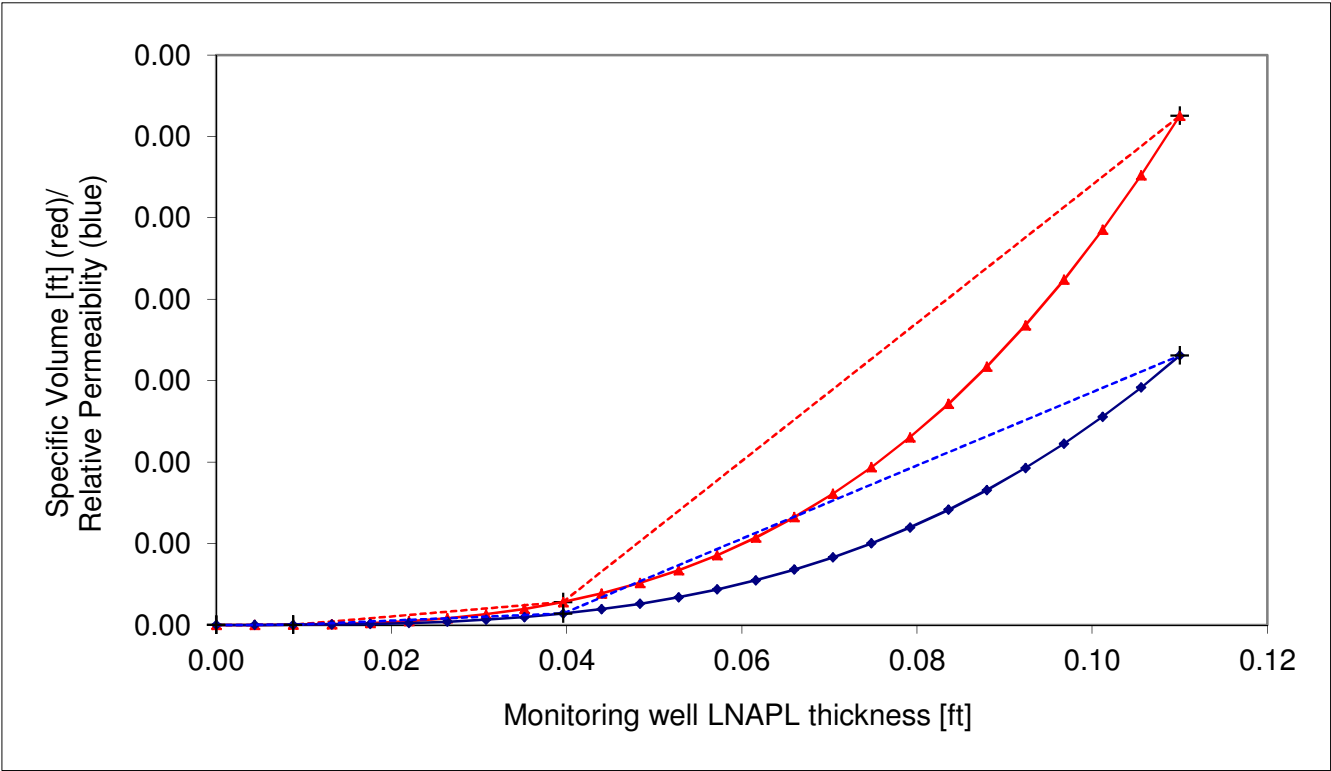
Calculated Parameters

$M = 0.510$	van Genuchten "M"
$\alpha_{ao} = 3.820$	air/LNAPL " α " [ft ⁻¹]
$\alpha_{ow} = 0.223$	LNAPL/water " α " [ft ⁻¹]
$Z_{ao} = 0.006$	elevation of air-LNAPL interface [ft]
$Z_{ow} = -0.104$	elevation of LNAPL-water interface [ft]
$Z_{max} = 0.016$	maximum free-product elevation [ft]
$\lambda = 0.773$	pore-size distribution index
$\Psi_b = 0.313$	B-C displacement pressure head [ft]

Set Tools > Option > Calculations tab to "Manual."**Press Ctrl+Shift+S to calculate sheet**

W-14

Data for curve-fitting segments				Press Ctrl+Shift+S to calculate sheet		
b_o [ft]	D_o [ft]	k_{ro}	χ [ft]	β	ξ [ft]	η
0.000	0.000	0.000				
0.009	0.000	0.000	0.0000	0.000000	0.0000	0.000000
0.040	0.000	0.000	0.0085	0.000005	0.0085	0.000002
0.110	0.000	0.000	0.0363	0.000042	0.0365	0.000023
						0.0001
						0.0001
						Eps-Do
						Eps-kro

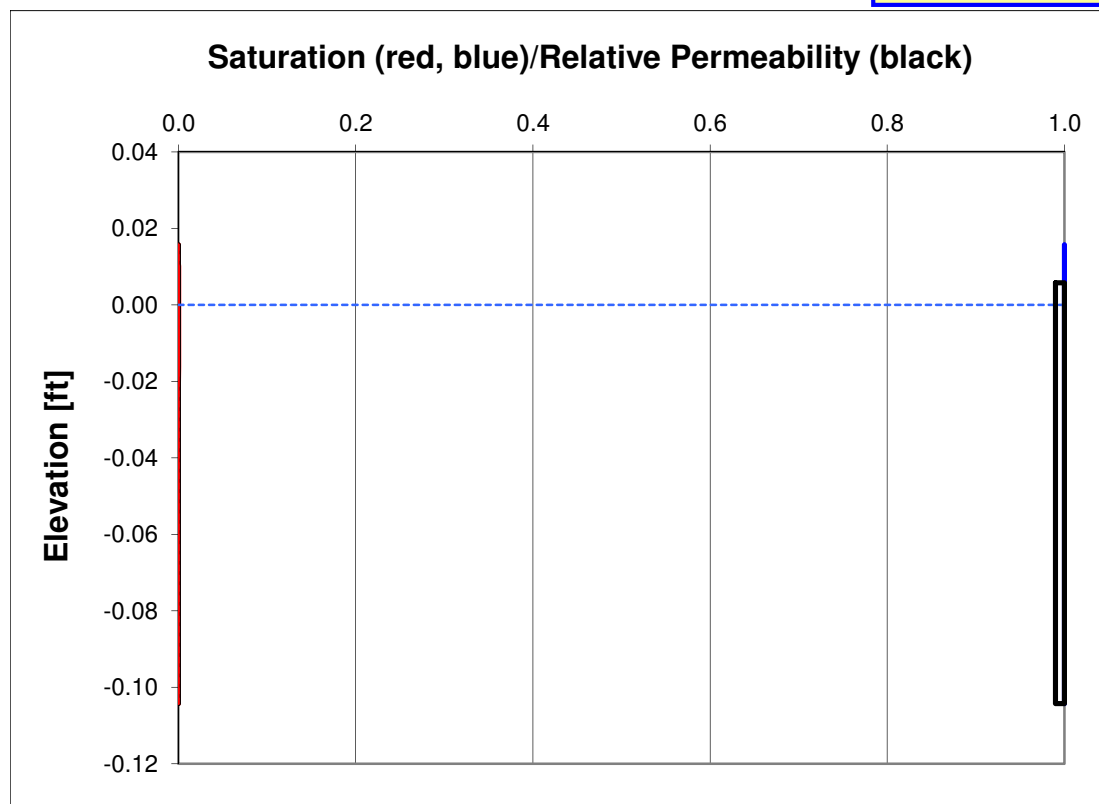


W-14

Monitoring Well LNAPL Thickness b_o [ft] =			0.110
D_o [ft] =	0.000	k_{ro} =	0.000

Enter b_o value
here to plot
corresponding
profiles

Press Ctrl+Shift+S to calculate sheet



W-18

van Genuchten-Mualem Model of LNAPL Distribution and Relative Permeability**Enter Data in Yellow Region****Maximum Monitoring Well
LNAPL Thickness [feet]** $b_o = 0.010$ **Soil Characteristic**

$n = 0.388$	porosity
$N = 2.040$	van Genuchten "N"
$\alpha = 1.990$	van Genuchten " α " [ft ⁻¹]
$S_{wr} = 0.253$	irreducible water saturation
$S_{orv} = 0.000$	residual LNAPL saturation (vadose)
$S_{ors} = 0.000$	residual LNAPL saturation (saturated)

Fluid Characteristics:

$\rho_o = 0.948$	LNAPL density [gm/cc]
$\sigma_{aw} = 65.000$	air/water surface tension [dyne/cm]
$\sigma_{ao} = 32.100$	air/LNAPL surface tension [dyne/cm]
$\sigma_{ow} = 30.200$	LNAPL/water surface tension [dyne/cm]

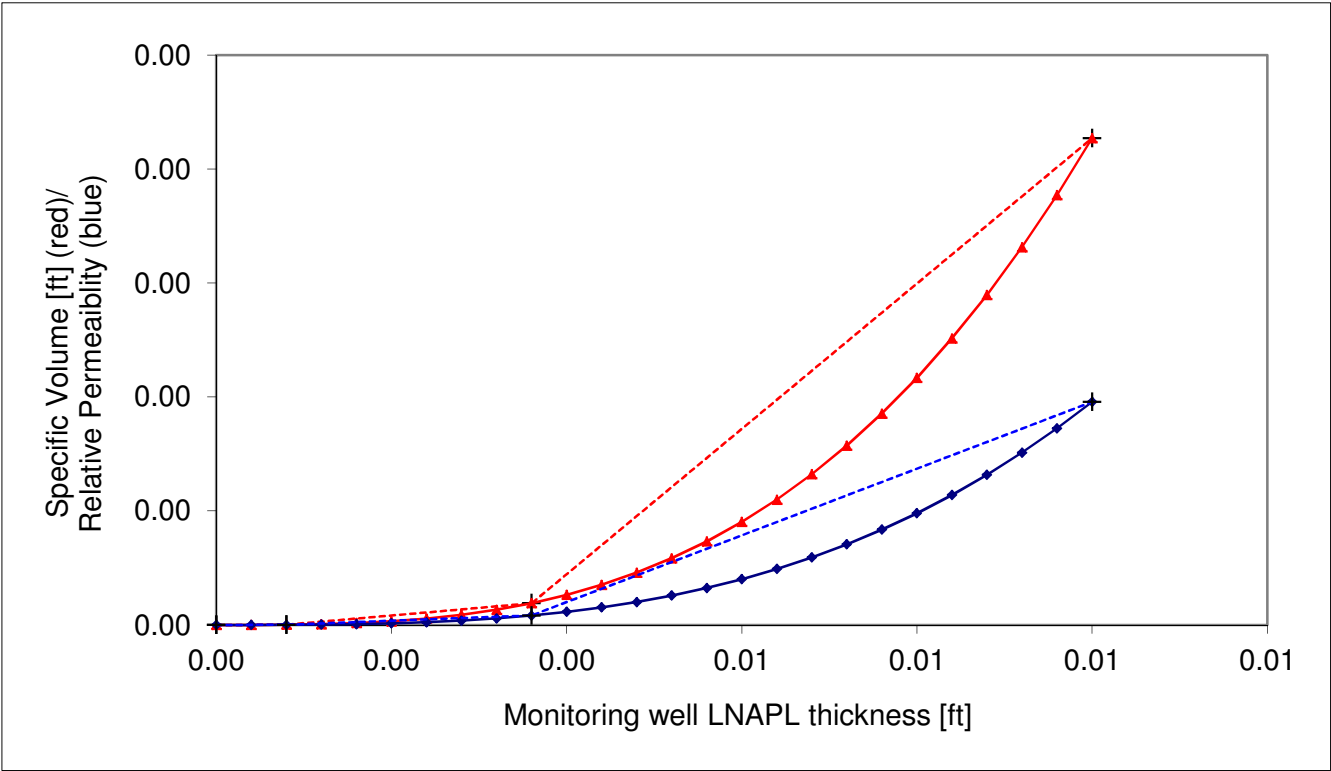
Calculated Parameters

$M = 0.510$	van Genuchten "M"
$\alpha_{ao} = 3.820$	air/LNAPL " α " [ft ⁻¹]
$\alpha_{ow} = 0.223$	LNAPL/water " α " [ft ⁻¹]
$Z_{ao} = 0.001$	elevation of air-LNAPL interface [ft]
$Z_{ow} = -0.009$	elevation of LNAPL-water interface [ft]
$Z_{max} = 0.011$	maximum free-product elevation [ft]
$\lambda = 0.773$	pore-size distribution index
$\Psi_b = 0.313$	B-C displacement pressure head [ft]

Set Tools > Option > Calculations tab to "Manual."**Press Ctrl+Shift+S to calculate sheet**

W-18

Data for curve-fitting segments							Press Ctrl+Shift+S to calculate sheet	
b _o [ft]	D _o [ft]	k _{ro}	χ [ft]	β	ξ [ft]	η		
0.000	0.000	0.000						
0.001	0.000	0.000	0.0000	0.000000	0.0000	0.000000		
0.004	0.000	0.000	0.0008	0.000000	0.0008	0.000000	0.0001	Eps-Do
0.010	0.000	0.000	0.0033	0.000000	0.0033	0.000000	0.0001	Eps-kro

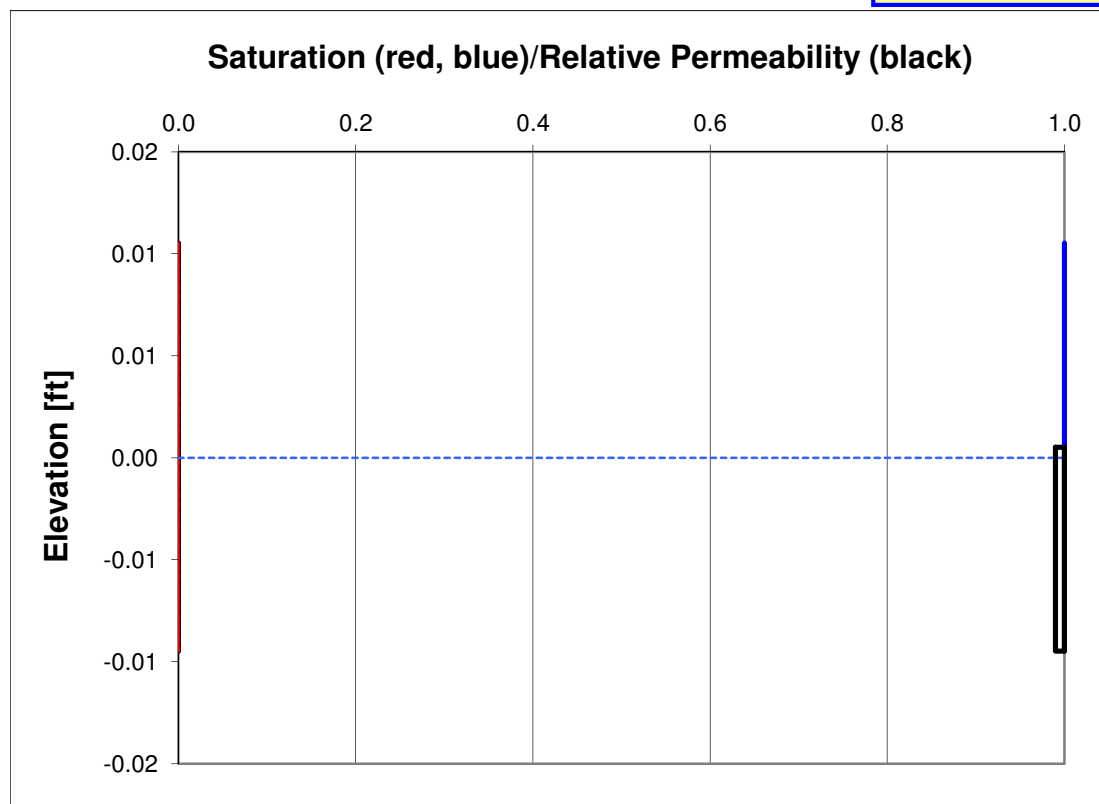


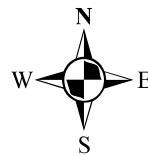
W-18

Monitoring Well LNAPL Thickness b_o [ft] =			0.010
D_o [ft] =	0.000	k_{ro} =	0.000

Enter b_o value
here to plot
corresponding
profiles

Press Ctrl+Shift+S to calculate sheet

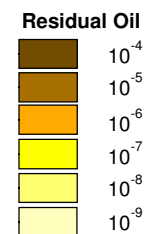




Legend

- Wells with Measureable LNAPL and Calculated LNAPL Specific Volumes (ft.)⁴
- Wells with No Measureable LNAPL (<0.01ft.) (April 2011)
- Abandoned/Unable to Locate
- Past Disposal Area (PDA) - Corrective Action Management Unit (CAMU)
- Area of Interest Boundary (AOI)

LNAPL Type and Specific LNAPL Volume (ft.)

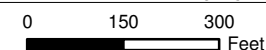


- Notes:
1. Bings Maps aerial imagery provided by © 2010 Microsoft Corporation and its data suppliers and obtained under the licensing agreement with ESRI.
 2. Past disposal area digitized from ENSR Figure 9 - Deep Aquifer Piezometric Map dated April 17, 1992. PDA boundaries updated based on 2011 delineation borings.
 3. All LNAPL thicknesses are in feet.
 4. LNAPL thickness and mobility calculations based on the American Petroleum Institute's van Genuchten-Mualem Model of LNAPL Distribution and Relative Permeability.
 5. LNAPL Type was based on density, distillation curve, etc. and are intended to qualify LNAPL mobility and recoverability, not to identify historic source.

Figure B-1 - Estimated LNAPL Specific Volumes
AOI-10 Site Characterization Report/
Remedial Investigation Report
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania



Sunoco, Inc. (R&M)
Philadelphia Refinery
3144 Passyunk Avenue
Philadelphia, PA.
19145



SCALE: 1" = 300'
DATE: October 31, 2011
DRN BY: MH
CHK BY: DW
JOB#: 2011001

LNAPL Model And Seepage Velocity Output Summary

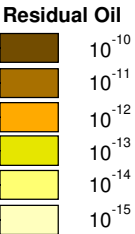
AOI	Well ID	Date Apparent Thickness Gauged	Apparent LNAPL Thickness (ft)	API Model Calculated LNAPL Specific Volume (feet)	Calculated LNAPL Seepage Velocity (cm/sec)
AOI10	W-8	11/02/03	0.010	4.880E-10	2.45E-16
		04/27/11	0.590	4.410E-04	7.03E-10
	W-14	04/27/11	0.11	3.130E-06	4.84E-12
	W-18	04/27/11	0.01	2.130E-09	2.87E-15



Legend

- Wells with Measureable LNAPL and LNAPL Mobility Values (cm/sec)
- Wells with No Measureable LNAPL (<0.01ft.) (April 2011)
- Abandoned/Unable to Locate
- Past Disposal Area (PDA) - Corrective Action Management Unit (CAMU)
- Area of Interest Boundary (AOI)

LNAPL Type and Seepage Velocity (cm/sec)

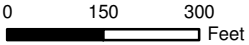


- Notes:
- Bings Maps aerial imagery provided by © 2010 Microsoft Corporation and its data suppliers and obtained under the licensing agreement with ESRI.
 - Past disposal area digitized from ENSR Figure 9 - Deep Aquifer Piezometric Map dated April 17, 1992. PDA boundaries updated based on 2011 delineation borings.
 - All LNAPL thicknesses are in feet.
 - LNAPL thickness and mobility calculations based on the American Petroleum Institute's van Genuchten-Mualem Model of LNAPL Distribution and Relative Permeability.
 - LNAPL Type was based on density, distillation curve, etc. and are intended to qualify LNAPL mobility and recoverability, not to identify historic source.

Figure B-2 - Calculated LNAPL Mobility Values
AOI-10 Site Characterization Report/
Remedial Investigation Report
Sunoco Philadelphia Refinery
Philadelphia, Pennsylvania



Sunoco, Inc. (R&M)
Philadelphia Refinery
3144 Passyunk Avenue
Philadelphia, PA.
19145



SCALE: 1"=300'
DATE: October 31, 2011
DRN BY: MH
CHK BY: DW
JOB#: 3024901

LNAPL Model And Seepage Velocity Output Summary

AOI	Well ID	Date Apparent Thickness Gauged	Apparent LNAPL Thickness (ft)	API Model Calculated LNAPL Specific Volume (feet)	Calculated LNAPL Seepage Velocity (cm/sec)
AOI10	W-8	11/02/03	0.010	4.880E-10	2.45E-16
		04/27/11	0.590	4.410E-04	7.03E-10
	W-14	04/27/11	0.11	3.130E-06	4.84E-12
	W-18	04/27/11	0.01	2.130E-09	2.87E-15



Torkelson Geochemistry, Inc.

2528 S. Columbia Place
Tulsa, OK 74114-3233

Phone: 918-749-8441
Fax: 918-749-8005

e-mail: BTorkelson@torkelsongeochemistry.com

CHAIN-OF-CUSTODY RECORD

Page 1 of 1

Project: Philadelphia Refinery - AOI-10
Location: Philadelphia, Pa
Proj. No.:
P.O.:
Sampled By: Shaun Sykes

Report/Bill To: Aquaterra Technologies, Inc.
Address: PO Box 744
West Chester, Pa 19381
Phone: 610-431-5733 x.109
Fax: 610-431-5734
e-mail: td@aquaterra-tech.com

Additional Instructions

Please include a brief interpretation of product type consistent with other samples from the refinery

Requested Turn-Around Time: normal

ITEM NO.	SAMPLE DESCRIPTION	DATE	MATRIX	LAB NO.	Total # Of Vials	PRESERVATIVES				ANALYSES REQUESTED										REMARKS													
						None				GC Characterization	Density	Viscosity	Water Surface Tension	NAPL Surface Tension	NAPL/Water Interfac. Tens.	Lead	Sulfur																
1	W-8	4/27/11			1							X	X								X												
2	W-14	4/27/11			1							X	X								X												
3	W-18	4/27/11			1							X	X								X												
4																																	
5																																	
6																																	
7																																	
8																																	
9																																	
10																																	

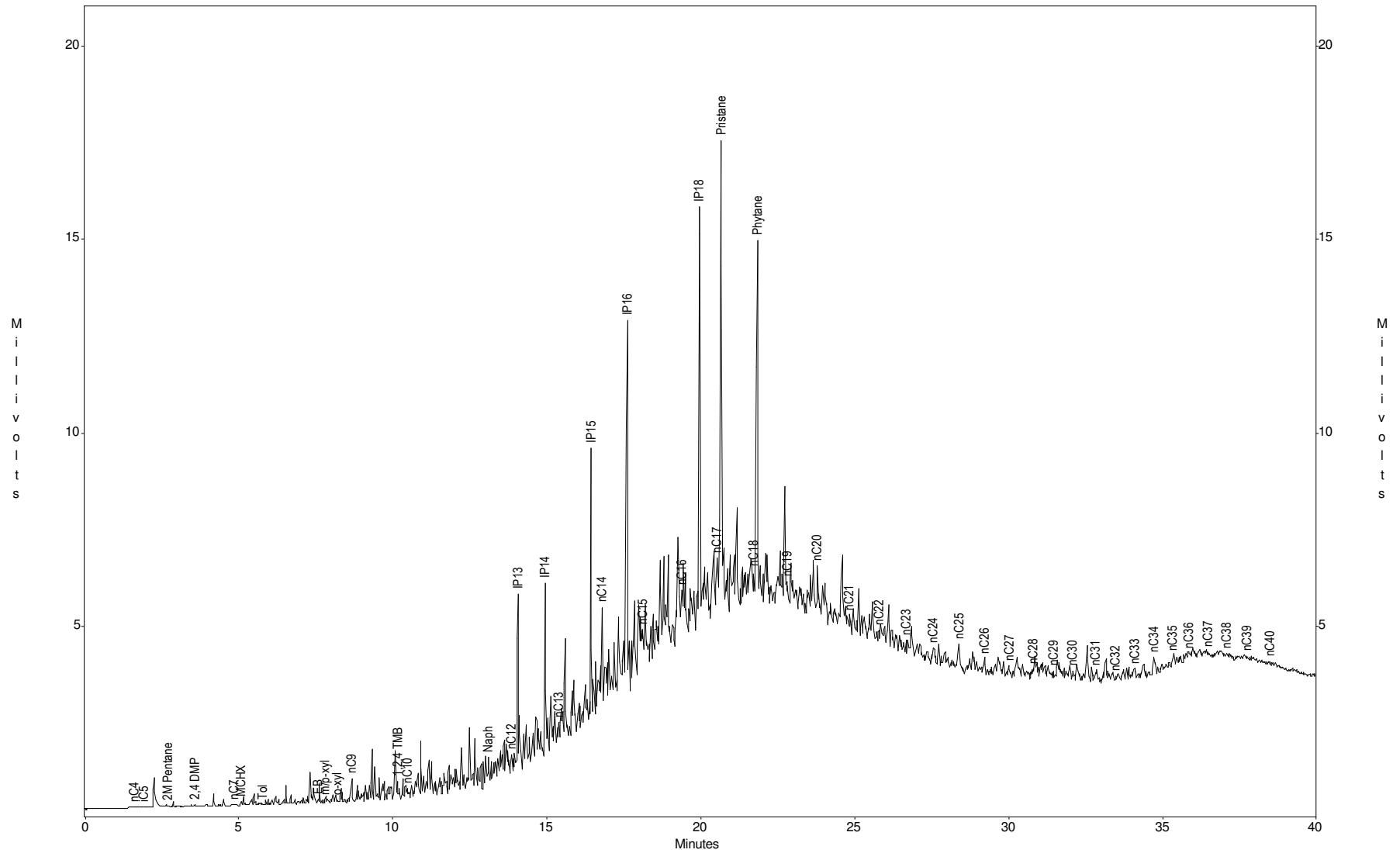
RELINQUISHED BY	ACCEPTED BY	DATE	TIME
<i>[Signature]</i>	<i>[Signature]</i> Fed Ex	5/5/11	1200
	<i>[Signature]</i>	5-10-11	0910

Philadelphia Refinery - AOI-10, Philadelphia, PA

Sample ID : W-8

Acquired : May 11, 2011 09:37:00

c:\ezchrom\chrom\11076\w-8 -- Channel A



Torkelson Geochemistry, Inc.

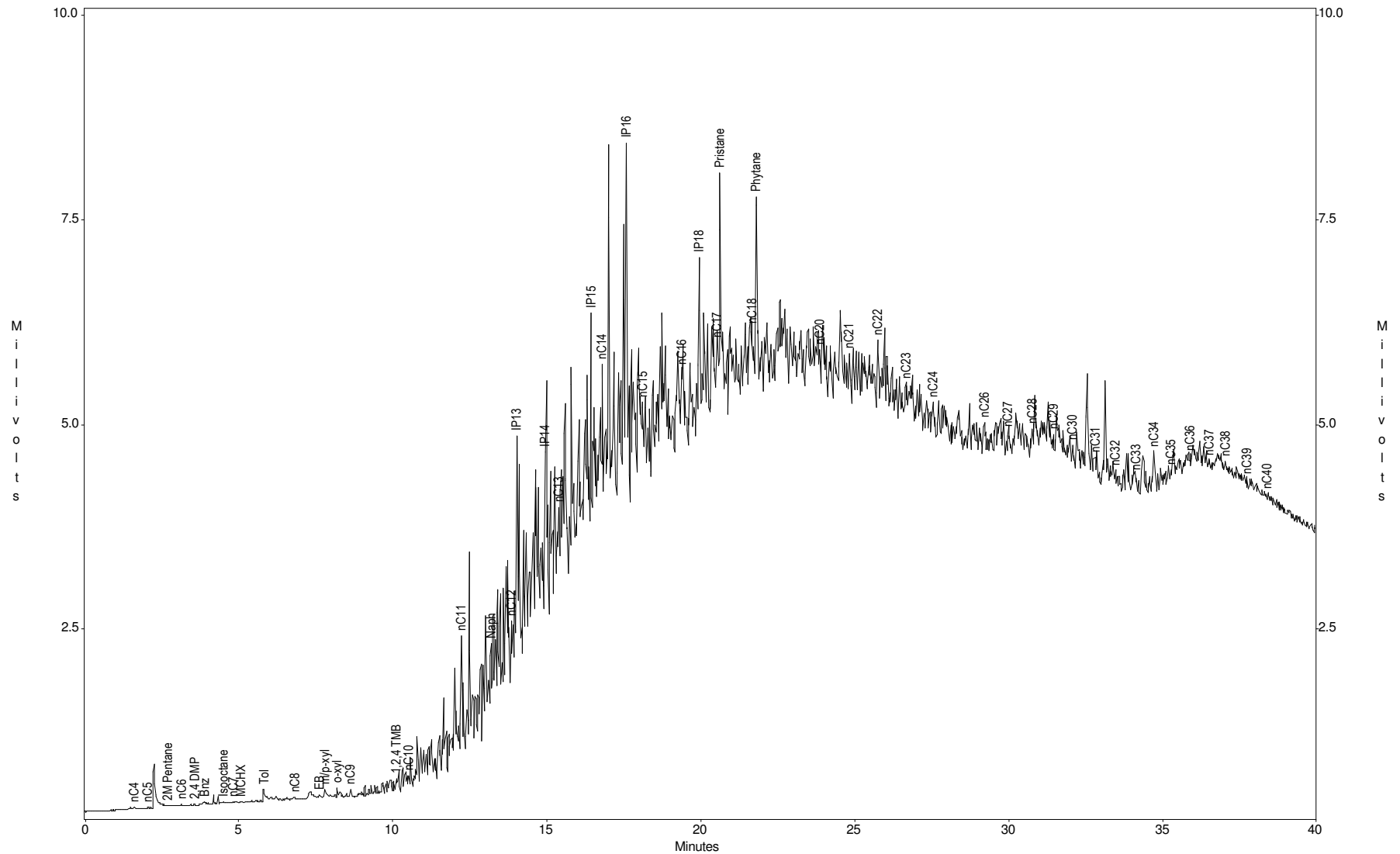
Page 1 of 1 (2)

Philadelphia Refinery - AOI-10, Philadelphia, PA

Sample ID : W-14

Acquired : May 11, 2011 12:10:20

c:\ezchrom\chrom\11076w-14 -- Channel A



Torkelson Geochemistry, Inc.

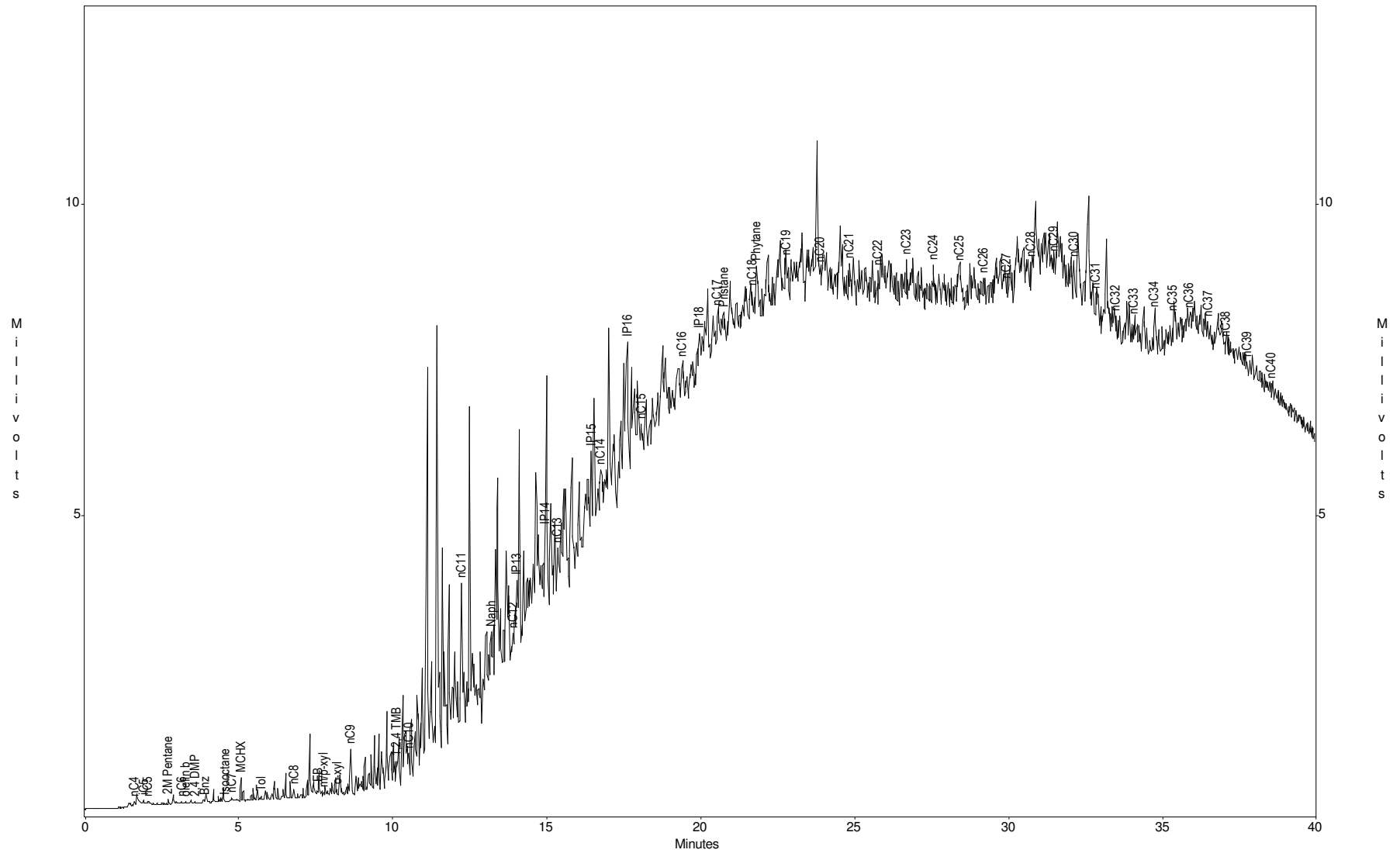
Page 1 of 1 (3)

Philadelphia Refinery - AOI-10, Philadelphia, PA

Sample ID : W-18

Acquired : May 11, 2011 14:41:20

c:\ezchrom\chrom\11076\w-18 -- Channel A

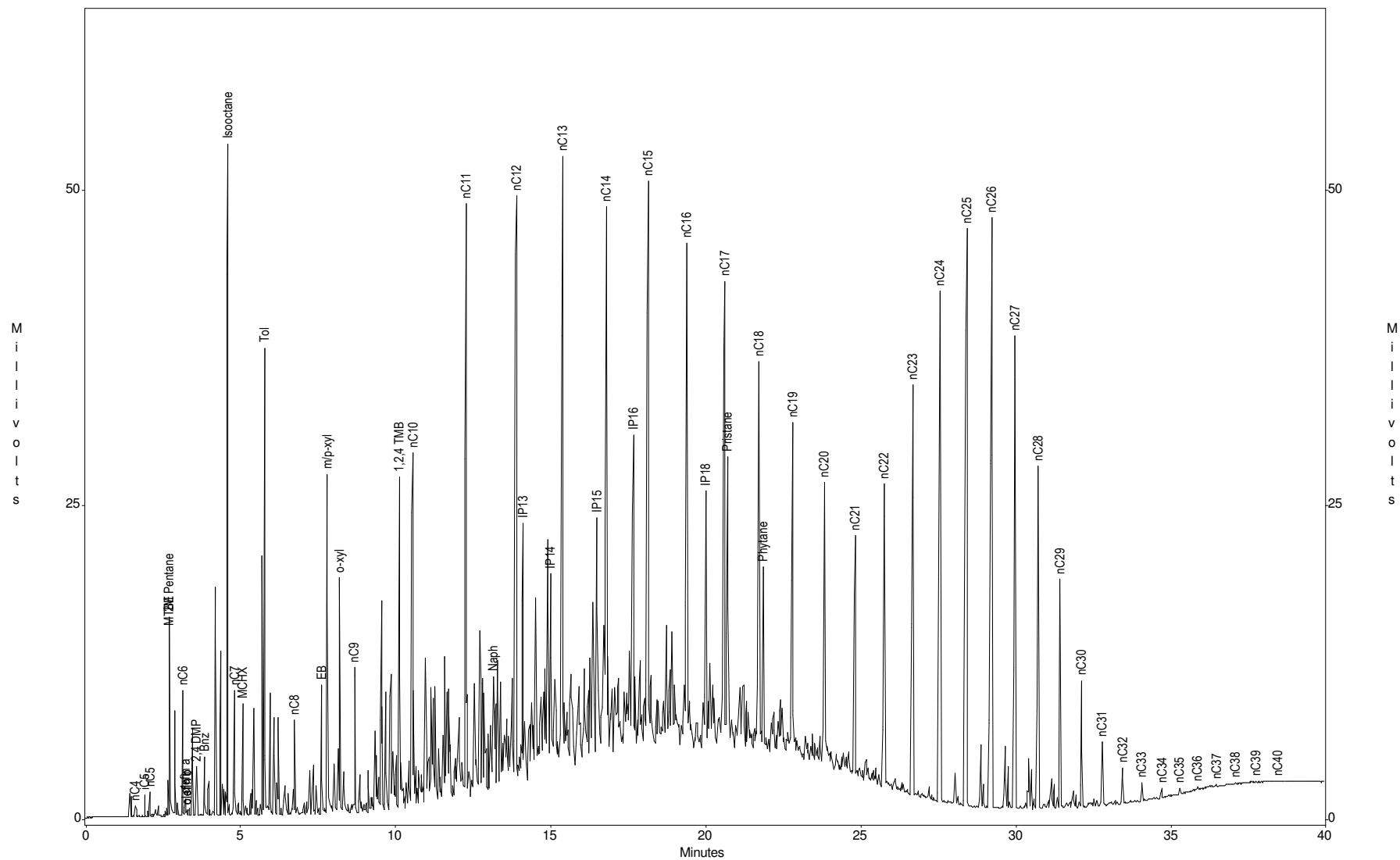


Philadelphia Refinery - AOI-10, Philadelphia, PA

Sample ID : Gas/Dies/Wax std

Acquired : May 11, 2011 08:45:38

c:\ezchrom\chrom\11076\gadiwax2 -- Channel A



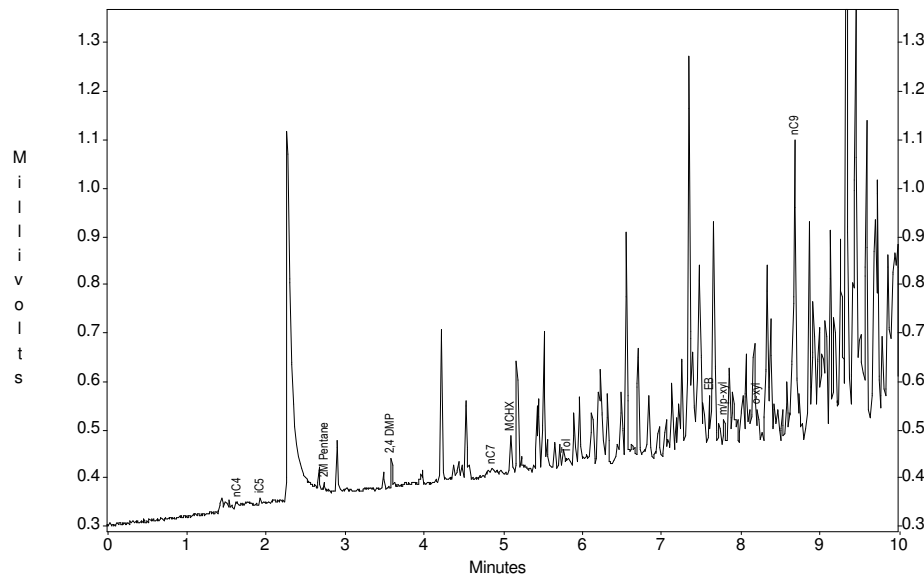
Torkelson Geochemistry, Inc.

Philadelphia Refinery - AOI-10, Philadelphia, PA

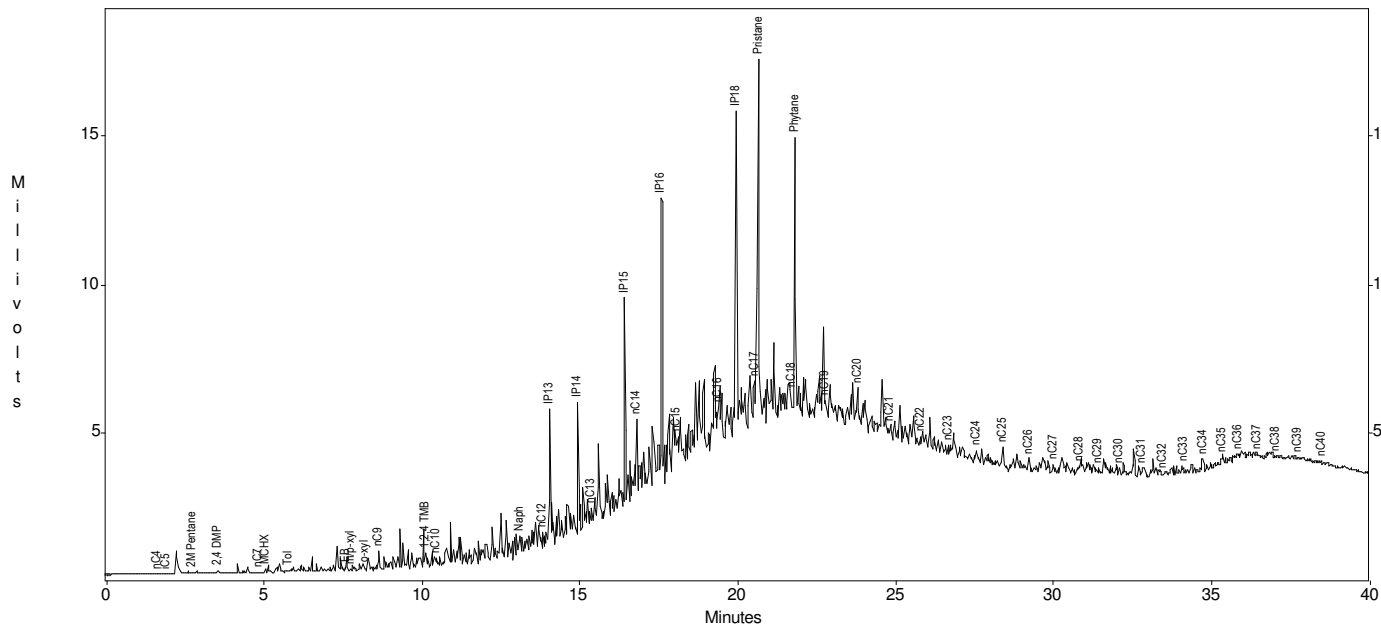
Sample ID : W-8

Acquired : May 11, 2011 09:37:00

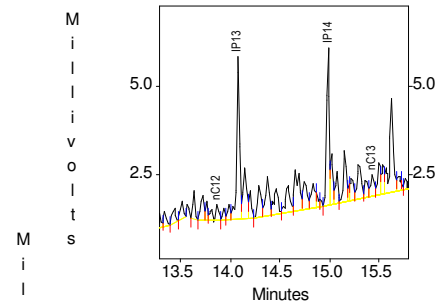
c:\ezchrom\chrom\11076w-8 -- Channel A



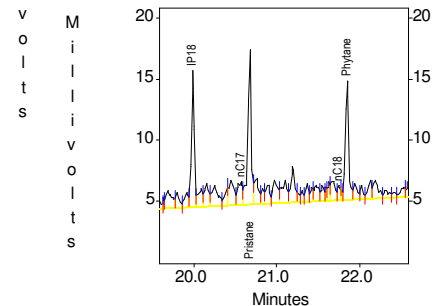
c:\ezchrom\chrom\11076w-8 -- Channel A



c:\ezchrom\chrom\11076w-8 -- Channel A



c:\ezchrom\chrom\11076w-8 -- Channel A



Channel A Results

Page 1 of 1 (1)

Peak	Area	Height
nC4	26	9
iC5	13	14
nC5	0	0
MTBE	0	0
2M Pentane	26	18
nC6	0	0
olefin a	0	0
olefin b	0	0
olefin c	0	0
2,4 DMP	71	61
Bnz	0	0
Isooctane	0	0
nC7	12	6
MCHX	137	80
Tol	60	18
nC8	0	0
EB	184	116
m/p-xyl	122	61
o-xyl	192	73
nC9	1278	623
1,2,4 TMB	1428	463
nC10	625	271
nC11	0	0
Naph	1924	690
nC12	1373	426
IP13	8332	4543
IP14	6898	4436
nC13	1666	583
IP15	10866	6887
nC14	5080	2616
IP16	21224	9646
nC15	1338	380
nC16	2931	1460
IP18	27062	11195
nC17	8600	1948
Pristane	35844	12690
nC18	2310	1203
Phytane	26486	9732
nC19	1722	579
nC20	4027	1396
nC21	1280	471
nC22	1111	362
nC23	792	339
nC24	2373	429
nC25	4148	691
nC26	1682	434
nC27	838	287
nC28	1048	250
nC29	333	189
nC30	298	154
nC31	131	91
nC32	86	78
nC33	241	133
nC34	667	194
nC35	121	34
nC36	62	20
nC37	99	75
nC38	164	45
nC39	39	62
nC40	92	57

Torkelson Geochemistry, Inc.

Philadelphia Refinery - AOI-10, Philadelphia, PA

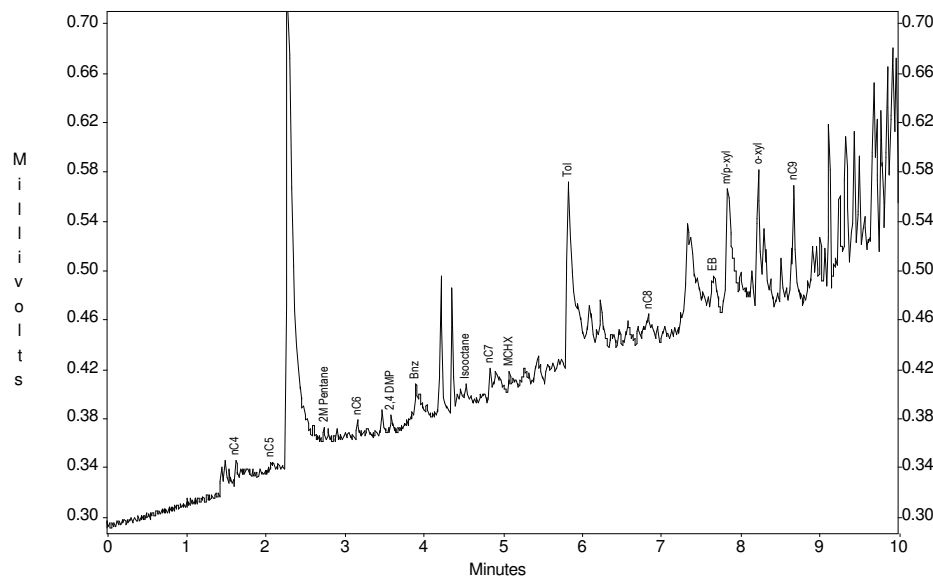
Sample ID : W-14

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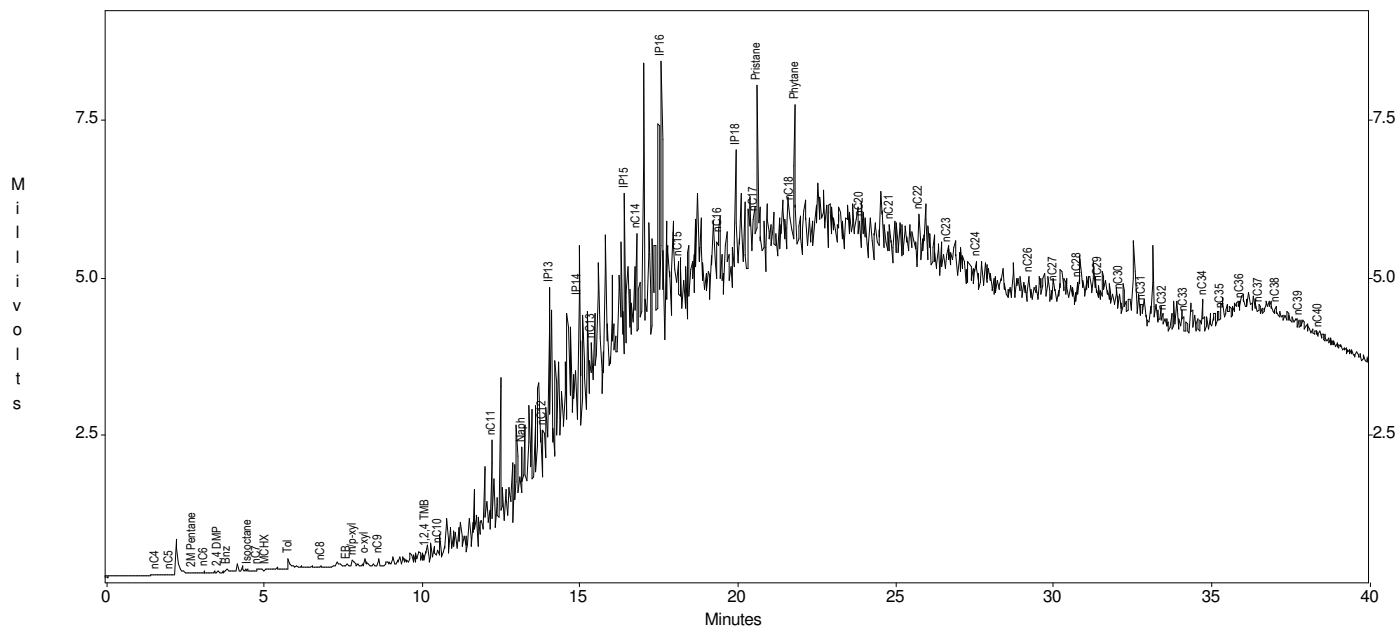
Page 1 of 1 (1)

Channel A Results

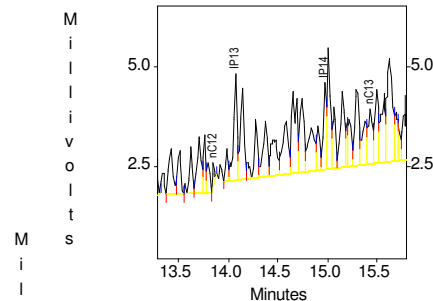
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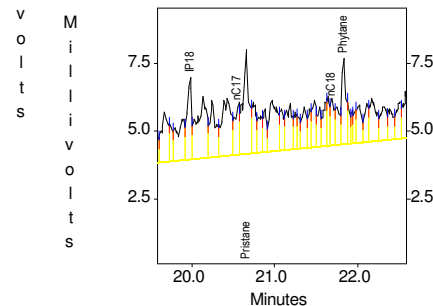
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c:\ezchrom\chrom\11076w-14 -- Channel A



c:\ezchrom\chrom\11076w-14 -- Channel A



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Peak	Area	Height
nC4	30	18
iC5	0	0
nC5	16	6
MTBE	0	0
2M Pentane	15	11
nC6	26	13
olefin a	0	0
olefin b	0	0
olefin c	0	0
2,4 DMP	19	13
Bnz	60	24
Isodane	31	15
nC7	37	22
MCHX	18	12
Tol	696	150
nC8	122	26
EB	219	41
m/p-xyl	666	108
o-xyl	310	117
nC9	235	99
1,2,4 TMB	365	168
nC10	255	161
nC11	2662	1386
Naph	1804	664
nC12	596	515
IP13	6689	2668
IP14	4029	2196
nC13	3982	1383
IP15	7913	3433
nC14	6859	2697
IP16	18715	5161
nC15	6080	1832
nC16	7165	1833
IP18	11154	3036
nC17	8304	1828
Pristane	17353	3866
nC18	5348	1639
Phytane	10753	3207
nC19	0	0
nC20	2476	721
nC21	966	475
nC22	2746	912
nC23	1084	511
nC24	1885	428
nC25	0	0
nC26	1608	389
nC27	1420	262
nC28	1183	308
nC29	314	191
nC30	559	212
nC31	127	126
nC32	218	130
nC33	102	129
nC34	483	202
nC35	82	75
nC36	144	84
nC37	52	26
nC38	143	88
nC39	123	97
nC40	270	63

Torkelson Geochemistry, Inc.

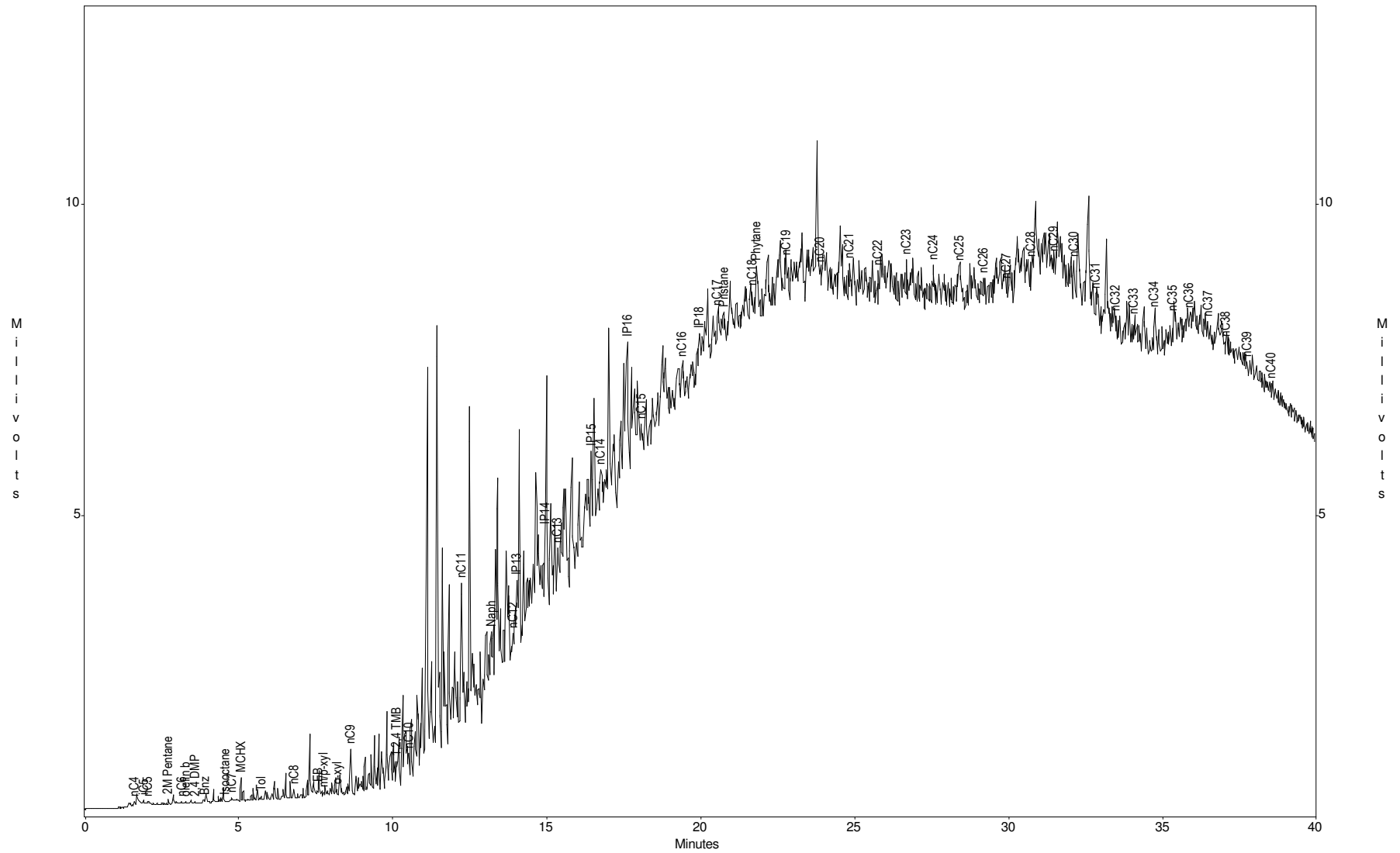
Page 1 of 1 (3)

Philadelphia Refinery - AOI-10, Philadelphia, PA

Sample ID : W-18

Acquired : May 11, 2011 14:41:20

c:\ezchrom\chrom\11076w-18 -- Channel A



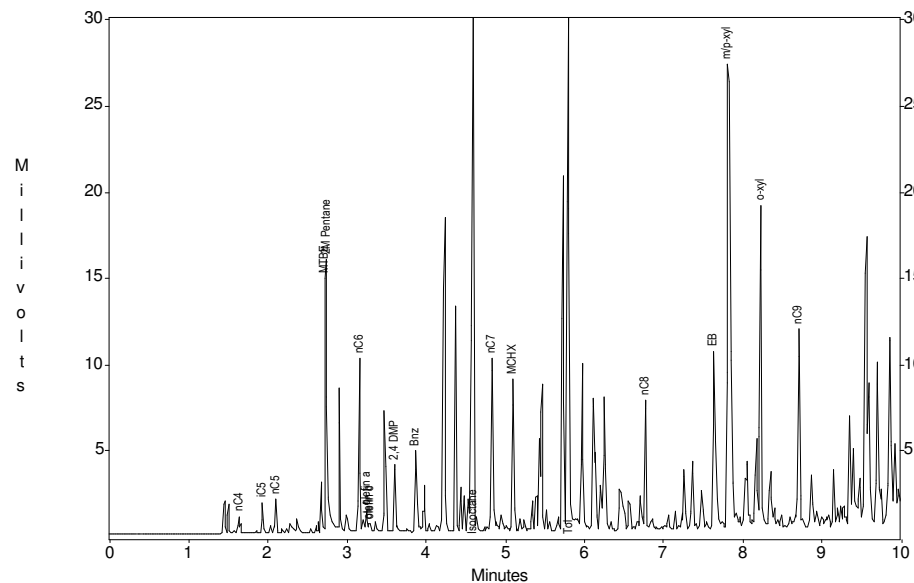
Torkelson Geochemistry, Inc.

Philadelphia Refinery - AOI-10, Philadelphia, PA

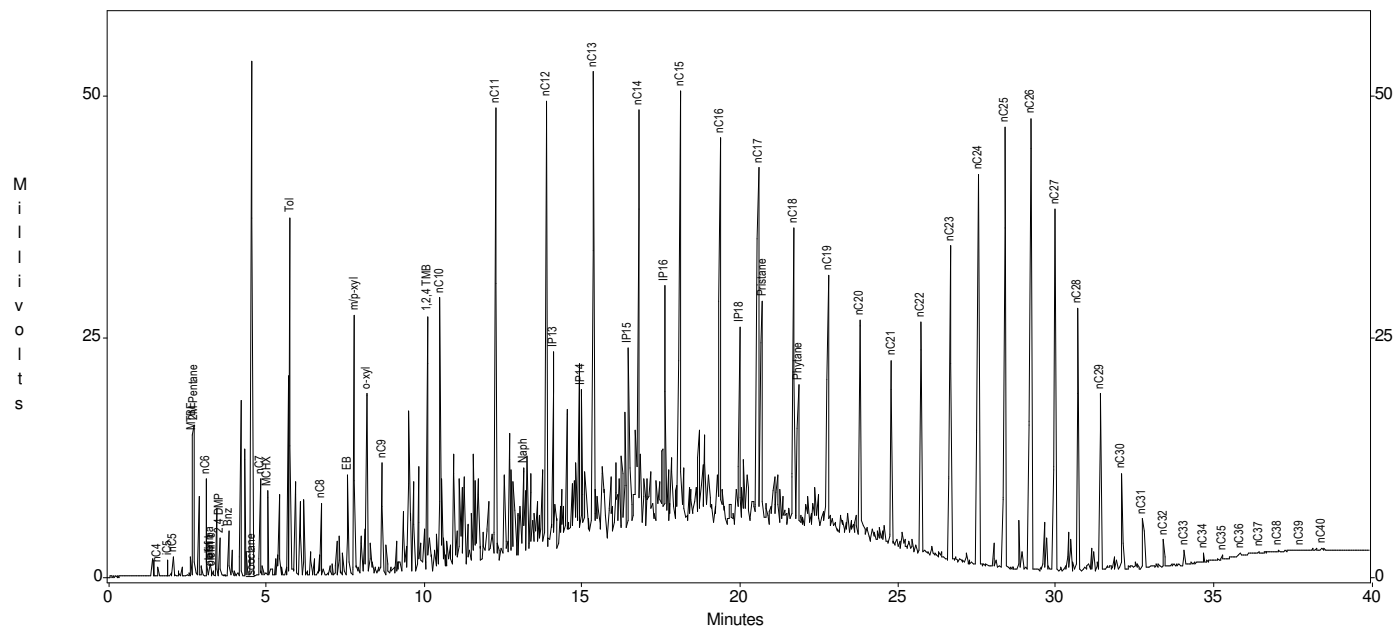
Sample ID : Gas/Dies/Wax std

Acquired : May 11, 2011 08:45:38

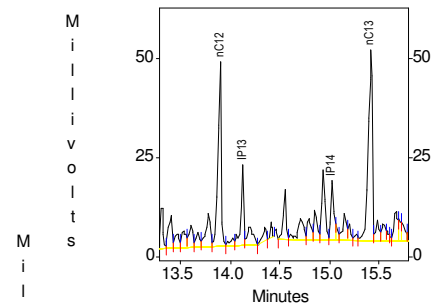
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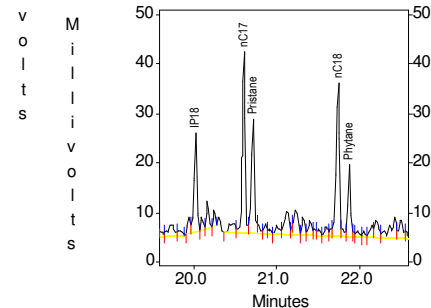
c:\ezchrom\chrom\11076\gadiwax2 -- Channel A



c:\ezchrom\chrom\11076\gadiwax2 -- Channel A



c:\ezchrom\chrom\11076\gadiwax2 -- Channel A



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Peak	Area	Height
nC4	882	909
iC5	1633	1749
nC5	1940	1953
MTBE	8850	14569
2M Pentane	18459	15652
nC6	10279	9981
olefin a	1514	1289
olefin b	601	484
olefin c	615	477
2,4 DMP	4152	3895
Bnz	6800	4664
Isooctane	72556	53339
nC7	13271	9974
MCHX	11206	8826
Tol	57982	37077
nC8	9634	7484
EB	18905	10280
m/p-xyl	61342	26945
o-xyl	29293	18689
nC9	18569	11567
1,2,4 TMB	51680	26364
nC10	47623	28216
nC11	122201	47154
Naph	23589	9025
nC12	106065	46620
IP13	44181	20448
IP14	27510	14987
nC13	136271	48220
IP15	40217	19413
nC14	127674	44012
IP16	58532	25574
nC15	127948	45568
nC16	109771	40258
IP18	46900	19832
nC17	97658	36773
Pristane	58335	22987
nC18	78896	31071
Phytane	35304	14857
nC19	79141	26845
nC20	54013	22611
nC21	41857	19064
nC22	54172	24047
nC23	86519	32680
nC24	132481	40589
nC25	156315	45816
nC26	157441	46917
nC27	118660	37602
nC28	74059	27225
nC29	40797	18246
nC30	19773	9898
nC31	9574	4849
nC32	5379	2820
nC33	2901	1511
nC34	1690	857
nC35	1012	480
nC36	527	254
nC37	561	177
nC38	191	86
nC39	196	88
nC40	101	49

Torkelson Geochemistry, Inc.

Physical Properties Measurements

Sample	TGI Job Number	Density of NAPL (gm/ml)	Viscosity of NAPL (centipoise)	Surface Tension Air/Water (dynes/cm)	Interfacial Tension NAPL/Water (dynes/cm)	Surface Tension Air/NAPL (dynes/cm)	Temperature of Measurements
W-8	11047	0.9515	NA	NA	NA	NA	60F
W-14	11047	0.9478	NA	NA	NA	NA	60F
W-18	11047	QNS	NA	NA	NA	NA	60F

QNS = Quantity of sample Not Sufficient for analysis

NA = Not Analyzed

6825 East 38th Street
Tulsa, Oklahoma 74145-1105
www.greencountrytesting.com



Telephone 918.828.9977
Telephone 800.324.5757
Facsimile 918.828.7750

Bruce Torkelson
Torkelson Geochemistry
2528 South Columbia Place
Tulsa, OK 74114
TEL: (918) 749-8441
FAX (918) 749-6005

May 27, 2011
Order No.: T11050348

RE: Samples

Dear Bruce Torkelson:

Green Country Testing, Inc. received 2 samples on 5/20/2011 for the analyses presented in the following report.

In accordance with your instructions, Green Country Testing conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analysis was conducted using EPA approved methodologies. Test reports meet all the NELAC requirements. All relevant sampling information is on the attached chain-of-custody form. The initials SUB as the analyst designate any testing sub-contracted by Green Country Testing.


Certifications/Accreditation: OK - 7604

AR - ADEQ
KS - E-10232
LA - 4002

A scope of Certified/Accredited parameters is available upon request. If you have any questions regarding these tests results, please feel free to call.

Sincerely,

Approved By: _____


Brian Duzan, Director
Environmental Services



CLIENT: Torkelson Geochemistry
Lab Order: T11050348
Project: Samples

Date Received: 5/20/2011
Date Reported: 27-May-11

Lab ID: T11050348-01 **Collection Date:** 4/27/2011 **Sample ID:** W-8 11076
Matrix: OIL

<u>Analyses</u>	<u>Result</u>	<u>Detection Limit</u>	<u>Qual</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Analyst</u>
METALS IN SOIL OR SLUDGE BY ICP	SW6010B					KR
Lead	< 0.500	0.500		mg/Kg	5/26/2011	

Lab ID: T11050348-02 **Collection Date:** 4/27/2011 **Sample ID:** W-14 11076
Matrix: OIL

<u>Analyses</u>	<u>Result</u>	<u>Detection Limit</u>	<u>Qual</u>	<u>Units</u>	<u>Date Analyzed</u>	<u>Analyst</u>
METALS IN SOIL OR SLUDGE BY ICP	SW6010B					KR
Lead	1.89	0.500		mg/Kg	5/26/2011	

Qualifiers:	ND - Not Detected at the Reporting Limit	S - Spike Recovery outside accepted recovery limits
	J - Analyte detected below quantitation limits	R - RPD outside accepted recovery limits
	B - Analyte detected in the associated Method Blank	MI+ - Matrix Interference
	* - Value exceeds MCL or Permit Limitation	H - Exceeds Holding Time

6825 East 38th Street
Tulsa, Oklahoma 74145-1105
www.greencountrytesting.com



Green Country
T E S T I N G

Telephone 918.828.9977
Telephone 800.324.5757
Facsimile 918.828.7750

CLIENT: Torkelson Geochemistry

Work Order: T11050348

Project: Samples

QC SUMMARY REPORT

TestCode	Analyte	BatchID	QCType	Result	PQL	Units	%Rec	%RPD
MET_S_ICP	Lead	5654	MBLK	< 0.12	0.125	mg/Kg		
	Lead	5654	LCS	48	0.125	mg/Kg	96.2	
	Lead	5654	LCS	47.36	0.125	mg/Kg	94.9	1.34
	Lead	5654	MS	191.1	0.5	mg/Kg	97.1	
	Lead	5654	MSD	191.7	0.5	mg/Kg	97.4	0.303



Country . Chain of Custody Record

Laboratory
Number:

1050348

[illegible]

All samples submitted to Green Country Testing for analysis are accepted on a custodial basis only. Ownership of the material remains with the client submitting the samples.

Green Country Testing reserves the right to return unused sample portions.

Green Country Testing

Green County Testing
6825 East 38th Street • Tulsa, OK 74145
918-828-9977 • Fax (918) 828-7756

Part 1 - Laboratory Copy Part 2 - Report Copy Part 3 - Client's Temporary Copy



Torkelson Geochemistry, Inc.

2528 S. Columbia Place
Tulsa, OK 74114-3233

Phone: 918-749-8441 e-mail: BTorkelson@aol.com
Fax: 918-749-6005

CHAIN-OF-CUSTODY RECORD

Project: Sun- Philadelphia Refinery COA
Location: Philadelphia, PA
Proj. No.:
P.O.:
Sampled By: M. Brad Spence & Tim Deik

Report/Bill To: Colleen Costello
Address: 30 South 17th St, Suite 1500
Philadelphia, PA 19103
Phone: 215.864.0640
Fax: 215.864.0671
e-mail:

Additional Instructions

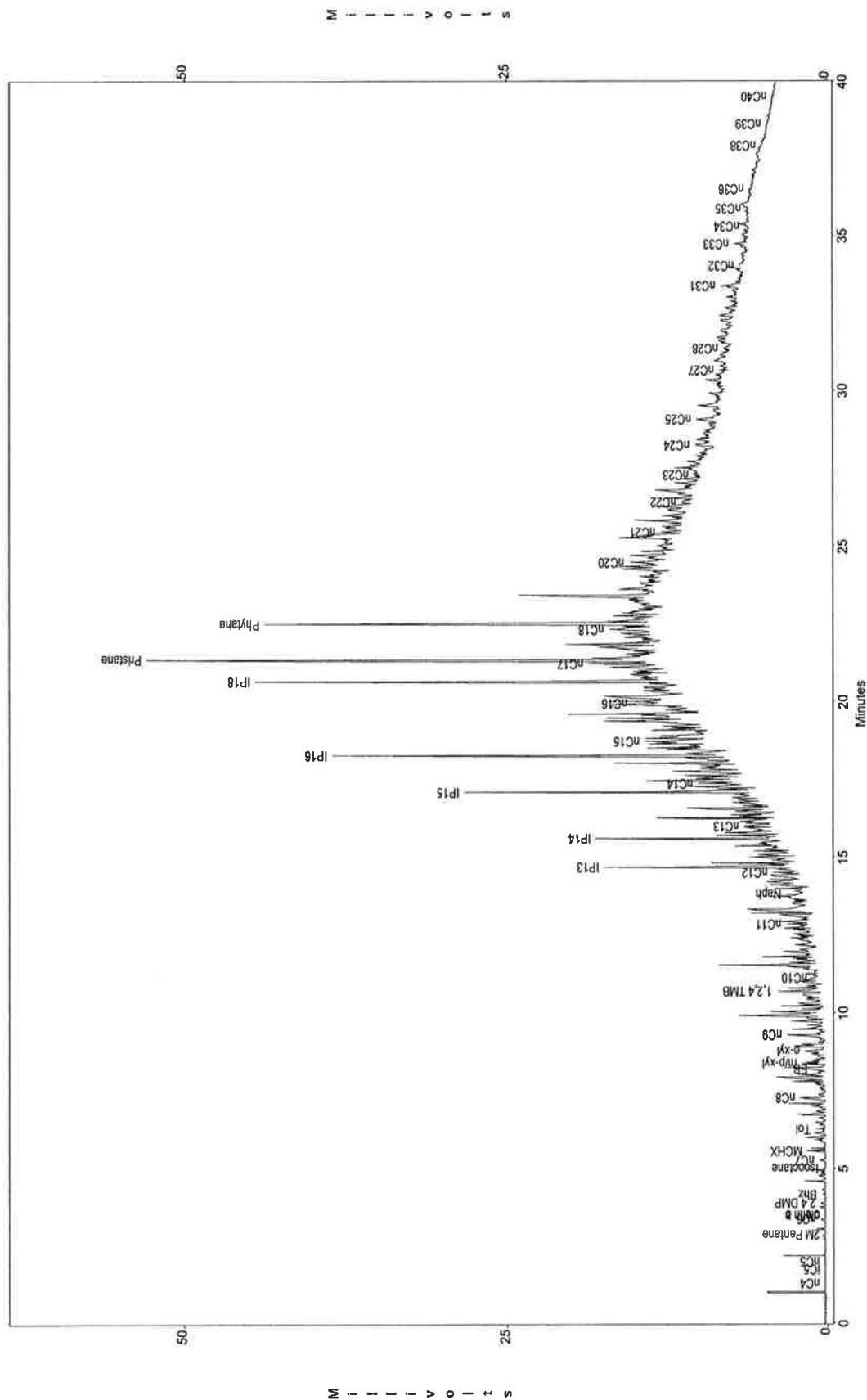
Requested Turn-Around Time:

ITEM NO.	SAMPLE DESCRIPTION	DATE	MATRIX	LAB NO.	PRESERVATIVES		ANALYSES REQUESTED										REMARKS
					Total # Of Vials	None	GC Characterization	Specific Gravity									
1	West Yard W8	2/27/04	Product		1	X	X	X									
2	A-13				1	X	X	X									
3	B-144				1	X	X	X									
4	C-106				1	X	X	X									
5	A-133				1	X	X	X									
6	C-65				1	X	X	X									
7	B-43				1	X	X	X									
8	A-39				1	X	X	X									
9	A-136				1	X	X	X									Sorbent Pad Sample
10	C-107				1	X	X	X									

RELINQUISHED BY	ACCEPTED BY	DATE	TIME
M. Brad Spence	FED EX	3/1/04	
	Am. Petroleum	3-2-04	1705

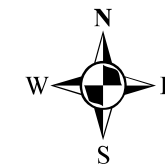
Sun - Philadelphia Refinery COA
Sample ID : West Yard W8
Acquired : Mar 07, 2004 08:54:39

c:\ezchrom\chrom\04046\wyw8 - Channel A



ATTACHMENT C

AOI 10 Existing Natural Resources Plan



Legend

- Floodway
- 0.2% Annual Chance of Flood
- AE - 100 Year Flood
- X - Areas Determined to be Outside the 0.2% Annual Chance Floodplain
- PSS1 - Palustrine Scrub Shrub Wetland
- U - Upland
- Past Disposal Area (PDA)
- Area of Interest Boundary (AOI)

- Notes:
1. Bing's Maps aerial imagery provided by © 2010 Microsoft Corporation and its data suppliers and obtained under the licensing agreement with ESRI.
 2. Floodway and flood hazard areas derived from the Digital Flood Insurance Rate Map Database (DFIRM) for Pennsylvania, by the Federal Emergency Management Agency (FEMA) 2005.
 3. Wetlands from the National Wetlands Inventory for Pennsylvania, by the U.S. Fish and Wildlife Service, published September 25, 2009.

Attachment C - Natural Resources Plan Sunoco Philadelphia Refinery Philadelphia, Pennsylvania



Sunoco, Inc. (R&M)
Philadelphia Refinery
3144 Passyunk Avenue
Philadelphia, PA.
19145

0 150 300
Feet

SCALE: 1" = 300'
DATE: October 27, 2011
DRAWN BY: MH
CHECKED BY: DW
JOB#: 201001

Path: \\lanman.com\data\DT\data\62574601\ArcGIS\MapDocuments\AOI-10\Workplan\AOI-10 Natural Resources Plan 11x17.mxd