

Remediation Plan as offered is DENIED. Not sufficient depth to groundwater data to determine shallow potential based on offered information and relative to OCD needs in terms of radius, age of offered data and details of construction of noted well/water locations.

In light of the above, the determination of groundwater being greater than 100 feet below ground surface is not supportable and as such the constituent values assumed from Table I of spill rule cannot be used.

Please evaluate more precisely the depth to groundwater and resubmit.

Also, it is suggested that if any variances are made from Spill Rule they should have rationale associated with request.