

## Anonymous Anonymous

Of concern is Ecology's intent to apply these standard universally to petroleum release sites regardless of the age of the fuel release. Weathered fuel products may exhibit significantly lower toxicity than fresh fuel products and there is no defensible way to extrapolate the concentrations in IM 23 to weathered fuel products. Without a comparable and comprehensive study with fuels that have undergone varying degrees of weathering, Ecology has not adequately shown the range of possible environmental effects that may or may not be observed at similar dosages. If Ecology moves forward with promulgating surface water cleanup levels for TPH in IM 23 (not recommended), the memorandum should acknowledge these facts and provide a caveat that the concentrations provided apply only to fresh fuel releases.