

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File: 300.38.186
Return Receipt Requested
Article No: 7007 3020 0000 1948 8865

April 7, 2009

Chuck Stilwell
BP Exploration (Alaska) Inc
P.O. Box 196612
900 East Benson Blvd
Anchorage, AK 99519-6612

Re: Record of Decision (ROD); BPX Well Pad W
Cleanup Complete Determination

Dear Mr. Stilwell:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with BPX Well Pad W Spill located near Prudhoe Bay, Alaska. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for BPX Well Pad W Spill, which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Cleanup Complete Determination.

Introduction

Site Name and Location:

BPX Well Pad W Spill
Prudhoe Bay, Alaska

Name and Mailing Address of Contact Party:

Chuck Stilwell
BP Exploration (Alaska) Inc
P.O. Box 196612
900 East Benson Blvd
Anchorage, AK 99519-6612

Database Record Key and File Number:

ADEC Reckey: 1999730117401

File: 300.38.186

Hazard ID: 3263

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Seventy-five gallons of diesel fuel were spilled at W Pad when a container was left unattended during filling. Soil samples collected during the spill cleanup effort were analyzed for diesel range organics (DRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX).

Contaminants of Concern

Based on the analyses and knowledge of the contaminant source, the following Contaminant of Concern was identified:

- Diesel Range Organics (DRO)

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341, Method One, Table A2 for the Arctic Zone.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
DRO	200

Characterization and Cleanup Activities

The spill initially went unreported after the contractor responsible for the spill removed several 5-gallon buckets of impacted soil from the surface, disposed of the soil in a nearby well cellar (W-21), and then placed fresh gravel over the spill area. Following discovery and reporting of the spill, the impacted gravel was removed from the well cellar and the spill area was excavated. Confirmation samples collected from the excavated area did not contain detectable concentrations of DRO or BTEX.

Pathway Evaluation

The exposure pathways for human health that were evaluated include the following: migration to surface water, indoor and outdoor inhalation of vapors, and direct contact with soil. These pathways may be complete but the remaining contaminant concentrations do not exceed the most conservative Method One cleanup levels in Table A2 established in 18 AAC 75.341.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be De Minimis Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

The cleanup actions to date have served to excavate contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as Cleanup Complete on the Department's database.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 5.325(i). However, since this site has met the most conservative soil cleanup levels, this letter will serve as your approval for future off-site movement and disposal of soil associated with this release. It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 75.380 (d) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

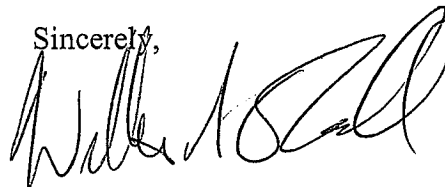
If you have questions about this closure decision, please contact the ADEC project manager, Bill O'Connell at (907) 269-3057.

Sincerely,



Linda Nuechterlein
Environmental Manager

Sincerely,



William O'Connell
Environmental Program Specialist

CC: Gary Schultz, ADNR Fairbanks