



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Site Program

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File: 2334.38.057

October 16, 2019

Mr. William Britt  
Hilcorp Alaska, LLC.  
3800 Centerpoint Drive, Suite 100  
Anchorage, AK 99611

Re: Decision Document: Swanson River Well Pad 31-16  
Cleanup Complete Determination

Dear Mr. William Britt:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Swanson River Well Pad 31-16, located in the Swanson River Oil Field outside of Sterling, Alaska (Figure 1 State and Site Vicinity). Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Swanson River Well Pad 31-16, which is located in the ADEC office in Soldotna, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

**Site Name and Location:**

Swanson River Well Pad 31-16  
Mile 2 Swanson River Facility Road  
Sterling, AK 99672

**Name and Mailing Address of Contact Party:**

Mr. William Britt  
Hilcorp Alaska, LLC.  
3800 Centerpoint Drive, Suite 100  
Anchorage, AK 99611

**DEC Site Identifiers:**

File No.: 2334.38.057  
Hazard ID.: 26335

**Regulatory Authority for Determination:**

18 AAC 75

**Site Description and Background**

In 2011 historical soil contamination was discovered during excavation activities on an abandoned drill pad at well 31A-16 in the Swanson River Oil Field. The pad has been renamed to SCU 34-09. The pipelines

passing through the area were reported as intact. Contamination was estimated to be approximately one cubic yard based on preliminary estimates.

### Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil, and analyzed for metals, PAH compounds, DRO, RRO, GRO and volatile organic compounds. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)
- Chromium VI (Cr)

### Cleanup Levels

The more restrictive of either the inhalation or ingestion cleanup levels apply to this site. Diesel range organics and chromium VI were detected in soil above the migration to groundwater cleanup levels established in 18 AAC 75.341 (d), Table B2.

**Table 1 – Approved Cleanup Levels**

Contaminant	Soil (mg/kg)
DRO	250
Chromium VI	0.089

mg/kg = milligrams per kilogram

### Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 2011. These activities are described below.

In 2011 historical soil contamination was discovered during excavation activities on an abandoned drill pad at well 31A-16 in the Swanson River Oil Field. The pipelines passing through the area were reported as intact. In 2017 impacted soil removal activities were started. On September 23, 2017 approximately 10 cubic yards of overburden were removed from the ground and stockpiled. There were no reported indications of contamination based on visual, olfactory or PID results. Analytical results from the overburden stockpile showed no exceedances other than arsenic and total chromium, which were attributed to background concentrations. Hexavalent chromium (Cr VI) was non-detect in the stockpile samples.

Samples were also collected from the excavation floor and sidewalls. One floor sample had an exceedance for DRO at 310 mg/kg. Both floor samples had an exceedance for chromium VI (0.12 and 0.25 mg/kg) as did one side wall sample (0.11 mg/kg).

Additional excavation was conducted on October 7, 2017 removing material from the floor and sidewall. Excavated material was placed into a Supersack for disposal. Sampling indicated that DRO was not present in the floor sample locations. Chromium VI was present in two sample locations (0.69 and 0.82 mg/kg).

Additional excavation was conducted on October 24, 2017 to remove an additional six to eight inches from the excavation floor. Sampling indicated no residual chromium VI from floor sample locations (See Figure 2,

Final Excavation and Sampling Detail). A total of less than one cubic yard of impacted material was placed into a Supersack for disposal. The excavation was backfilled with clean overburden. Soils were disposed of at the Hilcorp grind and inject facility. This information is documented in the 2017 Remedial Action (March 2018) report.

No contamination was detected in confirmation samples.

### Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

### Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

**Table 2 – Exposure Pathway Evaluation**

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil.
Inhalation – Outdoor Air	Pathway Incomplete	Minor contamination has been removed from the subsurface. No source remains on site.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Minor contamination has been removed from the subsurface. No source remains on site.
Groundwater Ingestion	Pathway Incomplete	Minor contamination has been removed from the subsurface. No source remains on site.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Minor contamination has been removed from the subsurface. No source remains on site.
Exposure to Ecological Receptors	Pathway Incomplete	Minor contamination has been removed from the subsurface. No source remains on site.

**Notes to Table 2:** "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors.

## **ADEC Decision**

Soil contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a "Cleanup Complete" designation on the Contaminated Sites Database, subject to the following standard conditions.

## **Standard Conditions**

1. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
2. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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, 555 Cordova Street, Anchorage, Alaska 99501-2617, within 20 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, P.O. Box 111800, Juneau, Alaska 99811-1800, 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 feel free to contact me at (907) 262-3412, or email at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov).

Sincerely,



Peter Campbell  
Environmental Program Specialist

Attachment:

Figure 1 State and Site Vicinity

Figure 2 Final Excavation and Sampling Detail

cc: Spill Prevention and Response, Cost Recovery Unit